



DOCTOR OF BUSINESS (DBA)

Challenges and barriers in adopting international accreditation standards with a focus on ACBSP: a case study of six universities in Mongolia.

Kovacs, Katalin

Award date:
2021

Awarding institution:
University of Bath

[Link to publication](#)

Alternative formats

If you require this document in an alternative format, please contact:
openaccess@bath.ac.uk

Copyright of this thesis rests with the author. Access is subject to the above licence, if given. If no licence is specified above, original content in this thesis is licensed under the terms of the Creative Commons Attribution-NonCommercial-NoDerivs 4.0 International (CC BY-NC-ND 4.0) Licence (<https://creativecommons.org/licenses/by-nc-nd/4.0/>). Any third-party copyright material present remains the property of its respective owner(s) and is licensed under its existing terms.

Take down policy

If you consider content within Bath's Research Portal to be in breach of UK law, please contact: openaccess@bath.ac.uk with the details. Your claim will be investigated and, where appropriate, the item will be removed from public view as soon as possible.



DOCTOR OF BUSINESS (DBA)

Challenges and barriers in adopting international accreditation standards with a focus on ACBSP: a case study of six universities in Mongolia.

Kovacs, Katalin

Award date:
2021

Awarding institution:
University of Bath

[Link to publication](#)

Alternative formats

If you require this document in an alternative format, please contact:
openaccess@bath.ac.uk

General rights

Copyright and moral rights for the publications made accessible in the public portal are retained by the authors and/or other copyright owners and it is a condition of accessing publications that users recognise and abide by the legal requirements associated with these rights.

- Users may download and print one copy of any publication from the public portal for the purpose of private study or research.
- You may not further distribute the material or use it for any profit-making activity or commercial gain
- You may freely distribute the URL identifying the publication in the public portal ?

Take down policy

If you believe that this document breaches copyright please contact us providing details, and we will remove access to the work immediately and investigate your claim.

Challenges and barriers in adopting
international accreditation standards with a
focus on ACBSP: a case study of six
universities in Mongolia.

Katalin Kovacs

A thesis submitted for the degree of Doctor of
Business Administration
(Higher Education Management)

University of Bath
School of Management
March 2021

COPYRIGHT

Attention is drawn to the fact that copyright of this thesis/portfolio rests with the author and copyright of any previously published materials included may rest with third parties. A copy of this thesis/portfolio has been supplied on condition that anyone who consults it understands that they must not copy it or use material from it except as licenced, permitted by law or with the consent of the author or other copyright owners, as applicable.

Declaration of any previous submission of the work

The material presented here for examination for the award of a higher degree by research has not been incorporated into a submission for another degree.

Candidate's signature



Declaration of authorship

I am the author of this thesis, and the work described therein was carried out by myself personally.

Candidate's signature...



Table of Contents

Acknowledgements	6
Abstract	7
1. Overview/Background of the study	8
1.1 Introduction to Quality Assurance, accreditation and student learning assessment	8
1.2 Mongolia as a setting for the study.....	11
1.3 Objective and rationale of the study.....	13
1.4 Thesis summary.....	15
2. Research Context	17
2.1 Introduction to Mongolia.....	17
2.1.1 Higher Education in Mongolia.....	17
2.1.2 Quality Assurance and Accreditation in Mongolia	24
2.2 History of Accreditation	26
2.2.1 Quality Assurance and Accreditation Overall.....	26
2.2.2 US based Accreditation	27
2.2.3 European and British accreditation.....	35
2.2.4. The Australian Accreditation System	37
2.2.5 Mongolian Accreditation.....	38
2.2.6 The process of accreditation, a comparative analysis	45
3 Literature Review	47
3.1 Critical review.....	47
3.2 ACBSP and a detailed look at its standards.....	68
3.3 Assessment of Student Learning.....	72
3.3.1 Learning Assessment Reviews.....	74
3.3.2 Accreditation Student Learning Assessment Tools	77
3.3.3 Common ground towards student learning assessment, its methods and tools	78
3.4 Summary of Literature Review.....	87
3.5 Theoretical Framework	89
4 Research Methods/Methodology	94
4.1 Introduction/Research problem and research questions.....	94
4.1.1 The research problem	94
4.1.2 Research questions:	94
4.2 Research Strategy.....	95

4.3 Research Design	98
4.4 Data Collections Methods	99
4.4.1 Semi-Structured Interviews.....	99
4.4.2 Institutional Information.....	100
4.4.3 Peregrine test.....	106
4.4.4 Research carried out in a different language.....	110
4.6 Data Analysis	112
4.7 Role of the Researcher	116
4.8 Validity and Reliability.....	118
4.9 Ethical Considerations.....	119
5. Data presentation and analysis of results and findings	121
5.1. Overview	121
5.2 Findings mapped against Standard 4 per institution.	122
5.3. Overall findings mapped against Standard 4	153
5.4. Literature review mapped against the overall findings	160
6. Conclusions and Recommendations	171
6.1 Conclusions.....	171
6.2 Recommendation and Proposal for further action.....	174
6.3 Relevance and Contribution to the Literature	186
6.4 Limitations and areas for further Research.....	186
6.5 Conclusions.....	189
7. REFERENCE LIST.....	190
8. Appendices.....	203

List of Appendices:

Appendix 1 Glossary of Abbreviations	203
Appendix 2 Letter of introduction.....	207
Appendix 3 Interview Questions	209

List of Figures:

Figure 1 The Baldrige Model adapted from NIST (2020).	91
Figure 2 Force Field Diagram Standard 4 Overall All Institutions	156

List of Tables:

Table 1 Overview of Major Accreditors	42
Table 2 Overview of ACBSP’s Unified Standards Requirements Adapted from ACBSP (2020).....	71
Table 3 Learning Assessment Tools sample comparative analysis.	80
Table 4 ACBSP Standard 4 Reporting Requirements Adapted from ACBSP (2020).	82
Table 5 Comparison of Student Learning Requirements Among Accreditors	83
Table 6 Institutional Overview	102
Table 7 Overview of Positions.....	106
Table 8 ACBSP Standard 4- Unified Standards. Adapted from ACBSP (2020).....	113

Acknowledgements

Firstly, I would like to thank my two supervisors, Professor Ian Jamieson and Professor Jack Lee. Your guidance has been invaluable. Ian, I have received so much support from you, I truly could not have asked for a better supervisor.

I would like to thank colleagues at the DBA (HEM) programme office, especially Jacqueline and Lesa for answering my never-ending questions.

I cherish my DBA 12 classmates, we had a wonderful time, I have learned so much from you and have made friendships for life.

I would like to thank the colleagues and friends at Maastricht School of Management for their support throughout the process.

I would like to thank everyone who participated in the interviews and everyone who has helped me to get to Mongolia and helped me while I was there. I could not have done it without you.

A special mention to my husband, Constantin, without whom I could have never completed this doctorate. He is my strength, he made it possible for me to embark on this journey, he constantly encouraged and pushed me when it was need. Thank you for putting up with me throughout this process, for being constantly proud of me, for loving me and for not allowing me to give up.

I would also like to thank my parents: Mama és Papa, my Sister: Tesókám, Hugikám, my niece Katinka and my nephew Krisztofer for believing in me. Thank you Gombika, Süti, Fütyi, Mazsi and Mr. Cat for letting me pet you and squeeze you when I needed it.

Finally, I would like to thank my friends around the world: in Hungary, in the Netherlands, in the US, and in Mongolia for their endless support. You know who you are.

Abstract

Accreditation bodies in higher education have played a central role in quality assurance for decades. While the system is well developed in some countries, in others, it is only penetrating the market. This research looks at Mongolian higher education institutions and discusses the challenges and barriers around adopting international accreditation standards.

The study adopted a qualitative study using in-depth case analysis of six universities in Mongolia and used multiple sources of evidence, including data collection and interviews.

The theoretical framework used in the research reports centres around the accreditation framework used by the Accreditation Council for Business Schools and Programs (ACBSP), specifically Standard 4 of student learning assessment. The emerging themes were grouped against Kurt Lewin's Force Field analysis, allowing for drivers and barriers to emerge.

1. Overview/Background of the study

1.1 Introduction to Quality Assurance, accreditation and student learning assessment

Accreditation within the framework of quality assurance has been at the forefront of discussion in higher education for decades. With the pressure of transparency both from external stakeholders and within the institutions, there is ever-growing need to revisit just what accreditation promises to achieve and whether these promises are fulfilled. What better way to investigate this than from the perspective of six universities which have gone through the accreditation process? In essence, higher education institutions exist to serve their student populations and through them, to serve the social and economic welfare of their countries (GFME, 2008).

The number of students accessing higher education has increased substantially in previous decades. Less advantaged countries are on the road to change, adapt and even revolutionize their higher education systems in order to provide better quality education for their students and sometimes to attract overseas students. With the increased entry of more institutions and students into higher education came the concerns for quality, as no matter how good the intentions of higher education institutions (HEIs) are, they are struggling to keep up with the increased demands of all the stakeholders. Achieving high level academic standards, whilst also satisfying varying cultural needs in terms of course delivery and student learning, puts serious pressures on institutions and faculty members alike (Wildavsky, 2010).

Wildavsky (2010) highlights the trends and changes arising from “massification” of higher education, including, but not limited to, these: strengthening cross-border activities; expanding university alliances; promoting the flourishing of branch campuses; supporting faculty on the move; improving standards of ‘customer service’; responding to student demands and providing efficient administrative support. The international accreditation bodies, who have now also expanded their cross-border activities and are entering countries where they have not been present before, are responding to these trends. They too

may have the objective of improving the quality of education worldwide, but this is mixed with the objective of serious hopes of business expansion. The 2011 report of AACSB International (AACSB) highlights the complexity of countries struggling to provide adequate financial support for higher education to enable institutions to operate effectively and efficiently, while also ensuring quality learning experience for the students. The harsh reality is that some countries have non-existent or underdeveloped quality assurance systems and possibly no experience of accreditation regimes (national or international) at all (AACSB, 2011). Accreditation undoubtedly has played, and will continue to play, an important role in building the threshold standard or standardization of the system, and as an example, we will see it presently within the context of this research report on Mongolia. Continued efforts of harmonization have been prevalent across Europe: an example is the establishment of the Bologna Accord (Huijsman and Westerheijden, 2010) which is not an accreditation body but certainly carries the objective of addressing inequalities in delivery across countries. Recent technological advances in education have also revolutionized the field, making education more accessible to students but further complicating the safeguarding of quality education. Use of online and distance learning technologies has increased exponentially: higher education institutions were dragged into a new harsh reality with the spread of coronavirus in the spring of 2020, when in a matter of months, campuses and “in-person” teaching had to stop abruptly and move fully online for the foreseeable future (as at time of writing in June 2020).

As the number of institutions offering higher education degrees continues to multiply, so does the number of accreditors. The estimated number of institutions offering business education varies: estimated numbers can range from 16,000 to 18,000 at this stage. Those institutions without the correct checks and balances in place can be a great threat to quality education. The so-called ‘degree-mills’ are often involved with similar ‘fake’ accrediting bodies, misleading students and other stakeholders alike. For this specific reason, there are certain establishments who are seen as the ‘accreditors of the accreditors’ who check whether the accrediting bodies also meet the minimum requirements. For example, the Council for Higher Education Accreditation (CHEA) is a body responsible for both regional and specialized accreditation bodies. Regional accreditors must have CHEA’s or the USDA’s approval in order for their accredited institutions to qualify for funding. This means that students applying to, and studying at, the institutions carrying regional accreditation will have a chance to apply for Free Application for Federal Student Aid

(FAFSA). In Europe, the European Quality Assurance Register (EQAR) has similar responsibility (whether national or international). The main requirement for the accreditors and the institutions they oversee is that they meet the European Standards and Guidelines (ESG).

Accreditation bodies would now appear to be heading in a different direction than may have been intended originally. Outgoing president of CHEA, Judith Eaton (2018), talked about just this in the foreword of the book *Accreditation on the Edge*. As suggested by the title, it could be that accreditation nowadays is under major attack, moving away from ensuring the threshold quality and ensuring continuous improvement, towards compliance and providing transparency. Stakeholders, governmental bodies, and the media would appear to be putting pressure on institutions and accreditors to be accountable for their assumed roles and to what they promise they would deliver. For the purpose of this research report, the researcher has chosen to focus on a specialized programme accreditor which has followed the strict guidelines of CHEA.

Quality Assurance, accreditation and reporting is a complex matter, which entails reviewing many aspects of higher education institutions, from the level of institutional strategy to faculty and staff qualifications, curriculum, stakeholder-focus and institutional effectiveness. To achieve a clear focus in a large field of study and even within the Accreditation Council for Business Schools and Programs (ACBSP) framework, the researcher chose one major aspect of the framework: student learning and assessment. Student learning and student learning assessment play a huge role in both transparency and improvement within higher education. Arguably, the single most important objective of higher education must be to ensure that students achieve the objectives set out by their institution. In order to achieve this, learning assessment frameworks have to be in place with corresponding assessment systems to measure the development of students' knowledge, skills and competences throughout the lifecycle of their studies (Randles and Cotgrave, 2017).

In looking at the implementation of student learning assessment, not all countries have moved at the same pace with assessment of student outcomes. The US for example took initial steps decades ago when the US Department of Education (USDoE) mandated the National Advisory Committee on Institutional Quality and Integrity (NACIQI) to rewrite the accreditation standards (Krzykowski and Kinser, 2014). The regional accrediting

bodies then started requiring their accredited institutions, in one way or another, to report on their achieved outcomes, which is then considered a targeted transparency policy. The UK is still somewhat at the early stages of development (Randles and Cotgrave, 2017), so the Quality Assurance Agency for Higher Education (QAA), the Higher Education Funding Council for England (HEFCE) and others are considering other nations' progress on this matter before bringing it to policy level. HEFCE did follow the steps on a European-based study, the 2015 RAND Europe (RAND, 2015) study and launched its own - called the Higher Education Learning Gain Analysis (HELGA) (OfS, 2019). However, the study could not be carried out finally as participation rates from institutions were too low. At European Higher Education Area (EHEA) level there have been a number of studies trying to address student learning. Many projects have started, but most have stopped before implementation. Outcomes-based education centres have been set up around the notion of helping students achieve the outcomes set by higher education institutions (Killen and Hattingh, 2004). Perhaps universities are hesitant to share so much information about whether their students achieve the objectives set out by the institutions. This is understandable, as some of the national accreditors would actually penalize institutions if they did not achieve the expected outcomes, contrary to the US practice. Nevertheless, there seems to be a gap in information regarding student learning outcomes and student learning assessment, especially when there is an attempt to link the notion specifically to accreditors and their assessment framework. This current research therefore hopes to shed some additional light on the challenges, barriers and in general the role of an accreditor in relation to student learning assessment, through analysing in-depth examples.

1.2 Mongolia as a setting for the study

Mongolia has undergone rapid change since the fall of the Soviet Union. Almost immediately, the country started reforming its education system, including tertiary education. The country has struggled with a number of roadblocks from the beginning, including the issue of funding for education: moving from a Soviet-type education system to a proliferation of public institutions somewhat regulated by the country's accreditation body. The number of students entering higher education in Mongolia has grown

exponentially and so have private institutions, but it would seem that quality and transparency remains an area which needs improvement. While the nation's accrediting body did not draw on the international standards for a long time, it did advise HEIs to opt for acquiring international accreditation. ACBSP, one of the specialized American accreditors, was fast to respond to the call, with its president setting up high-level meetings. This resulted in the accreditation of the first institution in Mongolia by ACBSP, the only international accreditation body present in the country until today. Many institutions followed this first one, allowing ACBSP a certain near monopoly in the country, which may or may not last long, as initial discussions have now started with one of the Triple Crown accreditors, namely AACSB. Nevertheless, as ACBSP entered the country, so did the quality assurance and accreditation framework based on student learning and outcomes assessment. The basis of this framework is to set student learning objectives, and consequently targets, on both programme and course-level offerings and then measure them to see whether the institution has achieved what it has promised as a HEI to deliver.

With only one international accreditor present in the country, now would seem to be an ideal time to capture the challenges and barriers of going through the process of accreditation, while reaching towards international best practice: the framework set by an international accreditor. At this stage, both public and private institutions in Mongolia have gone through the whole process: some already years ago and some recently. Arguably, this is an exciting time for the researcher to be able to interview faculty, management, and administrators working at these institutions, and as a result, she has been able to access qualitative data available at many institutions. With this research of a country at the early stages of the accreditation, the researcher aims to contribute to the existing knowledge on implementing an accreditation framework focusing on student assessment. Additionally, the researcher will analyse the status of the current accreditation processes and bodies, as it is likely that these bodies will experience further expansion. It would seem that the current study could be followed by further studies as national accreditors may continue to move towards international best practice and other countries have already shown interest in the adoption of various international accreditors.

1.3 Objective and rationale of the study

First, the researcher will explore the current Mongolian higher education and accreditation landscape. The study will consider the past decades and how higher education in Mongolia has evolved into its current state. The study will consider previous in country projects supported by the World Bank, the Asian Development Fund (ADF) and additional funding bodies on Mongolia as a whole, as well as studies and articles which examine quality assurance and accreditation in Mongolia and the surrounding countries.

Secondly, the researcher will explore the motivations and challenges of international accreditation as a whole and will provide a comparison of major accreditors focusing on student learning assessment. The researcher has been especially active in the international accreditation sphere, has had the chance to participate in international accreditation site visits both as member and chair of these visits, and has been a member of international accreditation boards, the decision-making bodies of the accreditors. The researcher hopes that a detailed look at the motivations and challenges will shed new light on the positive and negative aspects of international accreditation. These findings may also be helpful, not only for other countries, with the expected growth and expansion of accreditation onto uncharted territories, but also for the accreditors themselves in improving their own processes as they go forward. This research looks primarily at the leading specialized accreditors in Business and Management, with particular focus on the US frameworks, given that ACBPS is an American based accreditor. The researcher is aware that accreditation is very important especially in the subjects of engineering, sciences and the medical field, but this research is not reviewing those. The researcher is also aware of education policy transfer and its concepts, which is very important in the context of a comparative study, however student learning assessment remains the focus of this study, specifically in the context of management education and specialized business accreditation.

Thirdly, the researcher will look at existing frameworks around student learning assessment, consider these in terms of accreditation frameworks and will look at prior case studies and lessons learned from these. The researcher argues that although there have been a number of studies, an essential result of the student learning assessment process, these studies have either halted or were highly inconclusive. Some of these studies were planned

on a large scale, which perhaps contributed to the fact that they could not be carried out fully, because there were too many players involved and too high a risk for the participant institution. The researcher, in the present investigation, argues that embarking on a smaller-scale study, which poses less risk for institutions on reporting results, can be more successfully concluded. In this research, the discussion is centred less around the institutions and more on the role that an accrediting body plays in the whole process of student assessment. In addition, Coates and Seifert (2011) as others, argue for a critical review of the assessment methods to measure student learning, so this study aims to provide some additional insights on that topic.

Student-learning assessment has been chosen as the main focus for this study, especially as Mongolia has gone through an evolution from a traditional oral-based type of exam to newer types of assessments. Mongolian HEIs are now in the process of moving even further away from their previous model, with a commitment to measuring learning and ensuring that students graduate with the skills and knowledge previously promised. This has involved a new effort to show transparency, and the process of closing the gap between the HEIs, the government and industry - the actors of the Triple Helix - in terms of stakeholder engagement. The researcher hopes that the research will shed light on the possible improvements to the learning assessment frameworks deployed at the Mongolian institutions, which have gone through the accreditation cycle already. Hence the researcher will look at the ACBSP accreditation framework in terms of these Mongolian Higher Education Institutions and test the success of the framework against the progress of institutions who have gone through the process and identify the possible positive and negative aspects of the implementation. The ACBSP's theoretical framework follows and is modelled upon the Education Criteria for Performance Excellence Baldrige National Quality Programme (ACBSP, 2020). The Baldrige Criteria framework is centred on student learning assessment and outcomes; customer satisfaction and efficiency; market results and social responsibility, among other issues (ACBSP, 2020).

1.4 Thesis summary

The study comprises six chapters, including the introductory chapter and excluding the reference list and appendices. The introductory chapter outlines the overview and background of the study, with introductory notes on accreditation, and student learning assessment. This chapter also discusses the objective and rationale for the study.

The second chapter covers the research context. The chapter offers an introduction to Mongolia, historical perspectives and its higher education landscape in the past decades. It also offers a detailed overview of accreditation, its general landscape and then is reviewed by significant geographical areas. The end of the chapter concentrates on the development of quality assurance and accreditation in the country.

The third chapter is the literature review. It is divided into four sections, starting with the critical review of the literature, offering detailed information on the ACBSP framework. This is followed by a review of student learning assessment, considering previous projects in the field and exploring the common ground regarding student learning assessment tools. The next section of the chapter talks about the relation between accreditation and student learning assessment. The last part offers a summary of the literature review before moving onto the discussion on the theoretical framework.

The fourth chapter - Research Methods and Methodology - starts with an introduction to the research problem and displays the research questions. Then it moves on to the research strategy and the research design, before the discussion of the data collection methods. Information is provided on semi-structured interviews and the Peregrine Academic Services (PAS) test and the relevance of the language/translation issues, with their possible considerations and impact on the data collection methods. The chapter continues by outlining the sample selection, explaining how the data analysis was done and considering the role of the researcher. Finally, it looks at the validity and reliability of the research and closes with philosophical considerations with regards to epistemology and ontology.

Chapter Five concentrates on data presentations, analysis of the results and the findings. The overall findings are mapped against the findings in the literature review and against the framework used by ACBSP's Standard 4.

Chapter Six - Conclusions and Recommendations - looks at the conclusions but offers further recommendations and actions to policy makers, accreditors, both national and international and institutions in and outside Mongolia. It goes on to discuss the study's relevance and contribution to existing literature, its limitations and areas for future research.

The dissertation concludes with the reference list, list of appendices, figures and tables.

2. Research Context

2.1 Introduction to Mongolia

Mongolia is a landlocked country bordering the Russian Federation and the People's Republic of China (PRC) with about 1.56 million square kilometres of land (Yano, 2012; Asian Development Bank, 2008; Weidman and Yoder, 2010). The current population stands at around 3,360,000 according to the World Bank (2018) and about 65% of the population lives in the capital Ulaanbaatar.

The Soviet Union played an essential role in Mongolia's independence from China in 1921 (Weidman and Yoder, 2010). The Mongolian People's Revolutionary Party (MPRP) soon assumed power and then Mongolia was closely aligned with the Soviet Union. The start of the fall of the Soviet Union in 1989 triggered a major crisis, moving the country to a market economy (Suprunova, 2007). By the end of 1991, the Soviet Union was not able to continue with its level of support, leaving the country extremely vulnerable; the Soviet Union officially broke up on December 25th, 1991. The Mongolian currency (tugrik) then suffered 100 percent depreciation (Yano, 2012). In spite of all these sudden and abrupt changes, Mongolia experienced a relatively calm political transition, although the privatization of state assets in the early years resulted in high unemployment, hampering the economic transition.

2.1.1 Higher Education in Mongolia

The education sector in Mongolia was also highly influenced by the Soviet Union. Weidman and Yoder (2010) emphasize that at this point, in Mongolia and the Soviet Union, education, health and social services were provided free of charge. After the collapse of the socialist system, Mongolia then focused on trying to create a just system of education. This resulted in increased levels of literacy, although at the beginning of the transition, as available funds declined, many students in the rural areas could not continue attending schools for a while. Between 1990 and 1992, financial support for education fell by 56 percent (Walters et al., 1999). Postiglione (2010) points out that since governmental

expenditure was then severely limited for higher education, it was very hard for the Mongolian authorities to achieve the quality that would bring Mongolian higher education players to levels similar to their counterparts across the globe. However, legislation on education and the right to establish education institutions (Suprunova, 2007) was launched, with Mongolia promoting an educational reform system (quite differently from surrounding countries, such as Uzbekistan) through decentralization, aiming at a participatory approach (Weidman and Yoder, 2010). Soon enough higher education enrolment rates started to increase again, reaching almost 80% (Postiglione, 2011). Privatization of higher education followed (Yano, 2012), which also meant that the country saw a flourishing of new private higher education providers, which today contribute to 30% of the total enrolment of students. Another change is that next to Mongolian, English has become more and more widely used and is replacing Russian as the most popular foreign language in the country; this has enabled Mongolia to open its doors to new Western higher education trends.

In Mongolia, the central education authority is the Ministry of Education, Science and Culture (MESC). Its primary role has been the accreditation of HEIs, curriculum development, state examinations and teacher training. The Ministry also oversees technical and vocational education and training (TVET) (Yano, 2012). After 1995, the role of the MESC has shifted, from a centralized system of day-to-day monitoring activities, towards a system where they are now more responsible for providing leadership and advice (Weidman and Yoder 2010). Some governmental support today continues for education at all levels, but now institutions are mainly financed by charging tuition fees. The amount received from the government is used for minor expenses only. As Walters et al (1999) pointed out, before 1990, there were only nine higher education institutions in Mongolia, including the Mongolian State University which was then renamed the Mongolian National University. By 2000, there were already 172 higher education institutions in the country, of which almost 80% are privately owned (Weidman and Yoder). By the 2009 -2010 academic year, there were 146 universities in Mongolia - an increase of 1.9-fold in ten years (Natsag, 2010). In 2011, this increased to 162 HEI institutions with a slight decrease in student numbers over that year (Postiglione, 2011). This trend, of an increased number of institutions with decreased student numbers, was not viable economically and also created quality assurance problems along with a possible mismatch between the graduate profiles and the need for certain skills and knowledge areas (Natsag, 2010). This led to the

question of whether or not these institutions, operating with small numbers and small budgets, could maintain the minimum threshold quality when delivering their higher education product.

Both Natsag (2010) and Postiglione (2011) point out the further need for higher education reforms in Mongolia. First, it has been suggested that Mongolian higher education should align with and fulfil the social and economic developmental needs of the country. Higher education systems are under pressure to adapt and ensure that students can work in a changed market economy (Hall and Thomas, 1999). Second, it has been argued that institutions need to be equipped to deal with the decentralization agenda, which allows institutions to have greater flexibility and decision-making powers: faculty and other staff must develop the skills to be able to manager and educate students within a system that allows for greater institutional autonomy. Thirdly, it is suggested that reforms will be needed in the context of the issue of improving the quality of education.

After the 1990s, Mongolia moved away from a Soviet model of education towards the American model, which also helps to explain why the country is opening its doors to the new Western-type quality assurance bodies and accreditors. While there has been no official governmental decision specifically to use the Accreditation Council for Business Schools and Programmes (ACBSP), one of the specialized programme accreditors headquartered in the US, when the Mongolian government requested institutions to consider and start with international accreditors, the choice of the first institution went to an American accreditor, specifically ACBSP. Once one university went through the accreditation process and quality improvements were captured, it became a trend that many other institutions followed.

Part of this Westernization agenda has been a move towards a change in learning assessment methods. Prior to the collapse of the Soviet Union, students were mostly exposed to and dependent on their lecturers for learning, with not much engagement from both sides. This is not specific to Mongolia but also to many of the Eastern Bloc countries, where faculty members tended to dictate their lectures and then the oral examinations were also conducted by the same lecturer. Hall and Thomas (1999) point out that the reasons for this tradition are manifold, including, but not limited to, infrastructural constraints, the lack of learning materials in Mongolian and low salaries of teaching staff. The new guidance in

recent years has been to move away from lecture-dependent delivery towards a different approach, in which students would get more guidance and support for skills development; there would be an increased importation of new learning materials; assessment systems would shift to course work and written examinations and a cut in teaching hours would allow for more independent study. The findings of this study explore details of these changes in more detail.

There have been a number of efforts to help with this process of the Westernization of the curriculum, including a project of the European Union Technical Assistance (EU/TACIS) for the Commonwealth of Independent States (CIS). The aim of the project (Walters, et al.,1999) was to improve economic policy making by aiding the reform of the higher education economics curriculum. Specifically, the project aimed to design a market-oriented economics degree at bachelor level.

Subsequently, the Government of Mongolia (2007) started drafting the Millennium Development Goals (MDG) as a comprehensive national development strategy for Mongolia. One of the priority outcomes in the implementation strategy was education development under MDG 3 and 4, with the aim that by 2021 the foundation for an internationally competitive education system should be in place. Other priority outcomes were the review of curriculum and developing a strategy for implementation. International education is an aspiration that is reflected quite often in the document, for instance in the specific aim to “create the University responding to the international standards” (Government of Mongolia, 2007 pp. 21).

Meanwhile, the ADB has had several projects in Mongolia, some of which have been concentrating on the assessment of higher education. A 2011 report highlights the key issues Mongolia is facing in higher education. One main issue was the largely uncontrolled expansion of the number of higher education institutions, with only a small proportion having national accreditation. Consolidation of these institutions began in 2011 with public institutions reduced from 42 institutions to only 11. In addition, the report highlighted many quality issues, including the increasing student numbers, but with no confirmation that the threshold quality level was being met, or that the institutions had improved in any way. Some of the main items highlighted included but were not limited to: a weak national quality assurance and accreditation system; the lack of monitoring of the

performance of staff; the lack of a national credit framework; the lack of research capability and supporting facilities; inadequate learning materials and weak partnerships both on national and international levels (ADB, 2011). For many private institutions, the experience has been quite different. They had grown exponentially to 144 institutions by 2000, but with only a small number of those accredited at that time (WB, 2018). The big difference is that the presidents and rectors of private HEIs are appointed by the owners. Most of these private institutions are still located in the capital, Ulaanbaatar. Other problems include financing from the government; disadvantaged groups not being included in getting access to higher education; and a mismatch of skills and the labour market needs, essentially due to weak partnership within the Triple Helix framework.

In order to address these concerns, the government passed Resolution No. 15 early in 2010, supporting the roadmap and initiative of the Strengthening Higher Education Project for 2011-2015, again to be funded by the ADB. The 2016 ADB project report points out further needs for improvement (as well as those previously mentioned), this time around the learning-outcomes-based approach to education. This was a highly new way of thinking for Mongolia. The June 2010 World Bank (WB, 2010) report highlighted similar issues to the ADB report, perhaps even taking it slightly further with its emphasis on the possibly negative relationship between the skills and competencies of graduates and Mongolia's competitiveness. Arguably this points again to a possible mismatch of skills with the needs of the labour market, which, if corrected, could end the high unemployment rates for recent graduates. However, this problem may also have been due to the growth of enrolment in HE compared to the number of available jobs in the relevant sector. In the West today, HEIs advertise employment rates achieved by their graduates in an effort to attract future students. This was not the case in Mongolia. Lack of publicly available information and transparency was of high concern in the early 2000's. The World Bank's (2010) suggestions were therefore to achieve greater consumer protection by improving the quality of education, requiring performance indicators from institutions and providing aid to low-income students to ensure inclusiveness. It is not often mentioned, but the role of TVET is arguably essential and more students might be channelled from tertiary education towards TVET in order to improve inclusiveness. This may also aid the migrant worker groups: both Chinese migrant workers in Mongolia and Mongolian workers in South Korea, as well as in other countries where only estimated numbers are available.

If one looks at Central Asia and Mongolia, very similar education reform packages emerged in the last decades (Silova and Steiner-Khamsi, 2008). This is of course understandable since their education system was shaped and influenced by the Soviet educational policies and then the same international donors were present in those countries, leading reform policies for a while.

Phillips (2009) talks extensively about educational policy transfer, its historical perspectives, examples, and the spectrum of educational transfer. Policy borrowing in education (as defined by Phillips and Ochs, 2003) includes a range of issues and topics related to how policy makers are using foreign examples to initiate and implement change. Ochs and Phillips (2003) indicate four different stages of educational transfer, starting with cross-national attraction led by political change; knowledge and skills innovation among others; leading to ambitions and goals to be realized; and strategic plans drawn up. This leads to Stage 2 with the decision to move forwards. Stage 3 encompasses the implementation phase with adaptation and the important discussions on change and enabling actors, which then leads to stage 4 with internalization, indicating a mature system of evaluation and impact on existing practices.

