

THE LONG MARCH FROM EVALUATION TO ACCREDITATION: QUEBEC'S NEW "GOVERNMENT MANAGEMENT FRAMEWORK"

Kenneth Cabatoff
Université du Québec à Montréal
Montréal, Québec

Abstract: This article argues that the introduction of performance measurement should be seen as part of a larger trend towards the accreditation of public agencies and private business organizations. Because of its obvious similarities with accreditation, performance measurement in central government ministries can be assessed by examining the effects of accreditation in those areas where it has already been introduced. Accreditation systems are often seen as more realistic alternatives to program evaluation. In Quebec, for example, junior colleges have long been subject to a system of program evaluation administered by the Commission d'évaluation de l'enseignement collégial (CÉEC). The CÉEC has recently announced that it will abandon the field of program evaluation, in order to engage in a new form of "institutional evaluation." This was done at the explicit request of the Federation of Junior Colleges, which has long been opposed to the system of program evaluation administered by the CÉEC. The junior colleges, or CÉGEPs (Collèges d'enseignement général et professionnel), see accreditation as a way of reducing competition among junior colleges. They argue that the CÉEC should help the colleges improve their performance, but should refrain from distinguishing between good performance and bad performance. When a college cannot meet the accreditation requirements, the accreditation process should be suspended. Viewed in this light, systems of accreditation and performance measurement can be seen as tools for *reducing* the accountability of public agencies to government and to public opinion. Whereas program evaluation assumes the possibility of public debate about programs being evaluated, accreditation ensures that the information necessary for public debate will be kept confidential.

Résumé: La mesure de rendement devrait être considérée faisant partie d'une tendance plus générale vers l'introduction des processus d'agrément dans les établissements des secteurs public et privé.

À cause des nombreuses ressemblances entre les processus d'agrément et les mesures de rendement, il est utile de réfléchir sur les conséquences potentielles de l'introduction des mesures de rendement dans le Gouvernement du Québec, à la lumière des expériences vécues dans les différents secteurs où il existe déjà des processus d'agrément, qui sont souvent considérés comme des méthodes alternatives à celles employées par l'évaluation de programme. Dans le domaine de l'enseignement collégial au Québec, par exemple, la Commission d'évaluation de l'enseignement collégial a récemment décidé d'abandonner son mandat d'évaluation de programme, afin de consacrer ses ressources à «l'évaluation institutionnelle», en procédant à l'agrément des établissements. Cette décision a été prise en réponse aux demandes de la Fédération des Cégep, qui s'est toujours opposée au système d'évaluation de programme géré par la CÉEC. Les Cégep considèrent le processus d'agrément comme un instrument pour réduire la concurrence «malsaine» entre établissements collégiaux. La Fédération veut que la CÉEC aide les collèges à améliorer leur rendement, tout en évitant des distinctions malheureuses entre le bon rendement et le rendement déficient. Si un collège n'arrive pas à satisfaire les exigences de l'agrément, le processus d'agrément devrait être suspendu. À la lumière de cette expérience, on peut conclure que les systèmes d'agrément et des mesures de rendement sont souvent des moyens pour réduire l'imputabilité des établissements publics devant le gouvernement et devant l'opinion publique. Alors que l'évaluation de programme suppose la possibilité de débat public autour des programmes sous évaluation, les processus d'agrément éliminent toute possibilité de débat public, en assurant que les informations nécessaires au débat public restent confidentielles.

■ The rapid growth of accreditation has been one of the defining traits of both public and business administration in the 1990s. Spurred on by the total quality management (TQM) movement, as well as by international accreditation processes like ISO 9000, many public-sector decision-makers have come to the conclusion that accreditation is a simple and cost-effective alternative to program evaluation. Many who were proponents of program evaluation during the 1980s have become proponents of accreditation and similar activities such as "performance measurement" that, in contrast to program evaluation, focus on the organizations that provide services rather than on the services themselves.

Following the example of the Canadian government and several provincial governments, the Quebec government has recently introduced

its own version of performance measurement, in the form of a new government management framework (*Un nouveau cadre de gestion pour la fonction publique*, Gouvernement du Québec, 1999). It seems useful to reflect, at this stage, on the comparisons that can be drawn between “performance measurement” and the accreditation frameworks already in use.

