



## Policy Paper

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Accountability

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## **Executive Summary**

The question of how to hold Ontario's publically-supported universities accountable to the needs of students and the Province is a relatively complex one. On the one hand, government control of universities raises serious concerns about the institutional autonomy that safeguards the ideals of academic freedom and innovation. On the other, given that public investment in higher education exceeds \$8,000 per student, the public has a right to know where, for what and how tax dollars are being spent on post-secondary institutions. Over time, the Ontario university system has developed a series of accountability mechanisms that have attempted to acknowledge both realities. While these initiatives have been worthwhile, the results have not been entirely effective or accountable. Moreover, they do not adequately provide an avenue for quality improvement. To address these shortcomings, this paper makes recommendations for changes to current accountability mechanisms that will allow a greater degree of transparency in the system, but will also move universities towards certain public goals.

### **University Governance**

As it stands, university boards of governors are the bodies with the most legal and fiduciary responsibility for university operations. Unfortunately, boards are primarily self-selecting, with the power to appoint the vast majority of their own members. Student and faculty representation on boards of governors is low across Ontario. To change this, the government should exercise its pre-existing power to appoint members of boards knowledgeable in student and public priorities in higher education. Additionally, the share of boards comprised of students should increase to match the increased funding commitment students have made to universities over the past two decades.

### **Multi-Year Accountability Agreements**

Currently, Multi-Year Accountability Agreements (MYAAs) are little more than glorified data reporting mechanisms. Though the goals of the system were ostensibly to incentivize institutional behaviour to certain government priorities, the agreements set no targets, nor offer any incentive or reward for positive behaviour. Additionally, they do not provide any disincentive for lack of progress towards public goals. This paper proposes a new system, whereby the next round of Multi-Year Accountability Agreements are begun through the negotiation of strategic targets between the government and institutions for enrolment of under-represented groups, non-lecture style pedagogies employed, small class environments, student satisfaction, number and teaching loads for full-time faculty, and types and quality of support services offered. Once these targets are set, institutions should be rewarded financially for improvements towards goals. Data reporting should continue, but should not be the focus of the MYAAs.

### **Targeted Funding**

Targeted funding is an important tool available to the government to guarantee that monies invested in higher education achieve a defined purpose. Unfortunately however, the current state of reporting for funding envelopes is quite unaccountable. While institutions complain that report-backs are numerous and overburdening, students and the public do not have access to them. This paper recommends that all funding report backs be rolled into one annualized reporting strategy, and that they be made publically available. Furthermore, a small percentage of government funding of higher education takes the form of performance funding for employment and graduation rates. Due to the inability of institutions to control student performance in-class or in the labour market, this paper recommends that performance funding be eliminated and turned into an envelope to support quality improvement.

### **Ombudsperson Offices**

As publically-supported institutions, universities should be held accountable for their actions, and students should have a venue for appeals if they disagree with them. Existing ombudsperson infrastructure on campuses needs to be strengthened where it exists and created where it does not. Campus ombudsperson offices are more likely to be able

to work within the individual culture of an institution, providing students with more tangible advice to resolve conflicts or inequities.

### **Quality Assurance**

Quality assurance in Ontario is currently conducted by the universities themselves, through a framework created in 2010. This framework requires that each institution create a quality assurance protocol that conforms to an agreed upon set of standards. Periodic reviews of academic programs are measured against this set of standards. Students are concerned that the learning outcomes specified by the quality assurance plan are too broad to be objectively judged in a review process. This paper recommends re-visiting the undergraduate degree level expectations, as well as inserting more of an emphasis on teaching processes and pedagogy in the program review process.

## Glossary

*Terms are listed in the order in which they appear.*

**Boards of Governors:** This paper refers to all university governance boards outlined in the legislative acts of each Ontario university as “Boards of Governors.” These boards have final legal and fiduciary responsibility for university operations and serve as the final decision-making body on issues related to student fees, expenditures and budgeting. At two universities, these boards are in fact referred to as Boards of Trustees, but serve the same purpose.

**Multi-Year Accountability Agreements:** Refers to a set of agreements made between universities and the provincial government in 2005. Institutions indicate strategies, programs and performance targets in regard to various goals set by the Ministry of Training, Colleges and Universities, reporting back annually on progress made.

**Report-back:** A submission on behalf of a university to the government, detailing progress made towards provincially-mandated goals with provincially-controlled funds. Currently, institutions complete a report-back for the Multi-Year Accountability Agreements, as well as all targeted funding envelopes.

**Funding Envelope:** A portion of money distributed to institutions for a specific purpose that has its use restricted to this specific purpose or objective. Funding envelopes have been used by the government as a way of influencing university priorities

**National Survey on Student Engagement (NSSE):** A survey conducted by all universities of student engagement in the classroom as well as the broader community. NSSE scores are reported on annual MYAA report-backs.

**Collegiate Learning Assessment (CLA):** A standardized test of critical thinking, writing and analytical skills created to assess how these skills improve over the course of a university program. The CLA does not test discipline-specific knowledge, but rather overall critical thinking processes.

**Ancillary Fees:** Fees administered by universities or student unions, in addition to tuition, for activities that are not directly related to teaching and learning, including student support services, athletic facilities, health facilities, and student clubs.

**Performance Funding:** A funding model wherein institutions are funded based on their performance according to a pre-defined set of objectives.

**Key Performance Indicators (KPIs):** Three measurements that institutions are required to report in order to receive performance-based funding from the Ontario government. This funding changes based on changes to the KPI numbers themselves. Current KPIs include graduation rates, employment rates and OSAP default rates.

**Ombudsperson Office:** Ombudsperson offices are services that offer impartial and non-binding advice towards the resolution of disputes between members of a campus community. They are bound to offer independent and impartial advice, regardless of who is funding them. They can also be referred to as ombudsman and ombuds offices.

**Quality Assurance Framework:** An agreement made between universities in 2010 to adhere to a specific set of quality assurance criteria. This involves the creation of an Institutional Quality Assurance Process (IQAP) at each university, based off of the framework laid out in the Quality Assurance Framework. Each institution uses the IQAP as the basis for periodic reviews of academic programs.

## Introduction

In principle, accountability mechanisms in the university sector exist in order to ensure that publicly-subsidized institutions are adhering to public goals and priorities. The question of whether or not institutions should be held to such ends is relatively uncontroversial; virtually every stakeholder agrees that there should be some sort of meaningful accountability mechanism in place.<sup>1</sup> How those mechanisms take shape, however, have been and continue to be the subject of vigorous debate within the sector.

There are two questions around which the debate seems to focus. First, for what should universities be held accountable? Universities fill a variety of different roles that differ between and within institutions. Moreover, these roles are valued differently across the sector: government, for example, is often interested in economic return on its investment, ensuring that students can obtain employment after graduation, whereas faculty associations tend to place more emphasis on the development of students as critical thinkers and engaged citizens. Ultimately, the matrix of measures used to hold universities accountable will need to account for the priorities of a variety of different stakeholders in order to accurately reflect public priorities.

The first question is theoretical in nature, requiring measured thought on the mandate of public universities and their place in a democratic society. The second question is more technical: Once the areas for which universities are to be held accountable are decided, *how* are universities to be held accountable? In other words, how can a given institution's progress toward achieving public goals be measured? This question requires one to conceptualize accountability mechanisms such that they might be meaningfully and significantly measured. This is no small task, in large part because the various mandates of our public universities are enormously complex and not easily quantifiable. For example, how can critical thinking be accurately measured and reported? There are some promising practices in place in comparable peer jurisdictions, but no one tool can accurately capture critical thinking in all its complexity. Nor are labour market outcomes so easily quantified as it might first appear. As part of the current accountability framework, the provincial government requires institutions to report employment rates both six months and two years after graduation. But what kind of work have the graduates found? Are they working a poorly compensated job completely unrelated to their education, or have they gone on to apply their degree in the "knowledge economy"? Merely measuring employment rates gives no indication of whether or not students are graduating from university only to return to poorly paid, unskilled labour, saddled with thousands of dollars in debt. Again, more sophisticated tools are required to ensure that universities are meeting this public priority.

Thus far the debate has been limited to the above questions. There is a third question, however, which has been largely glossed over: To whom should universities be held accountable? The answer has been so far assumed; since the public funds universities, universities must be held accountable to the public. The government serves as the public's representative in this formulation of accountability. But if all those who fund post-secondary institutions are those to whom institutions must be held accountable – you get what you pay for, so to speak – then there is no reason that institutions should not also be held accountable to their students. Tuition and ancillary fees have risen exponentially in the last two decades, comprising 48 per cent of all university operating funding in 2011-12. And yet there has been no serious discussion about how universities can be held accountable to both the public at large and to their students.

To sum up: there are three questions that should guide the post-secondary education sector's discussions of accountability. They are:

1. *To whom* should universities be held accountable?
2. *For what* should universities be held accountable?
3. *How* should universities be held accountable?

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<sup>1</sup> Kisner and Hill, *Higher Education in Tumultuous Times: A Transatlantic Dialogue on Facing Market Forces and Promoting the Common Good*. American Council on Education (Washington DC: 2010).

This paper shall seek to provide a student perspective on each of the three questions in turn.

## To whom should universities be held accountable?

The assumption of much of the contemporary literature on university accountability is that those who contribute financially to an institution should be those to whom universities are held accountable. Since the public invests so much in education, the public – through government – is entitled to keep track of the money they spend, and implement whatever measures of accountability they feel are sufficient to ensure good use of their money. This view has intuitive appeal; those who make the investment are entitled to hold the firms in which they invest to account for their expenditure. If the firms don't want to be held to account, or feel that they are being micro-managed by their investors, then they are free to refuse the money and seek their funding elsewhere. For the purpose of this paper, this view will be referred to as the “shareholder” approach.

On this view, there is another group that could ostensibly make claim to shareholder status: students. It is widely known that the onus for funding university education in Ontario has increasingly been foisted on students over the past two decades. In 2011-12, students contributed almost an identical share to the operating budget of universities as the provincial government.<sup>2</sup> But there is reason to question the extent to which universities are held directly accountable to their students. Unlike taxpayers, students cannot collectively influence university policy or priorities directly. While the public (through government) can set targets in accordance with their priorities, students are often relegated to token representation on governing bodies.

The shareholder view is not the only way to approach this question. After all, the dispersal of funding to an institution does not necessarily entail the right to hold that institution accountable. One could instead look to those who are integral to the proper functioning of the university. Students, staff, faculty, administration and the public at large: without the support of each of these groups, universities could not exist. Their stake in the university thus gives them the right to hold the university accountable. For the purposes of this paper, this will be called the “stakeholder” approach.

It must be made clear from the outset that senate compositions are not covered in this paper. While they are a crucial component of university governance and play a role in academic accountability, the scope of investigation was limited. Future iterations of this paper should investigate clearly the elements of academic accountability governed by senates, making corresponding principles, concerns and recommendations.