Relevant for this research study is the notion of a country which has gone through turbulent higher education policy prompted by several factors such as political and economic changes, systemic collapse, and negative external evaluation. This led the country (in this case Mongolia) down the road of realization that change may come from foreign experience and the country opened its arms to international donors but also actively started searching out international accreditors in the field of business education with the hope of improving the quality of higher education and institution and the quality of graduates. Several of the previous reforms that were aimed at transferring and changing Mongolian HE policies and practices (as in the case of many other post-soviet countries) failed. Steiner-Khamsi and Stolpe (2006) indicate (pp. 185) that *'...a closer look reveals that policy borrowing in Mongolia occurs either rhetorically or selectively with a limited impact on existing practices'*. Perhaps the reason was that international donors arrived at a time when the country was not ready to take on all the advice just yet, as it was still at decision stage. Nevertheless, it seems that in general, the most successful policy impact is not one that replaces an existing practice but one that hybridizes existing reforms, which is in essence reforming practices but not replacing them. Silova and Steiner-Khamsi (2017)

point out that student centred learning was for example initially forcefully implemented to replace teacher centred education but, in the end, only softened the latter.

Steiner-Khamsi and Stolpe (2006) talk about the case of Mongolia as second-hand education adopters of traveling reforms, already from late adopters. They found Mongolia as case study specifically intriguing because policy makers seem to be enthusiastically engaged in policy borrowing. Steiner-Khamsi and Stolpe (2006) worry about educational systems possibly abandoning their specific and unique cultural practices while they are adapting to the global models of education practices. Indeed, when Mongolia faced a major political shift in 1990, the change had major effects for their educational import. They also talk about outcomes-based education as a practice that was introduced in 2003, and perhaps the reason why there was such a fascinating link with ACBSP accreditation, as the intention was back then already to have measurable performance agreements in place and there were monetary awards related to the performance of faculty in this regard. However, we do not know how systematically and successively this was implemented other than an additional strengthening of the surveillance system of faculty performance. Steiner-Khamsi in her study (2006) talks specifically about outcomes based educational reforms and again those countries who are late adopters of this reform. Late adopters of reforms are joining the movement usually at the burn-out stage. She indicates that next to Mongolia, Kazakhstan and Kyrgyzstan are the other two late adopters, all the while questioning which elements of the outcomes-based education reforms were implemented.

Considering the above and looking at this specific study, there are several reasons why the researcher chose not to embark on a detailed review from the policy borrowing and educational transfer perspective. One is that ACBSP is a specialized accreditor and the researcher reviewed business programmes only. Looking at programme content, a large percentage of business education curricula is common: consider as an example the management disciplines of marketing, leadership, strategy, and so on. Business schools and their programs are very similar, regardless of the country one considers. In addition, international business accreditors have adopted their standards to meet the needs of the globalised world. They are not simply American or European accreditors anymore; they have adapted in the past decade and adjusted their standards to reflect the global nature of business education. In addition, this research looks specifically at one aspect, one standard of ACBSP, so limited in scope. Moreover, Mongolia seems to be open to a modernising

agenda based on the operation of the capitalist model of profit seeking business, and this agenda seems widely, if not universally, applicable. ACBSP is a voluntary accreditation model, and the country shows acceptance of the model on programme level. Finally, the researcher cannot consider Mongolian HEIs adopting ACBSP standards second-hand adopters of the already late adopters (as indicated by Steiner-Khamsi and Stolpe, 2006). Mongolian HEIs have the dialogue, communication, and process exchange with the source, in this case ACBSP and not adopting accreditation standards from second hand. Hence overall, there is less applicability of the educational policy borrowing model to this specific study.

2.1.2 Quality Assurance and Accreditation in Mongolia

The MESCC regulates Mongolian tertiary education (World Bank, 2010). Whether the HEI is public or private, they are required to observe the country's regulatory and legislative norms. This has been the case for private HEIs since 1991, when the Education Law established the legal basis for all HEIs to operate. The Minister of Education has overall responsibility and is supported by an advisory council. There are differences however between public and private institutions. Rectors and presidents of public universities are appointed by the Minister of Education; this is not the case for private institutions.

The Mongolian National Council for Education Accreditation (MNCEA) is responsible for both institutional and programme accreditation. All new institutions must be accredited by MNCEA. There are specialized accreditors as well, especially in the fields of management and engineering, like that of international good practice. MNCEA is an independent body, led by the chairman and the council members, who are rectors of accredited HEIs. The council has hired over 15 external evaluators and they have accredited several HEIs (MNCEA, 2020). Programme accreditation was initiated in 2000. One of the bottlenecks faced by the MNCEA is the problem of enforcement and monitoring that all institutions are upholding the standards required. Their standards reflect some of the international accreditation standards, but they are not always derived from international standards. This has now been changing with the presence of ACBSP and with initial discussions taking place between the Ministry, some HEIs and AACSB.

Tserendagva and Jamts (2017) in their study reviewed the quality assurance sector of Mongolian higher education. They considered the development and impact of the national and institutional quality assurance arrangements in relation to the development of HEIs. The criteria and standards of the national accreditation played a positive part in the development of faculty and staff for Mongolian HEIs, built the base for a more independent governance structure and aided the development of course content especially during the second phase of accreditation, from 2004 onwards. Tserendagva and Jamts (2017) point out that this was especially significant for the private institutions, where the quality systems started to be designed for continuous internal evaluations and improvement mechanisms. Their study also revealed that joining regional and international quality assurance agencies and participating in their activities had a positive impact of the National Accreditation Council of Mongolia. For example, the MNCEA became member of the International Network for Quality Assurance Agency in Higher Education (INQAAHE) and the Asia Pacific Quality Network (APQN). They also found that one of the positive impacts of joining these bodies included the improvement of their practices and standards. Due to these results MNCEA has started encouraging Mongolian HEIs to participate in international accreditation bodies and start the process of accreditation. There was an interest shown towards the Accreditation Board for Engineering and Technology (ABET) and consequently as we have seen towards ACBPS and later AACSB. A cooperation contract was signed with ACBSP in 2011 and in 2012 MNCEA also signed contract with Peregrine Academic Services (PAS) to carry out external evaluation services and provide several training activities (Tserendagva and Jamts (2017) MNCEA members also participated in the CHEA conference in 2013 in Washington DC.

As far as the voluntary nature of accreditation, it seems there were clear signals from the national accreditor and the ministry that they appreciate international best practice and would like the institutions to embark on achieving international accreditation. So even though ACBSP is voluntary accreditation, it was clearly the objective to gain more knowledge for Mongolian quality assurance practices along with the objective of improved student learning.

2.2 History of Accreditation

2.2.1 Quality Assurance and Accreditation Overall

External quality assurance and accreditation are broadly accepted systems today across the globe. In many countries accreditation and accrediting bodies are highly developed, boasting a mature system, while in other parts of the world they are still in a developmental phase, looking to the more developed systems of the USA, UK, and Australia as providing models to follow. The quality assurance schemes are developing and progressing continuously, and they often serve as policy instruments for national accreditation schemes (Westerheijden et al., 2007).

When one looks at the definition of quality assurance and accreditation, the meanings are quite ambiguous. According to Judith Eaton, the outgoing president of the Council for Higher Education (CHEA), “Accreditation is a form of self-regulation - professionals reviewing professionals and academics reviewing academics” (2012, pp 8.). In essence, the idea behind external quality assurance is to ensure that institutions and programmes go through a regular review that leads to continuous improvement (Stenstaker, 2011).

Schwarz and Westerheijden (2007) point out that the development of quality assurance and accreditation regimes was prompted by matters of accountability, quality improvement, validation, and provision of information. HEIs, especially in countries where the national accreditation regimes are not or partially developed, try to differentiate themselves from their competitors by acquiring one or more international accreditations. Zammuto (2008) indicates that by becoming accredited, similar to being ranked, institutions have a chance to differentiate themselves clearly from the rest, as if they were on a different playing field. Zammuto (2008) suggests that international students travelling from countries where accreditation is prevalent and accepted, are more likely to choose institutions which carry a similar, or at least some, type of international accreditation. The likelihood of increasing such student numbers is much higher for the accredited institutions. In today’s VUCA (volatility, uncertainty, complexity and ambiguity) world, the risk of being non-competitive is very high for any institution, especially when expansion is planned across borders. However, Zammuto (2008) points out that most international students travelling abroad for degree programme attendance still are originate from countries with small or no

awareness of accreditation. Thus, educating the public, all stakeholders including prospective and enrolled students, about accreditation is valuable.

If one considers the two main approaches of accreditation regimes (specifically developed in Europe and in the US), Stensaker (2011) and Harvey (2004) both emphasize that the proliferation of private for-profit education institutions was partially responsible for the faster establishment and development of accrediting bodies at the national level. In Europe, public institutions were often (or seemed to be) 'controlled' already. However private institutions could have compromised institutional quality structures. Accreditation in Europe developed a lot later than in the US. A couple of decades ago it was still seen as a new phenomenon (Schwarz and Westerheijden, 2007), coming to fruition after the fall of Communism, and supporting the national policies of countries across the continent, while in the US it has been in place for a century. Contrary to the European landscape, the US model was aimed at protecting institutions from federal governmental regulation. These two conflicting ways of development explain the disconnect between the nationally-led state accreditors in Europe and the private and voluntary accreditors in the US. However, there is a possibility for the two models to move closer as indicated by Stensaker (2011), especially with considerations given to the latest developments on competence-based learning, the proliferation of distance learning activities and the effects of the COVID-19 epidemic.

2.2.2 US based Accreditation

How has accreditation practice evolved globally? The history and origins of US-based accreditation is extremely relevant for the current discussion. Not only because a US-based accreditor is the only international accreditor in Mongolia, but also because US-based accreditation has been at the forefront of quality assurance since the beginning on the 20th century.

If one looks at the structure of accreditation in the US, no one single agency is responsible for accreditation. There are two main types of accrediting agencies in the US: institutional and programme accreditation agencies. It is important to mention that US accreditation is very much decentralized and is a non-governmental exercise. As Judith Eaton (2012) indicates, this decentralization follows the structure of a decentralized higher education

system and both federal and state governments view these accreditors as reliable bodies to carry out both institutional and programme accreditation activities. This is indeed what El-Khawas (2001, pp. 18) calls a “*cautious attitude towards external accountability*”, going on to claim that “*a governmental form of accreditation review would be very unpopular*”. While the federal government has an indirect role, state governments have even less involvement, as they provide authorization or license to operate in the state, but they do not have state accreditation bodies as such. The US Department of Education (USDoE) does not accredit higher education institutions, but rather they recognize institutional accreditors (USDoE, 2020). Students attending institutions accredited by a recognized accreditor of the DoE are eligible for US federal aid. As of 2013 there were 85 recognized accreditation bodies and they review institutions in all the 50 states and across different disciplines, such as engineering, law, business, health and so on. These accreditors can have either regional or national scope. Although not a governmental body, CHEA is a body that reviews accrediting organizations. A non-recognized accrediting body does not necessarily mean that it is of low quality. It may mean that the DoE has simply not reviewed it; however, it may have been reviewed by CHEA. CHEA has specific guidelines as to what is required to gain their recognition, and they do maintain information on agencies they recognize. CHEA also host different activities, for example the CHEA International Quality Group (CIQG), a forum which addresses higher education quality assurance worldwide. They provide publications on developments of HE across the globe, with the mission to advance quality assurance while offering capacity building and policy directions as needed (CHEA, 2020). Again, it is quite important that while HE in the US may face fake institutions and fake accreditors, not having USDoE or CHEA recognition does not mean that institutions are illegitimate - they may just not meet the criteria set by DoE or CHEA.

Looking at US accreditation, there have been significant developments that signalled a move away from the most-used accreditor types, namely the regional and national accreditors. The USDoE explained in its June 2019 Notice of Proposed Rulemaking (USDoE, 2019) that the Department will propose to stop the current practice of limiting the scope of an accreditor’s approval to a geographic region. Regional accreditors were allowed to accredit in some cases even outside the US, and they will now be able to expand more, allowing for a healthier competition across the board.

There is also a claim of favouritism towards the regional accreditors with students facing problems with transfer credits, among other problems. The result is that the DoE, starting

in February 2020, no longer distinguishes between the national and regional accreditors and has changed its language to signal this. (For simplicity's sake, the researcher continues referring to them separately as regional and national accreditors even though the regionals were now commonly referring to themselves as institutional accreditors at their fall 2020 conferences.)

As indicated above, the most common accreditor type was (previously) called regional accreditors and there are six of them (note that WASC is split as indicated below):

- Accrediting Commission for Schools, Western Association of Schools and Colleges (ACS WASC) serving California, Hawaii, Guam, Asia, the Pacific Region, the Middle East, Africa, and Europe (considered as one here but split into three sections including K-12, community colleges and senior colleges);
- Higher Learning Commission of the North Central Region (HLC): Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin, Wyoming;
- Middle States Commission on Higher Education (MSCHE), serving Delaware, the District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, and the U.S. Virgin Islands;
- New England Commission on Higher Education (NECHE) serving Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont;
- Northwest Commission on Colleges and Universities (NWCCU), serving Alaska, Idaho, Montana, Nevada, Oregon, Utah, and Washington;
- Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), serving Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia.

All public institutions must be accredited by one of the regional accreditors.

The accreditation previously called 'national' was generally for private or for-profit institutions and/or for specialized programmes, religious education and those that focus on vocational education with examples indicated below.

- Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission (AARTS)
- Accrediting Council for Continuing Education and Training (ACCET)
- Accrediting Commission of Career Schools and Colleges (ACCSC)
- Accrediting Council for Independent Colleges and Schools (ACICS)
- Association of Institutions of Jewish Studies (AIJS)
- Council on Occupational Education (COE)
- Distance Education Accrediting Commission (DEAC)
- Transnational Association of Christian Colleges and Schools, Accreditation Commission (TRACS)

National accreditors have not been restricted to a certain region historically and the same goes for specialized programme accreditors, which allowed them to have membership from across the US, unlike the regional accreditors up until 2020.

Last but not least, there are the programmatic, or specialized accreditors concentrating on programmes or even departments within an institution.

The development of the quality assurance and accreditation regimes of the US went hand in hand with the development of higher education in general. As we go back to the end of the 19th century and the beginning of the 20th century, it should be noted that higher education in general was dominated by private colleges. Enrolment was limited to about 120,000 students (El-Khawas, 2001) in 1880, which then doubled in about 20 years. Some of the state universities were founded at the end of the 19th century (by the Land Grant College Act 1862 & 1890) but private institutions continued to outnumber the public schools. Enrolments continued to increase until the economic depression and the Second World War, after which there was moderate growth until the 1950s. The Servicemen's Readjustment Act of 1952 (or the GI Bill) set in motion major growth in the sector - reaching 11.6 million students by 1980. In order to keep the pace with the growth in student numbers, the transformation of institutions followed from the early stages of teacher education to state universities and colleges. This was the start of opening of the

community colleges with the establishment of Joliet Junior College was founded in 1901. By now, the public sector accounted for half of the enrolments. When it comes to the establishment of accrediting bodies, the original goal was to help the communication between institutions, rather than quality assurance. With the expansion in enrolment, the need arose for standardization of the amount of education one had to complete before entering higher education, which led to the creation of some definitions and requirements. These were not governmental actions but agreements between institutions (El-Khawas, 2001) and inspection visits were not part of the evaluation yet. In general, the North Central Association (NCA) was always on the forefront in urging standardization across the schools. In addition, NCA took the lead on becoming an organisation basing its judgements qualitatively and looking at an institution's scale of activities and patterns as a whole. However, it was not until the 1980s and 1990s that the regional accreditors started considering student outcomes. Then they were urged to ensure that their accredited institutions were required to show demonstrable learning outcomes (Kelley et al., 2010). It was perhaps the Higher Learning Commission (HLC), one of the regional institutional accrediting bodies, which had already started using assessment as early as 1989 (Lopez, 2002). Programme accreditation was developing differently, especially with the specific fields and training activities. More emphasis had to be provided on the qualifications of students at a much faster pace.

The development of the national and regional accreditation bodies was paramount but particular attention should be paid to the business programme accreditors, relevant to this research. This includes AACSB International, ACBSP and the International Accreditation Council for Business Education (IACBE).

AACSB International is the oldest US-based specialized accreditor. They were established in 1916, celebrating their 100th anniversary just four years ago. AACSB provides professional development services next to their main focus of quality assurance. They have over 1700 members and more than 840 accredited business schools worldwide (AACSB, 2020). At their foundation they were called the Association of Collegiate Schools of Business) and founding members included the likes of Cornell University, Harvard University, University of Chicago and University of California at Berkeley. Their first standards, adopted in 1919, included basic elements of the curriculum, also including business, engineering and law and their relationship to the secondary education system. In 1925, they changed their name to American Association of Collegiate Schools of Business

and just a few years later they came out with guidelines for institutions in five specific types of programme levels, from undergraduate to doctoral programmes. In 1997 they changed their name again and became the Association for the Advancement of Collegiate Schools of Business. Jumping ahead to the beginning of the 21st century, their 2003 standards concentrated on three areas: Strategic Standards, Participants and Assurance of Learning. AACSB nowadays is known for its heavy emphasis of the ‘assurance of learning’ method. This method was first featured in their revised standards launched in 2013, where institutions had to display a set of programme objectives on both institutional and programme level. Hence, today, it is essential for all programmes to showcase assessment plans, objectives, and a variety of tools, targets and assessment results. Their new standards refocus on Strategic Management and Innovation, Participants (also including professional staff), Learning and Teaching and Academic and Professional Engagement. Right now, the standards are again under review, with expected changes affecting the ‘assurance of learning’ section where there is a new trend of enquiring into indirect measures of learning. Indirect measures include student surveys as an example, while direct measures display direct learning assessed by the faculty and measuring actual student learning. Nevertheless, AACSB still places considerable emphasis on faculty and their research output, which mean exclusivity to certain types of institutions. We will see in the upcoming discussions that the match between the QA or accrediting body and the institution is essential, otherwise the process may be set up for failure. Standards, while similar, can indicate different threshold standards and while allowing some flexibility, in reality, only a limited number of institutions can and will be able to apply for the likes of AACSB. AACSB has now global presence with offices in Amsterdam and in Singapore.

The establishment of ACBSP, a specialized programme accreditor, was triggered by several factors, including the limitation set by AACSB, which meant that only a small percentage of institutions offering business programmes ended up being accredited in the US. Hence, in 1988, representatives across the country from over 150 business schools gathered in Kansas City to establish a new accreditation body (ACBSP, 2020). ACBSP accredits degree programmes at associate, bachelor, master and doctoral level. They also have a separate accounting accreditation (as AACSB) and recently launched certificate accreditation, allowing this option for business schools as long as certificate courses qualify for credits towards a degree. Their recently revised standards concentrate on

Leadership, Strategic Planning, Student and Stakeholder Focus, Student Learning Assessment, Faculty Focus, Curriculum, and Business Unit performance. The last standard is newly added allowing institutions to showcase their performance improvements at an institutional level. While there will be more information provided on ACBSP in the chapters below, it is important to mention that they base their framework on the Baldrige Performance Excellence Framework. This quality management framework has been widely used around the world and supports ACBSP's mission, outcomes (results) and process-oriented approach. Next to the seven threshold standards, ACBSP uses a qualitative scoring board when identifying the status of the institutions on their accreditation journey. The score is based on four areas in all standards: approach, deployment, learning and integration. Within these four areas, there are six classification or qualitative scores, which span from *best in class* through *very good* down to the lowest score, which is *major improvements needed*. This qualitative scoring board allows the site visit team members and then the Board of Commissioners (BoC) (the decision-making body of ACBSP) to decide whether the institution's programmes meet their criteria to be accredited.

Both ACBSP and the International Accreditation Council for Business Education (IACBE) were established by Jack Green. IACBE was formed when he responded to a request from business schools to establish an accrediting body that was specifically concerned with the institution's mission and its outcomes assessment process (back then this was not the centre of the agenda either for AACSB nor for ACBSP). IACBE's current mission statement reads as follows: "*The mission of the IACBE is to advance academic quality in business programmes through evidence-based accreditation that encourages institutions to build unique educational models to reflect their mission and vision.*" (IACBE, 2020). IACBE is indeed known for their mission orientation and, in addition, central to their work is collegiality: they very much support the organizations going through the accreditation process; they are developmental oriented, which is especially important for institutions which lack the basic quality process or are at the beginning of their journey as a higher education institution.

The IACBE has grown substantially since its formation both nationally and internationally, achieving CHEA recognition in 2012 for the first time. CHEA later approved the extension of their mandate in 2019 to include accounting programmes and associate level programmes in their portfolio. Approval from CHEA was an important milestone for the accrediting body to show their legitimacy. They are also in the process of gaining approval

by EQAR, which would be the first accreditor from the US to achieve this status. IACBE currently accredits over 2000 business and accounting programmes worldwide. As George (2018) points out, IACBE's principles are organized in terms of the developmental accreditation philosophy, the outcomes-based quality assurance, with a cooperative approach to accreditation, mentoring and mutual support for members and, last but not least, flexibility. These all support IACBE's mission and vision to advance academic quality for business education.

As mentioned before, the researcher has worked in the field of accreditation both within the business school setting and in a voluntary capacity with peer review teams and several boards, hence established a close relationship with the US based accreditors. Functioning in leadership roles with institutions carrying these accreditations and helping others to achieve those allows the researcher to draw on her own personal experiences when providing a comparison of these accreditors.

There are different reasons why institutions choose one accreditation over the other but general commitment to quality and institution-wide support is crucial when embarking on accreditation. It is no different for the US accreditors, however there are additional legislative requirements that specify those institutions which need a certain type of accreditation while for others accreditation is voluntary and more specialized. Out of the voluntary accreditations mentioned, one would have to compare the mission and vision of the institution and its strategic objectives in order to decide which accreditor would be the best to pursue.

It is well-debated that there is considerable competition between accreditors across the globe and this is no less true among the US accreditors. This may negatively affect the accredited member institutions especially since both IACBE and ACBSP now carries CHEA accreditation while AACSB has decided to stop with their CHEA membership. US accreditation and its developmental track has been highly debated and El-Khawas, in her 2011 study, asks the question: how can such a complex quality assurance and accreditation structure as the US can offer guidance to other countries?

2.2.3 European and British accreditation

The main business accrediting bodies in Europe and the UK are the Association for MBAs (AMBA) and the European Quality Improvement System (EQUIS) through the European Foundation for Management Development (EFMD) framework. The Quality Assurance Agency (QAA) performs quality and assessment activities in the UK, next to their policy and research advice and their activities mandated by the OfS (QAA, 2020). Both AMBA and the QAA has gone through many changes in the past years. AMBA generally accredits programmes on the graduate and doctoral level; however, they have launched a new service, a type of institutional assessment called the Business Graduates Association (BGA). The association's Charter is the body that provides a type of validation process ensuring that institutions demonstrate continuous improvement and quality (BGA, 2020). Institutions need to demonstrate commitment to nine different areas, which include, but are not limited to, involvement of stakeholders, principles of Corporate Social Responsibility (CSR), good governance and employability. As they announced at their annual Deans and Directors meeting in 2019 in Turkey, AMBA's accredited portfolio will peak at 300 accredited schools and this initiative allows institutions perhaps not exactly achieving the highest standards of AMBA to demonstrate quality delivery on a different threshold level. When you now look at the standards and requirements of AMBA compared to those of other programme accreditors, they are still more input-oriented, even though they have started placing more emphasis on student learning as well. The scrutiny of the student portfolio continues to be a priority, along with connections with the business world. Similar to the business accreditors in the US: ACBSP, IACBE, AACSB and the European based EQUIS and EPAS, all of them are member-driven organizations, and offer a variety of services to members, students and alumni from accredited schools and work settings across the globe.

UK higher education is certainly not a newcomer to quality assurance. Its quality assurance system has matured throughout the years towards a risk-based model. Raban (2014) highlights efforts of the UK governmental bodies to steer the system towards a risk-based model which was then new to higher education, but not new to the management world. This was taking place in 2000 and 2001 and after these efforts the QAA has used the term "risk" widely. In the UK, HEFCE and the QAA have led the implementation of

risk-based approaches. Today QAA monitors the standards of higher education institutions mainly based in the UK. They are mandated by the Office for Students (OfS), the body that awards degree granting powers in the UK. AMBA and EQUIS (nor EPAS, EFMD's programme accreditor) do not have this delegated authority. In 2019, the QAA also launched a new service, the International Quality Review (IQR), which gives the opportunity for institutions outside the UK to be reviewed by the QAA against the Standards Guidelines for Quality Assurance in the European Higher Education Area (ESG). This review is an institutional review and they have progressed with several case studies across the world so it will be interesting to see its development in the upcoming years. The QAA's Quality Code is the main reference code for UK Higher Education Institutions, highlighting its expectations for its standards and for quality. The last revision was published in March 2018. The Quality and Standards Review (QSR) uses two methods to ensure that institutions meet the specifications for the core practices: one for new institutions applying to the OfS; another for those providers already registered with the OfS (QAA, 2020). In both cases detailed information on the process is given in the Guidance for Providers, which includes roles and responsibilities, information on the review visits, post-visit activities and a checklist for providers.

By contrast, EQUIS – created in 1997 – is an international system of quality assessment and accreditation for higher education institutions in the field of management studies. This accrediting body was created by the European Foundation for Management Development (EFMD) with the purpose of awarding accreditation to high-level institutions. It continues to be elitist and its objective is maintaining the current level of institutions instead of expansion. EQUIS does have more offices in Europe now and a relatively new base in Miami. EFMD itself offers many activities in management education, including among others, professional development; online course evaluation; impact assessment; research and projects. Some of the requirements for EQUIS accreditation are that the targeted institutions must be international, be recognized, and have a high reputation in their country of origin. EQUIS standards and criteria include Governance and Strategy; Programme Portfolio; Students; Faculty; Research and Development; Executive Education; Resources and Administration; Internationalization; Ethics, Responsibility and Sustainability and finally connection with practice (EFMD, 2018). As an institutional accreditor, the standards are naturally more extensive than those of the programme accreditors. For the specialized programme accreditors, some of the items mentioned

above, such as ethics and sustainability, are more embedded requirements at programme level, while for EQUIS the institution needs to show a robust case at a higher level. In addition to the self-assessment reports submitted by institutions as part of the application process, they also need to submit a report filed by the students indicating their opinion of the institution or programme. This is normally the requirement of EQAR, however EQUIS is not currently a registered agency nor in the process of application as of the date of writing of this study.

2.2.4. The Australian Accreditation System

The Australian body responsible for carrying out quality assurance activities in the country is called the Tertiary Education Quality and Standards Agency (TEQSA). Unlike in the United States, the development of the quality assurance/risk framework is fully in line with national legislation. In the 1980's there was still an absence of a national quality assurance framework in Australia (2015). 1995 saw the implementation of the Australian Qualifications Framework (AQF), followed by several new policies in the 2000s. A legislative statute called the TEQSA Federal Act of 2011 allowed its establishment, with regulatory functions starting very early in 2012. TEQSA (2015) is indeed an independent national higher education regulator. The higher education providers are evaluated against the Higher Education Standards Framework. The main objective of TEQSA (King, 2013) is to control risk to students (for example failure to deliver, provider collapse, etc.) as much as possible and to protect the HE sector, while ensuring sustainability. When it comes to the four main assessment areas of HEI providers (TEQSA, 2015), these include regulatory history and standing; financial viability and sustainability; students and academic staff profile.

Relevant to our discussion, as will be demonstrated in the tables below, TEQSA's (2015) overall approach is similar to that of other quality assurance bodies. As with all accreditors, the registered HEI providers demonstrate how they meet the quality standards through accreditation/reaccreditation rounds or during the initial process. TEQSA considers a range of assessment methods to come to a final accreditation decision (TEQSA, 2015). TEQSA has two underpinning principles TEQSA (2015). One looks at separating providers with positive track record, which would then signal low risk of future non-compliance; the other looks at those with meagre and insufficient track record, obviously signalling the

possibility of substantial risk to the sector. TEQSA's aim is to avoid bias while applying the standards. As with other accreditors and legislated QA bodies, TEQSA can exercise its power in order to ensure that the provider is in line with the standards (TEQSA, 2015).

TEQSA reviews all the institutions annually and these institutions work with the so-called Risk Assessment Framework (RAF). The outcomes of the risk assessment framework can vary from no action taken to recommendations, or formal requests for information and/or regulatory action taken (TEQSA 2015). There are 46 risk indicators under these standards, and these include areas regarding the students: numbers, progress and/or completion rates, attrition, and information on graduates. Staff resources and profiles are very important with particular attention given to senior leaders and their role in internal QA processes. Additional attention is given to student-staff ratio, a diverse variety of services provided to students and alumni. As always with all QA and accreditation bodies, the financial sustainability and viability of the institution is paramount with an eye on the long-term view of the institution's capacity.

2.2.5 Mongolian Accreditation

As mentioned before, the Mongolian National Council for Education Accreditation (MNCEA) was established over 15 years ago (as of 2021, at the writing of this study). It has become a well-respected organization and has matured enough to go through an external review which was provided by the Asia Pacific Quality Register (APQR). APQR was established as a mandate by the Asia Pacific Quality Network (APQN) in 2015. The objective was in 2015 to provide a basis for mutual recognition of cross-border operations for quality assurance and accrediting bodies, with a role similar to the role of EQAR in Europe, but in the Asia-Pacific Region. It also aided its global stakeholders with a reference guide to external QAAs. APQR now serves as a register of external quality assurance agencies which meet the threshold requirements of quality as they themselves require the institutions to do (APQR, 2020) The independent external review of MNCEA started after their Self-Evaluation Report (SER) application was submitted. This was referencing the period of 2015-2018 and a site visit was conducted in mid-June at the office of MNCEA in Ulaanbaatar. The review looked at all criteria set by APQR and the review team was composed of prominent panel members from Taiwan, India, and the US. MNCEA was found to be substantially compliant on all criteria of APQR.

When reviewing the MNCEA accreditation process (MNCEA, 2020), the researcher does not see any major differences between the different accreditors. Their process applies to both TVET and HEIs as overall institutions and to their academic programmes. They carry out both institutional and programmatic accreditation. The process starts with the entity meeting the general conditions which centre around transparency and equality for all stakeholders. It continues with the self-evaluation, the external review and the accreditation decision making. At the stage of the submission of the self-evaluation report, the Secretariat office will scrutinize the documents and, if and when it finds it satisfactory, then a coordinator is appointed. Timelines and payments associated with the process will be handled at this stage. It is also at this stage that the composition of the panel is proposed and reviewed, and the panel will include representatives of the discipline, but also stakeholders such as students and employers. This is significantly different from other accreditors. European accreditors registered under EQAR must all include students in their panels, but this is certainly not the case for the US accreditors. It is also not customary at other accrediting bodies to include employers in the panel. Once the panel is proposed, the institution has the right to indicate whether there is conflict of interest or not. Once the panel is appointed, they receive and review the documents from the institution. Additional questions and requests can be addressed to the institution two weeks prior to the site visit event (MNCEA, 2020). The visit can last from three to five days and then an evaluation report is drafted within two weeks of the visit. This is then shared with the commission with evidence-based substantiation and then the basis for the accreditation decision is proposed. The MNCEA board meet, discuss, and vote on the proposal. The decision requires a majority vote. Conclusions include three choices: fully met, provisionally met, and not met. A positive decision may indicate five years of accreditation; provisional requires an exact term when the institution would need to submit a report (this is one to two years); it can also be that the decision is negative. In case of a positive or provisionally positive decision, the information on the accreditation will be displayed on MNCEA's website. Programme accreditation will follow the same process but concentrates specifically on programme level deliveries.