The new Quebec Civil Service Act, known as Bill 82 (Gouvernement du Québec, 1999), does not refer to accreditation as such. However, two key components of the accreditation process — self-evaluation and peer review — receive considerable emphasis in the new act. The new management framework, like other processes of accreditation, requires the use of “performance indicators” derived from an internally generated exercise in the definition of objectives. These similarities, together with the focus on evaluating ministries as complete organizations, support the idea that the new management framework is a form of ministerial accreditation.

Each ministry is required to prepare an annual management report — a self-evaluation exercise — that presents the ministry’s view of its own performance, in terms of the performance indicators defined in its strategic plan. This self-evaluation report is then submitted both to Treasury Board and to the National Assembly, which, respectively, fulfill the functions of technical support and peer review. The role of both the Treasury Board and the National Assembly is to help the ministry attain its own objectives, rather than to suggest the ministry should be pursuing objectives different from those it has defined.

The Treasury Board thus plays a role analogous to that of an accreditation agency, and the National Assembly plays the role of “peer reviewer” — without, however, benefitting from the opportunity for an on-site visit.

The new law sets out the following requirements for the new management framework (Gouvernement du Québec, 1999, III.9, author’s translation). Each ministry must draw up a “strategic plan,” which should include:

1. A mission statement
2. A selective analysis of the ministry’s “environment” and the main issues it faces within that environment
3. A statement of the objectives that the ministry or agency has defined

4. An enumeration of the performance indicators to be used in measuring the attainment of results
5. A statement of the results to be attained during the period covered by the plan
6. Any other information that might be asked for by Treasury Board

The new management framework is thus essentially a process of self-evaluation, followed by an examination of the self-evaluation results by “outside experts” in the Treasury Board and the National Assembly. From this point of view, it can be seen as part of a larger trend towards the multiplication of accreditation-like activities.

In like manner, Québec’s College Teaching Evaluation Board — the Commission d’évaluation de l’enseignement collégial (CÉEC) — has recently announced that it will abandon its previous commitment to program evaluation and introduce a new system of “institutional evaluation.” Junior colleges will no longer be called upon to defend the quality or relevance of the individual programs they teach, but only their own “performance” as colleges. The evaluation criteria are to be defined by the colleges themselves:

The College Teaching Evaluation Board intends, within the next few months, to introduce a process of “institutional evaluation” intended to identify the strengths and weaknesses of all the junior colleges ... Since its creation in 1993, the Board has only evaluated a few of the programs offered by the CÉGEPs. According to Jacques L’Écuyer, the President of the CÉEC, the time has come to “take another step.” (Thibodeau, 2000, author’s translation)

This change reflects pressures from the junior colleges themselves, who have frequently denounced the incursions of the CÉEC into the “internal management” of the junior colleges. As a result of this change, junior colleges will benefit from a system similar to the “schools accreditation” framework being introduced in several other Canadian provinces and American states.¹ See, for example, the appendix to this article for a presentation of the accreditation criteria used for schools in British Columbia (Government of British Columbia, 1998).

Some of the reasons for the shift towards accreditation are suggested in a brief prepared in 1998 by the Fédération des cégeps, which rep-

resents all of the province's junior colleges. The federation conducted a survey of its own membership, which was highly critical of the CÉEC (Fédération des cégeps, 1998):

Several colleges have emphasized that they find it very difficult to implement the evaluation plans decided upon by the Board ... They refer to the extensive tasks which need to be carried out within a limited time-frame, and the lack of resources with which to do so. All of the colleges said no when asked whether the Board's expectations were realistic, given the resources at their disposal.

The federation thus proposed that the CÉEC should abandon program evaluation and instead evaluate "the ability of each college to manage its programs and to provide a suitable educational environment."

The same movement towards accreditation is found within the fields of health and social services administration in Quebec. Although hospitals in that province are subject to accreditation by the Canadian Council on Health Services Accreditation, Quebec has created its own accreditation process for health and social service agencies not accredited by the CCHSA. Since 1995 these agencies have been subject to voluntary accreditation by the Conseil québécois d'agrément des établissements de santé et de services sociaux (CQAÉSSS).