**Principle One: Those who are integral to the functioning of a university should be responsible for assisting in holding it accountable.**

In many ways, university governance structures already follow the stakeholder model for accountability. For example, university senates and boards of governors often set seats aside for those who have no financial share. For instance, Nipissing University has a seat for an appointment by its Aboriginal Council on Education. A number of universities reserve seats for the Mayor of the town in which they exist. And all Ontario universities have seats reserved for faculty and students. It makes little sense to describe the presence of these groups on boards except in terms of the stakeholder approach to accountability. Students believe that this is as it should be and that the shareholder view would be detrimental to effective university governance.

A shareholder view where governance board seats were made up based on the amount of funding derived from certain stakeholders may seem enticing to students who feel little ability to control tuition increases, but would do the university community as a whole a disservice. Universities are environments that much balance multiple objectives;

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<sup>2</sup> Calculated from Canadian Association of University Business Officers (CAUBO) 2010-2011 data.

teaching, research and service to the surrounding community. To leave this balance completely up to the whims of government funding would inevitably end up upsetting this balance, particularly in light of current imbalances on university governance boards.

Those whose work and study are integral to the proper functioning of a university, and will be more likely to have the best interests of the university at heart. For a university to function as a community, university governance bodies must reflect a communitarian principle, with adequate representation from students, staff, faculty, administrators and community members.

**Concern One: Students are not adequately represented on university boards of governors and senates.**

Board composition varies by university, but each follows a more or less standard format. A handful of seats are reserved for faculty, staff and students, typically two per group. The following chart demonstrates student representation on university boards across Ontario:

**Table 1: Student representation on university governing boards in Ontario**

University	Board Undergraduate Student Seats	Board Graduate Student Seats	Total Board Seats	% of Board Comprised of Students	% of Board Comprised of Undergraduate Students
Algoma	2	0	12	16.6%	16.6%
Brock	2	1	30	10%	6.6%
Carleton	2	2	30	13.3%	6.6%
Guelph	2	1	24	12.5%	8.3%
Lakehead	2	1	31	10.0%	6.6%
Laurentian	1	0	26	4.0%	4.0%
Laurier	2	1	34	8.8%	5.0%
McMaster	1	1	37	5.6%	2.7%
Nipissing	2*	0	26	7.6%	7.6%
OCAD	2	1	26	11.5%	7.6%
Ottawa	1	1	32	6.2%	3.1%
Queen's	2**	1	37	6.8%	2.7%
Ryerson	3*	0	24	12.5%	12.5%
Toronto	6	2	50	16.0%	12.0%
Trent	2	0	24	8.3%	8.3%
UOIT	1	1	25	8.0%	4.0%
Waterloo	3	2	36	13.9%	8.3%
Western	2	1	28	10.7%	7.1%
Windsor***	3	1	30	10.0%	10.0%
York	1	1	32	6.2%	3.1%
<b>Ontario Average</b>	–	–	–	<b>8.4%</b>	<b>7.1%</b>

\*Student seats not specified as graduate or undergraduate

\*\*Includes Rector

\*\*\* One seat set aside for part-time students.

The executive head of the university has an ex officio (usually non-voting). The Senate and alumni association are sometimes permitted to appoint a few seats. Some boards allow representation from other stakeholders, such as a member of the Aboriginal Education Council or a representative of the local municipal government. But all these represent less than half the total board seats; the rest are either appointed by the provincial government on the recommendation of the board or elected by the board itself.<sup>3</sup> In either case, the board picks their own members.

<sup>3</sup> For a breakdown of each board's composition, see: <http://www.pas.gov.on.ca/scripts/en/BoardsList.asp?minID=2318>

The resulting governance structure raises significant accountability concerns. When a board is able to appoint the majority of its own members, it cannot meaningfully be held accountable to any of its stakeholders. Students are currently able to contribute in different ways, sometimes even sitting on committees with significant decision-making power. However, this representation does not adequately compensate for a lack of significant contribution elsewhere. Student representation comprises an average of 8.4 per cent of the total share of an Ontario university governing board, not enough to change the course of a decision if students had serious objections to a board decision. Students understand that boards must make unpopular decisions occasionally, such as the annual decision to increase tuition. However, the system could be made significantly more accountable than it is currently, where boards may elect officials who have little to know knowledge or connection with post-secondary education.

**Recommendation One: The provincial government should utilize its ability to appoint members to boards of governors knowledgeable in government and institutional priorities.**

It is currently the conception of many stakeholders that representatives from the institution and appointees of Ontario's Lieutenant Governor control university boards. In theory, this system represents a balance of power held between the province and institutions. As has been explored previously however, the province has tended to appoint members to university boards on the recommendation of the boards themselves.

One way the provincial government could take a greater role in helping universities accomplish their missions would be to actually exercise its power to appoint members to university boards. These members could simply be officials knowledgeable in university operations and the objectives of the province in higher education there to ensure the priorities of government are being reflected in university decision-making. These members would be able to ensure that university boards could make decisions effectively in the context of government priorities. To preserve institutional autonomy, these members would not have a plurality of seats, but would simply serve as true representatives of the public interest at the university governance table. Additionally, it is not our expectation that these members would somehow not place the needs and reputation of the institution at the top of their priority list. Rather, they would come at their roles with the mission of helping institutions operate efficiently alongside government priorities.

With the government's many new plans for higher education yet to be widely adopted or understood within the university community (*Putting Students First, Long-Term Capital and Infrastructure Plan, Mental Health Strategy*), students believe that representatives from the provincial government should be in place at institutions to help ensure their successful implementation.

**Recommendation Two: Students should be represented to a greater degree on boards than is currently the case.**

Boards should embody a partnership between the various stakeholders in the university, including a significant percentage of representatives from important constituency groups. Namely, boards should contain meaningful and effective representation from different constituency groups. Student organizations, faculty associations, administrators, government representatives, community groups should all be represented.

However, among these groups, students stand out as the only partner that has significantly increased their contribution to university finances on a per-capita basis. Since 1979, students have increased their contribution to operating budgets from one fifth to one half through tuition and ancillary fees. Greater representation would allow student voices to reflect this increased contribution.

## **For what should universities be held accountable?**

This question requires a conceptualization of what universities stand *for*, of what their collective and individual mandates should be. These are not simple questions with easily definable answers, but student answers are essential.

The reality is that students oftentimes do not attend higher education with a completely clear idea of what they should get out of a degree program, or what objectives degrees should be held to.

**Principle Two: University operations and governance must be transparent and accountable to all stakeholders.**

To be accountable in any way, institutions must first achieve a certain threshold of transparency. As public institutions, it is vital that data collected by the university be made easily accessible to all stakeholders. This includes any data reported for the purposes of performance funding, the Multi-Year Accountability Agreements or any other report the institution generates for the government. This data should be publically available for the purposes of institutional comparisons, where possible. Ensuring transparency of data will make sure that students, the government, and the public at large can be aware of what activities a university is engaged in, how it is utilizing its resources, and how well it is performing in comparison to other institutions. For example, as discussed later in the paper, institutions have not always used envelope funding for their intended purposes. Yet without detailed knowledge of university operations and governance, it is very difficult for stakeholders to hold institutions accountable for their actions.

**Principle Three: The conversation on university accountability must take place with the awareness that institutions provide both academic skills and employment potential.**

Universities must be held accountable for the quality of the education they offer. The definition of quality varies between stakeholders, but this does not mean that there can be no consensus about what is to be included in accountability mechanisms. Indeed, there is no good reason why the priorities of all major stakeholders could not be incorporated to some extent. Accordingly, universities should be held accountable for two broad kinds of quality. The first is academic, taken to mean the extent to which engaging teaching and learning techniques are employed to transform the student's capacity to think critically, read and write effectively, and engage in society as an informed citizen. These are capacities typically thought to be central to the university experience, but their outcomes are notoriously difficult to quantify. Despite this, academic measures of quality are vital to track in order to measure institutions against.

However, the government does not invest in universities purely for the intellectual value they provide. There are legitimate expectations that universities will help Ontario meet its economic needs by providing an educated workforce to meet the demands of the 21<sup>st</sup> century knowledge economy. Moreover, students investing thousands of dollars annually want to be reasonably sure that their investment will gain them something tangible in the labour market. As such, universities must be forthcoming about the extent to which they prepare their students for the labour market after graduation. This paper refers to this kind of quality as vocational quality. Accountability measures will need to gauge the extent to which graduates are able to find fulfilling employment in the field of their choice after graduation. Although this may be to some extent dependant on market forces like the recent recession, the ability of students to successfully obtain education-related employment is an important measure of quality.

Oftentimes, the discussion on academic vs. labour market outcomes is dichotomous. However, it is often the academic skillset that institutions provide that makes graduates more successful in the labour market. Strengthening academic quality is in many ways the same thing as strengthening labour market outcomes.

Though university stakeholders may not agree on the extent to which the community should accept either vocational or academic quality as a proper goal for the university system, it must be acknowledged that students enrol, governments invest and private entities donate to institutions for both academic and vocational ends. To ignore either one of these objectives would ignore an already established element of the system. To be clear however, we do not believe necessarily that institutions should be rewarded or punished for the labour market performance of graduates, simply that this performance should be measured and reported in such a way that it can be of use to students and educators.

**Principle Four: Universities should be held accountable for the extent to which they are accessible to their students.**

Thirdly, universities should be held accountable for their accessibility. Financially, universities should be held accountable for ensuring affordable programs and compliance with the provincial government's student access guarantee and tuition framework. Additionally, universities should be held accountable for creating an accessible campus culture, welcoming to a diversity of students. This is a priority for all sector stakeholders: no willing and qualified person should ever be prevented from accessing higher education. Universities should be held accountable if there are physical, financial or cultural barriers for students.

**Principle Five: Universities should be held accountable for the extent to which they provide high quality instruction and support services to their students.**

It is important to note that the quality of one's academic experience can be detrimentally affected to a large degree by non-academic circumstances relating to one's physical, mental, emotional, and social well-being. The renowned student development theory research of Alexander Chickering in the field of student affairs has focused on the various maturation phases through which PSE students progress: developing competence, managing emotions, moving through autonomy toward interdependence, developing mature interpersonal relationships, establishing identity, developing purpose, and developing integrity).<sup>4</sup> As such, universities have a responsibility in creating and fostering an environment conducive to learning mindful of the aforementioned maturation elements via integrated support services including personal, psychological, and academic counselling, medical and health services, and general wellness education resources.

## How should universities be held accountable?

Since whom and for what universities should be held accountable have been addressed, one turns to the final – and most difficult – question: *how* should universities be held accountable? Currently, there are a great deal of mechanisms by which Ontario universities report progress on a number of different indicators and targets to government. This paper will not seek to overhaul the current system or call for a revolution in accountability mechanisms, but instead will seek to improve upon the current framework in order to ensure that the right people are holding universities accountable for the right priorities.