Looking at programme accreditation criteria, there are eight criteria (MNCEA, 2020):

1. Programme design: considering national and international trends and stakeholders; clear mission, objectives and outcomes; learning outcome-oriented methodology; learning assessment; stakeholder feedback; curriculum design.

2. Environment and technology design for programme implementation: safe learning environment with classroom, library, etc. specification; education and research; software; high provision of information for both faculty, staff, and students, online environment utilization.
3. Programme management and administration: transparency in teaching; implementation of rules and procedures; adequate appeals procedures; long- and short-term planning; human resources; labour market surveys; promotion; alumni policies; international relations and cooperation; in country cooperation and services; budgeting and financing.
4. Student support: admission process and requirements; orientation courses, manuals; advising services, scholarly activities; labour market support; training courses and improvement services, student social activities; student organization; rewards and scholarships; course transfer and student rights.
5. Teaching process: recruitment and reward system; percentage of faculty with doctorates; faculty student ratio; performance monitoring systems; teacher development; educational and scientific innovations; publications, assessment activities including self and external assessment activities; evaluation by stakeholders, efficiency and outcome of the documented teaching process.
6. Learning process: Curriculum alignment with mission and outcomes; student-centered instructional methodology; complex student evaluation and assessment.
7. Programme outcomes and efficiency: programme outcomes should meet the stakeholders' demands; employability surveys with workplace alignment; external evaluation of the programme; Olympiads and competitions; transparent information to the public on website.
8. Quality assurance and evaluation: regular programme evaluation and revision in place; internal quality assurance, reflecting results and creating feedback.

On the institutional accreditation side, there are ten standards and in addition to covering the above, higher level institutional requirements are introduced. These include, but are not limited to: institutional rankings, institutional partnerships, overall achievement by graduates, national ranking, social responsibility and lifelong learning, research

infrastructure and funding, financial capacity, teaching and non-teaching staff development, legal framework and governance, institutional quality management system, institutional mission and objectives.

Without an in-depth review and application of the accreditation standards on both institutional and programme level, one may conclude that overall, there are no outstanding differences between the requirements and threshold expectations of MNCEA and other accreditors. Some items, such as the involvement of students, may be closer to the European accreditation systems. However other items, such as the outcomes and mission orientation along with the transparency requirement on the website, are tell-tale signs of the American accreditation systems. The comparative data is specifically related to ACBSP requirements and so is the stakeholder involvement which seems to have a prominent role in the standards.

Below is a comparative overview of some of the mentioned accreditors indicating basic information such as their establishment, scope, headquarters, and review cycles.

Table 1 Overview of Major Accreditors

Name	Abbreviation	Scope		Presence	Type	Founded	HQs	Review cycle
Association to Advance Collegiate Schools of Business	AACSB International	Programmatic	Public and private	Global-Largest body	Voluntary	1916	USA	5-year cycle
Accreditation Council for Business Schools and Programmes	ACBSP	Programmatic	Public and private	Global	Voluntary	1988	USA	10-year cycle
Association of MBAs	AMBA	Programmatic -only Master and Doctoral	Public and private	Global	Voluntary	1967	UK	Every 5 years or less
European Quality Improvement System	EQUIS	Institutional	Public and private	Global	Voluntary	1997	Belgium	3 or 5 years
The International Accreditation Council for Business Education	IACBE	Programmatic	Public and private	Global	Voluntary	1997	USA	5 to 7 years
International Quality Review	IQR	Institutional	Public and private	Global (based on the QAA)	Voluntary	2019	UK	5-year cycle
The Higher Learning Commission	HLC	Institutional	Public and private	Regional Accreditation	Voluntary and Policy	1895	USA	Various
Mongolian Accreditation	MNCEA	Both institutional and programmatic	Public	National	Policy		Mongolia	

Name	Abbreviation	Scope		Presence	Type	Founded	HQs	Review cycle
New England Commission of Higher Education	NECHE	Institutional	Public and private	Regional/global Accreditation	Voluntary and Policy	1885	USA	10-year cycle
Northwest Commission on Colleges and Universities	NWCCU	Institutional	Public and private	Regional Accreditation	Voluntary and Policy	1917	USA	7-year cycle
North Central Association of Colleges and Schools (replaced by the HLC in 2014)	NCA	Institutional	Public and private	N/A	Policy driven	1895	USA	N/A
The Accreditation Organisation of the Netherlands and Flanders	NVAO	Institutional and programmatic	Public and private	In NL only	Policy driven	2004	NL	5 years
Middle States Commission on Higher Education	MSCHE	Institutional	Public and private	Regional Accreditation	Voluntary and Policy	1887	US	Various
Southern Association of Colleges and Schools	SACS	Institutional	Public and private	Regional Accreditation	Voluntary and Policy	1895	USA	Various
Quality Assurance Agency for Higher Education	QAA	Institutional	Public and private	British	Policy Driven	1997	UK	5-year cycle
The Tertiary Education Quality and Standards Agency	TEQSA	Institutional	Public and private	National Accreditation	Policy Driven	2011	AUS	7-year cycle

Name	Abbreviation	Scope		Presence	Type	Founded	HQs	Review cycle
Western Association of Schools and Colleges	WASC	Institutional	Public and private	Regional Accreditation, also Global	Voluntary and Policy driven	1962	USA	6-year cycle

2.2.6 The process of accreditation, a comparative analysis

When looking at the process of accreditation, even though there are differences, yet most sections are in fact very similar. This self-study process emerged in the 1950's in the US (El-Khawas, 2001). Normally the process starts with institutions indicating interest in a certain accreditation body, and the first step is becoming a member of this accreditation body. Membership has some minimal requirements, for example for US institutions normally it is connected to regional accreditation, while internationally it involves governmental recognition or accreditation to award degrees. The next step is to submit a document for eligibility or candidacy. Normally the Board of Commissioners (BoC-the independent decision-making bodies of the accreditors) will decide to accept or reject an institution and/or programme for eligibility. This is indeed an important step as it ensures that institutions are not set up for failure in the process. For those who do not receive approval at this stage, there may be some major discrepancies between the requirements or standards of accreditation and where they currently stand. Institution accreditors have a wide array of requirements here. They require a lot more information compared to programme accreditors; this is only natural when the scope of accreditation is a lot wider. For example, for AACSB, the institution (as AACSB accreditation is granted by default to the institution, AACSB 2020) needs to give detailed information on the background of the institution along with student enrolment data and faculty information on each degree level and research capacity; ethical behavior; overview of programmes; sustainability; resources; among others. It is important for the accreditors at this stage to identify the scope of the accreditation, meaning the decision must be made which programmes will be included and which programmes will be excluded from the review.

Below is a short overview of a general accreditation process cycle from the very first contact started from the institution and/or programme:

1. Letter of intent/letter of application for membership.
2. Submission of documents for membership and/or candidacy.
3. Approval of candidacy generally by the Board of Commissioners or by staff members of the accreditors.
4. Appointment of mentor.

5. Preparation for the self-study reports or self-assessment reports (SAR) including preliminary reports to be submitted, questionnaire, visits, etc.
6. Advice of the mentor to the Boards whether schools can progress with submissions.
7. Submission of documents for initial accreditation.
8. Site visit.
9. Decision of the board of commissioners on accreditation.

The length of time for the process varies greatly. It can extend from two years in the cases of programme accreditors with institutions well-prepared; to over seven years with the case of institutional accreditation. The length of time is relevant in the discussion because preparation to a well-established systematical assessment process is the basis for gathering data on student learning. When institutions are preparing for the accreditation cycle, collection of data is essential in identifying whether they are on track in achieving their objectives for student learning.

3 Literature Review

As mentioned before, accreditors have been under scrutiny in the past decades with perhaps a bit more appreciation showing towards them during the COVID-19 crisis. The continued demand for high quality education is expected to increase, even with the fact that several (almost all small private liberal arts institutions) in the US will be likely to close due to a decrease in student enrolment numbers and financial hardship. Outside the US however, the expectation is still that new institutions will emerge, or the current institution embark on new partnership formats and enter new markets in order to ensure access to higher education. Accreditors seem to promise quality education. The question is, do these accreditors deliver what they promise? What is going to be more important for them, expansion of their own business or supporting institutions to achieve those threshold standards? Is it more important to advance smaller and less ambitious schools or is it more beneficial to protect the rigid and closed systems and only support the top layer of business schools?

3.1 Critical review

Phillips and Kinser in their study (2018) talk about the bipartisan attack on US accreditors serving as gatekeepers for federal funds. They mention reports from the mid-2000s, starting with George W. Bush's secretary of education, Margaret Spellings, challenging the accreditors' primary role to Barack Obama's State of the Union address in 2013, indicating that there may be space for an alternative to accreditation, and finally to Donald Trump's Secretary of Education challenging the Higher Education Act itself. Controversy is not new to accreditations and the accreditors have always managed to adapt, but the attacks indeed seem to have increased in the last decades. The trend shows that the accreditors are not the trusted entity they once were before.

Eaton (2018) called for a new era of accreditation, a new normal, moving away from overseeing threshold quality and application of minimal standards to improving quality in

general. She claims quality improvement has always been at the centre of accreditation and that this is what has been under challenge. The new role is compliance and quality assurance, making sure the public understands how institutions meet their expectations. Quality improvement according to Eaton (2018) is taking a backseat. Previously the aim was to support institutional autonomy as much as possible and keep mission orientation at the core of accreditation, but with the increase of common terminologies and standards this has changed. International development tends to support this route, even if not attached to public funding as it is in the case of the US. Instead, student learning outcomes and comparability linked to the qualification frameworks are leading the discussions across the world. So then Eaton (2018) questions whether, with the changes on how accreditation is viewed, we can still sustain the original traditional elements of accreditation and show that a combined solution will take accreditors forward. Eaton (2018) suggests we should continue to focus on two measures at the centre of accreditation: firstly student achievement must be ensured, and secondly accreditation institutions should take the lead in requiring transparency. Is this a realistic feature for the new normal? There is too much at stake for many big universities to make such information available for the public. UNESCO and the ESG requirements are not fully implemented across the board, especially when it comes to transparency. Universities may not be willing to risk their reputation, which may, for instance, be linked more to research than education, by providing the type of detailed information that guarantees transparency. Now the CHEA requirement on information on student outcomes has also changed (prompted by the federal government), with the possibility to report instead on student attrition/retention rates, graduation rates, credit transfer, and job placement rates, among others. However, reporting on these numbers could be viewed as meaningless for the public. Vibert (2018) supports this notion, adding that if these metrics miss the critical review of student learning outcomes or competencies, they lead to oversimplification and can further confuse the students. Vibert (2018) even calls some of these data simply ‘incomplete metrics’. Accreditation is in danger of becoming window-dressing. Eaton (2018) urges institutions themselves to take the initiative to be transparent. With accreditors, there is a trend of moving more and more towards student learning focus even when that was not the centre of their attention. So, there is movement but still not enough and little is known about the institution’s performance in general.

Manning (2018) re-asserts that quality assurance and accreditation prompt continuous improvement. It is mandated and an institution is either improving or declining, hence quality assurance ensures that the improvement cycle rather than being an end product, ensures an ongoing process of enhancement.

Vibert (2018) considers the views from the programmatic or specialized accreditors. When it comes to programmatic accreditation (such as the case of ACBSP), the unit of accreditation refers to a school within a university (for instance business or management schools). The specialized accreditors then review the programmes and/or courses within that specific discipline. There are several similarities with institutional accreditation, for example quality improvement is at the centre and the process of accreditation remains mostly the same, but specialized accreditors focus on discipline specific matters and competences essential for professions linked to that discipline. The peer review process is essential in the whole accreditation process but has indeed been the subject of criticism. Often the peer review visits are viewed as nothing more than a friend reviewing friends: they pat each other on the back, pay the dues and receive accreditation. This should naturally not be the case, but peer review indeed prompts many questions. The Vibert (2018) suggests the following:

1. It is extremely hard to separate what the peer reviewers consider as good practice at their own institutions from what the standards of accreditors dictate. More often than not, site visitors mention what they have done at their own school, but this is not necessarily in line with the threshold requirement of the specific standards. Peer reviewers must make sure that they judge quality only against the standards and specific requirements and are not led by what they themselves consider good.
2. As Vibert (2018) mentioned, there is the misconception of what ‘member-driven’ means in the accreditation world. Do friends review friends? One of the main tenets of accreditation is that all institutions should be judged the same against all standards, but in some cases well-established institutions enjoy a certain privilege when going through the reaccreditation process compared to institutions just starting the process. The more established the accreditor, the more likely this is to happen to ensure the protection of their high-standing accredited member portfolio, because it supports the strength of the accreditor to stay in the elite leagues against other market competitors.

3. Sometimes the peer review team is not well prepared. The site visits tend to be extremely rewarding but it is also the case that very often accreditors allow only deans to participate and there are many other demands on their time. Also, it is often the case they themselves not the ones who prepare all the information for the self-assessment reports.
4. In certain instances, the peer review gives recommendations not in line with the standard requirements.
5. The length of time for the site visit/peer review is limited and the team often makes a judgement without a holistic view of the quality of the programmes.
6. Peer reviewers may not be familiar enough with the national policy regulations. Accreditors try to ensure they appoint someone who is familiar with HE system of the particular country where they operate, but this is not always possible.

Vibert (2018) continues to discuss the transparency agenda. The USDoE, for example, requires that accreditation decisions become part of the public domain. The US is not the only country requiring this, for instance the Dutch national accreditor, the NVAO, has required this since its inception in 2006. However, this decision is not without danger. Stakeholders, including students, may read the information and misinterpret it simply because they are not educated about the details underlying these decisions. For example, 'notes' and 'conditions' are viewed differently by different accrediting bodies. In the case of ACBSP, a 'condition' would need to be removed in the four years following the accreditation decision, but 'notes' serve more as suggestions. External suggestions to institutions are often more welcomed than internal indications for improvement, so this is a very useful tool in the hands of the accreditors. Others, not educated in the system, may interpret them as signals of bad practice or low quality, which may certainly not be the case. These suggestions are simply identifying the journey towards continuous improvement. On the other hand, if an institution is put on probation, that may signal serious concerns, but again different accreditors have different policies as to what they make public. The EQAR, does require accreditation decisions to be posted on the website of institutions and those of the accreditors as well.

The final point worth mentioning from Vibert (2018) is regarding the relationship between the stakeholders and the accreditors. ACBSP places high value on this relationship and

requires the accredited institutions to include their stakeholders in their quality processes: from strategic guidance and advice all the way to setting student outcomes and in some cases being part of the assessment. Now the institutions could view as stakeholders: students, faculty, staff and both the private and public sectors, however Vibert concentrates on the private sector. His points centre around the notion that accreditors should take the lead in defining the profession and encouraging more inclusion of practice areas in the curriculum. However, experts in the field understand the professional market needs even more than those of the academics and even though nowadays institutions tend to employ adjunct faculty who are very much involved in everyday practice of the field, it is still best left to the professional field experts to identify where the profession is heading. At the end, the ideal situation seems to point towards a collaborative and communicative relationship between the HEIs and the professional field, thus promoting a dialogue that allows the design and delivery of a highly competitive programme supporting and impacting each specific field.

Altbach in his 1999 study looks at the variations between public and private universities including from a QA perspective. Private higher education has become an essential part of overall national systems but as Altbach (1999) indicates it's very hard to coordinate or manage perhaps even more than the public universities. When it comes to Mongolia though as the directive is there to achieve international accreditation, both public and private universities were encouraged. The major difference it seems between public and private universities in Mongolia is that the public universities would have a more developed research base, they tend to be bigger with more departments while the private universities remain smaller with a teaching mission and may never achieve research status as the public universities as that may not be the objective in any case. The proliferation of low-quality institution was already discussed and recognized as a major issue hence the historical trend of merging and closing institutions.

Neil and Alacbay (2018) return to the earlier mentioned tension between quality improvement and quality assurance. Indeed, there are structural issues between the two notions, one being geared towards continuous improvement while the other is geared towards a possibly punitive system, especially in the US where it is often linked to Title IV student funds. But even in other countries around the globe, accreditation decisions can scar institutions and may even cause their demise if the public is informed about conditions or the loss of accreditation. In some locations this may not be linked to financial

requirements, but culturally losing face would be something many institutions could not afford. Neil and Alacbay (2018) are extremely critical of the US accreditation system, stating the US accreditors simply cannot show that their “convoluted systems” lead to student success. On the contrary, they continue to indicate that: (pp 75) “*Nothing in the accreditation process provides institutions, students, or families with an objective (much less quantifiable) measure of student learning, instructional quality, or academic standards.*”. Blanket statements such as the above are concerning. It is clear that this may be true of some of the institutional accreditors and some specialized programme accreditors, but there are some existing accreditors in the field who are quite prescriptive on reporting student outcomes and regulate the tools required to be used to measure the assessment of these objectives.

According to Neil and Alacbay (2018), there should be minimal threshold requirement for the metrics, such as graduation rates and so on. Interesting enough in the UK, institutional success related to student progress is linked to the right of maintaining visa awards by the UK government, perhaps more of an example for the US regional accreditors to envision in the future. Neil and Alacbay (2018) do come with a possible solution which would be delinking accreditation from student funds, allowing them to return to their original purpose of continuous improvement but more as a voluntary activity. Many of the specialized accreditors already have the voluntary activity but whether this will really be successful is to be seen. The competitive edge of accreditation has already prompted institutions to choose voluntary accreditation if they want to survive in today’s higher education environment. An independent auditor of their disclosures of transparency would perhaps prove added value.

LeBlanc (2018) in his study outlines an experiment launched by the USDoE in 2015 called Educational Quality through Innovative Partnerships (EQUIP). The project aimed at possible modification options for quality assurance in the US. The project findings are relevant to this research as it was concerned specifically with programme accreditation (such as ACBSP) and moving away from the typical gateway of institutional accreditation to accessing federal funds. EQUIP’s approach to quality in fact includes the central tenets of assurance of learning or an outcomes approach to accreditation. The project indicated that by concentrating on the learning objectives, how are they measurable, what tools they use and how the data is assessed, is perfectly in line with ACBSP criteria, but also that of AACSB and the like, using assessment as the centre of their accreditation standards. The

idea is then that the programmes can deliver programme results and not concentrated on the processes nor the inputs, allowing for plenty of innovation in the programmes. A similar project started in Europe the same year, also called EQUIP: Enhancing Quality through Innovative Policy and Practice. The aim of this project concentrated on the European higher education arena and wanted to support a consistent embedding of the European Standards and Guidelines across the Bologna signatories. Additional objectives included the development of the ESG as an efficient tool to ensure quality in higher education, hence the project saw a revision of the ESG and developed policy recommendation to practitioners, among others.

Studley (2018) concentrates on the accreditor's role in policy making next to the two traditional roles of quality improvement and quality assurance. Essential to this is for the accreditors to ensure that they are viewed as credible and effective entities, gaining involvement with institutions through their quality processes with aim of delivering quality education. She emphasizes that accreditors have more opportunity to shape the future of higher education than they believe, and the researcher wholeheartedly agrees with this. Accreditation may be heavily criticized in the US but enjoys substantial status across the globe. Similar to rankings, accreditation took off and achieved a status that places institutions and programmes carrying those accreditations at a fully different level. While in some countries the objectives are to gain these accreditations, in others the institution would not even be considered as legitimate without it. Some national policies are built around these accreditations to a level where they built their own systems according to these standards and criteria. Therefore, it is so important that accreditors are responsible leaders in the field of higher education and should not only extend their hand in shaping higher education but take the wheel, move out of their comfort zones and lead the way ahead. Studley (2018) highlights what she calls the accreditation competencies which are: promoting transparency; the role of judgement and finally, leadership and culture change. Promoting transparency has been high on the agenda of most US accreditors as it is required by CHEA and the USDoE. However, the tools for transparency, as discussed before, will need refined so that they are meaningful for the public. Judgement has been essential in the peer review process: so much depends on the site visit team and then the independent decision-making bodies of the accreditors do decide which institutions and programmes meet the threshold standards. This decision is made based on myriad information provided by the entity to be accredited. What is missing is peer review across

accrediting organizations themselves and Studley (2018) worries about the lack of consideration given to this when so much improvement could be made by the accreditors being transparent among themselves and sharing peer review knowledge. Before implementation, considerations would have to be given to several factors. Many institutions or programmes are already accredited by a number of organizations so there is significant sharing and comparison taking place. However, this sharing is not structured. Accreditors, even though they are not-for-profit organizations, still compete for institutions, act as businesses and need to survive in this competitive environment. So perhaps this is a reason why peer review across the board has not taken off and is simply not a subject for discussion at this stage.

McFarlane (2012) also brings up the question whether the competition between the accrediting bodies results in an undesirable impact on management and business education in the future. As the final segment on leadership and change, accreditors should try to give all the tools they have to ensure that as the centre of attention moves towards outcomes-centered accreditation, the institutions and programmes can change along those lines. There have been good examples where accreditors give more and more workshops and conferences. Especially now with the COVID-19 crisis, many of these are more accessible to more members of the institutions for also a lesser price. However, the shift towards outcomes-based assessment does require culture change within institutions. Several accreditors have realized this and are opting for helping institutions while still largely depend on the institutional leadership for implementation. If there is minimal understanding of what outcomes-centered quality assurance would mean, the executives would not promote it, so responsible and educated leadership must be appointed to management and leadership roles: educated primarily to the level of understanding accreditations, the transparency and stakeholder agenda and the positive impact out an outcomes-based quality system.

Green (2018) looks at the role of the accreditors in a globalized world. Activities of accreditors include accrediting institutions or programmes outside their home base. This is relevant to this discussion as ACBSP is a US-based specialized programme accreditor having a global portfolio and accrediting programmes in Mongolia, among others. There are different motivations as to why an institution looks for accreditors outside their home country. It may be that the national quality guidelines are not developed yet. It may be because these accreditors are viewed as offering a seal of approval across the globe, or

because they deliver a certain type of system, for instance American style education within another country. Whichever it may be, it is expected that this demand will continue to increase. An example is the case of Mongolia. Several accreditors have expansion in their strategic plans and have been globally inclusive when it comes to their member schools and their boards, as in the case with all the American specialized business accreditors (AACSB, 2020; ACBSP, 2020; IACBE 2020).

Blanco-Ramirez (2015) in his study looks at the strategies of US accreditors have while accrediting internationally. A growing number of institutions across the globe are opting for US accreditation as in the case of Mongolia. However, he only considers regional accreditors in his study and not specialized accreditors. As we have seen in the Research Context chapter, under US Based accreditation, the regional accreditors accredited many institutions outside the US already, including countries in the Middle East and Africa, in Europe, and South America. Blanco-Ramirez (2015) indicates that one of the limitations of the available research studies is that US accreditation is rarely studied from the institutions' perspective, so his aim was to look at the similarities or differences between the approaches towards US or non-US institutions and how are the policies reflecting this diversity and what is the strategy of explanation outside the US for these accreditors? In his findings he highlights that there are several reasons, including learning new quality practices; extended engagement with international institutions while sensitive to local context; a response to globalization; increased interest in quality education in the Global South. Issues arise when accreditors start competing against each other especially without a clear strategy on how to engage with non-US institutions.

One of the concerns Green (2018) points out is that accrediting institutions outside the home base could be viewed as a form of neocolonialism. This notion has been debated, as the national regulations are always taken into consideration and as this is voluntary accreditation sought by the receiving institution, seeking out the possibility of gaining the specific accreditation, in some cases even prompted by national requirements. It is important to mention the growth of branch campuses across the globe. They require the accreditation and approval in the country of establishment. Accreditors play an important role in this aspect and afterwards the receiving country's national quality assurance bodies work together with the accreditors to carry out quality reviews. In Europe, the establishment of the Bologna Accord already aimed at this synchronization, but one can see this now across continents. For example, AACSB has been working with the Dutch

NVAO accreditation carrying out combined institutional site visits (AACSB, 2020). In the United Arab Emirates (UAE), Dubai's quality body the Knowledge and Human Development Authority (KHDA) has been working with the UK's QAA for a long time (QAA, 2020). The list goes on. So, through the development of cross border activities, both the accreditors and the institutions bring possibilities for synchronization to the front of the agenda. Green (2018) does have exciting suggestions for the future, for instance the establishment of an accreditation "superbody" or a "World Wide Quality Register" if you will, allowing for the mutual recognition of accreditation bodies. As exciting as this may be, smaller efforts, like that of Europe's EQAR, have not reached their original objectives of simplifying the system and allowing for an easy cross border accreditation recognition withing the countries in Europe, so one must wonder if taking it to the next level, without even having found a smaller scale, workable solution, may be doomed from the very beginning.

Altbach (2003) is of the opinion that it is bad idea for American accreditors to be accrediting institutions and/or programs outside the country. He indicates that America as an academic superpower must be very careful not to abuse its status while doing so. Demand is increasing, and more and more institutions are reaching out to US accreditors today to achieve accreditation status. Altbach (2003) speculates that there is a real risk in the fact that American accreditation is designed for American institutions only, and site visit team members may not understand the language and the national traditions. It seems that the current accreditors take these notions into consideration with either having site visit team members who speak the language on the visit or someone who is familiar with the cultural implications and understand the local education system.

Lederman (2013) in his study also looks at the accountability agenda. He relates the fundamental tensions arising from the federal government delegating the task of judging quality to several entities, including those of the accreditors. The fact that these accreditors are run by the colleges themselves led to considerable discomfort and ended up with the accreditors in the limelight. He reminds us that Molly Corbett Broad, the former President of the American Council on Education (ACE), in 2010 assembled and appointed a panel of college presidents to see how much reform and change should and could be introduced into the American accreditation system. The findings of the panel matched the suggestions of many others in the field: increasing the transparency of the accreditation process by making assessment information available to the public; focusing on student success; taking

faster and stronger action against those programmes and institutions not meeting threshold requirements and, finally, introducing a more cost-effective process. This may not be a major restructuring of the system, but more of a refinement - in line with the suggestions of many other experts. Perhaps the only suggestion that was not highlighted in other studies is the cost effectiveness. Indeed, accreditation can mean a major financial burden for institutions, and it does not only entail the payment of membership fees, but also the additional costs of meeting the requirements: hiring additional faculty, hiring additional administrative staff and the like.

Kinser (2018) in his study reconfirms a number of items discussed above. He highlights matters related to the institutions' provision of the information, which should be accessible, transparent, meaningful, and understandable to the public and stakeholders. Understanding accreditation is paramount to the stakeholders. It is indeed a complex matter, along with its triple mission of quality improvement, quality assurance and consumer protection. Central to this is also the 'process versus outcome' debate: should accreditors concentrate on the input or the output? No accreditor relies only on a single metric and that is understandable. In the opinion of the researcher, higher education is perhaps not ready for such drastic measures. Imagine a system where all that matters is the learning objectives, the assessment and the results; a system that would require no information on admission criteria, nor prior learning, where there was no interest in the qualification of teachers and nothing which would outline the contact and study hours and the requirements of the curriculum. There would be no information on grades, only rubrics indicating how the students meet the learning objectives of the programmes. The researcher does understand that this is perhaps too ambitious for now. Competency Based Learning (CBL) is perhaps the closest that we have. It allows the students to study at their own pace and focus on the demonstration of the learning process and the achievement of the learning outcomes. It allows for summative measurement of student learning and can be viewed as a form of outcomes-based learning. Another critical issue that still lingers is the measuring of quality: what are the right tools, indicators, targets, and measurements? Even though the current study does not investigate this in detail, it is relevant as ACBSP (and several other accreditors) endorse certain type of tools as proper assessment for student learning.

Zammuto (2008) draws attention to the growth of for-profit and private universities, the global spread of accreditation and its implication to reshape higher education's competitive dynamics. As accreditation moves into a more mission-oriented standard focus, institutions

will have a better chance to understand the market and stakeholders and will be in a better position to respond to the needs of the market. So, in essence Zammuto has a much more positive view of the competitive edge accreditation could bring to business schools, including those of traditional institutions. In the US already in the early 2000's there was a trend for corporates to support their employees and reimburse tuition fees and this would be attached to the requirements of certain types of accreditation. In response, institutions started the processes for gaining accreditation, taking the applications for membership to a new height. This strengthens the view of Zammuto that the value of accreditation will continue to rise, and this has not stopped in the past 20 years, but goes hand in hand with competition for the international student market. In essence not having accreditation could mean a major financial risk for institutions. Zammuto does indicate one issue: the proliferation of accrediting agencies. Knight (2005) is concerned about the same matter: the number of accrediting agencies is increasing, some of which are not legitimate accrediting bodies causing further problems. This may create confusion and has prompted the need for both accreditors and institutions to educate their stakeholders not only on the value of accreditation but also on the difference between legitimate and fake accreditors, between institutional and programme accreditation, even going as far as providing an explanation of standards. Zammuto's views from 2008 correctly indicated the positive aspects but also the issues that we see in today's accreditation landscape.

Istileulova and Pelhjan's study (2013) concentrates on business schools in the Commonwealth of Independent States (CIS) and considers what type of impact external accreditation could have on business school changes. They specifically concentrate on non-Western countries, contrary to most other studies related to accreditation, similar to what prompted this research study. The study reviewed 22 business schools in four countries, Russia, Kazakhstan, Kyrgyzstan and Belarus. The findings indicate that business schools would go on to change entrance requirements, review their mission, introduce metrics for outcomes-based learning, emphasize internationalization of programmes and strengthen financial resources. The study is limited to reviewing the frameworks around the Triple Crown accreditors, which would be AACSB International, EFMD and AMBA, with short reference to the national and local accreditors and some additional accreditors, ACBSP being mentioned by one institution in Kazakhstan. Literature suggests that changes to admission requirements normally come as a result of AMBA accreditation with heavier emphasis on the input side. Mission revision and assessment would come as a result of

AACSB accreditation, and EFMD/EQUIS would be concentrating on the internationalization of curricula. Istileulova and Pelhjan's (2013) conclusions also indicate that further studies are needed in the field, continuously outside the western country arena and also a comparative study on how business schools make decisions on accreditations and how accreditation signals the market.

As we have seen, the scrutiny of accreditors by the public was prompted by several matters, but in particular, meeting the expectation of stakeholders: society, students, governments and business. Huisman (2010) talked about the results of the Bologna Declaration, which was established in 1999 in an effort to synchronize the European education platform. The European Standards and Guidelines (ESG) were developed with the hopes of not only managing but also enhancing the quality of educational institutions on the continent. Huisman (2010) rightly questions whether these efforts have actually paid off as they seem to be serving more of a bureaucratic process instead of the hands-on support needed by institutions. Is it just an exercise to meet the requirements, leading to a simplistic compliance matter or does it positively affect the quality levels of delivery? Stensaker (2011) highlights that as good as external quality assurance may be, it seems to be only affecting the managerial process, not the student learning experience. The potential of impact of accreditation is less known and needs further investigation.