The CQAÉSSS was established as a result of pressures from Local Community Service Centres, the most numerous category of social service agencies in Quebec. In addition, the CQAÉSSS has in recent months begun accrediting convalescent and nursing homes, day centres, and youth protection centres.

WHAT IS ACCREDITATION AND HOW DOES IT DIFFER FROM PROGRAM EVALUATION?

The Self-Evaluation Process

Although the mechanisms of accreditation vary substantially between different professional contexts, in Quebec the process of accreditation is composed of two steps or phases: self-evaluation, followed by a peer review organized by the accreditation agency.

The self-evaluation process is in turn composed of three steps: defining the agency's performance indicators, assessing agency performance in terms of the indicators, and deciding on the improvements to be introduced as a result of the accreditation exercise.

In the Quebec system for the accreditation of health and social service agencies, the suggested performance indicators are grouped into six main categories: service quality, client relations, external partnerships, operational activities, organizational "climate," and resource use. Within each of these categories, agencies are asked to generate indicators and to provide evidence of "performance" in terms of the specified indicators.

The evidence to be gathered includes the results of surveys carried out among agency staff, clients, and "partners" in order to measure their degree of "satisfaction" with the agency's performance. To preserve objectivity, this research is organized by the accrediting agency rather than by the agency undergoing accreditation. In Quebec, the agency undergoing accreditation pays the CQAÉSSS a substantial fee that is used to defray the costs of the survey research. No attempt is made, however, to validate the questionnaires used to measure satisfaction, or their reliability as research methods.

As such studies frequently yield user-satisfaction scores in excess of 80%, some argue that they are not a valid reflection of what staff, users, and partners really think about the organization being accredited (Cleary & McNeil, 1988; Clemenhagen, 1994; Scrivens, 1995; Williams, 1994). Nevertheless, the agencies being accredited are pleased to receive such "scientific" evidence of the high quality of the services they offer.

The Peer Review Process

Once the self-evaluation study has been completed, responsibility for evaluation passes to the accrediting agency itself or, more specifically, to a "visiting team" composed of persons with professional and administrative expertise in the field corresponding to the services provided by the agency. This part of the accreditation process can be referred to as peer review, as the persons carrying out the review are frequently staff members from agencies similar to the one being accredited. They have no evaluation training as such, except that they typically follow a short course organized by the accreditation agency.

The visiting team begins by examining the self-evaluation document prepared by the agency being evaluated. This, at least in theory, enables them to identify the agency's strengths and weaknesses, which in turn makes it possible to draw up an agenda of issues to be clarified during the on-site visit.

The on-site visit involves interviews with staff members, especially those who prepared the self-evaluation report. There will also be interviews with some clients and partners of the agency, but time constraints make it impossible to speak with more than a small sample of these. Those who are interviewed are thus not representative of the groups for whom they are acting as spokespersons.

Once the on-site visit has been completed, members of the visiting team devote their efforts to preparation of the final accreditation report, which assesses the agency in terms of its ability to attain its own objectives. The report may present a list of changes to be introduced once accreditation is completed. Accreditation, in the vast majority of cases, is a foregone conclusion.

WHY DO GOVERNMENT AGENCIES PREFER ACCREDITATION TO EVALUATION?

The situation in Quebec is thus similar to that found in the rest of North America: there is a large-scale movement towards institutional accreditation, which is rapidly displacing other kinds of accountability methods like program evaluation. What factors might explain this tendency?

The 1998 brief of the Fédération des cégeps provides useful clues to the reasons why public agencies prefer accreditation over program evaluation. The main objection to program evaluation, according to the brief, is that it is too time consuming. The colleges do not have the resources to carry out comprehensive evaluation of all their programs:

In all, the colleges offer more than 130 different programs leading to a CÉGEP diploma, and each college offers a wide range of these programs. The operations already carried out by the Board should not be repeated for each of the programs, since the results of these evaluations were made use of outside the strict limits of the programs

being evaluated. (Fédération des cégeps, 1998, author's translation)

A process of accreditation or "institutional evaluation" is the obvious alternative to program evaluation, the federation argues. Institutional evaluation can focus on evaluation criteria defined by the colleges themselves, rather than relying on criteria defined by professional evaluators in outside agencies.