### Multi-Year Accountability Agreements (MYAAs)

Multi-Year Accountability Agreements (MYAAs) form the cornerstone of system accountability in the Province of Ontario. They came about as a result of recommendations made in the 2005 Rae Review, which led to the Reaching Higher Plan for post-secondary education. Former Premier Bob Rae made clear that their purpose should be two-fold: first, to ensure that institutions can count on stable funding over a multi-year period; second, to hold institutions accountable to targets negotiated between them and the government.<sup>5</sup> The first such agreement was in fact only for a single year in 2005-2006, and a portion of Ministry funding was held back until such a time as it was signed by the institution. This funding was allocated through the Quality Improvement Fund, an envelope of the government's funding formula for universities. The actual MYAAs were introduced in 2006-2007, and ran through 2008-2009. These were allocated through the Access to Higher Quality Education Fund. Lacking a replacement for the Reaching Higher plan, the government extended the MYAAs through 2009-2010, and again through 2010-2011.

Each MYAA presently has three areas of focus: access, quality, and accountability. The first half of the MYAA consists of the government outlining the steps it will take to further each of these priorities. The second half consists of

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<sup>4</sup> Chickering, Alexander W.; Reisser, Linda (1993). *Education and Identity* (2 ed.). San Francisco, CA: Jossey-Bass. [ISBN 978-1555425913](https://doi.org/10.1080/07674809308839513).

<sup>5</sup>Rae 2005: 20

expected action on the part of the institutions in furthering the priorities. When submitting the MYAA in 2006-07, university representatives had to attach a multi-year action plan, outlining the specific steps and strategies that would be taken to achieve the various goals of Reaching Higher. Adherence to these action plans is measured through yearly report backs, which must be submitted by institutions in order to receive a small portion of their yearly operating funding. MYAA reports contain fields for information pertaining to each of the three areas of focus, into which institutions must enter their current statistics, progress, and future strategies.

In this section, this paper makes recommendations about two aspects of MYAAs. First, through examining the process by which MYAAs are drafted and monitored. Second, through examining the content of MYAAs themselves.

## MYAA Process

**Principle Six: The setting of strategic long-term goals must be reflective of the needs of both the university stakeholders and government.**

Universities do not operate in isolation. Boards and administrative officials may have significant autonomy in the running of an institution's daily affairs, but their long-term viability is contingent on funding from the provincial government. As significant beneficiaries of Ontario tax dollars, it is incumbent upon institutions that they act in the public interest.

It might be argued that universities fulfill this goal simply by carrying out their mission. First and foremost, universities are institutions of collaborative learning. Whether that learning is by students in the classroom assisted by a professor, or by a professor in a lab with a team of research assistants, all members of the university community are either committed to learning themselves or else to assisting others in that project. This is in itself a public good, and should not be underestimated when assessing the public utility of Ontario universities.

But the principle of institutional autonomy is not enough to justify handing universities free reign with public funds. The elected provincial government often receives a mandate from their constituents to advance particular principles in the university system. Therefore, universities must accept that, in return for sufficient and stable funding from the provincial government, they must negotiate long-term strategic plans in the form of MYAAs.

**Concern Two: Multi-Year Accountability Agreements have not always been successfully used to hold universities to account for their lack of performance toward goals.**

Currently, a portion of university operating funding – about 4 per cent in 2010-2011, and slightly higher before that – is withheld until such a time as the report back for the previous year is submitted. This funding has never been denied, and essentially serves to hold universities accountable only in name. There have been no consequences for failing to meet targets set out in MYAAs, or for providing unsatisfactory responses on MYAA report backs. The effect on institutional behaviour has been limited to the reputational effect public reporting of data can have. Given the widespread public unawareness of the existence of Multi-Year Accountability Agreements, students do not believe that this is enough.

**Concern Three: Stakeholder participation and consultation is not reflected comprehensively in the Multi-Year Accountability Agreement process**

As one of the core components of system accountability in Ontario, MYAAs should be widely consulted upon before being signed by institutional leadership and the Minister of Training, Colleges and Universities. All major stakeholders – including students, staff, faculty, and the community at large – should have the opportunity to see their priorities reflected in the final version of the agreement. This principle is recognized in the first 2006-2007 MYAAs by a section

requiring institutions to describe consultation undergone with faculty, staff and students before the agreement was signed.

Unfortunately, institutions were not held to standard in their consultations, and were permitted to carry them out as they saw fit. As a result, few institutions took steps to consult with their stakeholders. Many simply reported the consultation they had undergone for their strategic plans, some of which was done as many as five years – an entire cohort of undergraduate students – before the MYAA was signed. Others simply reported having consulted with deans and executive heads, claiming that senior administration is representative of the university's constituency at large. On the whole, consultation seems to have been shallow at best, and most certainly did not directly represent the interests and priorities of major stakeholder groups.

This is particularly concerning because of the commitments made in MYAAs regarding such important issues as targets for faculty hiring, initiatives to improve teaching quality and the student experience, and programs to enhance accessibility. Everything contained in MYAAs is of direct concern to all university stakeholders; if they are not adequately consulted, then there is reason the question the legitimacy of such a document.

**Concern Four: Current Multi-Year Accountability Agreements have not been leveraged for their potential as strategic planning tools.**

While MYAAs were meant to help universities set strategic targets in return for stable funding, they have in effect become little more than mechanisms for reporting information to the provincial government and to the public at large. From the first year, MYAAs failed to set concrete targets for enrolment growth and other indicators, instead relying on university-reported plans. Moreover, the annual MYAA report backs have requested different information each year. Under a thoughtful, organized and widely accepted multi-year planning framework, report backs should be consistent and agreed upon by all stakeholders. Institutions should know what to expect on them year-to-year and be expected to deliver on their stated commitments.

A key reason for this failure has been the lack of sector-wide goals to set context for the MYAAs. If the government is to implement MYAAs as a meaningful accountability mechanism for public funds, they must set the tone for the negotiations by establishing system targets and asking universities to develop their indicators accordingly. The initial MYAAs merely asked universities to describe programs they have in place for various indicators. The government will need to work with universities to create more prescriptive targets if MYAAs are to take on a strategic mandate.

For instance, the current MYAA report-back provides institutions with a blank box and asks them to highlight initiatives aimed at improving quality. Each institution reports whatever university projects are deemed to be “quality enhancing” and the government compiles these responses into a system-wide report back with no real measurements associated. This sort of measurement neither holds institutions to account for any year-to-year improvement of quality, nor provides any direction as to what is meant by “quality.” Students see substantial room for improvement in sections like this, through the implementation of system-wide targets for quality, accessibility and affordability.

**Recommendation Three: The Multi-Year Accountability Agreements, as well as subsequent report-backs, should become the centrepiece of a centralized annual reporting strategy for Ontario universities.**

MYAAs provide a unique opportunity for universities to publicly report progress on indicators set by stakeholders on a yearly basis. Currently, universities submit yearly report backs to the Ministry of Training, Colleges and Universities (MTCU) explaining performance along various indicators negotiated in the MYAAs. These reports must be posted by institutions on their website, to be available to the public at large. This has been an extraordinary first step towards ensuring accountability in the Ontario university system. However, more can be done.

The province of Alberta provides us with an interesting model of university accountability. Alberta's *Post-Secondary Learning Act* (PSLA) mandates that universities submit annual business plans, access plans, financial statements, and annual reports to the Ministry of Advanced Education and Technology. The content of the annual reports and business and access plans can contain any information required by the Minister.<sup>6</sup> The MTCU then reports to the public via its own annual report, which explicitly outlines targets across a number of indicators, as well as an evaluation of progress in one of four terms: target exceeded, target met, target not met, or no target set.<sup>7</sup>

Elements of this model would be extraordinarily useful in Ontario. As they stand, MYAAs are not central to university operations, nor do their stated goals influence university decisions significantly.

Our proposed model here harmonizes with our recommendations for the strategic mandate process, providing a basis for differentiated MYAA targets across each institution to form a component of the strategic mandates institutions develop. In this way, MYAAs can strike a balance between allowing each institution to pursue a differentiated mission while holding them accountable for certain ends (which will in some cases be common amongst many institutions. This process is more fully outlined in OUSA's System Growth paper.

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**Stage 1: Consulting with stakeholders, the provincial government should set system-wide targets for the improvement of accessibility, quality, affordability and accountability.**

In any scenario, the heart of any planning exercise is concrete goal setting. The new set of MYAAs should propose a framework whereby agreed-upon objectives for the entire post-secondary system are decided by the government in collaboration with universities. This paper proposes the following suggestions for sector-wide targets in subsequent recommendations as an initial contribution:

- Enrolment of under-represented groups;
- Proportion of students involved in classes employing non-lecture style, high-impact or active pedagogy;
- Number, types and student satisfaction with support services;
- Number of classes with 29 or fewer students;
- Average faculty teaching loads and faculty composition.

**Stage 2: Each University must be made to negotiate a new MYAA within the framework of these system-wide targets. Each institution would negotiate its share of the target and propose a multi-year plan to achieve it. Additionally, each institution could negotiate its own indicators unique to its own mission.**

With system-wide targets set, a process would begin whereby the government could negotiate each institution's commitment to the system-wide indicators based on the unique circumstances of the university. For instance, of a total system-wide enrolment target of 50,000 Aboriginal, first generation, disabled or under-represented students, Lakehead could opt to take on 5,000 students from these constituencies over five years, whereas Guelph could commit to only 1,000 if deemed necessary. In any case, institutions would have to submit a plan involving annual targets for increased enrolment of under-represented populations. These targets should be negotiable and renegotiable with the government alone, not between institutions.

The government would ultimately be responsible for ensuring that the system as a whole met the established targets. Additionally, institutions and governments could negotiate individualized accountability mechanism specific to the

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<sup>6</sup> Province of Alberta, *Post-Secondary Learning Act*, Statutes of Alberta, 2003, Chapter P-19.5 (Edmonton: Alberta Queen's Printer, 2011) <http://www.qp.alberta.ca/documents/Acts/p19p5.pdf>

<sup>7</sup> Government of Alberta, *Advanced Education and Technology: Annual Report 2009-10* (Edmonton: 2010) [http://www.advancededucation.gov.ab.ca/media/279714/annual\\_report\\_2009-10.pdf](http://www.advancededucation.gov.ab.ca/media/279714/annual_report_2009-10.pdf)

university's mission or mandate, which would help provide greater clarity on what goals and objectives are institutionally valued.

**Stage 3: On an annual basis, universities should be required to submit a report to the Ministry of Training, Colleges and Universities (MTCU) detailing progress on these objectives. The executive head of each institution should sign these, and they should be passed through university governing bodies.**

On an annual basis, report backs for the MYAAs, along with all other government report backs (for envelope funds or key performance indicators) should be rolled into a single, annual report, released to MTCU and the public at large. Annual reports should contain progress on all MYAA targets, as well as all strategies employed to meet targets. As will be explored below, institutions that fail to meet improvement targets could have a certain percentage of their operating funding withheld, depending on the size and type of failure in question. Alternatively, additional discretionary resources could be devoted to the institution to meet their target, depending on the situation. Additionally, these would also be an excellent venue to annually publish data universities are already required to publish but can be difficult for stakeholders and the public to access, such as university financial statements.

Finally, these documents should be signed by the executive heads of each institution as an assurance that the highest governing authorities of the university are monitoring progress on publically set goals.