Reddy (2008), Schwarz and Westerheijden (2007) are concerned with the threshold standards approach. As mentioned earlier, this implies that accreditors often follow the 'minimum standards' approach meaning that they do not ensure that accredited institutions and programmes achieve the highest quality, but rather that a minimum standard is achieved. No consensus is achieved on this matter within the experts. Urgel (2007) for example argues heavily against the notion of aiming at the highest standards, as when it comes to certain accreditors, they are strictly accrediting only those institutions who already have achieved top quality both in the national and international context. Reddy (2008) draws attention to the fact that accreditation should be value-added to the credentials which institutions award. He continues the emphasis that more research is needed on the impact of accreditation processes in an institution, so that it would be clearer how the implementation of an accreditation system increases the value of that particular degree programme. Moreover, there are hardly any studies available which look at the global accreditors in comparison to the various national approaches, which this specific research study incorporates. The development of a comprehensive international QA system

would be welcomed by Reddy instead of the existing national policies. Last but not least, his concern is that accreditation only serves as a snapshot instead of actually assessing the capabilities of institutions. However, literature suggests that expectations of accreditations are exaggerated, as would seem to be the case with Reddy. Accreditation is an external peer review; it was never aimed at continuously managing HEIs and programmes. The institutions themselves are responsible for doing this. In the UK's QAA approach or AACSB, or TEQSA, there is a more extensive review at the initial accreditation or approval process and then the institutions and/or programmes must report only on certain areas, as the institutional history is taken into account (or its risk level if you will) (QAA 2020, AACSB, 2020, TEQSA, 2016). Indicators are linked to assessment and less on capabilities of institutions. This matter has been debated in Board of Commissioners' meetings of both IACBE and ACBSP (between 2012 and 2020), where the researcher has actively participated. It is not easy to decide on issues such as the length between accreditation cycles; the deliverables and the degree of trust that is placed on the accredited institution, but accreditation should never have to serve a role where HEIs are closely and continuously monitored. This must not be the expectation. Reddy (2008) does bring up the impact of new modes of delivery, especially relevant now, even more within the COVID-19 and post COVID environment. He questions whether the existing systems can keep up with all these developments. What would be the different requirements for the different modes of delivery? In hindsight the COVID-19 pandemic has pushed institutions and accreditors alike to adapt to the new environment, delivering programmes online at an unprecedented speed, with accreditors carrying out site visits online, with a requirement of a one day on-site visit by the chair of the site visit team when permitted (CHEA, 2019).

Tomlinson's study (2015) reviews external quality assurance agencies across the globe and their models of assessment. His general conclusions lean toward the adoption of a more differentiated approach towards assessment indicating a 'review of reviews' approach. This means that the validation is aimed at reviewing the internal and external quality reviews of institutions and programmes. This specific aspect related also to the ACBSP model where the last segment of the quality cycles indicates that not only changes are made to the programme that is reviewed but changes are introduced to their processes, signaling a mature internal quality system according to Tomlinson (2015). He mentions the different projects which took place including OECD's AHELO project, the Tuning project, different Australian attempts at mapping learning outcomes and evaluating standardized

testing but no comprehensive study revealed. He indicates that there are indeed signs that some external reviewers are on track for differentiation, meaning a minimal review of core processes needed in the case of mature providers, but these efforts are still at early stages. He suggests considering a future where different models apply to different providers, hence more in line with the TEQSA risk framework, but he goes further to suggest that the institution reviews itself and detects and fixes issues that may arise. This is essentially a trust-based system, moving away from reviewing a variety of programmes across different fields each year there could be an agreement of broad fields allowing for simplification. Unfortunately, with the expansion of HEIs across the globe, the number of mature HEIs is significantly less than the HEIs on a developmental track or just simply not considered mature at any time. This means a trust based system would only impact a small percentage of institutions, like the issue of Triple Crown accreditors only accrediting a very small percentage of institutions. In addition, a lot of institutions need a long period of time to build up to a mature system and external accreditors play an important role in this. Very often recommended improvements are only taken seriously and implemented when they come from the external reviewers, allowing accreditations to impact the overall quality of institutions or programmes. The sentiment is understandable. Self-governing institutions would be the ultimate objective or a system where the review of core processes and input is minimal and only outcomes would be reviewed, but institutions do often prefer detailed guidelines by external bodies.

It is not only experts who question the relevance of the accreditors. Lowrie (2008) mentions that in certain cases accreditors may even make matters worse with the narrow focus on the competitive nature of accreditation. As an example, some countries who are facing financial problems and cannot afford to hire highly qualified faculty may never meet the required threshold standards. Lowrie (2008) argues that accreditors should not be left alone to pursue their own interests. It needs to be ensured that they serve their stakeholders. He also questions the lengthy process of accreditation suggesting the administrative time spent on gaining accreditation (which could be up to seven or eight years) should be instead spent on teaching and research, and recommends that the financial implications should also be revisited. Institutions could save on annual accreditation fees and on the fees spent on the maintenance of accreditation, let alone the amount they spend on hiring both faculty and staff meeting those accreditation standards. He is very critical and views accreditation as the middleman, highlighting that institutions should be allowed

to make their own decisions as to what information they share publicly on their website with their stakeholders (such as faculty, students, employers).

There is also the consideration that the implementation of such major changes as required by an accreditation framework means significant changes in the schools' assessment activities, especially the requirements of implementing direct type of assessment measures. Pringle and Michel (2007) discuss these and the effects of such changes on institutions. In their 2007 study, they surveyed institutions going through AACSB accreditation with similar requirements on summative direct measures and the findings were not favourable. Many faculty members indicated they would rather reduce the number of measures used in their assessment. This means that such requirements prompted faculty resistance and in general were viewed as increasing bureaucratic measures instead of serving their original objective of aiding and improving student learning.

McFarlane (2012) highlights the competition taking place between the three main American business accreditors, which also tends to create a problem elsewhere. He talks about "accreditation discrimination" -where institutions with certain types of accreditation would not hire faculty nor would they accept students from non-accredited institutions, or those accredited by a lower-level accreditation body. While none of the standards of the accreditors require that an institution's faculty body has to be from specifically accredited schools, institutions themselves set such standards and are responsible for this discrimination. McFarlane (2012) is highly critical of the US accreditation system and even indicates American accreditors tend to hide weaknesses in order to guard the so-called "Gold Standard" (McFarlane, 2012, pp. 126). However, he does not critique AMBA nor EQUIS to this level, so he is less worried by the European accreditors, which is interesting as CHEA requires all institutions accredited to post information on student learning, which is not required by EQAR.

Krzykowski and Kinser (2014) in their study consider if the different accreditors and their standards result in different practices in the US. The study is limited to the regional accreditors and institutions under their umbrellas. They compared the standards of the accreditors and the information published on the accredited institutions' websites from a variety of states. Upon the reviews, they come with several recommendations for accreditors and for institutions themselves. They tend to be quite prescriptive towards

accreditors indicating, for example, that accreditors need to specify which stakeholders HEIs should consider. They also request identification of information for the different target groups. For institutions they give recommendations on full transparency – a noble objective indeed, but the literature reviewed indicates repeatedly that institutions are not willing to share information on their website for a number of reasons, including fear of backlash from national accreditors if they do not meet objectives and unfavorable comparative data with other institutions. Krzykowski and Kinser (2014) however do realize that their action proposals are not going to help unless there are major reforms within the accreditation sphere.

Kis in her 2015 study highlights the difficulties in measuring the impact of any quality assurance systems, simply because there are too many other forces affecting the outcomes of studies, which is why there are also limitations presented in this research. Indeed institutional, or even programme level quality cycles, are affected by national and international events, national and international level policies, economic changes affecting countries and institutions, as well as funding, hiring and admission results. In today's COVID-19 impacted world, many institutions face huge problems next to the already worrying student admission numbers in certain countries. Accreditors are trying to provide help, giving options for later payments, postponing site visits - the list goes on. Indeed, quality can be impacted by many forces outside the realm of the institution.

Gaston's 2014 study is very comprehensive and highlights many aspects and problems of accreditation, but also offers solutions and a way forward. One of the positive impacts he indicates is that even though accreditation agencies are membership driven and their leadership and independent boards come from the accredited member portfolio, they are still viewed as objective decisionmakers. He does mention several negative aspects, first of which would be the procedures and processes which have not evolved with the changes in HE (including student body, increased accountability, relationship with the federal government, scale of HEIs, rise of for-profit HE, new technologies, adjunct faculty portfolio, distance education, competency-based education). He talks about cost of accreditation versus the benefit that accreditation can offer: the threat of liability arising from the transparency and confidentiality agenda; the two competing priorities of improvement versus evaluation of quality; enhancing accreditation while maintaining standards and the internationalization agendas. In Gaston's view there are two main trends

for solutions. One trend calls for major changes and very radical and urgent actions, but may cause too much defensiveness and not lead to required improvements. The other trend is less provocative but without much pressure to act, so the question is whether throughout all the debates, this would lead to any change at all? Gaston (2014) thematized the solutions going forward into five areas: consensus and alignment; credibility and efficiency; agility and creativity; decisiveness and transparency; and shared vision. When reviewing these in more details the researcher finds several matters addressed in the other literature. Consensus and alignment are indeed important for several reason. Unfortunately, accreditors tend to not use the same wording, so it causes confusion for institutions applying for accreditations but also for the site visitor carrying out the accreditation reviews. Gaston specifically advises on business accreditation with significant confusion between the specialized business accreditors namely AACSB, ACBSP and IACBE. He also suggests that the specialized accreditors should work together with the national and regional accreditor on the same platforms. Regarding credibility, his advice is to strengthen the accreditor boards and site visit teams. However, a problem could arise as there are limitations because involvement in these boards is voluntary and does take up a considerable amount of time. Being a member of the Board of Commissioners means not only that one would have to attend the meetings, which can last anywhere from two to three days, but also requires prior review of materials. Assessment or site visit teams are also required to undertake considerable preparation, but are usually given small remuneration. The site visit teams are regularly trained and retrained but still some perform better than others, so training site visit teams remains a challenge.

Accreditors themselves raise the concern between quality assurance and quality control, while pointing out they have been blamed for issues outside their control. Customers often find accreditation costly, intrusive, and certainly not enabling innovation. Accreditation is a messy business and not one solution by itself will be enough to address the many issues surrounding the current practices. This study does not aim at providing a comprehensive overview of all the issues facing accreditation and the issues the accreditors themselves are facing, rather it aims to identify some general views on the matter, which are indicated below.

In summary of the above, there are several problem areas related to institutional and/or specialized programme accreditation. Some major ones are listed below:

Effects and Impact of Accreditation:

- The impact of accreditation is often not measured systematically or accurately in the following aspects: Student learning, financial burden, administrative burden, overall quality improvement, faculty, research output, impact on society, differences between public and private institutions (Altbach 1999; Eaton, 2012; Eaton, 2018; Gaston, 2014; Lederman, 2013; Lowrie, 2008;).
- Competition between accreditors can be detrimental to institutions (Blanco-Ramirez, 2015; McFarlane, 2012; Neil and Alacbay, 2018; Studley, 2018).
- Accreditation decisions can be detrimental for institutions (Neil and Alacbay, 2018; Vibert, 2018).

Methodology:

- Accreditation seems to be more geared towards improvement of management and administrative processes and not student outcomes: the process versus outcome debate (Eaton, 2018; Neil and Alacbay, 2018; Kinser 2018).
- Focus on minimal threshold requirements instead of continuous improvement (Eaton, 2018; Neil and Alacbay, 2018; Reddy, 2008; Schwarz and Westerheijden, 2007; Eaton, 2018).
- Focus on deliverables that are too high and not achievable for all institution or programmes (Urgel, 2007).
- Assessment should be at the centre of the accreditation agenda (McFarlane, 2012; Manning, 2018).
- Institutional autonomy is often not supported (Lowrie, 2008).
- Snapshot view of the institution instead of continuous improvement (Reddy, 2008).
- Accreditation is often intrusive to institutions (Altbach 2003; Pringle and Michel, 2007).

- Accreditation should not be the end-product - it should be a continuous cycle (Kis, 2015; Eaton 2018).
- Involvement of more stakeholders is needed (Krzykowski and Kinser, 2014; Vibert, 2018).
- Proper assessment tools for learning should be evaluated and developed (McFarlane, 2012; LeBlanc, 2018; Kinser, 2018).

Peer Review:

- Peer review is often criticized (peer reviewer not prepared) (Vibert, 2018).
- Accreditors are member-driven; leaders of the accredited HEIs are on their boards and serve as commissioners which could lead to favoritism (Lederman, 2013; Vibert, 2018).
- Peer review of the accreditors themselves is missing (Tomlinson, 2015; Studley, 2018).

Cost:

- Accreditations are not affordable in some countries (Lederman, 2013; Lowrie, 2008; Gaston, 2014)

Transparency:

- The rise of too many accreditors could be creating confusion for stakeholders (Knight 2005; Zammuto, 2008).
- Accreditation discrimination takes place: faculty and student discrimination (McFarlane, 2012).
- Meaningless data and useless metrics reported on websites under transparency (Eaton, 2018; Vibert, 2018).
- Institutions are not initiating transparency on their own (Eaton, 2018, Kinser 2018)

- Stakeholders are often not educated on accreditations, the objectives, and their differences (Knight 2005; Lowrie, 2008; Vibert, 2018, Kinser 2018).

Policy:

- The role of accreditation should be delinked from student funds in the US (Neil and Alacbay, 2018).
- Possible development of an accreditation super-body (Green, 2018).
- Accreditors should assume a more prominent role in policy making - should lead the discussion and not lag behind (Studley, 2018).

Next, the researcher will review the ACBSP standards and criteria in more detail.

3.2 ACBSP and a detailed look at its standards

As indicated previously the researcher has chosen ACBSP and ACBSP standards as the basis of the research, as they have been the only international accreditor in Mongolia. Below the researcher provides detailed information of the accreditor with an in depth look at the standard requirements.

As mentioned, ACBSP was founded in 1988 and was the first accreditor to offer programmatic accreditation to all business education levels, including programmes at associate degree level and up to and including doctoral level programmes (ACBSP, 2020). In 1992, they achieved recognition from the US Department of Education. This was discontinued in 1996 when the decision was made to link recognition to federal funding. In 2001, when CHEA was created, ACBSP became the first specialized programme accreditor to achieve recognition. In 2005, when a new strategic plan was presented, ACBSP extended its outreach to seven regions within the US and included Canada as well. 2006 marked the introduction of the accreditation standards for accounting, allowing for an expansion of their portfolio of members and accredited programmes. Then in 2010 the name was changed from Association of Collegiate Business Schools and Programs to the Accreditation Council for Business Schools and Programs to better reflect its mission of inclusivity and its growing global presence (ACBSP, 2020).

During the past years, ACBSP has continued to evolve, launching a certificate accreditation for short programmes (ACBSP, 2020). Requirements for the certificate programmes are similar to those of the programme accreditation standards and include faculty qualifications, admission and enrolment, completion statistics, resources and most importantly outcomes assessment processes and results. Eligibility requirements include 75% of business-related subject areas and minimum 12 credits assigned (ACBSP, 2020).

When considering the structure of ACBSP, the organization is led by the President/CEO, supported by the Vice President of Operations, the Chief Accreditation Officer, and the Director of Training/Associate Director of Accreditation. As ACBSP is a member-driven organization, the members of ACBSP elect the Board of Directors, the Board of Commissioners and the Accreditation Governance Board members. The Board of

Commissioners is the independent decision-making body of ACBSP. They are split into two boards: The Baccalaureate/Graduate Degree Commission and the Associate Degree Commission. These two bodies approve or remove accreditation status of programme, review and approve accreditation standards criteria, and review accreditation applications (ACBSP, 2020).

The standards are based on the Baldrige Education Criteria for Performance Excellence, which means that there is an in-depth review of leadership, strategy, relationship with stakeholders, academic programmes, faculty readiness, education, and operational support with underlying commitment to continuous improvement (NIST, 2020).

When one considers ACBSP's worldwide network, it is not significantly different from the specialized business accreditors. They organize themselves into 11 geographical regions, as follows: seven U.S based regions: Northeast, Eastern, Southeastern, Great Lakes, Midwest, Southwest, and Western regions. The other four are the overall international region: Latin America, South Asia and finally Canada. These regions meet bi-annually and host a regional conference in the fall, while the regions also meet normally at the annual conference in person, as well in June. In 2020, like many other conferences, the annual meeting was moved to an online setting. The leadership of the regionals are on a voluntary basis. The regionals provide unique experience to meet with their peer institutions and also provide a platform to discuss developments in higher education in general, specific to the region and specific to their field. They also allow members to discuss possible partnership options and to engage with other institutions who have gone through the accreditation process already, sharing best practices. The regional meeting also serves as an additional platform to provide feedback on the needs of member and accreditation institutions. Normally the President, and or members of the Board of Directors or the Board of Commissioners, attend these meetings forging a stronger relationship with the members.

ACBSP's standards and criteria have evolved through the years. For this specific study, the researcher considers the **Baccalaureate/Graduate and Doctoral Degree Standards** (ACBSP, 2020). This set of guidelines aims at aiding institutions to achieve excellence while guiding them through a process of self-evaluation, site visit, and assessment. There are various documents available for the member schools including the Standards and Criteria, detailed Process Manual on the full accreditation lifecycle, and all the tables required for the self-study process. The ACBSP Standards and Criteria document allows

member institutions to demonstrate compliance with the accreditation standards. The standards have always to be approved by a vote of the membership. The criteria itself have been developed and approved by the Boards of Commissioners. There are Qualitative Scoring Band Tables which are used by both the site visit evaluators and the institutions themselves while they prepare for accreditation. Finally, the members of the Board of Commissioners also use these Tables when identifying compliance with the threshold standards. As mentioned before, the ACBSP standards and criteria uses the Malcolm Baldrige Performance Excellence Framework in Education as the basis for the standards. The standards then aim to bring the mission and core values together in an effort to integrate them into a solid foundation for members' schools to follow. ACBSP concentrates on education and learning and the business programmes aiming at this accreditation will need to show how students achieve this learning. Leadership plays an equally essential role in achieving this with the strategies and systems supporting institutions. Faculty participation and development also enables institutions to achieve these objectives, since they are indeed responsible for developing quality education programmes and ensuring the learning environment that then supports the learning efforts of students (ACBSP, 2020). Continuous improvement is now at the heart of most accreditation bodies: ACBSP is no different. In fact, ACBSP is highly process-oriented and institutions are tested against a set of criteria that outline the review and improvement of these processes. Dialogue within the organizations is just as important as dialogue with peer institutions on the national and international scale. Equally, importance is given to transparent and accurate management data, analysis of this data and accurate feedback across the board. Public Responsibility goes hand in hand with this, allowing institutions to display their achievements towards all stakeholders (Unified ACBSP standards). Below is a detailed overview of ACBSP's accreditation standards and criteria.

Table 2 Overview of ACBSP’s Unified Standards Requirements Adapted from ACBSP (2020).

ACBSP standard	Sub-standards
Standard 1: Leadership	Mission and Values Performance Measurements Social and Community Responsibility Impact on Society
Standard 2: Strategic Planning	Institutional-Business Unit Mission & Vision Alignment Stakeholder Input Communication Linkage
Standard 3: Student and Stakeholder Focus	Key student segments and stakeholders: Description of how the business unit determines key student and stakeholder requirements and the processes Description of the systematic process that the unit uses to respond to complaints from students and other key stakeholders A list of methods used to communicate with students and stakeholders A list of improvements made from knowledge gained from students and stakeholders;
Standard 4: Student Learning Assessment	Business Unit Outcomes Assessment Plan and Process Determination of Outcomes and Performance Determination of Outcomes and Performance Measurements Key Stakeholder Engagement in the Assessment
Standard 5: Faculty Focus	The business unit must have a human resource plan that supports its strategic plan Linkage of HR plan to Key Objectives System of procedures, policies, and practices for the management and professional growth of faculty members
Standard 6: Curriculum	Approach and Deployment Baccalaureate Degree Deployment and Master’s Programmes Deployment
Standard 7: Business Unit Performance	List of key Student Performance Tracking Processes to performance List of key Business Operation Processes provided to ensure student success List of key Education Support Processes provided to ensure student success Sharing of Performance Results with the Public

3.3 Assessment of Student Learning

In the previous chapter, the researcher provided insights into the different accreditors, including a more detailed overview of ACBSP and its standards along with a critical review of the literature. Now the researcher will turn her attention towards assessment of student learning, as this is a significant segment of ACBSP's standards.

Assessment of student learning or assurance of learning is, according to Suskie (2018), an integral part of teaching and learning. In layman's terms, it means we identify what the students would need to learn during the programme and ensure that this learning is indeed taking place. Suskie (2018) points out that assessment is used for three major purposes: ensuring and improving quality, stewardship, and accountability. Fundamental traits include setting the learning goals, gathering evidence that the students achieve the learning goals, ensuring that the evidence is good enough and using the evidence for reflection and if necessary, making the changes necessary in order to achieve improvement. Deming (Redmond et al, 2008) popularized this as the so-called Plan-Do-Check-Act (PDCA) cycle. The process highlights the need to establish a full process of establishing the learning goals, delivery with appropriate tools, assessment of results and finally using those results as a basis for quality improvement. The traditional approaches for assessment of student learning often concentrated only on knowledge gained, without the use of learning goals, more course level approach compared to programme level approaches, assessing in silos, not linked to programme level goals, lack of transparency, among others. The new types of assessment with the above outlined PDCA cycle allows for completed cycle where students are informed on the processes and results, it is an integrative experience and results are used to make improvements. Student assessment may result in more valuable education, stronger student performance and better, more accurate and relevant forms of assessment to test education quality. In essence, we assume that the accreditation quality frameworks considered in the earlier chapters may enable, specifically these results. AACSB assurance of learning expert Kathryn Martell indicates in an interview with Lee Davidson (2015) that the process may seem intimidating at first, but it is just about the achievement of learning expectations. She does highlight two essential aspects that is often missed, which is the measurements of soft skills including leadership skills and that the measurements must take place on individual level and not group level. This does not mean

there should not be group assessments, on the contrary, but how the group assessments are set up is key to measuring individual achievements within the group setting itself.

Suskie (2018, pp. 8.) defines student learning assessment as follows: *“Assessment is deciding what we want our students to learn and making sure they learn it”*. Student learning goals are expressed as what we want our students to acquire in terms of knowledge and skills. Learning goals are generally at a higher level, while student learning objectives or outcomes are more readily quantifiable, allowing institutions to assign tools and targets. We identify what we want our students to do. The objectives then are indicators of the learning goals and written very often in terms of Bloom’s Taxonomy, which then links the objectives to the different degree levels. Traditional assessment methods tend to be linked to the classification and award of degrees. International accreditors do not use degree classification as part of their assessment. What they do require is that institutions identify the level of degrees and the learning objectives then need to match those levels, as indicated above for example with Bloom’s taxonomy. While in the UK, the degree classification indicates several levels such as first-class honours, second-class honours, and the list goes on, in many other countries the only differentiation may be is graduating with or without distinction with a grade point average (GPA) signalling the achieved grades. It is no different in Mongolia. The Mongolian HEI system reflects the Bologna system with ECTS credits and some universities have moved to the American credit system. The levels are bachelor, master and doctoral and the learning objectives reflect the appropriate level of learning.

Learning assessment goes hand in hand with the notion of learning gain. The objective here as well as being to measure students’ knowledge, skills, competences throughout the lifecycle of their studies (Randles and Cotgrave, 2017). However, it is best described by Evans et al (2018, p. 4): *‘...the distance travelled’ or the difference between the skills, competencies, content knowledge and personal development demonstrated by students at two points in time*. This is what is called value-added. The researcher will consider learning gain studies as well but this specific research does not investigate value-added in detail but rather presents it as part of the development of assessing student learning.

3.3.1 Learning Assessment Reviews

As mentioned in the introductory section, quality assurance, accreditation, and student assessment go hand in hand. Accrediting bodies across the globe have started the implementation of student learning assessment type systems. It is essential the researcher consider the different types of learning assessment studies and projects carried out up until now.

There have been efforts to identify what is the best way to measure institutional effectiveness and/or student performance outside the accreditation frameworks. These efforts were prompted unfortunately not by the highly ranked institutions, which have the means to recruit the best students and be as selective as possible, but more by governmental organizations under pressure to show that higher education institutions under their watchful eyes are indeed performing as promised. They were also not prompted by rankings, although there has been a shift where the attention is more concentrated on the output (as with student learning) instead on the input, as it was the case previously. Let us review examples of these research and project efforts in relation to student learning now.

RAND Europe is a non-profit research institute that helps with advising and decision-making in a wide variety of sectors (RAND, 2015). They are registered in Cambridge, in the UK and in Brussels, Belgium. The work they perform in the higher education field helps and advises policy makers on employment, internationalization, science and innovation, technology and the like. In 2015, they delivered a report entitled the Learning Gain in Higher Education (RAND, 2015). There is also the Collegiate Learning Assessment (CLA) test, developed by the Council for Aid to Education (CAE) which aims to help education institutions to measure learning assessment by custom-built tests. This is very similar to the Peregrine Academic Services (PAS) test, one of the ACBSP approved measurement tools. The current Chairman of the Board of the CLA is also the President and CEO of the RAND cooperation. Another study reviewed is the Assessment of Learning Outcomes in Higher Education (AHELO) study, carried out by the Organization for Economic Co-operation and Development (OECD). This specific study reviewed direct evaluation of student learning and comparative methods (in line with that of the ACBSP requirement) allowing institutions to benchmark their results across cultures and languages with all types of HEIs (OECD, 2012). The study was stopped in 2015 for various reasons,

which will be discussed later. Other big projects include the Measuring and Comparing Achievements of Learning Outcomes in Higher Education in Europe (CALOHEE) project. However, this project mostly concentrates on frameworks for assessing student learning and less on the type of assessments being used. Therefore, they focus on a common framework for students' skills, knowledge and competencies and not on the actual learning (albeit using a common test). The objective here is then not to benchmark, because there could, from the onset, be differences between the key objectives of institutions. Comparisons can be made if the programme objectives match, but not at institutional level. This is part of the group of initiatives looking at degree level qualifications, the so-called qualification frameworks; these indicate expectations of student performance at the end of their studies.

There are also various student engagement surveys, used heavily in certain countries (such as the UK) but the dilemma here is: are student surveys actually relevant for measuring institutional performance when looked at from the perspective of student learning? As an example, the UK's Higher Education Academy's pilot student engagement survey of 2017 was also reviewed, but this study mainly concentrates on proxy measures, such as the opinion of students, or the so-called indirect measures (UKES 2017).

The RAND study considers the definition of learning gain, looks at the measures it can be used for and assessment of the methods, among others. Its relevance for this dissertation is that the RAND study does indeed define learning gain as a learning assessment methodology, with the aim of showing the difference between competencies assessed and measured, taking at least two different points. The study started with a review of 14 different versions of learning gain methods and these areas were then clustered into five main groups. These were: grades, surveys, standardized tests, mixed method and other qualitative methods. Under grades, they looked at predicted pass rate, grade point average (GPA), output indicators. Surveys included the UK Engagement Survey (UKES), National Student Surveys (NSS), careers registration and skills audit. The Standardized tests included progress testing (discipline specific), CLA (independent from discipline), Measure of Academic Proficiency for Progress (MAPP) (independent from discipline). Mixed method included Academic Progress Tracking Tool (APTT), Advanced Level Information System (ALIS), and finally other qualitative methods included Personal Development Portfolio (PDP). The RAND study (2015) uses the name 'proxy measures'

for indirect measures, which essentially rely on the opinion of students, for example student surveys, alumni surveys and so on. These measures indeed provide important insights into students' learning, especially into their student learning journey, but most international accreditors require direct measures as their base. The validity of these tests has been questioned (RAND 2015) and it has been commonly suggested to use both measures to secure better findings, in a way validating the two measures against each other.

The **AHELO study**: was prompted by a number of factors which included 'massification' of higher education, the rapidly increasing numbers of higher education institutions catering to a worldwide need for graduate employment, the changing need for different skills and knowledge in the workplace and the transparency agenda presented by stakeholders including students, parents, ministries and businesses. The AHELO study tried to fill this gap relating to the performance of institutions in relation to student learning outcomes, rather than counting on flawed surveys and rankings. The aim was to develop a global level discussion including consideration of the national systems, but at the same time allowing for benchmarking measures. The data expected to be available at the end of the study aimed to help three major stakeholder groups to benchmark learning outcomes across institutions: the students themselves, individual institutions and governments, who would be better informed to evaluate the quality of their HEIs (OECD, 2020). There are two main parts to the AHELO study: it started with the feasibility study and then continued with the main study. The AHELO study is very useful for our considerations as it also highlighted the limitations of other performance indicators such as international rankings, indirect measures, as in students reporting on their own progress (surveys), applicants' views about institutions, based on rankings, accreditation and so on. Unfortunately, the study had to be stopped in 2015, due to highly debated topics such as reporting of data and results (Lennon 2018). It seemed that, to various stakeholders, sharing information would prove just too complex and sensitive. CHEA already requires its recognized accreditors to ensure that institutions and programmes accredited by them indicate certain information on student learning, but not in such detail as this study would have provided. Sharing information on student learning if not meeting expectations could have serious consequences for national accreditors. As an example, the Dutch national accreditor (NVAO) indicates that if the student learning objectives are not met, that could jeopardize initial or reaccreditation of programmes or institutions, while their international

counterparts prefer less window-dressing and more improvement cycles and presenting actual results. This type of view also tends to push institutions towards a structure that sets easily achievable targets instead of a bit more ambitions but more in line with continued improvement agenda. The study's main challenge then was to identify the primary audience, which led to further tensions of accessibility of data. A government-funded project had to provide some type of access to data, so then in essence participating institutions would need to have provided information to the study, which could be potentially damaging (Lennon, 2018). Interestingly, it was more the European and Anglo-Saxon countries that had issues with engagement as Lennon pointed out (2018). Is it perhaps because governments are more involved in Europe with the role of HEIs, while in other locations it is more separated? At the end, Lennon is correct to point out that even though the study was not actually carried out fully, the feasibility segment remained and pointed to a direction for other researchers to pick up and see how the next studies on outcomes assessment can be structured on an international scale. It is especially important, as the study is still in its infancy, that more work should be done.

The EU funded project CALOHEE started looking at the student's competencies needed in today's world. Ultimately, it is a European project scrutinizing national differences in student achievements and expectations, looking at a range of fields on bachelor and master levels, keeping in mind the stakeholders involved within the HE landscape. The five core areas covered are as follows: Engineering, Health Care, Humanities, Natural Sciences and Social Sciences (CALOHEE, 2018). Later, the developed methodology could be used for a variety of other fields. What is exciting is that the project is considering the different varieties of universities within Europe with their different missions. However, it has not said it will also consider other higher education institutions, which would be a major limitation of the scope of the project.

3.3.2 Accreditation Student Learning Assessment Tools

Following the specifications on assessment tools from the international accreditors, the researcher now reviews the different assessment tools. It is important to emphasize that these definitions are commonly used by the accreditors. There are both programme and course level assessments available, also called summative and formative assessments. Programme level assessment looks at how students achieve the learning goals of the programme, while course level assessment concentrates on lower-level assessment

objectives. Consequently, summative assessment generally happens at the end of the programme for example via a thesis, dissertation or capstone courses summarizing all the subject areas discussed over the course of the programme. Formative assessments can happen throughout the whole programme, but do not give an overall view of the students' knowledge, since they measure course level learning.

In all these cases, there are direct and indirect measures. Direct measures of learning measure actual learning (or evidence of it in a learning environment) by assessments carried out, for example by the faculty members on student's performances, as evidenced in portfolios, projects, thesis and so on. Indirect measures of learning look at the opinion of students or alumni as how they perceive the extent of their learning or how they feel about their learning and the learning environment provided. These perceptions are gleaned from surveys, interviews, questionnaires. It may be that these indirect measures identified by the accreditors may not be viewed as measures of achievements, but nevertheless these are required assessment tools set out by the accreditors for assessment and hence are considered as such for this research report. It is interesting to note that course grades are considered indirect evidence of student learning if not accompanied by associated rubrics. Rubrics are tools allowing for sectional assessments and can be linked to both course and programme level objectives while grades and grade distributions by themselves cannot. The latter ones also provide useful information on student learning, but most attention has been on the direct measures of learning on programme level, ensuring that assessment is part of an integrated and collaborative learning experience, allowing the institutions to gather information on the performance of students at a programme level. Measures normally need to take place over time so that there is enough data to indicate a trend before drawing conclusions.

3.3.3 Common ground towards student learning assessment, its methods and tools

As indicated, for the purpose of this study, the researcher concentrates on the ACBSP assessment framework, specifically on Standard 4. However, it is important to highlight the similarities and differences between the learning assessment studies and the various accreditors with regards to their requirements in relation to student learning assessment and the tools they use to assess student learning objectives. This research will then outline what methods and processes are unique to ACBSP compared to the other accreditors.