However, the federation is opposed to the system of *voluntary* accreditation that the CÉEC would like to introduce, arguing that "the CÉEC has proposed that institutional evaluation should be introduced on a voluntary basis ... however, we feel that *this process must be compulsory.*"

The reasons for this insistence become clear from the description of the proposed accreditation process:

We believe that institutional evaluation should be a *dynamic process* which allows each college to improve the quality of its teaching, and not as a means for classifying or making distinctions among the different colleges ... In order to overcome some of the existing differences it would be important to provide training and support so as to better equip the colleges to undergo the evaluation process.

Accreditation, according to the federation, should not distinguish between good performance and bad performance. It is obvious, in their view, that CÉGEPs that cater to children of well-educated and well-to-do parents will do better on provincial examinations than those that cater to children of disadvantaged families. This fosters harmful competition among the CÉGEPs, allowing those with good performance records to attract the best students, leaving other CÉGEPs with the weaker students. This inequality is thus accentuated, and CÉGEPs that perform badly are unable to improve their performance.

Voluntary accreditation should thus be avoided, because it would allow the CÉGEPs with the best performance records to obtain accreditation, and to use their accreditation as a further means for attracting the best students. Poorer-performing CÉGEPs would hesitate to seek accreditation, and their lack of accreditation would itself be a mark

of their inferior performance. All CÉGEPs should thus undergo the accreditation process, and all of them should succeed in obtaining accreditation. The CÉEC should help CÉGEPs that perform less well to meet the requirements of the accreditation process:

It would be important for the CÉEC not to make unilateral judgments ... Its decisions should not take the form of a verdict without appeal. ... when a college has difficulty complying with the established norms the accreditation process should not be completed. ... A verdict of "process incomplete" would provide the college with the opportunity to continue its initiative.

THE POLITICAL CONTEXT OF THE DEBATE OVER ACCREDITATION

There are thus other reasons for the federation's commitment to accreditation, quite apart from its concerns about insufficient resources. The federation hopes that accreditation will be more successful than evaluation in reducing competition among the CÉGEPs and in improving their public image:

This position stemmed from the ... doubts which exist in public opinion concerning the value and the efficiency of the CÉGEP system, which persist in spite of the numerous successes attained by the college network over the years. These doubts continue in spite of the high levels of satisfaction expressed by employers and by former students.

The CÉGEPs thus see accreditation as a means for defending their somewhat fragile status as an innovative institution within Quebec society. From the time of their creation in the 1970s they have been criticized as an "unnecessary step" in the education of Quebec youth. Whereas talented high-school graduates elsewhere in North America proceed directly to university, in Quebec they must spend two years in a CÉGEP before doing so. It is argued that this is a waste of time and talent, which may discourage some students from going on to university.

Within this institutional context, it can be argued that the CÉGEPs' search for accreditation is an attempt to defend the much-criticized status quo: to ensure, in other words, the survival of an embattled

institution whose existence is sometimes questioned. It remains to be seen, of course, whether accreditation will be more successful than program evaluation in providing CÉGEPs with the legitimacy to which they aspire.

The search for legitimacy, and the need to defend the status quo, might also explain the movement towards accreditation in some other areas. It is noteworthy that the impetus towards accreditation of health and social service agencies in Quebec came initially from the Local Community Service Centres (CLSCs). Like the CÉGEPs, the CLSCs have frequently been criticized as “unnecessary institutions” that provide services that could easily be supplied by other agencies, and whose professional competence is inferior to that of other health and social service agencies.

Even the Quebec government’s new government management framework, and similar systems of evaluation based on “performance indicators,” can be used as instruments for improving the image of the ministries involved. There is hardly a ministry or public agency that has not within recent memory been subject to criticism. The presence of an approved system of performance measurement can be seen, at least to some extent, as a way of demonstrating that government ministries and agencies really do provide quality services, in spite of frequent public criticism.