**Stage 4: MTCU should compile these results into a system-wide report, available to the public. Each institution would receive an evaluation of progress towards their goal, benchmarked against performance from the previous year.**

In order to keep the public informed on the progress of the university system as a whole, MTCU should publish system-wide progress towards established goals. This would allow the public to compare institutions in a multi-faceted and nuanced way, enabling prospective students to make decision based on the stated priorities and progress of a university, rather than simply branding materials or word-of-mouth.

**Recommendation Four: Multi-Year Accountability Agreements should be passed through university governing bodies and require consultation from students.**

In order to ensure that MYAAs are taken as legitimate, binding strategic documents for both the government and for the university concerned, they must be passed by a formal motion at the Board of Governors, or its institutional equivalent. Boards of Governors, if properly representative of the university community, can hold the institution accountable for the goals laid out in the MYAA. What's more, if there is adequate consultation and collaboration in the development of these agreements, then the stakeholders will be more committed to seeing the plan achieved. Adequate stakeholder consultation is essential for reasons of both accountability and efficiency.

In this vein, for an MYAA to be accepted as legitimate by the government, students at a given institution must indicate that they have been engaged and consulted. This could be confirmed on the agreement with the signature of an authorized representative of each university's student government, or through an equivalent process. However, as the largest constituency on campus, it is not enough that institutions fill in a box indicating that a town hall was held on a certain date to discuss MYAAs. The government should set a certain threshold for student consultation centrally, with students associations indicating that the threshold has been met or not met. .

**Recommendation Five: The government should utilize its ability to influence university funding mechanisms if measurable progress is not made towards Multi-Year Accountability Agreement targets, as well as when measurable progress towards targets are made.**

There are an infinite number of reasons why universities may not be performing to targets, many of which are through not fault of their own. While universities should not be punished for failure to achieve targets where clear mitigating factors exist, the current reality of no-consequences for inadequate MYAA responses cannot continue in a new system of system-wide targets. If an institution lists a commitment to a target and a plan to achieve it, failure to achieve the target should be cause for question. While funding should not be withheld in a knee-jerk manner and institutions should be able to re-orient unmet plans without penalty (in fact, more resources in some scenarios may be necessary and worthwhile) clear lack of progress cannot continue to be rewarded. The government should withhold funding from universities until such a time as they can demonstrate that they either have or will soon implement conditions laid out in the MYAAs. Currently, approximately 4 per cent of operating funding is withheld until MYAA report-backs are filled out. This recommendation would transform this policy lever from an incentive to data reporting to an incentive for performance.

It should be made clear that this is not a recommendation to withhold substantial amounts of operating funding, or even enough to severely affect the viability of post-secondary institutions. However, attaching a small percentage of funding could strike a balance between motivating institutional behaviour and ensuring financial stability for Ontario universities.

However, influence goes two ways. If institutions exceed their MYAA targets in ways that benefit the sector, this performance should be rewarded. For instance, if McMaster set an MYAA target to teach 30 percent more students using online courses and the demand increased 50 per cent, McMaster should receive new funding to compensate for the increased investment made. In this way, tying funding to the achievement of MYAA targets can serve as both an incentive to perform, as well as a disincentive to ignore targets.

Additional funding should only be provided in cases where performance comes as a result of positive institutional behaviour. For example, if enrolment targets are exceeded due to a low target, population trends or external factors, additional funding should not be given. However, if institutions invests substantially to expand enrolment and exceeds its target, then additional funding could be granted.

**Recommendation Six: Institutions should be able to re-negotiate MYAA targets in circumstances where external factors prevent institutions from achieving them.**

Universities should be able to renegotiate aspects of an MYAA should their stakeholders feel that their priorities have shifted. MYAAs are meant to encourage a climate of stability and stakeholder collaboration toward the accomplishment of shared goals, but sometimes those goals will change. For whatever reason, if students, faculty and administrators all agree that progress toward a goal must be re-evaluated, they should be empowered to re-negotiate their targets and goals with the government.

Additionally, circumstances may arise where completely external forces such as demographic or economic forces prevent the implementation of an MYAA goal, an especially salient point in cases where enrolment is involved. In such cases, the MYAAs targets should be open to reconsideration and realignment with provincial priorities. The government should always retain the ability to judge whether or not a renegotiation is allowable. However, formal avenues should be created to allow institutions to publically appeal a target.

## MYAA Content

Through the re-negotiation of the Multi-Year Accountability Agreements, the government has a distinct opportunity to incentivize universities to achieve goals that would benefit the entire university community through system-wide targets. However, not every tracked metric in the MYAA report-backs should be tied to a system target.

As a result of having been drafted in a rushed process involving few major stakeholders, MYAAs have predictably fallen short of stakeholder goals. They lack a number of indicators of great concern to stakeholders.

Currently, MYAAs report:

- Enrolment headcounts, below and above the age of 25;
- Enrolment of Aboriginal students, students with disabilities and first generation students;
- Student Access Guarantee compliance;
- Credit transfer applications, registrations and satisfaction scores (from colleges);
- Class size (though there are severe errors with the reporting methodology for this metric);
- Summaries of online learning activities;
- International student headcounts and tuition revenue;
- Revenue derived from off-shore activities;
- Top source countries for international students;
- Number of international students participating in exchanges;
- Ontario Supply Chain Code of Ethics compliance;
- Student satisfaction scores for senior year students as measured by the National Survey on Student Engagement;
- Graduation rates;
- Graduate employment rates;
- Year-to-year retention rates;
- Self-reported improvement on quality of the learning environment.

On paper, this may look like a good list. However, many of these metrics have no targets attached to them and no incentive for universities to focus on improvement. In the absence of set targets, the Multi-Year Accountability Agreements are little more than data-reporting tools. However, even in this regard they are far from perfect, as will be explored later.

### Metrics That Should Be Attached to System-Wide Targets

**Recommendation Seven: Multi-Year Accountability Agreements should include specific long-term enrolment targets for undergraduate, graduate, underrepresented students and mature students.**

The MYAAs currently only specify that the provincial government's goal was to increase graduate student enrolment by 12,000 in 2007-2008 and 14,000 in 2009-2010, as well as to increase medical enrolments by 23 per cent by 2009-2010. The annual report backs also require institutions to report enrolment for Aboriginal students, first generation students and students with disabilities. In addition, report backs ask for institutions to describe programs in place aimed at increasing enrolment in those areas. There is no sector-wide goal within which institutions could work, nor are institutions required to lay out any specific goals for enrolment in their MYAAs.

If the MYAAs are to be adopted as strategic documents, then they must set concrete goals and report transparently on whether they are reaching those goals. This principle applies to recommendations surrounding access. For example, rather than simply stating that increasing Aboriginal, rural and northern student enrolment, the government should set sector-wide enrolment goals for these under-represented groups and allow institutions to claim different portions of the goal. Thus, each institution would have local target based on the institution's desire or commitment to the province's goal. Institutions should report on programs in place built toward achieving those targets, and should provide a substantive evaluation of their progress in any annual reporting. Furthermore, these targets should include other underrepresented groups supported by government programs, namely rural and northern students, as well as students with dependants.

**Recommendation Eight: The government should require institutions to accurately report class size, broken down by department. System-wide targets should be set for the percentage of small classroom environments made available to students.**

Class size reporting requirements currently rely on a flawed data set provided by universities. The data dramatically overestimates the number of small class experiences students actually have. It reports sections of a class as if they were their own, independent classes; as a result, the 2009-2010 MYAA report backs tell us that 40 per cent of first year classes in Ontario contain fewer than 29 students. In reality, most of these students will be sitting in a very crowded lecture theatre. Current class-size reporting allows institutions to report multiple sections of the same class as independent classes.<sup>8</sup> As a result, current estimates drastically over-report the number of small classes, reporting one large lecture as multiple small classes.

Universities should develop a mechanism that accurately reflects average class size. This task is best left to the administrative units responsible for data collection and tracking registration at the university, but the government should monitor this process and ensure it is being conducted appropriately. The data thereby collected should be broken down by program, and publicly reported in yearly annual reports. The government should set a system-wide target for the number of small classes offered at Ontario universities and hold institutions accountable for offering these.

This recommendation should not be taken as an endorsement of class size as a holistic measure of educational quality. However, it is certainly a metric that will indicate to students the kind of classroom experience to expect when attending a particular institution. Furthermore, if an institution selects a target for class size, they should be held accountable to maintaining it.

**Recommendation Nine: When government and stakeholders are looking to report quality, they should look to a diverse educational experience and community-based learning in addition to self-reported student satisfaction.**

MYAA report backs require institutions to report student satisfaction as measured by the National Survey of Student Engagement (NSSE). There is no question that specifically gages student satisfaction on that survey, however, so the report back solicits data via the following questions:

- 1) "How would you evaluate your entire educational experience at this institution?" (both *excellent* and *good* responses are counted);
- 2) "If you could start over again, would you go to the same institution you are now attending?" (both *definitely yes* and *probably yes* are counted).

The aggregate is taken to represent the extent to which students are satisfied with their educational experience. This assumption is patently false. In the first place, neither question asks outright whether the student is satisfied. In the second, there are a number of scenarios in which a student might answer either question favourably and yet still be dissatisfied with their educational experience.

For example, a student indicating that they would definitely attend the same institution if they had to start over again may do so because they attend an elite institution with a powerful name brand. In this example, they select "definitely yes" because they value the labour market outcomes associated with their institution's brand, and not necessarily because they were satisfied with the experience. Another student may select "definitely yes" because of geographic distance rather than any satisfaction with their experience.

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<sup>8</sup> Michael A. Adams, Tim Bryant, Yolande E. Chan, Kim Richard Nossal, Jill Scott and John P. Smol, *Imagining the Future: Towards an Academic Plan for Queen's University* (Kingston: 2010), page 23.

Alone, these questions provide an incomplete picture of student engagement. A wide variety of active pedagogical techniques are used across the province in order to enhance student learning, including inquiry, problem based learning, experiential education, undergraduate research opportunities, independent studies and more. Students propose that institutions set targets for both the types of non-lecture style pedagogy they offer, as well as the proportion of the student body that is exposed to non-lecture, active style course.

A limited number of students are currently benefitting immensely from active learning techniques. Programs like integrated science at McMaster combine research and teaching, co-op programs at Waterloo allow students to learn both in the classroom and at the workplace. The beneficial nature of these types of programs makes their expansion a goal that students believe the province should set for the entire system. Institutions should be allowed to pursue the pedagogical techniques they feel would benefit their students the most, but no Ontario student should be left behind as learning advances into the future.

**Recommendation Ten: Multi-Year Accountability Agreements should include long-term, comprehensive faculty hiring plans to meet enrolment demands, as well as report the number and average teaching load of faculty.**

The 2006-2007 MYAAs asked institutions to report on annual net new hires for full-time tenured and full-time limited-term and part-time faculty. MYAA report backs dropped this reporting requirement in 2009-2010. The Ministry set no targets for faculty hiring, and does not provide any more detailed information about type of faculty hired.