Hence, detailed information is given below on the overall ACBSP process and standards, as well as a comparison of the tools used with the student learning assessment studies and accreditors. Finally ACBSP standard 4 criteria is matched against the respective accreditors. The results of the comparisons are quite clear. The ACBSP requirements, as in the most effective way to measure student learning, is very much in line with international best practice, both compared to what the other accreditors require and what student learning assessment activities take place. In a way, we can indicate that best practices with regards to student learning assessment measurements are consistent across the board with different threshold levels. In order to better understand, the researcher showcases first the detailed ACBSP standard 4 requirements in the table below, before moving on to a comparative view of the different accreditors and QA best practices.

Table 3 below highlights the fact that when it comes to student learning assessment tools, there is minimal difference between the accreditors, the international assessment projects and ACBSP. Perhaps the most outstanding requirement of ACBSP is the benchmarking information. This is indeed above and beyond the requirements of other accreditors. Another major difference noted by some of the projects that took place is the use of grades. ACBSP, and generally the accreditors, do not allow overall grades, only sectional grades, which must be accompanied by rubrics clearly showing which learning objectives they are measuring in the assessment. Finally, in some project cases direct measures are not required while all accreditors require them. Again, ACBSP's criteria as far as the requirement on reporting is in line with, if not above, the international threshold standard

Table 3 Learning Assessment Tools sample comparative analysis.

Accreditor or Learning Assessment project/Method or tool	Direct Measures	Indirect Measures	Formative	Summative	Benchmark
ACBSP	Required	Required	Grades not allowed	Required	Required
AACSB	Required	Required (new 2020 standards)	Required	Required	Not required on method level however at candidacy comparative analysis is required with similar institutions
AMBA	Required (last couple of years)	Required	Required	Required	Not required
IACBE	Required	Required	Required	Required	Not required
EQUIS	Required	Required	Required	Required	Not required
Regional	Required	Required	Required	Required	Only NEASC
Mongolian National Accreditation	Required	Required	Required	Required	External evaluation required
Tuning Project	Required	Required	Required	Required	Project aim is comparability
RAND Study	Required	Required	Required	Required	N/A
AHELO	Required	Required	Required	Required	Result would be comparative

Next, the researcher prepared a comparative analysis on how the different accreditors view student learning assessment, what practices they use, and what their standards require. The findings indicated quite significant common ground: assessment plans required to be in place, student learning outcomes identified, targets set, assessment cycles taking place, assessment tools developed. The type of assessment tools used to measure student learning also seem to be in line of the ACBSP requirements as showcased below.

Table 4 indicates ACBPS reporting requirements. Table 5 aims to indicate the similarities and differences between how learning assessment is measured in the existing literature and how ACBSP use the same type of measures.

Table 4 ACBSP Standard 4 Reporting Requirements Adapted from ACBSP (2020).

4-Overall/ Each Criterion	4.1 Approach	4.2 Deployment	4.3 Results	4.4 Continuous Improvement
<p>Systematic outcomes assessment process</p> <p>Continuous improvement</p> <p>Outcomes developed and implemented</p> <p>Communication to stakeholders</p>	<p>Assessment plans and process</p> <p>Performance measures</p> <p>Stakeholder engagement</p>	<p>Direct/Indirect</p> <p>Summative/Formative</p> <p>Internal/External</p> <p>Comparative measures</p> <p>Evidence of 3-5 sets of data cycles with assessment schedules</p> <p>With data cycles</p> <p>Type of assessments used</p>	<p>Data reporting, results</p> <p>Student Learning Results</p> <p>Collection, Analysis and use of student data (inclusion of direct measures)</p> <p>Reporting actual results of comparative data for all programmes</p> <p>Communication: results systematically made available for stakeholders</p>	<p>Action taken</p> <p>Closing the loop: Evidence for using the results for continuous improvement</p> <p>Continuous improvement and Assessment process (Specific improvements deployed and stakeholder engagement)</p>

Table 5 Comparison of Student Learning Requirements Among Accreditors

Comparative table on student learning requirements among accreditors				
ACBSP requirement/ Accreditor	1. Approach Assessment plans/Performance measures/ Stakeholder input	2. Deployment Data cycles/Measurements and types of assessments: Direct/Indirect Summative/Formative Internal/External Comparative measures	3. Data reporting/Results/Comparative (external) measures/Communication to stakeholders	4. Continuous Improvement also in the assessment process/actions taken
AACSB	Assessment plans required with a 5-year cycle. Stakeholder?	Requirements have evolved to include both Direct and Indirect measures however no clear clarification on comparative measures only at the candidacy stage.	Data is required measuring twice in a 5-year cycle however communication to stakeholders is very limited. Note that AACSB is not recognized by CHEA anymore and the transparency is CHEA agenda	1 full assessment is required in a 5-year cycle
AMBA	Limited	Limited	No comparative data required	Required
EQUIS	Required	Limited	Limited	Required
US Institutional accreditors	Required	Required except comparative measures	Required: CHEA	Required
IACBE	Required	Required except for benchmarking comparative measures	Required: CHEA	required
QAA	Required	Required, grades are allowed but link is needed with SLOs	Required/high on the transparency agenda	Required
TEQSA	Required	Required	Required/high on the transparency agenda	Required
Mongolian Accreditation	Newly required	Newly required	Newly required	Newly required

As we can see from the tables above there is some differentiation between ACBSP and the rest of the accreditors.

Differentiation between US accreditors:

The AACSB Assurance of Learning (AOL) process echoes very closely what can be seen as requirements by other accreditors: ensuring that learning objectives are specified; tools or instruments are identified to measure the objectives; targets are set; data gathered (in this respect twice in a five-year cycle); and finally improvements made in the system (Lakhal and Sevigny, 2014. AACSB, 2017; ACBSP 2017; IACBE 2017). However, differentiation with AACSB was on three levels: one that AACSB is not recognized by CHEA, an indication of the disagreement on the transparency agenda. Because AACSB accreditation is not linked to receiving federal student aid and also because the large AACSB universities questioned both why they should share information and what type of information should be shared, they do not follow CHEA recognition. The second main differentiation is the comparative results, so while ACBSP pays special attention to ensure that results of student learning gain are benchmarked with other institutions, AACSB only requires competitive information at the time of candidacy and on an institution level, not a student-learning level. Institutions are requested to identify their main competitors and also institutions who are similar in their structure and have similar programme offers, but curiously enough, it stops at that stage. Finally, AACSB evenly reviews formative assessment (as in course level) and summative assessment as in programme level while ACBSP seem to concentrate more on programme level learning, even though they do specify formative assessments as well. ACBSP and IACBE requirements are very similar due to several reasons mentioned already. The biggest difference is that IACBE also does not require external comparative measures and while they review formative assessment on course level as part of a holistic QA requirement, their attention is centred around the summative, or end of programme, assessments in terms of both direct and indirect measures.

Differences between the US institutional accreditors are mostly in the area of general education requirements. ACBSP has stopped this requirement just recently as the previously mentioned regional and national accredits ask institutions to provide such information, while ACBSP just continues to review business-related subjects. When it comes to assessment, as ACBSP is also CHEA recognized, transparency is high on their

agendas and they require measures on both programme and course level even in more details than ACBSP. However they also do not require external comparative measures.

Differentiation with International accreditors and QA bodies:

When comparing to EQUIS, the biggest difference is that there is a strong requirement in each EQUIS standard towards internationalization and executive (short course) requirements. Before embarking on EQUIS accreditation, first and foremost a discussion has to take place about whether the institution's mission includes internationalization and to what level. Without that they do not stand a chance of gaining this accreditation.

As mentioned before, the overall approach of both the QAA and TEQSA is similar to that of the other accreditors and QA bodies. However, their requirements include extensive risk assessment from the onset. TEQSA, for example, looks at the provider's track record and uses additional assessment methods to come to a decision. These additional assessments are grouped in four areas: Student Profiles and Outcomes (specifically relevant for this comparison and study); Staff Resources and Profile; Financial Viability and Sustainability; and, finally, other identified risks – this last area allowing for flexibility in the framework. The first section on Student Profiles and Outcomes considers issues such as student projections, completion rates (in other word direct assessment measures), QA activities, resources and graduate satisfaction (indirect measurements). The risk indicators or tool they use in the student outcomes segment are in line with other accreditors. The QAA is not an accreditor a such, it is mandated to carry out tasks by the OfS. It relies on the Quality Code as their basic document for outlining their advice for institutions. Their Core Practices highlight their expectations and are mandatory for all UK HEIs (QAA, 2020). Their main concern areas are quality assurance and enhancement; learning, teaching and assessment approaches; and student engagement expectations. Central to our study is of course the learning, teaching and assessment approaches. The QAA has an advisory document available on assessment and the very first page highlights immediately formative and summative measures required. However, the biggest differentiation is that they allow grades (or marks) to be used in this assessment measure, with the stipulation that still, they link intended learning outcomes to the course (or programme as is indicated in this study). It is important to reiterate that transparency is high on both TEQSA's and QAA's agenda, very much in in line with what CHEA-approved accreditors require from their accredited institutions.

As mentioned in the introductory section, quality assurance, accreditation, and student assessment go hand in hand. Accrediting bodies across the globe have started implementation of a range of systems for assessing student learning. The push towards a focus on student assessment mostly originated from ministerial bodies, as in the US, where the Department of Education implemented the National Advisory Committee on Institutional Quality and Integrity (NACIQI) over 30 years ago, where the accreditation standards have been rewritten and included transparency policies, meaning that institutions were now required to report on student assessment to their stakeholders (Krzykowski and Kinser, 2014). This move was not exactly a surprise as HEIs were already requested to perform student assessment, but the guidelines were vague enough. This is not to say that the guidelines to report externally are any clearer: institutions had quite a leeway for decades as to what information they considered should be made available to their stakeholders. Fast forward to today, CHEA has now made this simpler for institutions of their recognized accreditors. Below is an excerpt from the 2019 CHEA recognition guidelines verbatim:

*‘11(B)(1) Evidence that an Accrediting Organization Requires and that Institutions and Programmes Provide Aggregate Public Information on Performance and Student Achievement, with External Verification, as Appropriate. Provide evidence that accredited institutions and programme have and provide the public with information on performance and student achievement such as **completion, graduation, retention, academic transfer, graduate school entry, employment or other indicators acceptable to CHEA.**’*

Lopez’s study also (2002) indicates that a wide variety of tools for direct measures of learning are evident. These include, but are not limited to, standardized and/or locally developed tests, and portfolios, reflecting the same conclusions reached by the large-scale European studies discussed prior as the researcher.

In essence, all the accreditors find the following aspects essential when measuring the success of students: having a well-established assessment plan in place with articulated student learning objectives and targets set. They all agree on the use of various assessment methods. Differentiation is here in the requirements for comparative benchmarking measures. Where ACBSP requires this, most other accreditors do not.

3.4 Summary of Literature Review

Postiglione indicated in his 2011 study that an urgent review is needed of the use of performance indicators in HE, which will allow the stakeholders, specifically the students and their families, to see transparent standards and results. Accreditors lead the way in setting these standards and requiring institutions to meet these standards in order to ensure quality delivery. In the Mongolian context, due to the developmental track on Mongolian higher education, with several factors influencing both positively and negatively, there is much to be done to ensure that higher education of quality is delivered in the country. Many positive intentions and projects have taken place, the results of which could be accelerated if the gaps are clearly identified and if the central players in Mongolian HEI come to some conclusions, perhaps in a consortium setting, to aid this process of development. Loo (2017) points out that Mongolia should ensure that HEIs provide quality education in country and that they can counter the brain drain that the country is facing. There is an estimate of at least 100,000 Mongolians living abroad. The expectation was that, during the economic boom Mongolia experienced in the early 2010s, they would return, but since then the economic stagnation seems to have prevented some from returning (Loo, 2017). As many Mongolians leave the country to be educated in other countries and then stay abroad, providing high quality education both on undergraduate and graduate level could be the solution. Several Mongolian HEIs seem to be well under way with the implementation of ACBSP accreditation and choosing ACBSP as the “tool” to increase the quality of education in the country (ACBSP, 2020).

The researcher reviewed and compared several international and national accreditors in an effort to identify their requirements and the kind of systems and tools they use to judge whether those requirements are met. From those accreditors reviewed there is a common ground as to what needs to be in place as threshold standards to help improve the quality of education and within that, student learning. Standards review itself gives a good overview of threshold requirements, with further emphasis on the current assessment tools used to measure student learning. While student learning is indeed influenced by many factors, components in systematic measures aid the identification of common tools.

There are a significant number of studies looking at accreditation in the existing literature and the reviews indicate areas of concern centred around the methodology of accreditation,

specifically: the tension between the threshold requirements and continuous improvement; the effect and impact of accreditation; the peer review process; the costs of accreditation; the transparency agenda; policy advice for improvement and the role of accreditors.

The researcher has also undertaken a review of the existing QA research projects related to student learning assessment. This undertaking was slightly more complex because a significant number of comprehensive studies have not taken place – and some of the existing studies failed to provide us with answers and/or conclusions. However, the researcher was able to compare the assessment tools used in these projects against the standards and requirements of ACBSP, specifically with Standard 4 on the assessment of student learning. Here the findings indicated that there are certain restrictions from ACBSP's side (for example the use of grades) but overall all frameworks are using direct and indirect measures, including surveys and standardized tests and they all seem to be promoting continuous learning and improvement efforts. The researcher can draw a preliminary conclusion from the literature and available frameworks both from the other accreditors across the globe and from the student learning gain projects. These conclusions indicate that ACBSP's Standard 4 framework and its review provides an adequate measure of assessing student learning from the accreditation's point of view and identified improvements can be linked to implementing this specific framework.

The objective of this study is not to review individual student performance nor to advise on new performance measures. It is also not measuring quality of teaching, nor taking account of the external measures affecting HE, but rather exploring the underlying trends supporting the accreditation process specifically aligned with student learning assessment and outlining the historical significance of these trends in relation to the country of study. The study does not aim at qualification of students as one of the aims of the Bologna Accord, nor advises on the differences between qualification frameworks and degree classification. It considers the ways previous researchers and studies approached the implementation of various approaches to accreditation in relation to programme improvement and student learning assessment.

The researcher prepared a comparative analysis of how different accreditors view student learning, the practices they use, and the requirements of their standards. The findings indicated significant common ground with assessment plans required to be in place,

student learning outcomes identified, targets set, assessment cycles taking place and assessment tools developed.

3.5 Theoretical Framework

There are two frameworks used: the ACBSP Standard 4 framework of Student Learning Assessment and Kurt Lewin's Force Field Analysis. (Thomas, 1985)

ACBSP's aim (2020) is for member institutions to achieve excellence in business programmes and in order to enable this, the accreditor provides a set of threshold standards as guidelines. The process takes the institution through a self-study preparation, assessment and site visits so that the institution can demonstrate excellence in their business programmes to its stakeholders. This specific model of excellence allows the institutions to gain global presence and prompts the programmes to embed the continuous review and learning model.

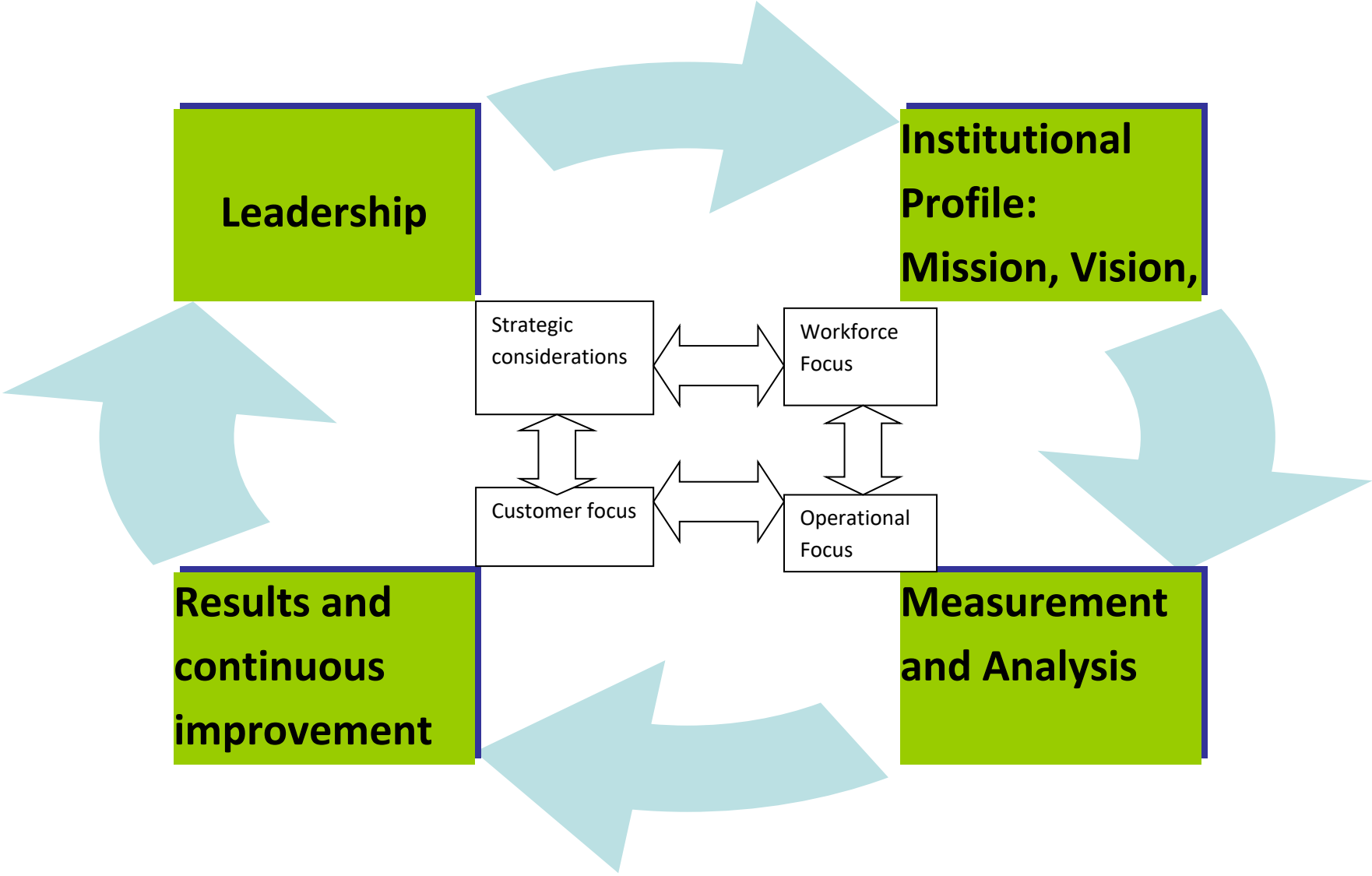
The basic theoretical model of ACBSP follows the Malcolm Baldrige Excellence Framework which claims that effective HE practice flows from the implementation of the model. The device is the accreditation framework with a partial focus on student learning. Kurt Lewin's Force Field Analysis is then used to evaluate how effective this framework is.

Emerging as the quality management guideline in the 1980s, the Baldrige framework has evolved into a catalyst for many businesses and organizations to achieve excellence through process management and result assessment. According to Ruben and Bigliotti (2019), the Malcolm Baldrige Excellence Framework remains one of the most prominent frameworks in the world used to integrate organizational assessment, planning and improvement. Flynn and Saladin (2001) explain the validity of the theoretical models using the Baldrige excellence model, as it is the case with the ACBSP framework. Ruben and Bigliotti (2019) also indicate that the framework has been used successfully in many HEIs and it very much facilitates assessment and improvement within institutions, taking into consideration specific matters relevant to the HEI. In their study, Ruben and Bigliotti (2019) highlight a case study where one of the strategic aims of the institution was to

achieve accreditation and where implementation of the Baldrige framework made a significant contribution to facilitating this.

Building on the Baldrige framework, the ACBPS's accreditation philosophy concentrates on a mission-based systematic approach to continuous improvement. In addition, it recognizes teaching excellence, while prompting practices that business schools and programmes can use to achieve their objectives. ACBSP's student-centered teaching and learning approach aims to measure whether students gain the right skills from their educational investment. The figure below depicts the major building blocks of the Baldrige Excellence Framework.

Figure 1 The Baldrige Model adapted from NIST (2020).



The Force Field Analysis framework was first developed in the 1950s (Thomas, 1985) and was originally used in the physical sciences where, in comparison to its use in education and organizational planning, the concept tended to include very precise measurements. Today it is used as an aid in implementing institutional and strategic changes and while no precise measurements are used, identification of the most important forces do help management to identify the best possible direction for the organization to take. The use of Force Field Analysis in the specific area of the implementation of an accreditation/quality assurance system in relation to student learning, would perhaps allow researchers to get a better idea of both the positive and negative effects and aspects of implementation of an accreditation/quality assurance system in relation to student learning.

Force Field Analysis seeks to identify the forces supporting movement to a desired position and those restricting progress. The equilibrium point is moving depending on the findings of the research more to either side. For example, if there are too many negative results of the implementation of accreditation, the equilibrium is moving away from the centre, towards the left as it will be highlighted in Figure 2. The strengths of each arrow are represented by the number of times the issue (both positive and negative) was mentioned during the interviews which we carried out at several HEIs.

The limitations of using Force Field Analysis should be acknowledged. Thomas (1985) suggests that the methodology is best used by a group of people so that individual bias is removed. In this case, the researcher evaluated the negative and positive forces herself. Consideration should be given to the idea that any type of change can be viewed as negative (or a threat) unless the persons in question have had a chance to influence it. In the case of those interviewed, the decision to go for international accreditation was not the decision of any of the individuals. In some interview cases, where higher level managers were involved, they were indeed more involved in the decision-making. However, the faculty or administrative officers responsible for implementation were less involved, so could have been more prone to bias, especially at the beginning of implementation. This shows in the interviews as well as will be seen later. If greater change is implemented, the greater the resistance will be. In general, when it comes to implementation, any new system especially one as comprehensive as accreditation and involving so many stakeholders of the institutions (from parents to students to businesses to faculty and management) generally takes years to be accepted (if ever). The process includes a robust planning to roll it out institution-wide and institutions use different strategies to achieve

this. Expectations of performance change with the system and this type of change may well prompt major organizational changes if needed. Using agents of change can be very useful and the accreditors themselves point towards a slow process where initially it may be that only a small percent of staff would be on board.

The next chapter reviews the research methodology underpinning the research study.

4 Research Methods/Methodology

This chapter outlines the research methodology used in order to answer the research questions of the study.

4.1 Introduction/Research problem and research questions

4.1.1 The research problem

The research problem identified is centred around challenges and barriers around adopting accreditation standards in Mongolian HEIs. As the researcher showcased in the literature review, there are limited number of research projects/studies that have been taking place with empirical results on the implementation of international accreditation frameworks, rather the studies focus on the processes and policies of accreditation. There are many assumptions in the field on both matters, but a lack of consensus; hence, this study hopes to provide new information on the challenges, barriers, and the results of implementation of a new accreditation system through in-depth case analysis. In addition, considering that large scale studies on learning assessment have failed to provide us with answers, a smaller case study seems to be more fitting to answer the research problem at least as a starting point.

4.1.2 Research questions:

The central research question of this study is as follows:

What are the challenges and barriers in adopting international accreditation standards in Mongolia with a special focus on ACBSP Standard 4?

In examining this question, the thesis seeks to shed light on the following questions achieved by introduction of an international accreditation system to a specific country:

1. What were the forces and key rationale driving the implementation of an international accreditation system in Mongolia? (*General national level question*)
Who was the decision maker on implementation?
2. How does the ACBSP Standard 4 framework differ from other international quality assurance and accreditation frameworks?
3. What were the effects of going through international accreditation on the institution's processes overall and in relation to assessment of student learning? (*Criterion 4.1 process*) sub question: What are the strengths and weaknesses of the tools used to assess learning?
4. What are the main challenges with implementation of these processes? (*Criterion 4.2-deployment*)
5. How are the findings, which are collected from the process used in identifying specific action items? How do comparative measures improve overall student performance? (*Criterion 4.3 Results*)
6. How is the institution using the results for continuous improvement of programme outcomes and improvement of its assessment processes? (*Criterion 4.4 Continuous improvement*)
7. To what extent do the respondents believe accreditation improves student learning?

4.2 Research Strategy

There are three main types of research approaches: quantitative, qualitative research and mixed study approach. For the researcher to identify which of these strategies to use, she had to identify the purpose of the study, the method of data collection and the method of data evaluation, while considering her philosophical views about social reality. These views then guided her when identifying what she considers as knowledge, with her ontological views shaping the study of existence and reality and her epistemological views shaping the 'theory of knowledge'.

There are underlying differences between those main strategies mentioned above. These differences are related to the orientation of the approach and the epistemological and ontological considerations (Walliman, 2006). Saunders et al. (2007, pp. 101) points out that "the research philosophy you adopt contains important assumptions about the way in

which you view the world.” These assumptions form a theoretical basis for how the world is experienced, what is considered knowledge and what one does with this specific knowledge. It is the perspective of the researcher and how he or she views the world that shapes the individual’s research philosophy.

Ontology is concerned with the nature of reality (Saunders et al., 2007), exploring how the world operates, what needs to be investigated, and the nature of the commitment given to the resulting views. There are two opposing theories called objectivism and constructivism. Both can produce valid knowledge in the field (Saunders et al., 2007). Objectivism is the belief that social phenomena and social entities exist independently from social actors. Constructivism on the other hand is based on the belief that social interactions are continuously impacting on the social phenomena, which are in a constant state of change and hence knowledge continues evolving. Objectivism relies on and stresses the importance of formal systems of investigation while the constructivist approach emphasizes how these relate to the researcher.

From an ontological perspective, quantitative research is objectivist in that social reality is regarded as an objective fact. Qualitative research may be seen as constructivist, with social reality as a constantly shifting product of perception.

Epistemology is the theory of knowledge. It concerns what is acceptable knowledge in the discipline, how it is acquired, and what is believed as something true (Saunders et al., 2007). Empirical considerations about what is assumed to be true takes the field towards two positions: the epistemological externalist who believes that the state can be achieved if is supported by external data; the internalist who focuses on the sensory evidence which supports the individual’s subjective experience of the world.

Epistemology in the management sciences follows an interpretative and qualitative paradigm, using a variety of social constructivism. In other words, in the qualitative research, it relies on the individual interpretation of social reality. Quantitative research generally uses a deductive approach to test the theories, essentially moving from the general to the specific, while qualitative research uses an inductive approach to generate theories, moving from specific to general. The distinction between the two influences the way the researcher collects data throughout the study.

According to Walliman (2006) there are two ways of acquiring knowledge in the social sciences: empiricism and rationalism. Empirical knowledge is gained by sensory experience and rationalism knowledge is gained by reasoning. The first uses inductive reasoning while the latter uses deductive reasoning.

Walliman (2006) continues to explain another polarization of knowledge which is related to the scientific methods and subjectivity of the researcher, and these are positivism, interpretivism and realism. Walliman (2006) Saunders et al, (2007); and Bryman, (2012) highlight that positivism assumes the application of the natural sciences and its methods concentrating on the establishment of cause and effect by testing theories and establishing scientific laws. Hacking (1983) indicates how positivism is based on realism or in other words an attempt to find out about the world or an aspect of the worlds that is true regardless of what people think or believe. This also means that one would build on what is already known. On the other hand, interpretivism advocates that the so-called 'social actors' play an essential role in research and the researcher has to recognize the importance of subjective meanings in actions leading to different interpretations and meanings, hence moving away from only theorizing definite laws (Walliman, 2006, Saunders, et al., 2007). This alternative approach to research is largely based on doctrines of idealism and humanism. The world we see around us is then an interpretation and the creation of the mind, as experienced by the individual. Thus, the personal perceptions are at the centre and is led by personal preconceptions and individual beliefs. The individual view of the researcher cannot be completely separated from the view of the society, supporting the reflective nature of human beings.

Realism considers that the scientific theories underpinning social events and discourses are true but likely to be provisional in nature (Walliman, 2006).

The aim of this research is to consider the possible effects of the introduction of an international quality assurance framework, namely ACBSP, on student learning assessment. As qualitative method is used in this research study with the case study approach, in which the researcher adopts an interpretivist epistemological view with the aim of understanding the human experience of the social actors in the study using in-

person interviews, while from an ontological perspective, there will be elements of a constructivist approach.

4.3 Research Design

Once the broad research strategy has been chosen, the next step is to identify which research design to adopt. There are fixed and flexible design strategies as highlighted by Walliman (2006). Fixed research design strategies are normally used for quantitative studies with specifications set at the beginning of the study as an example with cross sectional designs and longitudinal designs. Flexible designs do evolve during the study; they are normally associated with qualitative studies, such as case study design or grounded theory methods.

As indicated before, the researcher will adopt a qualitative approach. The researcher is using the case study approach, with Mongolian HEIs as the case, and will be using multiple sources of evidence, including data collection and interviews.

The case study approach is chosen specifically for this study as it allows for empirical investigation of a particular phenomenon (Yin, 2003, Saunders et al., 2007). Bloomberg (2005) indicates that this is a widely used method in qualitative research and is used both for descriptive and explanatory research. Saunders et al, (2007) further advise that this is still the preferred strategy used by researchers, despite claims of being 'unscientific'. Case study designs are not aiming to generalize (Walliman, 2006) but rather allow for an intensive investigation into a few cases. This approach helps especially when the questions to be examined are explanatory, concentrating on the how and why. There are advantages with the case study design, as they allow for in-depth exploration. Yin (2012) considers the various types of case studies, which include single, multiple, holistic, and embedded studies. He highlights that analytic conclusions are more powerful when using multiple case studies instead of a single case study. This is a multiple case study, which reviews six different institutions. Each institution is reviewed on an individual basis (more on a holistic level) but they are also reviewed overall. Within this approach, the researcher chose a comparative approach, selecting higher education institutions that are differentiated but also have commonalities specifically tied to the accreditation framework

applied. Each segment of the ACBSP theoretical framework is also reviewed per institution and overall, allowing the researcher to draw overall conclusions considering the overall effects of accreditation in the Mongolian setting.

When considering interviews, the semi-structured approach was used, to allow the researcher to use a specific list of questions covering all areas, but also allowing for some flexibility, which aids the exploratory character of the research and allows the researcher to consider items not thought of before (Blumberg 2008). Individual interviews were arranged and interview questions were also drawn up in the Mongolian language. In order to have a proper research strategy, the researcher needs to ensure that the data collected is linked to the research problem questions.

In the evaluation of the data, the researcher used thematic analysis. Once the data was collected, the process continued with familiarization of the information collected, identification of coding (matching against the Standard 4 criteria) and then the results of the coding were used to aid with identification of meaningful patterns.

4.4 Data Collections Methods

Saunders in his 2007 study highlights the type of data collection techniques that can be used. The current study is relying on documentary analysis, semi-structured interviews, report reviews, policy and accreditation standards and documents.

4.4.1 Semi-Structured Interviews

The semi-structured interview approach was used in the study, allowing the researcher some flexibility while conducting the interviews. Bloomberg (2008) confirms that this allows the researcher to include questions on subject areas not considered previously. Interview questions were drawn up and translated to Mongolian in case the interviewee did not speak English and for better understanding. The lengths of the semi-structured interviews lasted from 30 minutes to 90 minutes and the interviews were digitally

recorded, using two separate devices and then transcribed by the researcher. After transcription, coding was applied to enable sorting of data according to themes and concepts. One important consideration should be given to transcribing data. As Saunders et al. (2007) points out, it is that the researcher should not only pay attention to what is said in the interviews, but also how it is said. Non-verbal communication is an important part of contextualizing the results of the interviews and so when the researcher transcribes that information, this should be given special attention. Indeed, the semi-structured interview model allowed the researcher to obtain information on the respondents' behaviours, their interpretation of the world around them, their hesitations, pauses and emphases.