CONCLUSION: IMPLICATIONS FOR PROGRAM EVALUATION

The trend away from program evaluation thus seems to be well established in Quebec, as in the rest of North America. The trend reflects a widely shared belief that program evaluation is too complex and time consuming, but also a political need to defend the legitimacy of public organizations. Many management specialists, and an increasing number of program evaluators, see accreditation as a “user-friendly” alternative to program evaluation, one that can win the support of those being evaluated.

The fact that program evaluation is typically carried on by people from outside the organization being evaluated also leads agency officials to fear that the problems identified during evaluation might lead to public criticism. Accreditation is safer than program evaluation, to the extent that its confidentiality ensures the discretion of all participants. The fact that it is carried out by peers or by staff members of the organization being accredited reduces the anxiety

of agency officials concerning the political potential of the evaluation exercise.

In addition to the above-mentioned factors, there is a little-recognized advantage that many program evaluators may be unaware of. This is the fact that accreditation, unlike program evaluation, tends to reinforce the power of agency managers in their attempts to exercise control over salaried professionals.

As organizational theorists have often pointed out, most organizations are composed of competing interest groups. These groups can usually find sufficient common ground to work together, but there are always important issues on which they disagree. Karl Weick (1976) has used the term "loosely-coupled system" to describe organizations that are partially integrated but whose component groups enjoy some measure of local autonomy.

Organizations that contain large numbers of highly trained professionals are more likely than others to be loosely-coupled. In practice, this means that agency managers can be confronted with challenges to their authority on the part of the professional groups that staff the agency's programs. Program evaluation's focus on programs may help to foster challenges to managerial authority, whereas accreditation, by focusing on the organization as a whole, reinforces the position of central managers.

However, the trend towards accreditation is not without its risks and dangers. Some of these were illustrated by a scandal that took place in 1999 at the Rivière-des-prairies mental hospital, which had just received its accreditation from the CCHSA. Quebec's public trustee revealed that this hospital had practised gross abuse and neglect of its patients over an extended period of time. In explaining how accreditation could have been given to such a hospital, a spokesman for the CCHSA remarked that "we are an organization with a formative approach based on the principle of self-evaluation. We try to help the hospitals improve their performance. Our role is not that of an inspector who can remove an agency's permit" (Actualités, 1999).

Viewed in this light, as Scrivens (1995) has pointed out, systems of accreditation can be seen as tools for reducing the accountability of public organizations. By focusing on information provided by the agencies being accredited, and by ensuring that all information is

kept confidential, accreditation reduces the probability that major problems will be discovered and corrected. Accreditation allows some organizations to claim a degree of legitimacy that is not justified by the realities of their performance. Scandals like that of the Rivière-des-prairies mental hospital foster increased criticism of public agencies and contribute to a loss of faith in public organizations. And by requiring agencies to focus on the issues defined through the accreditation process, accreditation may distract agency managers from other, more pressing problems.

The future may well demonstrate, in other words, that accreditation is not the easy and cost-effective alternative to program evaluation that its proponents consider it to be.

NOTE

- 1 The expression "institutional evaluation" seems to have arisen in Quebec as a result of the pioneering work done by the Office of Research on Educational Policy at McGill University (Smith & Bordonaro, n.d.). Quebec's prestigious Conseil supérieur de l'éducation has become an advocate of institutional evaluation, as shown in its 1998–99 annual report. The approach has even spread to the federal government's International Development Research Centre, which regularly employs a group of McGill-based researchers to evaluate organizations that receive IDRC support (Lusthaus, Anderson, Adrien, & Murphy, 1996).