For instance, institutions currently do not report the average teaching responsibilities of full-time faculty, which by some reports have been dropping over time as research expectations rise. The amount of professors per student is a meaningless measurement if these professors are not operating at full teaching capacity.

Just as the government should plan for enrolment growth, so should it plan to meet the demands of an increasing number of university students by hiring faculty to teach them. Future MYAAs should include long-term hiring plans tailored to expected areas of program growth. Annual report backs should indicate progress toward achieving the goals of the plan, with explanations for any unforeseen variance.

Furthermore, universities should provide more detailed information about the number and type of faculty they currently employ and plan to hire, broken down by department. Part-time faculty and contract faculty are not reported at many institutions, despite carrying significant portions of the institution's teaching responsibility. If an institution chooses to download it's teaching to part-time staff, it should at least be known to the public.

**Recommendation Eleven: Multi-Year Accountability Agreement report backs should include a complete breakdown of support services offered to students by university administrations, as well as the degree to which they are supported by compulsory ancillary fees and university operating budgets.**

The first MYAAs asked institutions to describe "strategies and programs that will support increased participation of Aboriginal, first generation and students with disabilities". Later report backs did not include anything further until 2010-2011, when institutions were asked to provide highlights of an activity contributing to the improvement of the learning environment in a box labelled "support." Neither of these requirements was in any way proscriptive. Institutions could fill these requirements to whatever level of detail they pleased.

Given the significant concerns students have over the quality of academic and non-academic student support services, this is unacceptable. Future MYAAs must require institutions to detail all support services offered to their students. Institutions should be required to lay out their multi-year plan for each of these services.

Students are also concerned about how these support services are funded. As government funding has stagnated in recent years and teaching costs have increased, less and less institutional operating funding has been available for support services. Students have experienced a marked increase in ancillary fees as a result, but have no access to information about where student support services derive their funding. Annual MYAA report backs should include a breakdown of revenue sources for student support services, differentiating between operating funding and funding levied through ancillary fees. At the very least, institutions should be required to guarantee a certain level of support and a minimum type of student support services.

**Recommendation Twelve: Multi-Year Accountability Agreements should deliver a clear, measurable plan for how each university will improve the quality of education offered to their students.**

The current MYAA report backs contain a section called “Quality of the Learning Environment” in which institutions must report on programs aimed at improving the in-class experience, engagement and support. But the MYAAs set no targets for educational quality, and institutions are not held to account for failing to provide an adequate explanation. These reporting requirements do little to encourage quality.

Future MYAAs should set clear, measurable goals for the improvement of educational quality in the institution. These multi-year plans should vary by institution, catering to unique missions and institutional mandates. However, there are some quality initiatives that apply universally, such as the amount of active teaching in an institution. Active teaching styles go above and beyond the traditional lecture style in engaging students with the material at hand, and are far more effective at conveying information.

### Metrics That Should Be Reported but Not Necessarily Attached to System-Wide Targets

**Recommendation Thirteen: The government should track and publish multi-year statistics on employment satisfaction and average salary after graduation, broken down by field of study.**

MYAAs currently ask that institutions continue to report 3 key performance indicators: graduation rates, employment rates 6 months after graduation and employment rates 2 years after graduation. These statistics are not only an inaccurate measure of employment outcomes, they might be misleading to students thinking that they mean employment in their desired field. They provide no indication as to whether the graduate is working in a pawn shop or at their preferred firm. Additionally, both measures are surveyed at the same time (two years after graduation), posing some methodological problems for this data.

The province should collect much more detailed employment outcome information from Ontario’s graduates. The government should collect employment data for graduates 6 months, 2 years, and five years after graduation, coupled with average salary information. What’s more, MYAAs should include results of the question “Considering your experience, education and training, do you feel that you are overqualified for the (main) job you held last week?” from the National Graduates Survey provided through Statistics Canada. This information will provide a much more robust picture of employment outcomes of Ontario universities.

While students should be cautioned against letting labour market outcomes completely guide student choice, understanding students’ labour market outcomes is important. Many students attend university in order to better their chances in the labour market and lead fulfilling lives. A more nuanced understanding than the employment rates currently tracked would help this end.

**Recommendation Fourteen: The government should empirically review the Collegiate Learning Assessment, and if found to be a promising indicator of student learning outcomes, should be implemented on a wide-scale.**

The Collegiate Learning Assessment (CLA) plays a significant role in assessing learning outcomes in the US. According to the website of the publisher of the CLA, the Council for Aid to Education (CAE), the CLA is adopted by 500 institutions, reaching 250,000 students across the US.<sup>9</sup> The CLA administers one of two tests, called “tasks”: the Performance Task and the Analytic Writing Task. The Analytic Writing Task is further divided into Make-an-Argument and Critique-an-Argument prompts. The Performance Task is 90 minutes long, and the sections of the Analytic Writing Task are 45 minutes and 30 minutes long, respectively. The tests are administered online. Each task present students with information and ask them to provide a written response. The field into which the response is entered has no character limit, that is, they are entirely open-ended, so the length of the response is up to the student.<sup>10</sup>

The student’s answers are subject to a complex scoring rubric which evaluates different criteria for different sections, as per the following table:

**Table 3: Collegiate Learning Assessment Marking Scheme**

Section	Skills evaluated
<b>Performance Task</b>	<ul style="list-style-type: none"> <li>• Analytic Reasoning &amp; Evaluation</li> <li>• Writing Effectiveness</li> <li>• Writing Mechanics</li> <li>• Problem Solving</li> </ul>
<b>Make-an-Argument</b>	<ul style="list-style-type: none"> <li>• Analytic Reasoning &amp; Evaluation</li> <li>• Writing Effectiveness</li> <li>• Writing Mechanics</li> </ul>
<b>Critique-an-Argument</b>	<ul style="list-style-type: none"> <li>• Analytic Reasoning &amp; Evaluation</li> <li>• Writing Effectiveness</li> <li>• Writing Mechanics</li> </ul>

Each criterion is graded from one to six, with one being the lowest and six being the highest. A recent influential book, *Academically Adrift*, uses a great deal of longitudinal data from the CLA to show that many American students are not measurably improving their writing and critical thinking skills in college.

While there is insufficient data to justify immediate and widespread implementation of the CLA in Ontario – much less formulation of policy on information collected thereby – it is a promising indicator of student learning outcomes. The government should sponsor and monitor a trial of the CLA in Ontario, analyse the results and make a decision about whether it should be implemented as a tool for performance measurement across Ontario. If so, the government should directly fund implementation of the CLA at each Ontario university, and should require that data thereby collected be made available through MYAA annual report backs. The government should pay close attention to those programs performing poorly, and direct resources toward the improvement of critical thinking and writing ability in those areas.

It should be noted that the CLA is meant to be a universal instrument to measure writing and critical thinking skills for all university students. While this is a valuable measure, many students also pursue their studies to gain other learning outcomes, often-specific field knowledge. While administratively more difficult, universities could also consider implementing discipline-specific tests to improve transparency and accountability for learning outcomes.

While many rightly express concerns that standardized tests can play a negative role in homogenizing course content and incentivizing a “teaching to the test” mentality in instructors, it must be recognized that the CLA provides an interesting opportunity to measure general skills such as problem solving and critical thinking. In other words, the very

<sup>9</sup> <http://www.collegiatelearningassessment.org/>, accessed May 26, 2011

<sup>10</sup> Council for Aid to Education, *Architecture of the CLA Tasks* (New York)  
[http://www.collegiatelearningassessment.org/files/Architecture\\_of\\_the\\_CLA\\_Tasks.pdf](http://www.collegiatelearningassessment.org/files/Architecture_of_the_CLA_Tasks.pdf)

skills students should expect to develop in a degree program. More work should be done to assess whether or not it is effective tool to this end.

**Recommendation Fifteen: Multi-Year Accountability Agreement report backs should include a detailed breakdown of all ancillary fees levied against students.**

As provincial funding for universities has declined in recent years, students have paid an increasing share of university operating budgets. This cost has largely been levied through tuition fees, regulated by the government. But some costs are also downloaded to students through the raising of ancillary fees, specific fees other than tuition that must be approved by student governments. These fees have risen steadily in recent years.

These fees are often explained to students at the point of payment, but are rarely reported transparently to the public in the same way that tuition fees are. Future MYAA report backs should include a thorough breakdown of all ancillary fees, including compulsory fees, non-compulsory user fees and program fees. Reporting this data in such a way will allow the public to have a better conception of the real cost of education, which is often assumed to be tuition alone.

**Recommendation Sixteen: Report backs' should ensure that all results of the National Survey of Student Engagement are published on institutional websites in survey years.**

In the absence of a simple indicator for determining quality, many institutions rely on the National Survey of Student Engagement (NSSE). First implemented in 2000, by 2006 31 Canadian institutions – including all Ontario universities – were participating in the survey. Today, all Ontario universities administer the NSSE to first- and fourth-year students in first-entry undergraduate programs.<sup>11</sup>

The NSSE asks 105 questions, seeking to gauge student satisfaction across five variables: level of academic challenge, active and collaborative learning, student-faculty interaction, enriching educational experiences, and supportive campus environment. Annual MYAA report backs do not require detailed information about each of these indicators; instead, they report student satisfaction alone. The report back also allows for institutions to describe their own survey instruments for student satisfaction, if any. Many institutions publish full reports of NSSE data on the accountability sections of their websites, though some only provide the full range of reports available. For example, Queen's provides a breakdown of the data by means, by benchmark, and by individual response to questions, resulting in a very robust data set to which the general public can access. By contrast, Brock University publishes only the benchmark comparison and an executive summary.<sup>12</sup>

All institutions should be required to provide a complete breakdown of NSSE results for public consumption. Future MYAAs should require institutions to publish all results from the NSSE on their website. Though the validity of NSSE as a measure of quality has legitimately been called into question by many stakeholders, it provides students a perspective through which to compare the student experience across institutions. Since all Ontario institutions are conducting the NSSE utilizing student and government dollars, it is only fair that this data

## **Targeted Funding**

The majority of a university's operating budget is funded through student fees and through a basic operating grant from the government. These funds can be spent on anything the university desires, and can be referred to as "unrestricted funding." Government funding not included in a university's basic operating grant – and thus contingent on certain outcomes or directed toward certain programs – is called "envelope funding." Unlike unrestricted funding, envelopes are tied and must be spent on the program for which they were created. Universities cannot use those funds for some

<sup>11</sup> Huizi Zhao, *Student Engagement as a Quality Measure in the Ontario Postsecondary Education System: What We Have Learned About Measures of Student Engagement*, @Issue Paper No. 5 (Toronto: Higher Education Quality Council of Ontario, 2011).

<sup>12</sup> Both institutional websites accessed July 8, 2011.

other purpose. For most envelopes, money is dispersed to institutions at the beginning of the fiscal year, after the government has received a report for how the funds were spent in the previous year.