As mentioned, six institutions took part in the study, with 21 respondents overall across the institutions. The researcher sent the interview questions in advance due to translation and she wanted to be transparent on the topic and questions. There were no concerns with window dressing as respondents themselves addressed this specific subject during the interviews but more in relations to the accreditation process and not how they formulated their responses. The respondents felt free to give negative comments as well and asked about the process of feeding the findings back to the accreditors. They also felt that this research might be able to draw attention to additional challenges that individually discussed would not be possible to achieve.

4.4.2 Institutional Information

The researcher chose institutions to be included in the study with a list of specific criteria in mind, using maximum variation sampling:

- The universities interviewed must have secured accreditation already.
- The selection must include both institutions who have received accreditation just prior to the interviews and others where several years have passed already since accreditation and they are at the maintenance stage.
- The must have include both private and public universities.
- The selection must include institutions with varied background and trajectories such as: more established institutions compared to younger institutions; larger entities

with thousands of students compared to smaller institutions with a couple of hundreds.; institutions with only one discipline (must be business at minimum) compared to institutions with several departments.

Anonymity of the institutions is secured by codes given to the institutions.

To get initial access to the universities, the only possibility was to go through the leadership of each university. Hence the very first step was to send an introductory letter to the rectors and ask for permission to interview faculty and staff members at each university. The researcher is confident that the respondents were free to participate in the interviews. The Rectors and/or Deans gave the initial approval to proceed but afterwards they either handed over decision to colleagues to participate or in some cases, as was the case with the smaller institutions, they were also interviewed as they were heavily involved in the accreditation process. In all cases the accreditation champions were involved, these are the colleagues who are the main contact person for the accreditation process. Also in all cases, Dean or President level involvement was secured which signaled overall leadership involvement in the accreditation process. In addition, during the preparation for the interviews, there were changes in the participant lists and even on the day if someone had an urgent matter to attend to, they could easily find someone else (on the requested level) to give the interview. While on site, all institutions indicated they could bring on more faculty and/or staff if needed, they were very enthusiastic about the process. At the beginning of the interviews the researcher indicated to all the respondents that their answers could be excluded from the results at any point, and they could stop the interview as well. They were very enthusiastic about the whole process indicating this is the first time anyone asked them about the process before and this is a good chance for them to give feedback but also showcase the changes they have made and the problems they may still face. Next to the positive feedback, there was no hesitation to also give negative feedback, so they were not hesitating in giving information. Moreover, they indicated during the interviews that they can bring in additional colleagues but unfortunately time was limited on site so could not add more colleagues easily.

Information is provided on the institutions on the next page:

Table 6 Institutional Overview

Institution	Ownership	University/ Business school	Student population Size	Faculty size	Year of ACBSP accreditation
A	Public	University	Small	Small	More than 8 years ago
B	Public	University	Medium	Large	Less than 5 years ago
C	Private	University	Small	Small	Less than 8 years ago
D	Public	University	Large	Medium	More than 5 years ago
E	Public	University	Large	Medium	Less than 8 years ago
F	Private	Institute	Small	Small	Less than 8 years ago

1. Institution A

Institution A aims to become a leading academic and research university that meets international accreditation standards and requirements. It was founded with the mission of training leaders who would use their knowledge to contribute to society. The institution is one of the oldest universities in Mongolia. The institution has undergraduate, graduate, and postgraduate students studying in programmes in finance, accounting, marketing and other business and management fields. The institution has received many national awards during its 90 years of existence acknowledging the institution's innovative approaches to teaching and learning. The president was interviewed in this institution along with the Head of Coordination Affairs who is a faculty member and carries responsibilities for accreditation and an officer for is responsible for quality assurance. As this is small institution, it was expected that the President would be involved with accreditation.

2. Institution B

Institution B is a large university. This university also positions itself as a Research University in the field of life sciences but offering a wide range of programmes. Its mission is to become a leading research university coupled with its philosophy of supporting sustainable development initiatives led by high tech-based researchers. They also aim at

significant internationalization and continue strengthening their collaborations with international universities. The institution has also received numerous awards. It has 5 academic units and 4 research departments. There were four people were interviewed along with the Dean and Vice Dean, a faculty member responsible for academic deliveries within the business school and an accreditation coordinator. This is again in line with the request for interviews as all carry responsibility towards accreditation and were familiar with the process.

3. Institution C

Institution C was established as a vocational institution and later received university status. The institution is a private, not-for-profit institution divided into three main areas including Law, Humanities and Business Administration. It is a smaller institution offering bachelor, master and doctoral level degree programmes. Four people were interviewed at this institution, all carrying responsibilities for accreditation. For a small institution it was great to see the commitment from Dean level to the accreditation champion, where the latter is assigned as the main contact with ACBSP. It came as no surprise that both the Dean and Vice-Dean was available for interviews, they both had close involvement with the accreditation process.

4. Institution D

Institution D was established with main academic areas in the fields of engineering, education, social and business. Today there are 17 schools across the institution with three research institutes and several experimental and technology centres. Currently they have a large number of students and a large portfolio of professors and support staff. The institution has over 120 international partnerships. The institution considers itself as one of the leading institutions in Mongolia with an entrepreneurial vision boasting both education and research high on their agenda. They aim to be one of the top 1000 universities by 2030, a very challenging objective, but showing their perseverance in continuous quality improvements. This is a large public university and three people were interviewed. Naturally at large universities, there is less involvement from the rector due to the size of the institution and the number of academic departments. The Vice Dean was interviewed along with the ACBSP champion and a faculty member who was specifically charged with handling Standard 5. This institution decided to assign a faculty member responsible to each of the standards, a unique approach not often seen.

5. Institution E

Institution E is a public university in Mongolia hosting five main faculties: Business, International Relations and Public Administration, Law, Engineering and Applied Sciences, and Sciences. It has two branch campuses in other regions of Mongolia. They have a large number of students enrolled with programmes mostly taught in Mongolian. The institution has gone through many changes in its long history, with other institutions being merged into the university while others were spun off and established in their own right. At the end, their vision and mission are to continue as pillars for Mongolian development, transfer into a sustainable university and contribute to the country's development in their areas of expertise. This is also a relatively larger institution, where the Dean has the accreditation champion assignment was interviewed along with accreditation coordinators both of faculty and administrative staff levels. All very much involved in the accreditation process.

6. Institution F

Institution F is small private university with small number of students, faculty and administrative staff. Despite being one of the youngest educational institutions, it does rank in the national ratings of Mongolia. This university has gained the national accreditation.

Interviews took place in person in November 2018 and continued in February 2019. Overall, 21 staff and faculty members have been interviewed. This is a smaller institution and perhaps one where it seemed everyone in the institution was involved in the accreditation process. Four people were interviewed from the President to the responsible faculty and administrative members. This was the only institution where they also invited a high-level board member further showing their commitment to the accreditation process.

The university staff interviewed included:

1. Higher level executive board member who is responsible for the strategic direction and is part of the decision-making process on management level
2. Higher level faculty member who oversees the full programme implementation and faculty assignments and responsible for the QA reviews across the board
3. Faculty member who is involved in teaching and QA on course level

4. Administrative staff member who is involved in the implementation of the accreditation process

When reviewing the positions of the respondents, the researcher secured two presidents of institutions, a high-level board member, four Deans, two Vice Deans or all institutions she secured interviews with: accreditation champions; those specifically assigned delegated responsibility for the ACBSP accreditation process; a number of faculty members; professors and adjunct professors and also accreditation implementation coordinators. The objective that to secure interviews with staff on four different levels was achieved. This allowed for the collection of alternative views of the institutional stakeholders.

Institution A:

1. President
2. Head of Coordination Affairs including accreditation
3. Officer for Development and Cooperation

Institution B:

1. Dean
2. Vice Dean, Academic Coordination Affairs
3. Accreditation Coordinator
4. Academic Coordinator

Institution C:

1. Dean
2. Academic Secretary
3. Dean of Academic Affairs
4. Accreditation Champion

Institution D:

1. Vice Dean
2. Adjunct Professor of BA Department, Coordinator of ACBSP
3. Professor, Coordinator of ACBSP Standard 5

Institution E:

1. Dean, Accreditation Champion
2. Management Lecturer, Accreditation Coordinator

3. Secretary of the Accreditation Process

Institution F:

1. President
2. Chair of Board of Directors
3. General Manager
4. Head of Academic Affairs

The table below provides an overview of the level of positions at the six universities.

Table 7 Overview of Positions

Position level/Institution	A	B	C	D	E	F	Overall
Board/President level	1	0	0	0	0	2	3
Dean Level	0	2	2	1	1		6
Faculty Level	1	1	1	1	1	1	6
QA level	1	1	1	1	1	1	6
Overall	3	4	4	3	3	4	21

The researcher did not face any issues with getting access to the institutions, nor to the participants. Introductory letters were sent to the Rectors or Deans of the chosen institutions, explaining the scope and objectives of the research, and requesting access to colleagues at the institution. Since the interviews took place in Mongolia, they were held at two different times, allowing a full week each time in case schedules had to be adjusted, which was indeed the case. Luckily, the interviews could be moved around within the allocated week and there were only a couple of cancellations due to personal and work schedules, but the researcher was able to carry out 21 interviews across the six institutions.

4.4.3 Peregrine test

The Peregrine Academic Services inbound and outbound exam was partially used to determine which institutions were chosen for the study. One of the main requirements of ACBSP's Standard 4 is that institutions compare and benchmark their results with external bodies. As this standardized test is used in many countries and institutions, it is one of the favorite tools used by ACBSP and IACBE accredited schools and gaining more popularity now with AMBA and AACSB accreditation. The inbound and outbound exam shows three

sets of data results for accreditation, so institutions were chosen because their programmes' results included these cycles already. The test results were available for the researcher and although not used in this study, it aided the process of identifying institutions for the research.

Accreditors, institutions, and the public have all raised questions about the reliability of popular assessment tools (Jaschik, 2013). These tests include, for example, the Collegiate Learning Assessment Test (CLA), the ACT, the Educational Testing Service (ETS) and the like. Jaschik (2013) points out that students tend not to take these tests seriously. The results are not highlighted on their transcripts; students do not need to pass them in order to graduate, which results in low motivation. Djoundourian's study (2017) also questions whether it is better to use standardized testing or have it developed by the respective institutions. So, can these tests, including the Peregrine test, be reliable when students have different motivators? There are studies showing that students who are motivated, perform better on tests. Jaschik (2013) emphasizes that ETS researchers advise the use of different strategies to increase student motivation and that this issue is not only specific to ETS tests, but also to other externally and internally developed tests. So, home-grown institutional tests and assessments are not better either, unless students expect a direct consequence of their performance in such tests. Two suggestions mentioned included educating students that their test scores will affect the public perception of their institution and will affect how the degree awarded at their institutions is viewed. The second is that ETS started preparing certificates for the test takers, indicating levels of achievement. Students receive electronic versions and can share these certificates as many times as they wish with other institutions.

Bright et al. (2019) indicate that with the growing trend of transparency and the need to show skills and knowledge gained during study programmes, inbound and outbound exams are gaining more and more momentum, and these tests are being used for accreditors and for different reporting mechanisms. The goal then is for institutions to improve the outbound exams results scores and one such activity would be to increase simulation games throughout the programme. Bright et al. (2019) indicates that the PAS examinations are used to meet both accrediting and transparency guidelines. The objective is also that the university administrators understand more of the gained competencies in the business domain. The exams are used either at mid-point or at the end of the programmes to see if modification is needed or not. Bright et al. (2019) also indicates his concern about

these exercises: they may be costly, difficult to implement and often meet with faculty pushback.

Kelley et al. (2010) carried out a survey of 420 deans at AACSB business schools to see how they implemented their assurance of learning standards. Direct measures are one of the main measurements of learning and use both written and oral assessments. Surveys are used for indirect measures. Kelley et al. mention the faculty resistance to implementing assessment activities because of the increased time commitment to carrying out the exercise but also because of a lack of appropriate knowledge as to how to carry it out. AACSB recommends both course and programme level measurements. Many schools end up choosing standardized test for direct measures which can be the MFT or the PAS test.

Chowdhury and Wheeling (2013) indicate that many institutions require exit exams by graduating students. They mention ETS, which carries out the MFT, indicating that both these exams include questions in the general business fields of management, marketing, accounting and so on, same as the PAS test. The results are used to assess student performance and the evaluations should also be used to make changes in the programmes in order to improve student performance. Slover and Mandernach's 2018 study looked at comparing traditional and non-traditional student performance on the PAS exams as a summative (end of programme) measure in relation to mode of instructions. Green (2014) looked at alternate exams to the MFT for assurance of learning which included the PAS exams. He points out that ACBSP and IACBE explicitly recognize these exams as appropriate tools for assessment. Green (2014) also indicates that the Major Field Test (MFT) is not an appropriate measure for assessment because the test results are reported in such way that they do not indicate whether students have gained the common business knowledge or not. This test is also not helpful for benchmarking. However, the biggest concern is that this type of methodology is problematic in the business/management subject areas.

Finally, the issue of high stakes or low stakes assessments should be mentioned. In the case of high stakes assessments, they are normally associated with scores required to pass for a degree as an example, while low stakes test are not. In the case of the PAS test, this initially started out as a low stakes test however due to issues with the motivation of students, some institutions opted for the inclusion of results in their degree requirements,

hence changing the nature of testing. This have allowed for higher participation and increased motivation.

Peregrine Academic Services (PAS) published a report in 2018 on the validity and reliability of their services. They highlight the process for these services from the development of the test banks and exams to today's improvement activities. These tests always serve to measure or assess the retained knowledge of students for several purposes, including programme level assessment and evaluation. PAS (2018) indicates that conceptually they used the principles of the American Education Research Association, the American Psychological Association, and the National Council on Measurement in Education. PAS provide several assessment services, including but not limited to, programmatic assessment activities, assurance of learning services, learning outcome evaluations in different fields, for example Business, Accounting and Finance, General education, Criminal Justice, Healthcare. For the purpose of this research, the Business (BUS) and Global Business Education Services (GBE) are relevant.

PAS (2018) explains the development of these exams which were based on the discipline-specific knowledge areas set by the US and international accreditors. The accreditation standards were used to provide direction and accreditors were in consultation with PAS during the development. Next, PAS conducted course curriculum reviews and used subject matter experts to develop these exams. Initially between 300 and 500 exam questions (multiple choice) were developed matching the subject areas. The test banks were then beta tested both within the US and internationally. The exams are delivered online with 10 questions per topic with overall 100 and 120 questions. Naturally, the exam questions are randomized according to topic. PAS (2018) indicated that they performed content level validity on the exam questions. As mentioned, the exam questions are based on the requirements of accreditors for programme level assessments. Each exam question has four or five possible answers with only one correct choice. Substandard questions were eliminated following the beta testing. The exam questions have been continuously reviewed with over 5000 reviews taking place by 2015. For reliability of the exam, they performed item analysis (effectiveness of the exam): item difficulty (percentage of questions answered correctly or incorrectly indicating either too easy or too hard) and item discrimination. PAS also used interchangeability, which means substitution of a question to another without significantly affecting test scores. They list other reliability measures as

well, such as peer review, secure electronic item banking, quality assurance procedures in place throughout the whole process.

The appropriateness of the Peregrine test has been questioned and evaluated in the context of multiple-choice question exam methodologies and other popular assessment tests, such as ETS testing. However, it's also essential to consider the appropriateness of the test as a measure of learning outcome for students and universities specifically in Mongolia. Major concerns of the Peregrine test center are around the fact that the test is designed for US institutions and student only. For this reason, Peregrine designed a set of test bank that is aimed at students of international institutions. Also, there were issues around the language and translation. Peregrine has made two major adjustments: first they have improved the translation of the test banks (as confirmed by the respondents of the interviews) and second the test is now available also in Mongolian (next to several other languages). The tests are also now designed in a way that individual institution can request their specific questions to be added to the test bank, further helping the localization of the test. Finally, as discussed before, and perhaps quite innovatively, Peregrine Academic Services (PAS) signed a cooperation contract in 2012 with MNCEA to carry out external evaluation services and training activities (Tserendagva and Jamts, 2017) ensuring a continued cooperation in assessing student learning.

4.4.4 Research carried out in a different language

Consideration has been given to the fact that some of the respondents could not speak English at all, or had a limited level of English language skills (for example, they could understand the questions in English, but they tended to answer in Mongolian). In preparation, the researcher had arranged a translator to accompany her and she recorded all the interviews for future analysis. She did not have any other researchers working with her during the interviews and she analysed the data by herself. Shortly after the interviews they were transcribed by the researcher, who also evaluated the data. Incorporating the need for translation is of course not new in research. International research plays an ever more important role in international collaborations, whether in research projects across borders, or doctoral students conducting qualitative research in their home countries (Santos and Black, 2015). Several studies focus on data collection carried out in the researcher's native tongue, while the analysis and interpretation is done in English, which is not the researcher's native language. Santos and Black (2015) highlight the five key time points

when translation can occur: prior to data collection; at data collection; during data preparation; during data analysis; at the point of the dissemination of findings. The researcher for this specific study used the second option, which is translation at the point of data collection. This essentially means that the interview questions were translated by the interpreters and that simultaneous interpretation was used during the interviews, so that this was a real time discussion between the researcher and the interviewee. All the evaluation of data and coding was performed in English. Santos and Black (2015) mention that often enough researchers do not indicate the timing of translation, which can have a varied impact. For this study the researcher found it essential that the competence of the translators was adequate, hence one of the translators was an English language teacher at university level, while the other translators had worked in higher education in quality assurance and assessment for years and were educated to masters-degree level. Research suggests (Santos and Black, 2015) the use of only one translator to be preferable. This option was not achievable, but in over 21 interviews the researcher used the same two translators during both visits.

Other scholars, such as Temple et al. (2006), mainly concentrate on issues with secondary qualitative data analysis. However, as the researcher collected primary qualitative data, this issue is not necessarily relevant for this study. As a primary researcher making use of simultaneous translation, the researcher was able to grasp readily the implications of the data collected at first hand and develop a positive relationship with those participating in the studies. This was evident from the way they responded in the interviews and the interest that was shown towards the study. The respondents especially appreciated that the researcher conducted the interviews in person. The study of Sutrisno et al. (2014) concentrates on written translation and not oral translations, discussing the options for single translation, back-translation and finally parallel translation. He also highlights that while some studies use complex translation processes, very often this is not widely available especially when considering doctoral students. Hiring numerous translators to cross check is out of reach for many researchers, including in the current study. As important, in fact vital for the findings of any study, was the trustworthiness of the translation.

4.6 Data Analysis

Once the data was collected and recorded, the researcher first transcribed the interviews individually and per institution. The interview protocol ensured that the same questions were covered in each interview. Once the interviews were transcribed, the data needed to be rearranged to see higher-level themes emerging. These themes were then grouped against Kurt Lewin's Force Field analysis. This meant grouping into drivers and barriers first and then coded to match the requirements of Standard 4, Student Learning Assessment of the ACBSP framework. Further matching was carried out looking at all four of the sub-criteria, which are Criterion 4.1: Approach; Criterion 4.2 Deployment; Criterion 4.3 Results, and Criterion 4.4 continuous improvement (ACBSP, 2020). As Saunders et al. (2007) indicate analysing data into units of data with the appropriate and meaningful categories, which are in effect codes or labels, allows the researcher to systematically analyse the information. These categories are of course guided by the research questions and objectives and need to be part of a coherent set, ending in a framework that the researcher can then use to analyse. Finally, the researcher measured the level of strength or weakness based on the number of times a higher-level theme was mentioned under the 4 standards and sub standards, thus indicating the level of positive feedback or a concern area.

Example of higher-level themes grouped towards drivers:

- Cooperation with international universities
- Development of outcomes assessment process, plans and learning outcomes
- External benchmarking activities
- Changing teaching and learning approaches and pedagogy
- Revised mission and strategy
- National accreditor of Mongolia revising their requirements
- Real time data
- PAS test results and benchmarking
- More students recruited

- Better professors
- Stakeholder involvement

Example of higher-level themes grouped towards barriers:

- Accreditation takes too long to implement
- PAS exam
- Accreditation is too expensive
- Accreditation versus degree recognition
- Lack of faculty exchange.

These higher-level themes then are mapped against the ACBPS Standard 4 Criteria as indicated in the table below:

Table 8 ACBSP Standard 4- Unified Standards. Adapted from ACBSP (2020).

Standard 4				
4-Overall	4.1 Approach	4.2 Deployment	4.3 Results	4.4 Continuous Improvement
Systematic outcomes assessment process	4.1. a: Outcomes assessment plan and process	4.2.a: Assessment Process Deployment	4.3.a: Collection, Analysis and use of student data (inclusion of direct measures)	4.4.a: Closing the loop: Evidence for using the results for continuous improvement
Continuous improvement	4.1.b: Performance Measures (what student competencies and skills measured; data collected, substantiation of measurements)	4.2.b: Evidence of 3-5 sets of data cycles with assessment schedules	4.3.b: Comparative measures, evidence of internal and external performance results	4.4.b: Continuous improvement and Assessment process (Specific improvements deployed and stakeholder engagement)
Outcomes developed and implemented	4.1.c: Stakeholder Engagement (Evidence)	4.2.c: Assessment measurements including the types used	4.3.b.1: Reporting actual results of comparative data for all programmes	
Communication to stakeholders			4.3.c: Student Learning Results Communication: results systematically made available for stakeholders	

Table 9: Illustration of mapping of overall strengths and barriers against ACBSP’s Standard 4

Standard 4-All institutions				
4-Overall:	4.1 Approach	4.2 Deployment	4.3 Results	4.4 Continuous Improvement
Systematic outcomes assessment process Driver: 101 Barrier: 20	4.1. a: Outcomes assessment plan and process Driver strength: 4, 6, 2,3,2,1:18 Barrier: 1, 0,1,0,0,0:2	4.2.a: Assessment Process Deployment Driver Strength: 4, 1, 7,0,1,0:13 Barrier: 0, 0, 6,0,0,0:6	4.3.a: Collection, Analysis and use of student data (inclusion of direct measures) Driver strength: 0, 1,0,0,0,2:3 Barrier: 0,0,3,0,0,0:3	4.4.a: Closing the loop: Evidence for using the results for continuous improvement Driver strength: 3,14,16,15,7,12:67 Barrier: 2,0,3,2,2,0:9
Continuous improvement Driver:79 Barrier:33	4.1.b: Performance Measures (what student competencies and skills measured; data collected, substantiation of measurements) Driver strength: 1, 8,0,8,6,5:28 Barrier:2, 6,0,1,5,7,7;28	4.2.b: Evidence of 3-5 sets of data cycles with assessment schedules Driver Strength: 1, 0,0,2,3,0:6 Barrier: 0, 0,0,1,0,0:1	4.3.b: Comparative measures, evidence of internal and external performance results Driver strength: 3, 5,6,2,2,2:20 Barrier: 0, 0,1,0,0,0:1	4.4.b: Continuous improvement and Assessment process (Specific improvements deployed and stakeholder engagement) Driver Strength: 6,7,6,1,2,3:25 Barrier: 0,0,1,0,2,0:3
Outcomes developed and implemented Driver:29 Barrier:3	4.1.c: Stakeholder Engagement (Evidence) Driver strength: 0, 5, 1,5,1,3:15 Barrier:0, 0,0,0,0,0:0	4.2.c: Assessment measurements including the types of assessment used Driver Strength: 2, 0,0,0,0,1:3 Barrier: 0, 0,0,1,0,0:0	4.3.b.1: Reporting actual results of comparative data for all programmes Driver Strength: 2, 0,1,3,2,3:11 Barrier: 0,0,2,1,0,0:3	
Communication to stakeholders Driver: 12 Barrier: 3			4.3.c: Student Learning Results Communication: results systematically made available for stakeholders Driver strength: 0,2,2,0,0,8:12 Barrier: 0,0,3,0,0,0:3	

Standard 4-All institutions				
4-Overall:	4.1 Approach	4.2 Deployment	4.3 Results	4.4 Continuous Improvement
Driver: 9, 8, 8, 8, 9, 11: <u>53</u> Barrier:1, 5,2, 6, 5, 0: <u>19</u>	Driver: 5, 19, 3, 16, 9, 9: <u>61</u> Barrier: 3, 6, 1, 15, 7, 7: <u>39</u>	Driver: 7, 1, 7, 2, 4, 1: <u>22</u> Barrier: 0, 0, 6, 2, 0, 0: <u>8</u>	Driver: 5, 8, 9, 5, 4, 15: <u>46</u> Barrier: 0, 0, 9, 1, 0, 0: <u>10</u>	Driver: 9, 21, 22, 16, 9, 15: <u>92</u> Barrier: 2, 0, 4, 2, 4, 0: <u>12</u>
Overall all institution:	Drivers: institution A: 35, institution B: 57, institution C: 49, institution D: 47, institution E: 35, institution F: 51 <u>Overall: 274</u> Barriers: institution A: 6, institution B: 11, institution C: 22, institution D: 26, institution E 16, institution F: 7 <u>Overall: 88</u>			

The researcher was then able to identify which areas had certain drivers and which had certain barriers, based on the in-depth interviews conducted and on the qualitative evidence gained through probing questions. In particular, an assessment took place to analyse which of the elements of the standard was seen as having the most drivers and the most barriers. This is showcased in the force field diagrams with the ratings per institution, as well as overall. The researcher used this as her basic research findings and then she described the findings per institution and overall, allowing the researcher to pinpoint the individual results per institution but also the overarching trends and areas where significant improvements took place and where more improvement were needed in order to reach the standard. For example, when one of the interviews commented that employer satisfaction surveys had to be put in place, then that specific comment was matched to 4.1 c Stakeholder Engagement and it was grouped with the drivers, as it indicated a positive change being put in place due to the requirements of the ACBSP process. If a comment was repeated more than once, then that specific driver was getting stronger. This process then allowed for each Standard 4 section to be matched with interview comments and assigned a driver or barrier strength, based on the number of times it was mentioned. The researcher then could draw conclusions as to which Standard 4 segment received positive or negative comments and draw overall conclusions per institution, but also overall drawing on responses from all participants and institutions.

4.7 Role of the Researcher

Since the researcher is involved in the accreditation process herself and is an active assessor for ACBSP, there may be a possibility of researcher bias, which could compromise her objectivity, especially as she is personally convinced of the value of the accreditation process in helping with student learning. In addition, her current role as Associate Dean Global Education Programmes at a Dutch institute also carries the responsibility of overall national and international accreditation for the institution's programmes across the globe, so she is leading the process in that environment as well. However, she is also keen to help improve the ACBSP and the accreditation process more generally, by suggesting areas to clarify and enhance some of the elements in the process

through feedback from institutions undergoing accreditation. On the plus side, the researcher's deep knowledge of accreditation is an asset in this research, given that she is fully aware of the way that ACBSP seeks to find evidence from institutions, and its way of questioning individuals to ascertain aspects of compliance. Through training provided by numerous accreditation bodies, including ACBSP, she has developed skills in this area, which have greatly benefited this research. Therefore, her experience is both an asset and a limitation.

As the researcher has a positive bias towards accreditation, she has intentionally chosen to look at the accreditation process from the perspective of the institutions themselves and not from that of the accreditors. Accreditors were not interviewed in the process. Information about the accreditation schemes and frameworks came from desk review and the knowledge of the researcher. The researcher also ensured that she concentrated on both the positive and negative aspects of the research, as it can be seen in the follow-up chapters, allowing the researcher to report on findings in a neutral manner.

The researcher was concerned about the respondents opening up in the responses, but at the introduction of each interview the current roles of the researcher were indicated in a transparent way. It appeared to give confidence to the respondents that the researcher understands the field and has a deep knowledge of the accreditation and student assessment sector. Respondents welcomed that the researcher would be able to provide improvements points to the accreditors themselves. Experience in the field of accreditation also helped as the researcher understood references to the subject areas, and only minimal clarifications were needed on the actual standards and their interpretations. There were some sensitive issues that were brought up by some respondents, for instance some critical comments on certain accreditors. There was also some bias shown by larger institutions against smaller institutions involved in accreditation. Some respondents favoured ACBSP very much, almost putting the accreditors above all other existing QA frameworks. The researcher found this was the case when the institution and its programmes experienced substantial improvement throughout the process, so for them the quality gain and the effort required to reach threshold standard was substantial, compared to those institutions who had to make less effort to reach the requirements of ACBSP.

The researcher introduced herself first and foremost as a student at the University of Bath. This is clear in the introductory letter with verification information such as student number

indicated to the rectors and then to the respondents as well. The interview questions were shared ahead of time and all the respondents understood that these were very different from an actual site visit. They all participated in and were familiar with the accreditation process, as this was requested from the respondents and was clarified during the questions. In addition, the researcher did not previously participate in any site visits in Mongolia and joined the ACBSP Board of Commissioners after the interviews concluded already. At the end of the interviews, the respondents were more curious about the institution she works with as Associate Dean and especially were interested in her Hungarian origin but never her role in ACBSP or any other accreditor.

Overall, the participants were very open to answering questions, welcoming, curious about the results and findings and asked when the researcher would be returning to present her findings. They were also interested to expand the possible research and get additional advice on accreditations. Some of the interviewed respondents are now considering other accreditation bodies, this was showcased for example in the joint information session by MNCEA and AACSB in Mongolia at the end of 2019.

4.8 Validity and Reliability

The researcher based much of her analysis on the ACBSP standard framework, which has been developed based on the Baldrige Performance Excellence Framework, perfected over many years of trial and error by ACBSP and has been validated through application to many dozens of institutions worldwide, allowing it to be considered an excellent framework for assessing quality in higher education. In addition, this tool is especially focused on student learning – hence the researcher regarded it as a valuable measure in addressing the central problem of this thesis. The ACBSP standard has been in force for many years and has been continually improved to ensure maximum validity and reliability for institutional assessment purposes.

The Force Field model has also been used for many years to analyse change management processes, and indeed Kurt Lewin is seen as a guru in the field.

Nevertheless, a key issue to address is trustworthiness in the qualitative studies. Triangulation was achieved by review of documentary evidence from the accreditors and

accompanying interviews. More individuals were interviewed from one institution. Trustworthiness is the core to the methodology of the research carried out.

According to Saunders et al. (2007) reliability is the extent to which the way the data was collected and analysed would produce consistent findings on other occasions. In other words, would similar observations be reached by others? The researcher had to consider both subject or participant error and subject or participant bias. For the first matter the researcher ensured that participants were chosen from institutions which went through accreditations at different times, hence strengthening the credibility of the research carried out. For the second, the researcher ensured the anonymity of the respondents, hence their bosses would not know what they had indicated in the interview, ensuring there was no threat of employment security. The interviewer via the translator in some cases, has transcribed the words of the respondents as spoken in order to minimise interviewer bias.

Saunders et al. (2007) also point to the need to question the validity of the research: are the findings indeed what they appear to be? There are several matters to consider here, Blumberg (2005) indicates history, maturation, testing, instrumentation, among other matters, to consider under internal validity. Relevant for this research is history. As indicated before the researcher has chosen institutions which went through the accreditation process at different times.

Regarding external validity or generalisability, Saunders et al. (2007) point out that if the research concerns a smaller number of organizations, the aim is not to draw up a general, widely applicable theory but to explain what is taking place in the context of this study. Indeed, the researcher is not aiming at generalizing the results.

4.9 Ethical Considerations

Various measures have been taken to ensure that this study is carried out in accordance with The University of Bath's Code of Good Practice (University of Bath, 2018). The researcher has also used the guidelines from the Code of Practice for Research by the United Kingdom Research Integrity Office (UKRIO, 2009) and/or the Ethical Guidelines

for Educational Research published in 2011 by the Council of the British Educational Research Association (BERA).