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Appendix 1

The B.C. Schools Accreditation Process

Accreditation Topics

1. Students' ability to access, evaluate and use information.
2. Students' ability to express themselves effectively through writing, speech and a variety of other forms of representing.
3. Students' ability to analyse critically, reason and think independently, solve problems and make decisions.
4. Students' ability to think creatively and express themselves creatively.
5. Students' co-operative and team skills.
6. Students' ability to set goals and work towards attainment of their educational, training and career objectives.
7. Students' knowledge, skills and attitudes necessary for employment and future education.
8. Students' awareness of the value of lifelong learning.
9. Students' sense of self-confidence and personal initiative.
10. Students' sense of social responsibility.
11. Students' tolerance and respect for the ideas and beliefs of others.
12. Students' knowledge, skills and attitudes related to the Language Arts ... Curriculum.
13. Students' knowledge, skills and attitudes related to the Social Studies curriculum.
14. Students' knowledge, skills and attitudes related to the Science curriculum.
15. Students' knowledge, skills and attitudes related to the Mathematics curriculum.
16. Students' knowledge, skills and attitudes related to the Physical Education curriculum.
17. Students' knowledge, skills and attitudes related to the Fine Arts (drama, art, music and dance) curriculum.
18. Students' knowledge, skills and attitudes related to the Applied Skills (technology education, business education and home economics) curriculum.
19. Students' knowledge, skills and attitudes related to the Personal Planning/Career and Personal Planning curriculum.
20. Students' knowledge, skills and attitudes related to Information and Computer Technology.
21. School's provision for students' active participation in learning.
22. School's provision for students' learning occurring in a variety of ways.
23. School's provision for students' learning occurring at different rates.
24. School's provision for students' learning occurring both individually and co-operatively in groups.
25. School's provision of effective student evaluation and reporting strategies.
26. School's provision of a safe and accessible learning environment for all students.
27. School's provision of programs and services to meet the needs of all students.
28. School's provision of programs and activities that are relevant to all students.
29. School's provision for regular monitoring of student, parent and community satisfaction.
30. School's provision for parents and community representatives being regularly informed of the progress of school improvement and being involved as partners in planning.
31. School's fair allocation of human and material resources.
32. Staff working both independently and collegially to examine and improve their practice.
33. Students', parents' and staff leadership.

Evidence

School and student performance is assessed through examination of each of the accreditation topics with respect to "Opportunities Provided" and "Performance Indicators." All accreditation topics must be considered by the school.

The category "Opportunities Provided" includes key programs, strategies and activities.

The category "Performance Indicators" includes those key indicators by which the school judges its effectiveness.

For each category, schools should deal with a reasonable amount of evidence, using information readily available to them.

Guidelines for Determining Evidence

Wherever possible, the evidence chosen to reflect each accreditation topic must:

- be broad-based and representative of the school;
- be drawn from information which is readily accessible;
- show trends;
- show distributions;
- represent opportunities and results for all students; and
- be a clear measure of performance related to the accreditation topic.

Districts are responsible for ensuring the school gathers valid and accurate evidence for each topic, and that these data are displayed appropriately in the "Record of Evidence" forms.

Record of Evidence Form

The "Record of Evidence" form has been developed to assist schools in the gathering, recording and analysing of the available data which will be used to inform decisions about school improvement. The "Record of Evidence" form is presented together with a detailed description of its components.

Accreditation Topic (1) There are 33 accreditation topics which form the basis for the provincial accreditation process. Schools and boards may incorporate additional topics at their discretion.

School Context (2) In this section the school will identify the contextual variables which may affect the delivery of educational services and programs for the school. Examples may include size of school, cultural diversity or availability of courses. It is intended that this section be completed only as necessary for each topic.

Opportunities Provided (3) "Opportunities Provided" describe what the school is doing to provide a quality education for all students with respect to the accreditation topics. Examples of evidence include the range of programs offered and strategies or activities which indicate how the school is working to support student learning in a particular area.

Performance Indicators (4) "Performance Indicators" are information which demonstrates the level of school and student performance. Examples of this type of evidence include student achievement results (PLAP, Provincial Exams, etc.), participation rates and survey results.

Performance Indicators need not be limited to traditional academic measures such as test scores or exam results, but could include a wider range of authentic student performance developed by the school or district.

Satisfaction (5) The "Satisfaction" section must be based on consideration of evidence for each of "Opportunities Provided" and "Performance Indicators." "Satisfaction" reflects the opinion of all staff and a select group of informed PAC members and students. These results reflect satisfaction with school and student performance after considering the evidence that has been presented for that topic.

Analysis (6) This section is used to interpret evidence and satisfaction responses. The analysis may raise issues and provide a basis for subsequent actions for school improvement which the staff wish to address.

Source: <www.bced.gov.bc.ca>