Funding envelopes are not new in Ontario. According to former HEQCO president James Downey, universities in the pre-World War II era were essentially funded entirely through envelopes.<sup>13</sup> University presidents would send a budget to the Premier outlining expenses and expected revenues, and would ask for a grant for the difference. The Premier would decide whether to fund a university's operations. As more universities were founded and the concept of university autonomy began to take hold, the government began to play a less direct role in university operations. Still, the government has retained the right to direct funding toward specific programs, and thus maintains envelope funding to this day.

**Principle Seven: Funding envelopes are important tools for ensuring the accountability of government investment in post-secondary.**

Funding envelopes are an effective way for the public to hold universities accountable. While there are some examples of poorly designed or insufficiently funded envelopes – some of which are outlined below – in principle, funding envelopes can be used to provide effective direction to the system and to improve performance. For example, the Access to Opportunities Program (ATOP) was established in 1998 to increase enrolment in computer science and high-demand engineering programs. The government set a target at 23,000 extra spaces by 2004-05; this target was reached in 2002-2003 through institutions creating spaces with the enveloped funds.<sup>14</sup> The program clearly met its goals, and demonstrates that envelope funding can effectively influence institutional behaviour toward the achievement of public goals.

There are some who claim that envelope funding is inherently flawed, and that it is one of the reasons funding has not kept pace with costs. The argument goes that the importance of increasing the basic operating grants to meet inflating costs has been ignored, with new funds being partitioned into targeted envelopes. Proponents of this view claim that by tying ever-increasing amounts of funding to specific goals, the government forces institutions to pull money away from the core function of the university, such as instruction, infrastructure, library holdings and equipment. As a result, quality suffers.

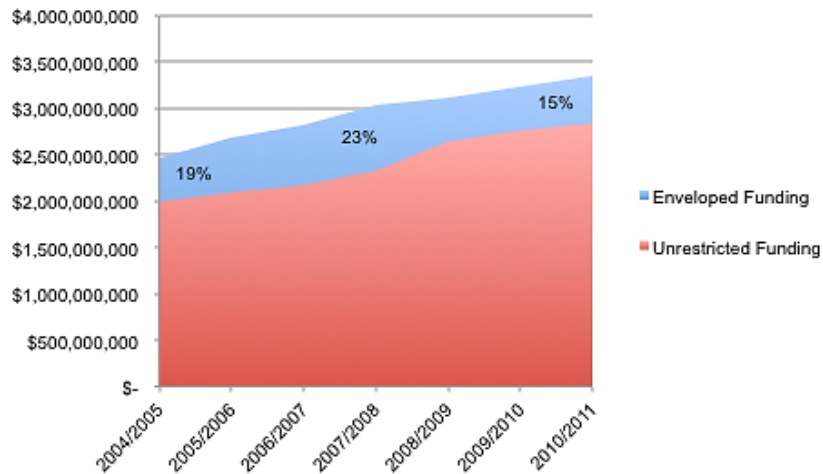
However, evidence from the government's Final University Operating Transfer Payment Totals indicates that, while funding envelopes have increased as a percentage of total funding over the history of their use, 2007 saw a sharp increase in per-student unrestricted funding and a plateau in enveloped funding that has lasted to date. For the last three years the basic operating grant has comprised very close to 85% of total government funding for universities. As the graph below indicates, over the past seven years, the vast majority of funding growth has gone toward basic operating grants, not envelope funding.

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<sup>13</sup> James Downey, "Accountability versus Autonomy." 2008.

<sup>14</sup> Ontario Ministry of Training, Colleges and Universities Operating Funds Distribution Manual, 2010, page 24.

**Table 4: Percentage of university operating funding enveloped, 2004-2011**



**Principle Eight: The government must closely monitor funding envelopes in order to ensure the envelopes are being dispersed in accordance with their mandate.**

The government and universities should take proactive steps to ensure that the accountability mechanisms for all funding envelopes are posted transparently and accessibly. Stakeholders have the right to be kept updated about the status of programs funded through envelopes by the government. Should the government provide funds to support a certain program, the public should be able to go to a post-secondary institution's website and see what funds have been used to support. For instance, if the government were to launch a new envelope supporting mental health counselling, the report-backs detailing how this funding has been spent should be accessible to the community.

Stakeholders should not have to submit freedom of information requests to access this data, nor should institutions have any reason to not provide it barring reasonable confidentiality constraints for legal and human resources reasons.

**Concern Five: Report backs for individual funding envelopes are not made available to the general public, and the government does not publish a system-wide analysis on the progress of funding envelopes.**

The government publishes data from only one of its funding envelopes: performance funding. It publishes sector-wide statistics, broken down by programme, as well as requiring institutions to publish their own statistics on their institutional websites. While this is a step in the right direction, both mechanisms fall short of ensuring adequate transparency of university accountability mechanisms.

First, the website publishes data from only three indicators: graduation rates, employment rates after graduation and OSAP default rates.<sup>15</sup> If a member of the public was looking for another tool on the website – for instance, information about how Women's Campus Safety funds are being used, or an institutional Multi-Year Aboriginal Plan for Post-Secondary Education – they would not find anything.

Institutional websites go a step further by additionally including their MYAAs and MYAA report backs, but they still lack much vital information. Like MTCU's website, they lack information about projects undertaken through funding envelopes provided by the government. There is no way a member of the general public can learn about whether or not individual envelopes are successful without issuing a freedom of information request.

<sup>15</sup> <http://www.tcu.gov.on.ca/pepg/programs/osaprates/>, accessed 16 August, 2011

Neither of these mechanisms succeeds in enabling stakeholders to make their own, independent evaluation of programs funded through government envelopes. They must instead rely on government or university press releases. This is neither transparent nor accountable.

**Concern Six: There is great inconsistency between reporting requirements for different funding envelopes, and some reporting requirements are far too weak while others are overly redundant.**

While universities are required to report on the status of all programs funded through envelopes, reporting requirements vary significantly between envelopes. For example, the Women's Campus Safety Grant – a grant of up to \$50,000 to each university for education, advocacy and infrastructure aimed at preventing sexual assault – holds each year's funding until the report for the previous year's is submitted. Little in the way of substantive evaluation of the report back is conducted before funds are released. This is corroborated by evidence suggesting that the fund is sometimes used for purposes other than the prevention of sexual assault. For example, Queen's University used \$17,000 of their funding to expand the availability of mental health first aid courses on campus in 2011-2012.<sup>16</sup> While certainly a laudable initiative, it is difficult to reconcile this decision with the goal of the fund.

There is also anecdotal evidence to suggest that institutions face difficulty with the consistency and level of reporting they are required to do to access even small pools of funds. Such inefficiency can be a drain on institutional resources that could otherwise be directed to student priorities.

**Concern Seven: The current performance-funding formula neither provides enough money to improve performance nor uses the right performance indicators to assess improvement.**

Another funding envelope, called the performance fund, provides money to institutions based on their performance on three indicators: graduation rates, employment rates 6 months after graduation and employment rates 2 years after graduation. The fund was implemented by the Ontario government in 2001, and initially split universities into three tiers, based on their performance. The top tier received two-thirds of the fund, the middle tier received one-third of the fund, and the bottom tier received no funding at all.<sup>17</sup> This system arguably did not fairly distribute funds; often, the difference between being in the top and bottom third was within the statistical margin of error. The formula was quickly changed to more fairly assess university performance. The Ministry set a benchmark for each particular indicator at 10% below the system average. In order to be eligible for funding, the institution must have met the benchmark. The amount of funding for eligible institutions was then calculated using a formula that takes both size of the institution and their success in achieving high rates.<sup>18</sup> This system is currently in place today.

There remain problems with the current performance framework, however. First, Key Performance Indicators (KPIs) do not provide useful information. Measuring aggregate employment rates recently after graduation gives no indication of whether the graduate is working in a firm related to their studies. More importantly, the data does not tell us whether the graduate is satisfied with the relationship between their field of study and their employment after graduation. Moreover, as the latest data indicates, there is very little variation between employment KPIs:

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<sup>16</sup> Queen's University, "AMS, Safety Fund build capacity for mental health training", August 11, 2011 <http://www.queensu.ca/news/articles/ams-safety-fund-build-capacity-mental-health-training>

<sup>17</sup> Ontario Confederation of University Faculty Associations, *The Measured Academic: Quality controls in Ontario Universities* (Toronto: 2006), page 19.

<sup>18</sup> Ontario Ministry of Training, Colleges and Universities Operating Funds Distribution Manual, 2010, page 9.

**Table 5: Variation in KPIs, 2008-2009**

	Highest	Median	Lowest	Average
<b>Graduation Rates</b>	90.0% (Nipissing)	78.6% (Brock) and 76.8% (Guelph)	57.7% (OCAD)	78.3%
<b>Employment – 6 months</b>	100.0% (Hearst)	94.0% (Ryerson) and 93.7% (Windsor)	89.5% (Algoma)	94.1%
<b>Employment – 2 years</b>	100.0% (Algoma, Hearst and UOIT)	96.3% (Nipissing) and 96.2% (Trent)	93.5% (OCAD)	95.7%

Finally, there is simply not enough money in the performance fund to influence institutional behaviour. KPI funding has declined as a percentage of government funding to universities over time to just 0.7% of provincial government funding. And this figure does not include tuition, another massive component of university revenue. KPI funding comprises a miniscule proportion of a university operating budget. Combine this fact with the difficulty of influencing these indicators, and there is little possibility that institutions are changing their behaviour in any significant way due to the performance fund.

**Table 6: Key Performance Indicators as a percentage of provincial funding over time**

Year	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11
<b>KPIs as % of funding</b>	0.94%	0.86%	0.82%	0.77%	0.75%	0.72%	0.70%

**Recommendation Seventeen: The government should require universities to include envelope funding report backs in their annual report.**

Most universities already publish annual reports to promote transparency and accountability. These include audited financial statements in addition to highlighting accomplishments of students, staff and faculty for the year. In their current form, they essentially serve as advertising material for each institution. But they could be changed to become extremely effective tools for communicating progress toward strategic goals to stakeholders.

Each university should explicitly report on the progress of programs funded through government envelopes. They should include goals set for the programs, descriptions of how funding was used to achieve those goals and an evaluation of whether those goals were met. All annual reports should be accessible from institutional websites.

If the government took this step, it would not be the first jurisdiction to do so. The Alberta *Post-secondary Learning Act* grants the Minister of Advanced Education and Technology the power to mandate the inclusion of data in university annual reports.<sup>19</sup> Each school must publish a report detailing its progress toward goals articulated by the government, in exchange for funding.

**Recommendation Eighteen: The government should publish an annual analysis of sector progress toward the goals of all funding envelopes currently in place.**

The government should compile and synthesize all institutional annual reports, publishing a sector-wide analysis of programs funded through envelopes. The Alberta government does just this, publishing a document which tracks the progress of various programs throughout the sector. The indicators are straightforward, their targets clear and their progress honestly reported.