As the research was conducted at Mongolian Higher Education Institutions, the researcher needed to ensure that there were organizational approvals to run the research and interviews. In addition, in order to protect the privacy of the institutions and individuals, the researcher informed the participants of their rights and gave assurance that their privacy would be protected. An introduction letter was sent to the participants (Appendix 2) informing them about the researcher's institution, her status as a student (including student number), the objective of the research, the University of Bath Code of Good Practice, (University of Bath, 2018) and confirming that the identities of respondents and institutions would not be revealed. The researcher has removed the names of the institutions and did not use the names of the interview participants. To ensure there would not be any risk or harm taking place, the confidentiality of the respondents was maintained throughout the whole process. However, if someone is familiar with the Mongolian higher education system and its institutions, it may be possible to identify the institution or the individual.

Before each interview, the researcher explained to the participants that they were free to stop the interview at any time and to opt out, at any time, including after the interview, from their response being used in the study.

The objective of the researcher is to show integrity and ethical compliance through the whole process and to ensure that the participants were not subject to any stress nor embarrassment while participating in the study.

5. Data presentation and analysis of results and findings

5.1. Overview

The focus of this dissertation is to look at the challenges and barriers around the implementation of an international accreditation quality framework in Mongolian HEIs. In order to assess this, the researcher is using Kurt Lewin's Force Field Analysis and the Standard 4 framework of ACBPS. The Force Field Analysis concept was introduced in the early 1950s and mostly used as a tool to aid diagnostic analysis in change management and implementing change (Thomas, 1985) or as a technique for reviewing and analysing forces that are affecting change (Thomas, 1985). The researcher specifically is testing those approaches.

In the researcher's diagram, the most ideal situation is when the challenges and barriers of accreditation are set as close as possible to the far right of diagram in Figure 2. This would indicate that accreditation can be seen as positively implemented against the Standard 4 framework. If the forces are stronger on the right side, hence pushing too much against the positive forces, then the results indicated are rather negative, indicating a lack of positive impact. The driving forces and restraining forces are represented by arrows. The length of the arrows represents the strength of these arrows on both sides and the level of the strength indicates how many times respondents mentioned them. This qualitative analysis based on the interviews is inevitably somewhat subjective but has enabled the researcher to reach some tentative conclusions from her data as to the impact of the accreditation process. The researcher then prepared an overview of these per institution again and then overall, allowing for in depth evaluation of the results, found in Chapter 5.

5.2 Findings mapped against Standard 4 per institution.

Below, the findings per institution are highlighted:

1. The First Institution:

When mapped against ACBSP's Standard 4, the researcher has found an overwhelmingly positive response from the respondents. Overall, per institution, based on comments in the interviews, 35 incidents of positive drivers were found, and only six barriers were mentioned.

In terms of looking at the findings in more detail, Standard 4 overall had nine drivers and one barrier; Criterion 4.1 (Approach) had five drivers and three barriers, Criterion 4.2 (Deployment) received seven drivers and zero barriers; Criterion 4.3 (Results) received five drivers and zero barriers; while Criterion 4.4 (Continuous Improvement) had nine drivers and two barriers.

Criterion 4.1, or the approach segment, emphasizes elements such as the institution's formalized assessment plans for its programmes, student competencies and skills, data collected, performance measures, and stakeholder engagement in these processes.

Interviewing respondents about this specific criterion included a finding of five drivers and three barriers. Drivers included the fact that going through the ACBSP accreditation process helped the institution to prepare an assessment plan, which in this case was very much absent on programme level prior to accreditation. The respondents indicated that the institution seems to have been assessing programs more on course level and there was no formal assessment plan in place to align the competencies and skills sets of student achievement with the curriculum of the programme. There were also no measurements on programme level, the introduction of summative measures highlighted this during the discussion. The first respondent indicated the following:

“The biggest change is based on outcomes based assessment. Before that we planned our curriculum course by course. Afterwards you can see the main destination. Programme learning outcomes, programme level. Tried to implement course levels as well.”

One of the respondents commented on the performance measures used: in this case the inbound-outbound exam by PAS. A major comment observed here was that the test is only

used as a window-dressing exercise, instead of its original aim of measuring, comparing and improving student learning. Window dressing in this context means that the institution only implements changes in order to gain accreditation. One of the respondents indicated the following: *“Implementing these tests takes long time. Inbound is for freshmen bachelor programmes and the outbound is at the end when they graduate and can’t change anything anymore once they graduate, so the period is very long to improve which is 4 years later.”*

The researcher believes that it will take additional time for this institution to achieve full deployment of the process for its programs. Stakeholder management was not addressed during the interviews by the respondents of this specific institution, which was seen as slightly surprising by the researcher, especially compared with the other schools. Stakeholder management is central to the ACBSP guidelines and it is discussed in detail in Standard 3. Once the institution identifies its key stakeholders, these stakeholders would need to have input in many of the institution’s processes including assessment. Below is an additional excerpt from the interviews in relation to 4.1:

‘Student learning....defining the programme level outcomes [they] had changed approaches, teaching approaches, pedagogy, teaching and learning.’

Criterion 4.2 (deployment) addresses the search for evidence that the assessment process discussed under 4.1 is indeed fully and systematically deployed. It also considers that the objectives established in the assessment plan are measured in 3-5 year cycles. Finally, it considers the type of assessments used, including internal, external, formative, summative, comparative measures.

There were seven drivers indicated under this criterion and zero barriers indicated by the respondents. Going through the accreditation process impacted the deployment of processes for this institution. It is very much related to the fact that the overall programme assessment process was designed during the accreditation process and part of that included the development of different types of tools, as required by ACBSP. The institution then designed its measurement tools in a way that can assess the newly identified student learning outcomes and its achievable targets. The introduction of Criterion 4.2 saw the institution implementing formative assessment measures twice a month for courses and programme level assessment performed once a semester. One of the respondents indicated the following:

“Twice in a month, faculty/teachers assess the students, formative in the courses, faculty comment about how students are improving in the system, this is twice in a month, then they do the midterm assessment, in this section teachers assess in teams, similar courses and subject areas they assess the courses, and they use formative assessment tool and other tools... At the end the programme level assessment, once in a semester. We are always aiming to assess using other assessment tools. Peregrine for example.”

It was observed that in the programmes of this institution, course level formative assessment already took place, but the frequency and the programme level semester assessment was newly introduced. The segment also indicated the introduction of new assessment tools such as the PAS test, allowing for summative, comparative benchmark measures on programme level. Transparent and clear management data is also mentioned highlighting the positive nature of implementing and deploying a well-structured assessment process. One of the respondents indicated the following regarding the PAS test: *“ PAS test questions for business components –[is used] only for that. We can see the differences comparing to other institutions so the benchmarking is available, we can see the weaknesses and for developing which main levels/ curriculum areas should be improved.”* The researcher saw it as quite curious that none of those interviewed had any negative comments related to the deployment of this criterion. The researcher suggests that there might be a couple of reasons for this: the tendency of these respondents to highlight the positive aspects instead of the negative aspects - this seemed to be more prevalent, especially when compared with the other institutions. It is also possible that this institution’s quality processes were below standard, so, in comparison with how they were before, they seem to have appreciated the improvements throughout the cycle and lot more than others may have done. It also may be that while the learning curve may have been higher for this specific institution, the benefits simply outweigh the negative aspects of the accreditation, so they seem to recall those more easily. Additional verbatim examples from the interviews related to this criterion:

‘..the map has been developed as an evaluation on operations, but they [faculty] are still reviewing this framework and updating it. So, this is the result of the ACBSP accreditation, because we had to set and develop the continuous improvement mechanism and process.’

'[The process] gives good management data, and all the information helps with transparency, clear information structure, we can start from the same point with the same information.'

Criterion 4.3 (Results) concentrates on assessment performance activities and within its framework highlights not only the results but also showcases the improvements that were made during the process. Graphs must be presented with identifiable improvements made as the result of the assessment. Comparative results are emphasized here as well, along with the transparency agenda, emphasizing the need to systematically make information available to all stakeholders both internal and external.

The respondents identified five drivers and zero barriers. The drivers concentrated around the use of comparative measures and external performance results and around reporting the information related to those above. Respondents very much appreciated the fact that the PAS test allowed for comparisons of statistical information on student result data. *“Admin offices and deans of departments are using the result of the PAS test in order to see how the knowledge and education of students is improving. And they check how the teaching process is efficient or not.....”*

4.4 (Continuous Improvement) considers the need for institutions to provide evidence that the results are used to make improvements and changes to several aspects of programme delivery. It also discusses the review of the assessment process, so it is essential that not only the results are reviewed, but the process itself must be improved to ensure better collection of data and evaluation among others.

There were nine drivers identified here and two barriers. This criterion had the most drivers at this specific institution. The respondents seem to have appreciated the changes that resulted from the whole assessment process. Respondents have indicated improvements in the teaching and learning approaches and pedagogy and in the curriculum development process. The results prompted revision of the mission and strategic planning of the institution (while keeping their identity), which is now including outcomes-based education. Respondents indicated, they seemed to appreciate the new understanding of accreditation they have, which is as a continuous improvement process. Respondents were also quite positive when it comes to the PAS test as the review of results and comparative statistical information are leading to changing of processes across the board. They also highlighted the fact that the quality of professors has improved, and there is now a chance

to present faculty's views on numerous institutional processes and the level of students. As a result of findings, they have improved their marketing materials as well. Barriers concentrated around the conditions they received during the accreditation process, which meant they have plenty to improve, especially when it comes to the strategic planning processes. Interestingly that strategy comes up both as a driver and as a barrier, but balance can be found again as this is seen as a continuous process and current barriers will help the institution to concentrate on areas that still need additional work. Below are excerpts from the interviews related to this criterion:

'...from the formative assessment we see we can improve the teaching approaches.'

' New understanding of accreditation: it's never a finished process, it's continuous improvement.'

'The PAS test results compared statistics and we changed our process due to this'.

Overall:

In looking at the overall results of the interviews, the researcher sees this as reflecting a clearly positive review of the whole accreditation process as well as an assessment of where the institution sees itself at its current stage. There were nine drivers indicated overall on Standard 4 and only one barrier. The respondents believed that they have improved considerably in several aspects related to Standard 4. They highlighted as a positive factor that they started using the Malcolm Baldrige criteria for performance excellence as assessment criteria. They now have a chance to compare their performance with other international institutions and can evaluate the institution as a whole next to the overall improved reputation within Mongolian universities. The only negative comment was that the accreditation process revealed that the institution needs a better information management system. Before going through the accreditation process, the institution lacked a fully systematic student learning outcomes assessment process, while now they have an outcomes assessment process deployed across programmes. They have collected data and they have closed the loop so there is evidence of continuous improvement of not only the outcomes, but also the processes themselves. Most criticism seemed to be directed outside the institution (for instance, at national level discussions) rather than inside.

Some comments from the participants on the overall accreditation process and Standard 4 in particular are highlighted below:

Drivers:

‘The biggest change is based on outcomes-based assessment. Before that we planned our curriculum, planned course by course. Afterwards [after accreditation] we can see the main destination. Programme learning outcomes, programme level.’

‘We think accreditation is a whole improving process, International accreditation means for us we are improving our standards compared to other international schools.’

‘[Accreditation] gives good management data, and all information helps with transparency, clear information structure....’

Barriers:

‘I think they [universities] are only using it [PAS test] for ACBSP accreditation and not for their own improvements...’

Final comments

When discussing any other institutional measures and frameworks, the respondents mentioned the so-called Olympiads, which are competitions between universities on a national level, supported by the Mongolian Government.

A major problem that was mentioned on a national level was that reviewing their own programmes and learning goals only helps so much, to a limited extent. The level and quality of high school graduates is often not adequate and if the students are not adequately prepared to enter higher education, then they will be unlikely to succeed in the programmes, or it will affect their learning outcomes as they have to gain knowledge during higher education studies instead of having acquired that knowledge during previous studies. So, the education system is very much interconnected, and dialogue needs to take place across the general education sector. English skills were mentioned here, but more generally the high schools’ foundation programmes. This specific institution is working with some high schools so hopefully that will positively affect future entry into the institution.

Comments on the Mongolian National Accreditation included the fact that around a year prior to the interview, the national accreditor had revised its requirements for programme and institutional accreditation. The new criteria require higher education institutions to

focus on student learning outcomes. This was not previously the case prior. In addition, the criteria were revised on the requirements of international principles. These are major developments. In many cases, the national accreditors are underdeveloped or not reaching their maturity yet, compared to well-accepted models like those of the US, UK, or Australia. So, the fact that a number of institutions having gone through ACBSP accreditation may have triggered improvements in the national requirements is an interesting finding. Especially in countries where the Soviet style of education was so predominant for so long, moving the centre towards students and student learning is a major change for the institution.

One of the respondents also talked about changes needed on the national level. The suggestion was that change should be introduced to educational leaders at university level. The respondent indicated that accreditation gives opportunities to improve the processes and is beneficial for the organization, but some leaders consider this as a process that just needs to be completed. The national council is now asking for annual quality assurance reports, so there is a changing trend, but still most HEIs submitting the report do not consider it as a change process to improve methodology and technology.

A final comment from the respondents of this institution was regarding the change that is needed to teach the new generation of students entering higher education. Changing the teaching process, the learning process, the use of IT tools, improving student habits to enable them to learn in the best ways they can – these points were also mentioned by the respondents.

2. Second institution:

When mapping drivers and barriers against Standard 4, in the case of this institution there were 57 drivers and 11 barriers. Overall, this also seems to be a positive review. One of the reasons why the numbers may be higher than the previous institution is that there were four people interviewed at this institution compared with the three at the previous one.

To look at the scoring in more detail, compliance with Standard 4 in the case of this institution overall received eight drivers and five barriers; Criterion 4.1 (Approach) received 19 drivers and six barriers, Criterion 4.2 (Deployment) received one driver and zero barriers; Criterion 4.3 (Results) received eight drivers and zero barriers; while Criterion 4.4 (Continuous Improvement) received 21 drivers and zero barriers.

As with the previous institution, the researcher started with reviewing each criterion, starting with 4.1 (Approach), concentrating on: the outcomes assessment plan and process; the student competencies and skills set measured; the data and key student performance measures and finally the stakeholder engagement. According to the researcher's analysis, there were 19 drivers here and six barriers. The 19 drivers here concentrated on several areas. The comments predominantly concentrated on the improvements in the assessment process. It seems that their approach to assessment was at the early stages of development with some formative assessments in place (similar to the first institution reviewed) so additional changes were needed to be made, for instance the inclusion of external assessment frameworks (such as the PAS test) and the introduction of qualitative assessment structures: *'The next advantage is our strategic planning, it is actions, activities. Our assessment has changed a lot, one important thing is the external assessment, we understand now qualitative assessment, before that we only had quantitative assessment.'*

Major changes took place around stakeholder involvement as well - this specific issue was mentioned several times throughout the interviews. Considering faculty as one of the stakeholder groups, the following was indicated by a respondent: *'Decreased faculty teaching hours to the international standard. We have to improve continuously and benchmarking.'* Another indicated the following: *'For student learning the biggest change was on the faculty level. Previously in the higher education system, the ministry planned all the programmes for the university but after the accreditation process the policy has changed so therefore each university had to create their own curriculum and programme. Due to the international accreditation, we requested our own faculty level programme at university level and it was a very successful request from us, so therefore we changed the whole business programme'*. Barriers cited by the school concentrated on the actual performance measures, talking about problems with the PAS test, which included translation issues especially at the beginning but also the fact that students do not take the test seriously enough: *'... students don't take the test seriously, because it's not part of the grading of the degree (not a requirement), they don't pay for it. They don't [take it] seriously enough.'* There are further comments that students score even lower on the outbound test, which highlights major motivation issues around this specific measure. Below are excerpts from the interviews regarding Criterion 4.1:

‘Before accreditation we did not have any student assessment, outcomes assessment plans had to be developed’

‘Organization of meetings with employers so we can see what skills and knowledge the students need. We improve the programme based on that. Before accreditation we didn’t care about that so they changed the process.’

‘For improvements, the translation of this test [PAS test] could be improved. Students always complain about the translation.’

‘...students don’t take the test seriously because it’s not part of the grading of the degree.’

4.2 Specifies deployment activities with process rubrics and forms; student learning assessment measure cycles and showing evidence and highlighting the type of assessment tools used. There was only one driver and zero barriers in this area. This one driver addressed the assessment process deployment specifically targeting the evidence segment of the deployment where documents are now presented in an organized way. It was interesting for the researcher to consider what the fact that there were so few comments at all on this segment may mean. She speculated that perhaps the institution is well established and has the support and capacity to deploy the assessment process, even if there are major changes introduced under criterion 4.1 before. It may also mean that this institution has already become familiar with the types of assessment used and had a variety of them but perhaps these methods were not fully or correctly used as the programme level assessments were not in place. One could argue that providing 3-5 sets of data was also not a problem for them, if on other levels (perhaps course and institution level) they used to provide management data already on a cyclical cycle.

4.3 Discusses the results segment with the collection, analysis and assessment of data as the point of focus. It also concentrates on comparative measures, the actual results of the institution and finally student learning results and the ways these are communicated. This segment had eight drivers and zero barriers. The strengths concentrated on comparative measures at international standards and noted that the PAS test allowed them to benchmark results. Finally, they also talked about the increased cooperation with international universities. Examples are related to this criterion are below:

‘Student learning has changed to meet international standards.’

'Peregrine test is reflecting reality, allows us comparison.'

4.4 segment had 21 drivers and zero barriers. This was seen by the researcher as a large number of strengths. Both closing the loop and the process improvement results received positive comments. One of the main comments was the fact the faculty members are encouraged and supported to study abroad for their doctoral degrees. There has been a huge increase in the percentage of faculty with doctoral degrees in the institution already, partly through the process of accreditation. The institution has moved from 13% doctoral-qualified faculty in the programmes that are accredited by ACBSP before accreditation to 41.6% and is expected to hit the 50% mark in three years. The researcher sees this itself as commitment of the institution towards continuous quality improvement. In addition, other faculty related improvements include decreasing the number of hours lecturers were teaching to meet international standards in an effort to improve teaching methods. In other areas, the faculty members interviewed also indicated improvements to the curricula, as well as to the quality of graduates, strategic planning efforts and more robust implementation of plans: *'Even though we had the old school strategy, we didn't have the curriculum strategy. Faculty development strategy was missing. Last 5 years, we let the faculty study abroad to develop their skills.'* The institution also lists infrastructural improvements with Wi-Fi and TV connectivity in all classrooms with Google classroom open for all. The need for a changed curriculum due to stakeholder involvement was also mentioned a number of times. These are significant improvements, all affecting student learning. The PAS exam also received positive comments: *'Yes, we did for improvement of student learning. Our internal assessment changed and improved because of these test. We start to take the levelling test of economics for our students'*.

Some additional examples of discussions related to Criterion 4.4:

'Our curriculum is improving continuously. Before [accreditation] we changed the curriculum [every] 5-6 years and now we improve it every year meeting ACBSP requirements and also with the comments from the stakeholders.'

'There are 90 teachers in this faculty. From that 22 are studying abroad for their PhDs....this means whole new opportunities and train the other teachers, train the trainers....we have human resource strategy for our faculty to 2021.'

'They [faculty] used to teach only and now teachers also teach and do research.'

Overall Standard 4 Evaluation:

General comments on Standard 4 at this institution included eight additional drivers and five barriers. Respondents of this institution commented on the fact that having ACBSP accreditation positively impacted on their student enrolment numbers, hence their financial status was improved and their reputation, on an international scale, was heightened. In addition, this institution apparently seemed to have received financial assistance from the government as a result of their accreditation process. Similar to the comments made to the researcher from the previous institution mentioned above, respondents at this School also indicated that the Mongolian higher education system has changed positively due to the accreditation process in the country. Last but not least, overall organization of documents have improved. One of the respondents indicated the following: *‘The advantage is that our documents are organized. We have organized all these documents at the other departments as well for other faculties as well, so they used the ACBPS standards to improve the other departments.’*

Negative comments included financial restraints to do with attending the ACBSP conference in the US (as a US based accreditor, the annual conference has always taken place in the US). There were also issues with the challenge of fully understanding the accreditation principles; and again the researcher noted the tendency of general window-dressing when writing the report to impress the site visit team and commissioners.

From the interviews conducted at this institution, the researcher concluded that before accreditation the institution did not have a clear and robust student learning assessment process. There was some evidence of measurements on subject/course level but there was no evidence that clear measurement of competencies, skills set and performance measures were in place. Moreover, the institution lacked engagement with faculty and stakeholders. During the process of initial accreditation, the institution tried to address most of the above and instituted additional measures such as faculty development in an effort to meet the threshold ACBSP criteria, which in turn apparently improved the overall quality culture of the institution.

When considering the Force Field Analysis results produced for this institution, it can be concluded that the School is not yet fully at the most-desired stage where all processes are fully responsive to the overall QA requirements of the ACBSP framework; but the approach is overall well-deployed with some variations in certain areas. The approach does

appear to be aligned with organizational needs, which is evident from the strategic linkage within the Standard 4 framework.

It was indicated during the interviews conducted by the researcher at this institution that as much as the respondents at this institution believed that international accreditation made a huge positive difference for them, there were some major potentially negative concerns as well. On the positive aspects, one of the respondents indicated: *'They are many minor advantages of international accreditation. After ACBSP, it had major changes on Mongolian system so also on the national Mongolian agency's requirements also improved. This is a very good advantage.'* One such concern was the issue that many of their faculty and staff were apparently unaware of what accreditation could mean, and many believed it was just an exchange of money but would not really lead to any improvements. The researcher feels that it should be the responsibility of recognized and established accreditors to ensure that the wider public, and not only the US market, is educated about the potential benefits of accreditation. There are currently many misconceptions in markets like Mongolia and, it could be argued that just as there are many fake degree granting institutions, there are also fake accreditors, so that if more reliable information were widely available to educators, it could be that fewer students would enrol at weak institutions, or at least would make more informed choices.

Another issue perceived by the researcher was the tendency to present the best possible image of the institution. This "window-dressing" was mentioned by the first two institutions. This seemed to be more of an issue not at the initial accreditation level, but with the follow-up reports. Respondents at both institutions investigated at this point by the researcher specifically mentioned that the QA reports were not seen as real and that they do not serve to keep up the pressure on institutions for continuous improvement – which was hoped might be a result. One of the respondents specifically mentioned that his concern was that accredited institutions falsify reports. His concern extended to the requirement of some institutions to become universities, which are then regulated by the ministry, which also grants national accreditations. This respondent suggested that many of the institutions carrying national accreditation are without real buildings or libraries, for example. Finally, it was suggested to the researcher that the national accreditation bodies do not separate national schools from private schools, although they are quite different.

In another interview with another respondent, however, there was a perception of an opposite point of view. The respondent notes specifically how much international accreditation had positively affected the national educational regulators, and the example quoted was the curriculum. In the years previous to ACBSP accreditation, the national education ministry in Mongolia used to dictate the curriculum to each institution, but that has changed, and the institution is now allowed to make changes to the curriculum as necessary. The ministry also used to limit enrolment for them and that too has changed. Now ACBPS standards seem to be leading the ministry's processes, it would appear that a school such as this reported by this respondent appreciate the transparency that this has created within the institution. The respondent commented that involving all the stakeholders around them had a major impact on their operations (another ACBSP requirement).

Private voluntary accreditation bodies, even if they are not-for-profit, have to be run as a business in order to survive. They count on their membership fees and have to advertise themselves in terms of their strengths in order to get more institutions to seek accreditation through them. A good example is AACSB established in Amsterdam, the Netherlands, and EQUIS as a European accreditor establishing in Miami, US in terms of their efforts to increase membership. However, a valid question to ask, according to the researcher, is about how transparent these accreditors are when they are in the race to get more and more institutions to seek accreditation through them, and often specifically aim to attract prestigious institutions.

3. Third Institution:

Respondents at the third institution analysed by the researcher indicated overall 49 drivers and 22 barriers. Four respondents were interviewed during the process. Standard 4 overall had eight drivers and two barriers; Criterion 4.1 (Approach) had three drivers and one barrier, Criterion 4.2 (Deployment) received seven drivers and six barriers; Criterion 4.3 (Results) received nine drivers and nine barriers; while Criterion 4.4 (Continuous Improvement) had 22 drivers and four barriers.

The first criterion is 4.1, highlighting the approach of the institution towards a systematic outcomes assessment plan and process, along with the determination of the students' competencies and skills. This criterion also looks at student performance measures and key stakeholder engagement in the assessment process. The outcome of the interviews

indicated three drivers in this section and one barrier. The drivers concentrated around the assessment plans, indicating that the learning process, along with the rubrics and assessment, had changed positively during the accreditation process. One of the respondents indicated the following: *‘Now for ACBSP, trying to clarify our path and aim with the learning objective and goals. Changing the process and how we evaluate things. Assessment had to be changed. After accreditation we are doing a handbook on Bloom’s taxonomy and on the rubrics, teaching guidelines. Handbook is coming out. Before ACBSP some used rubrics on course level.’* In addition, student learning is now measured according to the same requirements. Stakeholder engagement has been strengthened, and this institution is including student and employer satisfaction in their assessment process. Below is an excerpt from the interviews related to Criterion 4.1.

‘we had to do rubrics assessment, rubrics had to change and student learning process has changed.’

Criterion 4.2 concentrates on the deployment of the assessment process, including the use of rubrics, measurement cycles and the type of assessment used. There were seven drivers and six barriers in this specific segment, as analysed by the researcher. Both the drivers and barriers concentrated around criterion 4.2.a, which specifies the assessment process deployment. Positive aspects included implementation issues such as the use of an employer satisfaction survey, rubrics implementation on the programme level and the implementation of a PAS test for benchmark measures. Negative comments were focussed on implementation issues with the PAS test and the fact that there may be too much time in between assessment points requiring a further review of the assessment process.

Criterion 4.3 discusses the collection, analysis and the use of results collected throughout the assessment process. It also highlights the comparative measures used and the results and considers how the student learning results are communicated to the stakeholders. The researcher’s interpretation is that the respondents identified nine drivers and six barriers in this segment. Drivers centred around benchmarking possibilities with the PAS test and the fact that students now can compare their results online easily. Students also participated in business simulation exercises in Region 8 (International region of ACBSP) and they won the 2nd place in the overall competition and 1st place among Mongolian institutions. The respondents at the institution also indicated that through benchmarking they can identify that the performance level of students is improving and that students can more easily

transfer to other ACBSP institutions. Also, perhaps significant, one of the respondents indicated that employers prefer students coming from an ACBSP accredited institution. Barriers identified in the process included the PAS test results, where this institution identified that some students scored lower in some segments of the test, indicating (as with other institutions) that there may be an issue with the motivation of students, and the English language skills of faculty, compared with other institutions. An example of this as follows: *‘[Peregrine] Test bank: there was no question on business ethics or globalization, what I realized that they should increase the comprehensiveness of the curriculum. Some subjects are not really included, and other subjects have too many questions...’*

Criterion 4.4 highlights continuous improvement and looks at how the results collected have been used to make changes and improvements. Finally, it also considers how the institution reviews its own processes to ensure enhancement where needed. The researcher noted 22 drivers in this segment and four barriers. This segment has significantly higher positive feedback than the rest of the criteria. Positive aspects of going through accreditation seemed to be abundant here. Respondents mentioned curriculum changes due to ACBSP but also due to the findings on the PAS test, there was a decision to increase the salary for teachers, decrease the workload for faculty members, the teaching guidelines were positively changed to incorporate updates, faculty surveys were implemented and there was a review of faculty development activities. Also mentioned were: the use of the PDCA Deming cycle, the performance of a SWOT analysis, changes in university goals and values to the schools, the development of the business school’s own strategic plan and several continuous improvement processes. Most of the above were repeated and confirmed by different respondents, confirming their importance. Barriers included the fact that improving the percentage of faculty with PhD degrees meant there was more work to be done and that it was difficult to deal with the slowness of the improvement process. Below are excerpts from the interviews related to

Criterion 4.4:

‘Curriculum related standards had to be improved, changed textbooks and reviewed the curriculum based on ACBSP.....working on changing the curriculum based on the PAS test...’

‘After ACBSP we are changing the faculty surveys because faculty satisfaction is not good, salary changes and faculty development.’

Standard 4, according to the researcher's analysis of this institution, included overall eight drivers and two barriers. Positive aspects here were identified as an improved ranking in status as a private university, an increase of enrolment numbers, a changing of ministry requirements in a way which helped the institution, the requiring of faculty to be responsible for curriculum development, and a perception of greater credibility in terms of being able to add other programmes to the accredited portfolio (in this case, accreditation was gained for undergraduate programmes and plans are to accredit at least the MBA amongst graduate programmes). One of the respondents indicated the following: 'After the ACBSP accreditation, we are looking at new things, all stakeholders are now involved, including the stakeholders, students, employers. Before we could not look at it with the Mongolian accreditation only. They involve more the stakeholders now. It's now possible to compare, benchmark against other universities and criteria now.' In addition, another respondent indicated the following: 'Accreditation is very important, especially international accreditation [as] it effects enrolment, school's name is becoming more well-known globally, quality and performance of students is increasing. The institution is using ACBSP logos on graduates' diplomas, when they [students] get hired, it's a big benefit. Yes, the employers prefer students coming from ACBSP accredited schools.'

Negative aspects of the accreditation process mentioned to the researcher included the expectation of faculty exchange once accredited, which has not taken place. This expectation was similar to that found in one of the previous universities. It was not clear if faculty exchange would be the responsibility of the accreditor or if it was seen as enough if the platform was provided by accredited member institutions. It was not known whether or not the responsibility should be with the institution, in terms of ensuring additional partnership activities. The researcher recognises that ACBSP, or any other accreditor for that matter, cannot force institutions to cooperate; it must be an institutional decision to be open towards new partnerships. Another negative aspect observed by this institution was the view on accreditations in terms of financial matters, control, evaluation, and comparison. The researcher noted here again a trend arising for the need to educate the public across different countries on the objectives and purpose of accreditation.

The respondents at the institution reported several important developments while going through the accreditation process. More barriers were presented than in the previous institutions and mostly centred around the implementation or deployment of the established assessment processes. However, there were a number of positive aspects at the

same time, and emphasis was placed by the respondents on increased enrolments, and higher ranking as a private institution among the Mongolian universities. This institution was trying to establish itself as an international player, and to enable this has appointed a new Dean for internationalization. Activities on an international scale have increased, which is showcased by their involvement in their ACBSP Region 8 activities. Major improvements noted were related to faculty. Similar to the second institution described above, this school has paid particular attention to the faculty development activities, which is at least partially triggered by ACBSP's academically qualified faculty requirement, which may in turn affect student learning. Increased doctoral faculty members, with a lower teaching load, coupled with the fact that more time is now allowed for research, can be seen as aiding the development of student learning, assessment, and teaching delivery. As one of the respondents pointed out, she herself worked on her doctoral dissertation on how to improve faculty performance. Her findings indicated all the improvements listed at their university which positively affected student learning. Finally, the language skills of faculty were discussed. There was concern that unless the faculty exchange opportunities were improved, faculty would not be able to significantly improve their language skills, which would affect the quality of curriculum review and overall improvement. One of the respondents indicated the following: *'For the Mongolian faculty, the most difficult issue they are facing is language issue. There should be faculty exchange, learning from others, there is not much opportunity, and that would help a lot. I hope that ACBSP accreditation will help them. The books are very expensive, especially the latest editions with the education science sites, for the young teachers/faculty they need to learn English and get on education sites and go on faculty exchange, learn new innovative learning techniques that would affect student learning.'*

In the estimation of the researcher, the respondents at this institution seems to be more critical than others of the PAS test. Many negative comments relating to translation were made, but the question of whether this test was actually a good measure of learning or not was also raised. Even though Peregrine has a huge test bank, and it is randomized, one of the respondents was very critical, although unable to offer a better solution at this stage: *'I don't think it's a good way to measure student learning, 12 Common Professional Component (CPC), they only have so many questions on that. Peregrine has a huge test bank and randomized. Its ok. Now we have benchmark. So, they don't use it for the grades. Sometimes some areas going down and makes me very worried. We need to improve.'*

Olympiads were also mentioned here as a way to benchmark the knowledge and skills level of students. So, it seems that while the institution is on a fast development track and reports many positive aspects, there are still some gaps to identify. The institution's approach to assessment and Standard 4 signal its commitment to an effective systematic approach, and they seem to be responsive to the overall requirements for accreditation. However, under the deployment criterion, there are some areas that may require more attention. This could include the implementation of the tools they use, which they may want to revisit all together or this may include looking at the process on actual implementation and proposing changes there. The institution seemed to be at the beginning of a systematic approach to evaluate their key processes, and the alignment perhaps needs to be extended across more aspects of the institution to identify full responses to all situations.