<sup>19</sup> Province of Alberta, *Post-Secondary Learning Act*, Statutes of Alberta, 2003, Chapter P-19.5 (Edmonton: Alberta Queen's Printer, 2011) <http://www.qp.alberta.ca/documents/Acts/p19p5.pdf>

Ontario's Ministry of Training, Colleges and Universities should publish such a document. It would be of great use for all stakeholder groups, who would now have ready access to data concerning funding envelopes. What would result is an informed public debate about post-secondary policy, rather than simple ideological statements. What's more, members of the general public could easily educate themselves about the relative success of funding envelopes, and could better participate in the debate.

**Recommendation Nineteen: The government should eliminate the performance funding envelope and redirect the funding toward quality improvement.**

The performance-funding envelope neither collects useful information nor provides enough funding to noticeably affect institutional behaviour. The fund should be eliminated, and either rolled into the basic operating grant or redirected toward a funding envelope towards quality improvement. While performance funding may seem like an attractive notion at first, it is beleaguered with huge conceptual flaws. In theory, outcome-based funding serves as an incentive for institutions to increase performance along whatever metrics performance is measured. Institutions that measurably improve are granted a certain portion of the performance-funding envelope, while institutions that do not are granted nothing. In practice, institutions are measured according to metrics they have little-to-no control over, making any measure of performance dubious at best. Even if a better set of metrics were to be developed, performance funding would simply reward institutions who perform well and do nothing for areas of the system in need of improvement.

We are not alone in this recommendation. The Council of Ontario Universities and the Ontario Confederation of University Faculty Associations – representing two of the largest stakeholders in the province, faculty and administration – agree with this position.<sup>20</sup> The consensus of sector stakeholders is that the Ontario government should take steps to immediately eliminate this funding envelope.

### University Ombudspersons' Offices

One oft-forgotten piece of accountability in higher education is between student and institution. All members of the university community have a right to be treated fairly by their peers and mentors. Students have a right to be treated fairly by professors and professors have a right to be treated respectfully by students. Unfortunately, a variety of circumstances can lead to unfair treatment in the university context.

The question has been floated in the Ontario legislature recently as to whether the investigative power of the Ontario Ombudsman should be extended to the broader public sector, including universities. Given the reality that the Ontario Ombudsman Act empowers the ombudsman complete freedom to enter and inspect any premises under its purview without meaningful notice, the extent to which university autonomy and academic freedom are affected is a matter of much debate.

Rather than expand the powers of the Ontario ombudsman, the following recommendations support an expansion of institution-specific Ombuds offices to all universities in Ontario.

**Principle Nine: Those whose complaints are not being answered through the standard channels should have access to an independent, objective ombudsperson to help settle their grievance.**

While the public can trust that the vast majority of university interactions are performed in good faith, mistakes and personal biases sometimes enter usually fair and balanced processes. This is the case for all large organizations, and universities are no different. But as universities are unique in that they must be held accountable to their stakeholders, and as such they must subject their practices – such as grading and financial transactions – to independent review.

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<sup>20</sup> *The Measured Academic*, page 21.

The best form this review could take is that of a dedicated ombudsperson’s office, empowered to take complaints, make investigations, and issue public reports to university governing bodies. Ideally, each university should have its own, allowing those with grievances access to a local professional with extensive knowledge of the practices of their institution. The establishment of independent ombudspersons’ offices at each Ontario University would represent a great stride forward in operational accountability.

**Concern Eight: Many universities do not have an ombudsperson’s office, and of those that do few have the necessary jurisdiction and authority.**

Only 12 of 20 universities currently have an independent ombudsperson’s office, and their powers differ greatly. Table 7 details the funding and jurisdiction of each of the 12 ombudspersons’ offices. Most ombudspersons’ offices are joint ventures between student associations and university administrations, funded bilaterally to ensure distance from the administrative machinery of either organization. Every ombudsperson’s office remains independent of university structure in order to provide objective and impartial advice to those with a grievance. Some ombudspersons’ offices report to advisory committees, some to academic vice-presidents or provosts, some to presidents and a handful to governing bodies.

**Table 7: Funding Arrangements of Ombudsperson Offices at Ontario Universities**

<b>Funded By</b>	<b>Institution</b>
<b>Students and Administration</b>	Algoma*
	Brock
	Carleton*
	Lakehead
	McMaster
	Ottawa
	Ryerson
Western	
<b>Administration</b>	Toronto
	Wilfrid Laurier
	York

\*Ombuds Offices do not have the Ability to make non-binding recommendations to institutions. By definition, ombuds offices cannot make binding recommendations.

\*\*All institutions in Ontario not listed do not have ombuds offices.

While it is a testament to student association and university initiative that so many have joined together to create ombudspersons’ offices, they should not be forced to do so. Neither have an abundance of funds with which to finance the operations of ombudspersons’ offices. This means that a sudden shortfall of funds could result in the closure of this essential service – such was the case at the University of Windsor, when the ombuds’ office was folded into the human rights office.

**Recommendation Twenty: The government should provide complete funding for every university to establish its own independent ombudsperson’s office**

The funding for ombudspersons’ offices must come from a reliable, external source. Only the government can provide such a guarantee, through dedicated funding envelopes. The government should provide each university with the necessary funding to create their own ombudspersons’ office. This will allow students, staff and faculty to have recourse to solve any grievances they might have through an objective, independent body with in-depth knowledge of their institution. This funding should stipulate that the office will have authority over academic and financial matters and may make non-binding recommendations to the appropriate institutional authorities.

Moreover, these offices should be required to publish annual reports to the Board of Governors or its equivalent, which may contain recommendations for solving systemic institutional challenges. Boards should be responsible for making these reports available to the community at large.

There are some who suggest that universities should come under purview of the Office of the Ontario Ombudsman in the same way that Ontario colleges already are. They argue that it is equipped with the necessary infrastructure to immediately begin taking complaints and resolving grievances.<sup>21</sup> While they are right to critique the current lack of consistent recourse for those whose complaints to universities are not being answered, their solution is arguably problematic. The Ontario Ombudsman is a governmental office designed to hold the provincial government to account. Ontario universities are not governmental organizations or part of the Ontario Budget, despite their public nature. Moreover, each university is significantly different in terms of operations and grievance system. To subject them all to one office in Toronto would be to risk glossing over their important differences and missing key information in the grievance process. While it may be more costly to fund an ombudspersons' office at each university, such a move would ensure that the needs of all stakeholders are adequately addressed.

### University Quality Assurance Processes

Holding universities to account for the quality of education they provide is no simple task. Academic freedom is incredibly important to a free and open educational environment. As such, holding academics to account for what they teach has the potential to come into conflict with this. Stakeholders and the public rightly hesitate to put government in charge of curricula and course content. In fact, a 2011 opinion poll of Ontarians showed that only 7% would want the Ontario government to develop post-secondary curriculum.<sup>22</sup> However, there is no reason that academic institutions themselves could not be entrusted with accountability for quality, provided the process is transparent and easily accessible to the public.

Recently, the universities themselves have assumed ultimate responsibility for quality assurance for education in Ontario. As of March 1, 2010, quality assurance for both graduate and undergraduate programs in the province of Ontario has been the responsibility of the Ontario Universities Council on Quality Assurance (referred to as the Quality Council), an arms-length group comprised of academic and administrative representatives from the members of the Council of Ontario Universities (COU). This body operates in tandem with the Ontario Council of Academic Vice-Presidents (OCAV), another affiliate of the COU. The Quality Council's mandate is to ensure the quality of degree programs in Ontario as well as the integrity of each institution's individual quality assurance processes.

The Council uses a Quality Assurance Framework in order to set out standards for quality assurance at all Ontario universities.<sup>23</sup> This framework lays out the expectation that each university will set out their own individual Institutional Quality Assurance Process (IQAP) that will be consistent both with its mission statement and the Council's Quality Assurance Framework.

New undergraduate program proposals must be developed by institutions and submitted to the Council's Appraisal Committee. This committee makes a recommendation to the Council, on the basis of which the Council will either reject or approve the proposal. Proposals are judged against a detailed set of requirements laid out in the Council's Quality Assurance Framework, across factors including program objectives, program content, assessment of teaching and learning, and available resources.

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<sup>21</sup> <http://www.ombudsman.on.ca/About-Us/Who-We-Oversee/MUSH-Sector/Case-update---Annual-Report-2010-2011.aspx> (accessed August 11, 2011)

<sup>22</sup> Ontario Confederation of University Faculty Associations and the Canadian Federation of Students, *The 2011 OCUFA/CFS Study on Post-Secondary Education Ontario Results* (Toronto: 2011).

<sup>23</sup> Council on Quality Assurance, *Quality Assurance Framework* (Toronto: 2011) <http://www.cou.on.ca/related-sites/the-ontario-universities-council-on-quality-assura/policies/pdfs/quality-assurance-framework---guide-may-2011.aspx>

The Framework also requires each IQAP to lay out a minimum procedure for the internal review of departments and programs. When audits are conducted, existing procedures are compared to the standard laid out in the IQAP, and the IQAP is judged against the Framework's standard. All IQAPs must include the following stages of internal review:

1. Self-study, wherein the institution performs an internal review of the program under audit;
2. External evaluation, wherein an external review committee composed of at least two professors conducts an evaluation of the program in light of the results of the self-study and the standards set out in the framework;
3. Institutional evaluation, wherein an internal body evaluates the above reports and produces recommendations for improvement;
4. Institutional action, wherein recommendations are enacted and monitored, and;
5. Follow-up report, wherein the institution makes public their findings of the review and the implementation of its recommendations.

These standards are inspected at intervals of no more than once every eight years by an independent audit panel, jointly selected by OCAV and the Quality Council. Members must be faculty members not currently holding an administrative appointment in an Ontario university. Auditors typically review documents outlining institutional compliance with the IQAP, followed by a site-visit and interviews with participants in the various steps of the IQAP. Once the audit is completed, the audit panel produces a report summarizing their findings. This report is forwarded to the institution, to OCAV, the COU, and MTCU for information. A summary of the report's findings are published on the Quality Council's website. Institutions must report steps taken to address the report's recommendations within one year of the publication of the report. The follow-up report is also published on the Quality Council's website, and sent to OCAV, the COU and MTCU for information.

**Principle Ten: Ontario universities must work together to provide students and the public with assurance regarding the quality of the education they provide.**

As a public service, Ontario universities have a duty to provide assurance to the public at large that the education they provide is of the highest quality possible. Professors must be held to the standards of their chosen field, and are best held to those standards by senior colleagues. This task is not properly left to government; there would simply be too much potential for conflict of interest. For example, charged with the review for all political science curricula in the province, what politician would not be tempted to slant the education toward their political bent?

Academics are best suited for the task of assuring the quality of the education they provide. Ensuring that universities are made responsible for evaluating programs against agreed upon criteria and reporting their findings to the public will respect both the principle of academic freedom and the public's right to access information about public services.

**Concern Nine: The Council of Ontario Universities' Quality Assurance Framework should focus on processes, not just outputs.**

The COU framework is thorough and well crafted, but focuses heavily on learning outcomes. Program administrators evaluate IQAPs, which themselves are based on the council's Quality Assurance Framework. The framework appropriately requires departmental curricula to reflect "the current state of the discipline or area of study," but only requires teaching methods to be "appropriate and effective" at achieving learning outcomes.<sup>24</sup>

This is particularly concerning given that, despite a wealth of scholarship to provide evidence that the lecture is the least effective form of communicating information, it is by far the most widely adopted teaching method.<sup>25</sup> Without some sort of mechanism or expectation that innovative teaching methods be expected of undergraduate degree

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<sup>24</sup> Ibid, 23.

<sup>25</sup> Kuh, George D., Jillian Kinzie, Jennifer A. Buckley, Brian K. Bridges, and John C. Hayek. "Piecing Together the Student Success Puzzle: Research, Propositions and Recommendations" ASHE Higher Education Report, 32.5 (2007). 11.

programs, the system seems to unnecessarily divorce learning outcomes from processes. The public does not only require assurances regarding the quality of the information being delivered to students; they should also rest assured that the method by which students are learning is the most effective.

**Concern Ten: The University Undergraduate Degree Level Expectations (UUDLEs) are too vague and subjective.**

Institutional Quality Assurance Processes must all be based on a set of University Undergraduate Degree Level Expectations (UUDLEs) established in the quality framework. There are six UUDLEs<sup>26</sup>:

1. Depth and breadth of knowledge;
2. Knowledge of methodologies;
3. Application of knowledge;
4. Communication skills;
5. Awareness of limits of knowledge, and;
6. Autonomy and professional capacity.

The framework provides two explanations for what is meant by each expectation, one each for a Bachelor's degree with and without honours. The descriptions are vague, however, and differ only slightly between honours status. For example, the communications expectations are explained as follows:

**Table 8: Undergraduate degree level expectation details – communication skills**

UUDLE	<b>Baccalaureate/bachelor's degree</b>	<b>Baccalaureate/bachelor's degree: honours</b>
	This degree is awarded to students who have demonstrated the following:	This degree is awarded to students who have demonstrated the following:
<b>Communication skills:</b>	The ability to communicate accurately and reliably, orally and in writing to a range of audiences.	The ability to communicate information, arguments and analyses accurately and reliably, orally and in writing to a range of audiences.

The difference between the two is merely between communicating – in the general sense, one supposes – and communicating “information, arguments and analyses.” There is little but semantics to distinguish these two requirements; what does one communicate in a university if not information, argument or analysis?

Moreover, the requirements themselves offer no concrete means of measuring how it is that students are communicating “accurately and reliably” nor how they are able to make their knowledge available to a “range of audiences.” The audit committee is left to their own opinion of what constitutes achievement of these indicators. As such, unless the panel were to test student writing or presentation skills in an empirical way, the measurement of this objective would simply be the opinion of the auditors.

This is not to say that the system of quality assurance is in some sort of crisis; merely that the standards by which universities are holding each other accountable for quality are neither explicit enough nor independent enough of the opinion of the auditors.

**Recommendation Twenty-One: Program evaluations should place more emphasis on procedure and enhancement of teaching quality, adhering to guidelines for best practices laid out by evaluators.**

<sup>26</sup> Council on Quality Assurance, *Quality Assurance Framework* (Toronto: 2011).

Educational quality is not achieved through content alone. Students know from experience that what is taught and learned is heavily influenced by the method of teaching. The COU's Quality Council should ask its audit panels to substantively review departmental teaching methods across the province. Over the course of this review, natural leaders in teaching are likely to emerge whose best practices should be studied and shared with underperforming professors.

From these best practices, the Council could develop methods of assessing teaching, and empower audit panels to make critical judgements of teaching methods in the future. This critical judgement would not have to have negative ends; faculty mentorship programs and other forms of professional development could be offered to underperforming faculty.

Additionally, a wealth of research on effective teaching methods and strategies exists for review panels to review when making any sort of determinations on what constitutes effective teaching practice. All too often, the debate over what quality is, means or does overshadows the fact that a variety of teaching methods (inquiry, community service learning, etc.) have been developed over time that diversify and enhance student learning.

Given that the quality assurance process brings academics from different institutions together to evaluate quality, there is no reason why the process cannot also be an opportunity for best practices to be shared. For instance, if teaching were to be assessed as being poor at an institution, effective teachers could be brought in to share teaching strategies with the underperforming department.

**Recommendation Twenty-Two: Universities should work together to develop more objective metrics against which to measure the quality of their programs.**

The principle of academic freedom, allowing professors and departments to determine their own course content, is an important driver of quality in Ontario universities. Professors must be free to teach subjects according to their own expertise, and to speak truths which do not support dominant ideologies and structures of power. The UUDLEs are built to respect this principle by creating a loose set of outcomes into which most courses could easily fit, without having to significantly change their content. Professors can teach whatever curricula they like and still produce students who are able to “communicate accurately and reliably” to “a range of audiences.”

But the principle of academic freedom can still be respected while implementing more explicit expectations for undergraduate learning. Universities should empower Ontario Council on Quality Assurance to develop a more demanding set of expectations than currently provided in the UUDLEs. The Quality Council should provide program-specific expectations to which any undergraduate could refer and gain an understanding of what they will learn in their program of study. These should not prescribe course content, but should make clear that all courses should provide undergraduates with access to contemporary scholarship, regardless of subject matter.

## Conclusion

Ontario has made significant progress in recent years toward a robust system of university accountability. There is still much to be done, however. Accountability mechanisms cannot be conceived and carried out solely by civil servants and senior university administration; students and other stakeholders must be actively engaged in the process. In order to be effective, accountability mechanisms must go past data collection and become truly strategic documents, marrying sector-wide and institutional goals. The government must make significant, targeted investments in the form of funding envelopes in order to advance stakeholder goals, and must ensure that reporting mechanisms for funding envelopes are transparent and accessible to the public at large.

University accountability is an issue fraught with controversy. The twin principles of institutional autonomy and academic freedom have long been used to justify administrative free reign in the university sector. They are both meant to protect universities from becoming propaganda organs of the state. But they do not accomplish this goal at the cost of being unaccountable; on the contrary, this goal is achieved precisely by ensuring that universities are held accountable to the right sorts of people for the right sorts of priorities. This paper has sought to argue this point and thus lead us to a system of accountability which guarantees a high quality system of university education in Ontario.

## Accountability Policy Statement

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**WHEREAS** Those who are integral to the functioning of a university should be responsible for assisting in holding it accountable.

**WHEREAS** University operations and governance must be transparent and accountable to all stakeholders.

**WHEREAS** The conversation on university accountability must take place with the awareness that institutions provide both academic skills and employment potential.

**WHEREAS** Universities should be held accountable for the extent to which they are accessible to their students.

**WHEREAS** Universities should be held accountable for the extent to which they provide high quality instruction and support services to their students.

**WHEREAS** The setting of strategic long-term goals must be reflective of the needs of both the university stakeholders and government.

**WHEREAS** Funding envelopes are important tools for ensuring the accountability of government investment in post-secondary.

**WHEREAS** The government must closely monitor funding envelopes in order to ensure the envelopes are being dispersed in accordance with their mandate.

**WHEREAS** Those whose complaints are not being answered through the standard channels should have access to an independent, objective ombudsperson to help settle their grievance.

**WHEREAS** Students are not adequately represented on university boards of governors and senates.

**WHEREAS** Multi-Year Accountability Agreements have not always been successfully used to hold universities to account for their lack of performance toward goals.

**WHEREAS** Stakeholder participation and consultation is not reflected comprehensively in the Multi-Year Accountability Agreement process.

**WHEREAS** Current Multi-Year Accountability Agreements have not been leveraged for their potential as strategic planning tools.

**WHEREAS** Report backs for individual funding envelopes are not made available to the general public, and the government does not publish a system-wide analysis on the progress of funding envelopes.

**WHEREAS** There is great inconsistency between reporting requirements for different funding envelopes, and some reporting requirements are far too weak while others are overly redundant.

**WHEREAS** The current performance-funding formula neither provides enough money to improve performance nor uses the right performance indicators to assess improvement.

**WHEREAS** Many universities do not have an ombudsperson's office, and of those that do few have the necessary jurisdiction and authority.

**WHEREAS** The Council of Ontario Universities' Quality Assurance Framework should focus on processes, not just outputs.

**WHEREAS** The University Undergraduate Degree Level Expectations (UUDLEs) are too vague and subjective.

**BIFRT** The provincial government should utilize its ability to appoint members to boards of governors knowledgeable in government and institutional priorities.

**BIFRT** Students should be represented to a greater degree on boards than is currently the case.

**BIFRT** The Multi-Year Accountability Agreements, as well as subsequent report-backs, should become the centrepiece of a centralized annual reporting strategy for Ontario universities.

**BIFRT** Multi-Year Accountability Agreements should be passed through university governing bodies and require consultation from students.

**BIFRT** The government should utilize its ability to influence university funding mechanisms if measurable progress is not made towards Multi-Year Accountability Agreement targets, as well as when measurable progress towards targets are made.

**BIFRT** Institutions should be able to re-negotiate MYAA targets in circumstances where external factors prevent institutions from achieving them.

**BIFRT** Multi-Year Accountability Agreements should include specific long-term enrolment targets for undergraduate, graduate, underrepresented students and mature students.

**BIFRT** The government should require institutions to accurately report class size, broken down by department. System-wide targets should be set for the percentage of small classroom environments made available to students.

**BIFRT** When government and stakeholders are looking to report quality, they should look to a diverse educational experience and community-based learning in addition to self-reported student satisfaction.

**BIFRT** Multi-Year Accountability Agreements should include long-term, comprehensive faculty hiring plans to meet enrolment demands, as well as report the number and average teaching load of faculty.

**BIFRT** Multi-Year Accountability Agreement report backs should include a complete breakdown of support services offered to students, as well as the degree to which they are supported by compulsory ancillary fees and university operating budgets.

**BIFRT** Multi-Year Accountability Agreements should deliver a clear, measurable plan for how each university will improve the quality of education offered to their students.

**BIFRT** The government should track and publish multi-year statistics on employment satisfaction and average salary after graduation, broken down by field of study.

**BIFRT** The government should empirically review the Collegiate Learning Assessment, and if found to be a promising indicator of student learning outcomes, should be implemented on a wide-scale.

**BIFRT** Multi-Year Accountability Agreement report backs should include a detailed breakdown of all ancillary fees levied against students.

**BIFRT** Report backs' should ensure that all results of the National Survey of Student Engagement are published on institutional websites in survey years.

**BIFRT:** The government should require universities to include envelope funding report backs in their annual report.

**BIFRT** The government should publish an annual analysis of sector progress toward the goals of all funding envelopes currently in place.

**BIFRT** The government should eliminate the performance-funding envelope and redirect the funding toward quality improvement.

**BIFRT** The government should provide the majority of the funds for every university to establish its own independent ombudsperson's office.

**BIFRT** Program evaluations should place more emphasis on procedure and enhancement of teaching quality, adhering to guidelines for best practices laid out by evaluators.

**BIFRT** Universities should work together to develop more objective metrics against which to measure the quality of their programs.