Final comments:

A discussion of the transfer of students came up during interviews with this specific institution and contrary to others, this seemed not to be a problem here. The question is whether this is a real development or not – perhaps they assumed that students now have an easier chance to transfer, due to their status as in the accredited portfolio of ACBSP. More interviews at this institution included a mention of the fact that the year before the interview took place, Mongolian legislation had passed a law that universities must take part in a teacher development programme. The respondent in this case felt that ACBSP was pointing out the issue of faculty development and then the ministry had made changes. A complicating factor here could be that the ministers are changing quite rapidly. But the researcher suggests that it would be essential to address these matters nationwide.

4. Fourth Institution:

Overall, the researcher's interpretation of the respondent's response indicated 46 positive aspects (drivers) and 26 negative aspects (barriers). Three people were interviewed here, and as a result the researcher noted that this standard overall had eight drivers and six barriers. Criterion 4.1 (Approach) had 16 drivers and 15 barriers, Criterion 4.2 (Deployment) received two drivers and two barriers; Criterion 4.3 (Results) received five

drivers and one barrier; while Criterion 4.4 (Continuous Improvement) had 16 drivers and two barriers.

Criterion 4.1 discusses the approach the institution shows towards its outcomes assessment plan and process. The emphasis here was on the outcomes and performance measurements along with students' skills and competencies and the tools used to determine student achievement. Finally, the respondents of this institution considered stakeholder engagement through the accreditation process.

The respondents of this institution indicated 16 drivers and 15 barriers. This was interesting for the researcher in so far that this was the first time throughout the interviews that there were almost equal numbers of positive and negative aspects highlighted with significant comments on each. Drivers under this specific criterion centred around the PAS test as an assessment tool which is internationally benchmarked; new stakeholder engagement with employers using various survey methods; internal assessment process improvements and raising/improving student learning outcomes. One of the respondents indicated the following: *'As a result of being accredited we know more about the requirements of the [other] international tertiary institutions. Before being accredited we only used standard evaluation, grades, final test of the courses and the general examinations, upon accreditations they learned more, such as programme evaluation and that they should involve the external evaluations from employers and such. And also, one of the most important measurements was the programme inbound and outbound test, as a result of taking the test, they can compare and contrast the difference and similarities with Mongolian countries, Asian and international levels as well so this is one of the most important evaluation methods.'*

The barriers perceived in the Force Field Analysis by the researcher include again the PAS test, with translation and terminology issues, and a feeling that testing only once a year indicates limitations. One of the respondents indicated the following: *'Actually students are afraid to be tested, the students are a bit nervous and they are not willing to take the test. They don't get good feedback.'* It is difficult to see how this type of test would positively impact student learning, since it's too subjective, not measuring analytical skills, only measuring one outcome. Students were reported as being afraid of being tested, and lacking motivation to complete the test. Also, regarding the PAS test, one of the respondents indicated that once the first results were in and were seen as not particularly

good, then the faculty reviewed the test and then made changes to the curriculum to make sure they would be teaching subjects including the possible learning points in the test: *'Five-Six years ago there many difficulties, problems with the system and some errors in the system, some terms and terminologies and translations were issues, but they improve year to year, also the question style.'* Now the PAS test is known for being developed to mirror the requirements of international accreditors. The test is measuring subject specific knowledge that is required by ACBSP. So, in a way, receiving bad results on the test could have signalled to the faculty of this institution that their curriculum failed to deliver on many of the internationally accepted subject areas, so indeed this would be a good strategy to make sure they meet international threshold standards. However, changing the curricula to teach towards a test can also lead to problems. The objective then is for students to successfully pass the test instead of gaining knowledge. This issue has been debated for decades now and applies to many other standardized multiple-choice questions tests; this specific test is no exception.

Below are excerpts from the interviews regarding Criterion 1:

'As a result of accreditation and using the PAS test, now we can compare and contrast the differences and similarities with other Mongolian schools and Asian and international level.'

'I don't think it's [PAS test] a good way to measure student learning and the reason is it's a mix of questions, randomly selected, it's a test and not a real measurement. Students tend to guess; multiple choice is not a good test for this. The test asks about the knowledge and not the application and not the skills. If they want to improve the test, they should involve questions on, skills and the application of knowledge.'

Criterion 4.2 concentrates on the deployment of the assessment process, requesting reviews of tools, details of the rubrics used, reviews of the minimum 3-5 data measurement cycles and it also involves scrutinizing the corresponding assessment measurements spanning from internal to external assessment, formative to summative, benchmarking and other activities. This section received two drivers and two barriers in terms of the researcher's analysis. This segment does not seem to be a major concern nor a highly positive driver across the board and both sides concentrated on the data cycles, possible comments about the PAS test and thought it was too long a cycle, measuring only once a year. But it was suggested that this could also be a strength because the outbound segment immediately

allows for comparisons and can be started with the graduating intakes and held at the end of the semesters.

Criterion 4.3 reviews the results obtained from the implementation of the assessment plans and looks at the collection, analysis and use of assessment data along with the comparative measures and how the institution informs its stakeholders on the measurement of the outcomes of student learning. This area was analysed as having five drivers and only one barrier. Drivers identified in this case concentrate around the ability to compare and contrast their programmes with other universities and internationally. In addition, one of the respondents indicated the following: *‘For the first time, teachers looked at the inbound, the test result wasn’t good enough compared to what they accepted. Upon taking the test, they [teachers] looked at the test questions, they made a lot of changes in the syllabus. There are a couple of big sections, teachers had to collaborate with each other and develop the curriculum as such.’* This barrier mentioned is related to 4.3.b.1, which is the use of comparative measures, because some students at this university were concerned about their results and feedback, especially those that they did not do well on the PAS test.

Finally, critterion 4.4 looks at how the results from the previous criteria is being used to make changes across the programmes and also reviews whether the institution is closing the loop and reviewing its assessment processes effectively.

The researcher’s analysis suggests there are 16 drivers and two barriers here. 16 is quite a high number in this section, compared with other institutions. The positive aspects here included the introduction of Bloom’s taxonomy as a result of accreditation, using external evaluators from other departments, and clearer regulations across many aspects of the institution. More attention is now being paid to the professional development of faculty, including training in soft skills, with internal process improvements for faculty members, the establishment of a centre for faculty development and the allocation of a budget for professional development. One of the respondents indicated: *‘With the international framework we made a lot of changes, for example in accordance with standard 5, they [the department] had to have the programme faculty development. Before the accreditation it was only in the masterplan for the university, but now they founded the centre for faculty development, also they located some budget to promote professional development and those are the tangible results.’* The respondent indicated that as a result of the pressures from accreditation, more than 10 faculty members defended their PhDs. Teachers are

collaborating with each other more, and this institution is finally closing the loop, in terms of reviewing and making changes to its processes. In the experience of the researcher, this shows a very mature process from the university. Barriers expressed by this institution included a comment on the lack of actual tangible results, despite the examples listed as clear achievements as a result of going through international accreditation.

In terms of general comments, Standard 4 here received eight drivers and six barriers, according to the researcher's analysis. These included the perception that the process of achieving accreditation has raised the prestige of the institution; it has gained recognition on an international level; the possibility of student transfers has been discussed and additional opportunities are now offered for students on an international scale, whilst alumni are getting better jobs because they finished their studies at an internationally accredited institution. Meanwhile the barriers identified by the researcher included comments on ACBSP's orientation as being too much towards students and processes, and not enough towards faculty. The fact that ACBPS accredits small institutions as well as large ones was perceived negatively: *'these schools are the prestigious schools but the private and small colleges, they also receive accreditations. I wonder why small schools get the accreditation. I suggest that the certificate should be different, might be other layers.'* In addition, one of the respondents refused to see any advantages at all to accreditation. Other respondents commented that ACBPS looks at the number of PhD lecturers, but they don't care about their professional experience, so the suggestion here is for ACBSP to concentrate not only on the theoretical but also on the pragmatic aspects of the programmes: *'...they [international accreditors] should make some changes. Pay less attention to the theoretical, they have to correlating with the practical and pragmatic aspects of the school'*. Finally, one of the respondents commented that ACBSP claims their degrees are recognized in 130 countries, but there is no actual evidence for this. This point is not showcased on their website and the request is that ACBSP clarifies this and indicates the specific countries in which they claim recognition: *'If the university have been accredited international by ACBPS, how many countries and university and programmes would accept [the degree] worldwide? It is possible to expect that of the students [who] want to transfer how many countries would accept them, they should name it and make this clearer.'*

Overall, this would seem to be a well-established public institution and also one that is quite critical of their own internal processes and also not afraid to be critical of the

accreditation process. This was seen as refreshing by the researcher, as she could not assume that important information she was seeking would be easily revealed, especially since these institutions in Mongolia are not familiar with a researcher approaching them and asking them about the accreditation process. During the interviews, many respondents were surprised that she had travelled such a long way to contact them.

The number of driving forces identified by the researcher's analysis indicates that significant improvements took place while the institution was undergoing the accreditation process. It could be that this is a common tendency with most of the institutions reviewed simply due to the ways in which the Mongolian higher education system has evolved. Centralized control on curriculum is a common theme and so is the number of academically qualified faculty. It was also a feature of the old system that course level assessment took place, but none of the institutions showed a developed systematic overall assessment process prior to going through initial accreditation with ACBSP. Even this specific school which is clearly one of the leading public institutions in Mongolia is no exception. So, in its approach the respondents at this school commented less on the process stage (which is criterion 4.1) which was more developed than in the previous institutions analysed, and the issues raised centred around the question of assessment tools to be used. This institution was critical on this front, of how they use the PAS test, but some positive aspects came out of the discussions. The researcher expects that a dialogue within this school will continue taking place around this subject area. However, it was surprising to the researcher that feedback on item 4.4 on the process reviews side did not highlight this more as improvements to the assessment tools used may be part of process improvements. There were not many issues on implementation, so it was seen by the researcher that the approach is well deployed at this institution with no significant gaps identified from the interviews. The results segment also did not receive many comments either way, so it is thought that organizational learning is taking place from the results of a fact-based systematic evaluation. Regarding the integration of the process, the closing of the loop was also quite strong showing a well-integrated approach with organizational needs identified and addressed. It must be noted that one of the respondents was something of an outlier here, as this person made several comments indicating an overall negative understanding of accreditation and how it affected the organization altogether, so perhaps this area needs to be investigated further. These points are seen below in examples from the interviews:

'...so this is one of the examples, the employer in Sweden, student has completed the course which is internationally accredited so that's why he got the job.'

'They [ACBSP] look at the PhD but not the professional experience. School of computer technology in the management school is one of the most prestigious schools in Mongolia, it's accepted nationwide....'

Final comments:

If the last comment on overall accreditation is considered, this should give ACBSP reasons for concern. At two other institutions already visited by the researcher, there was a discussion about how important it is to educate the public and HEIs about what accreditation means, especially when it comes to private specialized accreditors where going through accreditation is a voluntary process. There was confusion about exactly what accreditation recognition means. Recognition from the point of view of the accreditor means that since ACBSP belongs to a group of well-known international accreditors, if an institution and its programmes go through accreditation and successfully achieve it, this brings a certain type of acknowledgment, perception, or awareness that the institution and its programmes have achieved threshold quality, and the students graduating from the programmes are expected to showcase a certain level of knowledge and skills. Following this thought process, the degrees awarded also carry this perception or recognition. However, it does not mean that the degree of an institution which has programmatic accreditation from ACBSP is recognized legally in all countries. Every single country can have different requirements for recognition. For example, many countries only accept degrees as recognized if they carry national accreditation. For other countries, the quality assurance system is not well developed and may not have a specific accreditation body so perhaps some type of ministerial approval will indicate recognition. In other cases, there may be agreements between particular countries.

Some countries choose which type of accreditations are listed as accepted and exclude others from the list. In other countries, not even the ministry regulates the private institutions, so they seek out international ways of showing recognition. In yet more countries different rules apply for national higher education institutions, and again different rules may apply for foreign providers entering the country. The researcher suggests that, to ensure that there are no misunderstandings and that expectations are managed, it is the responsibility of the specific accreditor to make this differentiation clear. She does not

necessarily argue that the accreditors must safeguard everything that is said about them, that would be impossible, but they can control what is on their websites and how they market themselves. This is an important recommendation to be made to ACBSP as an outcome of this research.

5. Fifth Institution:

There were three members of this institution available for interview by the researcher.

Overall, she noted there were 35 drivers and 16 barriers, and Standard 4 overall had nine drivers and five barriers; Criterion 4.1 (Approach) had nine drivers and seven barriers, Criterion 4.2 (Deployment) received four drivers and zero barriers; Criterion 4.3 (Results) received four drivers and zero barriers; while Criterion 4.4 (Continuous Improvement) had nine drivers and four barriers.

Starting with 4.1, as indicated before, this section concentrates on the business unit's approach to its outcomes assessment plan and its process, with student competencies and skills, the type of data collected and performance measures. It also considers the institution's plan for engaging its key stakeholders in the assessment process.

This segment has been analysed as indicating nine drivers and seven barriers. It seems there were not many comments on the outcomes assessment plan and the process itself. The institution already had a plan in place, so its issues were more about deployment. Comments heard by the researcher in interviews were mostly about the improvement of the already-existing learning outcomes and the performance measures and tools used. The respondents seem to have different opinions on the PAS test: *'They updated the test bank frequently, so the test has improved very much since the beginning.... We look at the results frequently and we benchmark with other schools. We compare with other colleagues.'* Some respondents are extremely positive, commenting on access to data both for the team and for students. Even the Dean commented that it was one of the best tools to measure student learning gain:

'PAS test software is very sophisticated, we can get access to different kinds of analysis.'

'I think it's [PAS test] one of the best measurements to measure the student learning knowledge, recently we made a big data analysis and compared their student level to

benchmarking [sic] and we had a big meeting with the results and gave some feedback and guidelines on how to improve the students' scores.'

'She [the Dean] believes being accredited means that the national university programmes will be much closer to international standards and as a result of this, student learning outcomes will be greatly improved.'

However, the researcher also saw barriers centred around the PAS test, one of the respondents being quite critical and noting that the test *'can't measure the outcomes'* and that *'it does not measure hard and soft skills'*. Translation issues were mentioned at this institution as well, and the fact that many students lacked motivation, ignoring the importance of the test.

Criterion 4.2 looks at the deployment of the assessment process identified in 4.1. Assessment measurement cycles need to be in place, and performance measurements, to gain accreditation. In this area, the researcher noted 4 drivers and 0 barriers. One of the positive aspects indicated was related to the deployment of the assessment plan and QA policy, one of the respondents specifically mentioning the following: *'QA policy existed only on paper but now it's working'*. Other drivers included the use of new and improved assessment scales, more sophisticated grading systems, and the fact that the institution is now using the assessments and tests banks including the CPC elements in a more structured way.

Criterion 4.3 considers the results, the collection, analysis and use of assessment data, the comparative measures to improve overall student performance and the way the business unit is systematically making the assessment results available to key stakeholders.

This segment has been assessed by the researcher as indicating four drivers and no negative comments. The drivers concentrated largely around the comparative performance measures, including the possibility to compare results with other institutions both on the national and international scale. The institution now regularly reports on, compares and contrasts the results found from the collection of data, indicating a mature, systematic use of data and analysis. In the experience of the researcher, this institution has achieved a beneficial outcome.

Finally, Criterion 4.4 looks at the continuous improvement activities, the evidence provided for these by respondents of the institution and the process of reviewing of its assessment plans and processes along with stakeholder engagement.

The researcher noted nine drivers here and four barriers. Positive aspects included improved curriculum, development of their QA system according to the Deming cycle, changes to the next teaching cycles based on the evaluation of data received from the assessment plans, evidence of innovation in the curriculum and improved teaching methodologies. Negative aspects included issues not related the accreditation cycle itself, but seen more as institutional issues, potentially affecting the continuous improvements that could have been achieved as a result of the assessment cycles. These included restrictions within the institution delaying the implementation of improvements and infrastructural changes resulting in having to move offices far away from the QA personnel, indicating less interaction in future. Two comments centred around the fact that no changes were achieved in the curriculum (which is contrary what other respondents indicated so this may be a question of perception, or the lack of these respondents' involvement in the curriculum changes) and the cumbersome nature of continuous improvement, indicating that it takes a lot of effort and time to keep the process going.

Overall Standard 4 can be analysed in terms of showing nine drivers and five barriers. The respondents cited positive aspects of accreditation such as the fact that accreditation is overall helpful for any institution seeking to improve their programmes and systems, the expectations of raised standards and being more in line with the quality of international institutions, as well as the expectation that all ACBPS schools will accept student transfers from the other ACBSP-accredited schools: *'Very different curriculum before the accreditation and now it's reviewed. And so we didn't involve the stakeholders in the curriculum and now it's much more improved the communications between the stakeholders, parents, employers.'* Negative aspects indicated that standard 4 overall is a very complicated standard with expectations, which are hard to achieve. The importance of national competitions and exams was highlighted during these interviews, similar to points made by the other institutions. These competitions are an important tool to measure the knowledge and level of students, and allow for benchmarking within the national system. National test and state examinations are still prevalent, and the state test is now also closely linked to the student learning objectives.

Final comments:

The business unit has received some negative comments on Standard 4 but seems to have a systematic approach to student learning. The outcomes assessment plan seems to have been developed already, although revisions were needed in the performance measures, competencies and in the data collected. In addition, as a result of accreditation, more attention was paid to the involvement of the stakeholders at this institution, which is a significant improvement from the status quo prior to accreditation.

However, there were some conflicting comments revealed during the interview, notably that no changes were implemented in the curriculum as a result of the evaluation of the assessment results. This would indicate that this institution is yet to close the cycle; however, the other two respondents indicated they did indeed see changes to the curriculum. So, in this regard, the information given to the researcher was inconsistent and further analysis would need to take place to specify the overall standing of the institution, specifically with Criterion 4.4. This is often referred to as a “prestigious” national public university, and they seem to view themselves as of higher ranking than the private schools, but perhaps this institution uses measurements which are more geared towards research and faculty instead of actual student outcomes. It also seems that they do not necessarily understand the differences between the different accreditors and the mission and vision of ACBSP. ACBSP status could be weakened in the country if some universities are dissatisfied with ACBSP. The suggestion here from the researcher is not necessarily for ACBSP to change their mission, but that they should perhaps review how they communicate, recruit and manage the expectations of their accredited members. Perhaps ACBSP needs to review what they offer to institutions as part of the accredited membership, and check if these benefits actually materialize, so that the schools are not left alone after completing the process. This was brought up as a concern at one of the earlier interviews and there seems to be general concern about the subject.

‘Most professors who are working at the public prestigious universities have started losing their hope of the accreditation board. Mongolia is a small country, many institutions are there, the small and big universities are all accredited internationally. That means they are on an equal level, so this is one of the disadvantages now, they seem to be on the same level. When she [the Dean] submitted to the school authority they suggested to

stop being accredited by ACBSP because most community colleges have been accredited so it does not mean international standard and quality. This is just an accreditation board for small schools, so find a bigger agency.'

'She [the Dean] cannot see any advantages being accredited by ACBSP, they charge a lot of fees, but they don't offer any services afterwards nor any support except discounts for 50 USD for participating in conferences. They have not made the final decision yet whether they decline the ACBSP accreditation or keep both, they are still in negotiations.'

Respondents at the university also mentioned the fragile political situation in Mongolia, specifically in higher education, which can hinder the realisation of some of the achievements in the process of accreditation. This includes mergers and restructuring of ministries and institutions, which can seriously affect the quality improvements which can be achieved, and this is highlighted by the accreditors that require all institutions to report all changes to them. The objective here is not to draw conclusions from just three interviews, but they certainly shed light on some of the concerns that accreditors and higher education institutions are facing all over the world.

6. Sixth Institution:

This is a private and smaller university.

Four university colleagues were available for interview and there were overall 51 drivers indicated, with only seven barriers. Standard 4 overall showed 11 drivers and zero barrier; Criterion 4.1 (Approach) had nine drivers and seven barriers, Criterion 4.2 (Deployment) received one driver and zero barriers; Criterion 4.3 (Results) received 15 drivers and zero barriers; while Criterion 4.4 (Continuous Improvement) had 15 drivers and zero barriers.

The respondents of this institution were the most positive among all researched in Mongolia, perhaps because this is a private university and the quality standards at the institution were perhaps much lower prior to the accreditation exercise. This is also an institution that tends to showcase their relationship with ACBSP and the role they play in the Mongolian higher education system along with their own achievements, so transparency and pride are high on their agenda.

Starting with Criterion 4.1, this criterion reviews the stages the institution has reached with regard to its approach to its outcomes assessment plan and process. It looks at the

formalized system present and in detail at the student competencies and skills measured, the type of data collected, the reasons for collecting this data and the appropriateness of the tools used. Finally, it considers the role of stakeholder engagement in the process.

This criterion can be seen in terms of nine drivers and seven barriers. Strengths here centred around the PAS test as a student performance measurement, appropriate for determining the desired outcomes, and also around stakeholder engagement in the outcomes assessment process. One interviewee was highlighting that the school's processes became systematic after going through the accreditation process. Barriers also centred around the PAS test, in fact all seven items seen negatively were in relation to this tool, citing issues such as translation issues, payment matters, students' motivation levels and their understanding of the test, as well as the lack of employers' understanding and expectation of this specific measurement: '*Students don't like to pay the fees, even though there are many advantages for the test, there is no employer expecting this test result. Students don't understand the main advantage of the test...*'.

Criterion 4.2 looks at the deployment of the assessment process with the need to consider evidence indicating the process rubrics, and the forms and documents deployed. This criterion also looks at the assessment cycles at minimum 3-5 data cycles, and finally considers the performance with assessment measures and the type of assessments from formative to summative, among others. There was only one driver in this area and no negative comments. The comments indicated the improvements towards student learning assessment measures with the institution embracing the accreditor's recommendation.

Criterion 4.3 concentrates on the results collected from the process and deployment above. It looks at the analysis and use of assessment data, the comparative measures across the accredited programme portfolio, and how the results are being communicated to all stakeholders.

This criterion received 15 positive comments and zero negative comments. Drivers included several internal and external comparative data points: the percentage of graduate students studying overseas has increased significantly and the institution had seen an increased number of their alumni returning to continue their studies at their alma mater. There had been institutional discussions of PAS test results and sharing the results with the students. The institution had also made an effort to educate their students on what ACBSP

is, and what the standards mean, ensuring clear communication towards their major stakeholder group.

Finally, 4.4 looks at activities for closing the loop of the assessment process, for the continuous improvement activities and evidence supporting these, such as improved teaching materials and the curriculum, improved use of technology at the university, and this criteria finally looks at whether or not the institution reviews their processes and improves or enhances them in a measurable way.

This criterion had 15 drivers and 0 barriers, the same as criterion 4.3 above. Drivers included the following: improved participation in assessment from the leadership, changes in the social responsibility agenda, improvements in the curriculum (due to PAS test), improved quality and development of faculty, improved student learning outcomes and measures, team approaches to problems (process improvement), the Dean taking charge of the assessment agenda, professors publishing more research papers, the fact that Fulbright professors are being invited to the institution, the reform of institutional and programme policies, the creation of strategic plans and objectives for the school, the introduction of internship for senior students, the university making sure that systematic processes are in place, and the adding of new subject areas in ethics, as well as the improvement of the CPC areas (adding more mathematics courses).

Overall, Standard 4 at this university can be seen in terms of 11 drivers and again zero barriers. This shows the overall positive view of the whole accreditation process, which was also felt by the researcher when visiting the institution. This may be the institution within this research study where the most improvement took place. To use the words of one of the respondents: *'When they were looking at the 6 standards, they had to improve 53 things. They had to provide all the documents and their report. Based on this report they had to make a lot of changes. They had to renew the curriculum as well.'* Positive aspects included the following: the perception of an American accreditation body being very positive; the possibility of credit transfer between ACBSP schools; the increased speed with which changes and improvements have been made at the institution, which would not have been possible without accreditation; the helpfulness of the mentor assigned; student transfers; the ability to make comparative measures with other institutions; the possibility of the university's diploma being accepted in other countries;

and the fact that now this university is now one of the 20 accredited institutions out of 100 universities in the country.

Overall comments:

The researcher observed that this specific university was grateful that she came to visit them for the interviews. They were very open, friendly, and more than happy to share both positive and negative aspects of the accreditation process. They were very proud of their achievements and had a fundamentally different view of accreditation compared with the respondents from the public universities visited. They wanted to share their experiences of the process they had gone through in order to improve higher education in Mongolia in general. They were not worried about the point that only some universities had gained accreditation. On the contrary they felt that accreditation in general would make a highly positive impact on Mongolian higher education and that all institutions and their students would benefit from the process: *‘I think that international accreditation is great for education quality and faculty development, exchanges the experience from other schools, best practices from other schools, satisfaction of graduates. Education quality is the most important quality.’* The researcher appreciated her hosts and their openness. She did not feel that the interviews were staged or that they would have prepared for them carefully constructing their responses. She felt that the experience of this institution was especially positive and would argue for the benefits of a more inclusive approach from international accreditors, specifically from those that perhaps are prejudiced towards certain type of institutions and certain types of course and programme deliveries: *‘I really think every school should be accredited by ACBSP and it’s a whole process to change the school. Every year there is an annual conference, they discuss all issues. One issue for one year. I really like it. Since 2014 with the site visit, Christina [ACBSP mentor] came here, last September for the school’s 20th anniversary, indicate how much the school has changed and improvement. They can see the ACBSP changes, people can recognize the changes.’*

5.3. Overall findings mapped against Standard 4

In the diagram below the overall findings are mapped against the framework of Standard 4 of ACBSP and against the research questions.

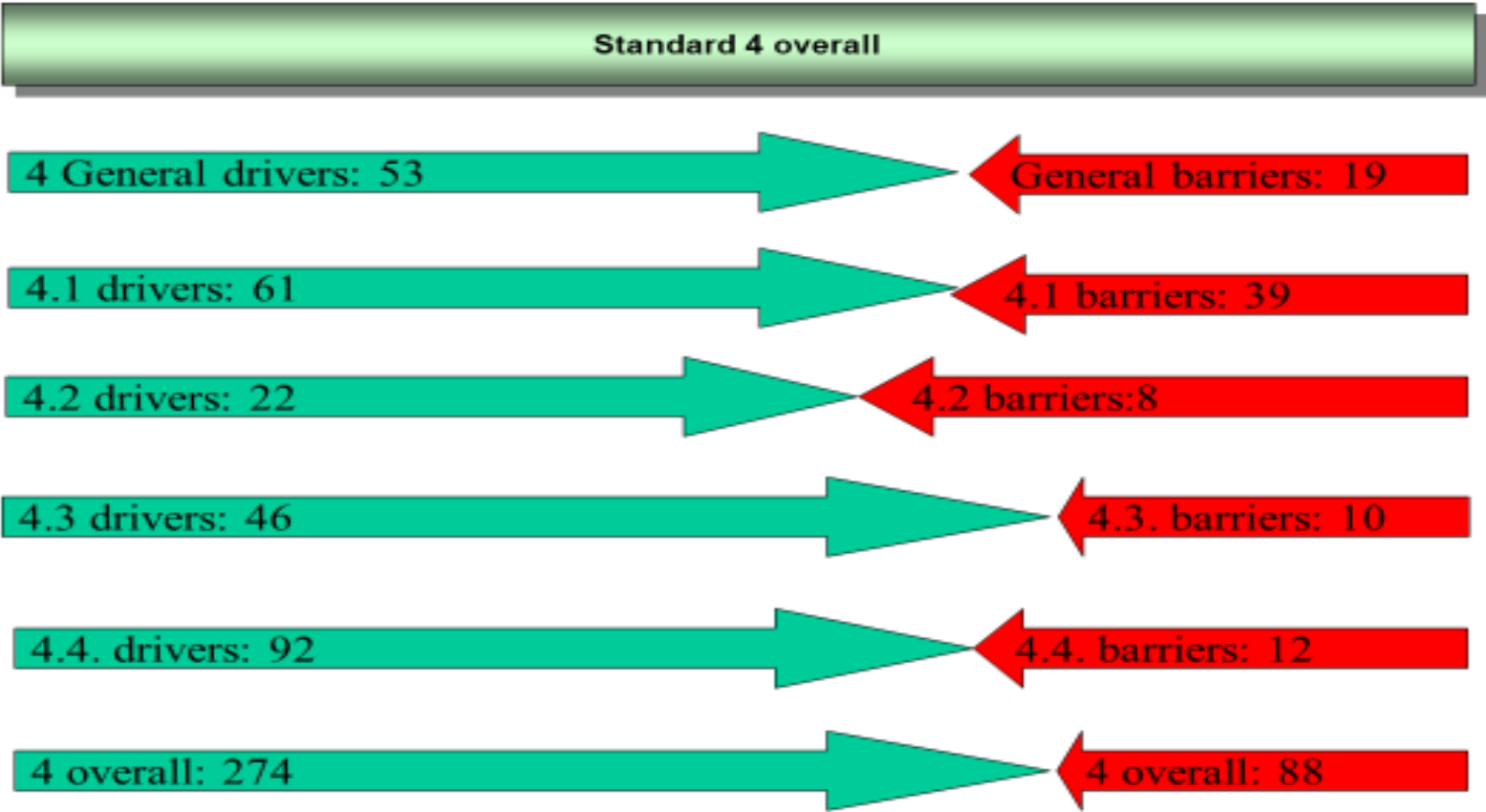
There were 274 drivers and 88 barriers overall across the six institutions interviewed. Within the framework, 4.1 had 61 drivers and 39 barriers, 4.2 received 22 drivers and 8 barriers, Criterion 4.3 received 46 drivers and 10 barriers, while 4.4 received 92 drivers and 12 barriers. General comments for Standard 4 were 53 drivers and 19 barriers.

In essence, criterion 4.4, which is the continuous improvement segment, received most of the drivers. It seems that these institutions gained a lot from going through accreditation and improved a lot when implementing changes to their programmes, curriculum and so on, but also when making adjustments to their established processes. 4.4 was followed by 4.1, which is the approach segment. Not surprisingly, institutions which were at the early stages of their development when it comes to assessment benefited very much from this criterion. ACBSP's requirements prompted a new activity for many of these institutions: to have assessment processes and plans in place, performance measures identified, and stakeholders involved. Comments on stakeholder involvement were especially noticeable: this had been lacking at most institutions. Criterion 4.1 was then followed by overall comments on standard 4. This does indicate, with 53 drivers, that the institutions have a positive overall view of the accreditation process in relation to the student learning process. Next, slightly behind, came Criterion 4.3 with 46 drivers. The most neglected segment within 4.3 was the comparative benchmark measures: institutions seem to have improved a lot on this section. The least drivers were reported on deployment and among those, the evidence of 3-5 data sets. This is quite surprising. The expectation would have been that if there was quite an improvement projected on 4.1 criterion on having assessment plans and tools, then that would have affected the data collection, but it seems this was not the case.

Now reviewing the barriers, most barriers were in Criterion 4.1 with 39 barriers indicated, again highlighting the need to have in place a robust assessment plan and process and student competencies and skills. No negative aspects were reported overall on the stakeholder engagement. It seems all institutions appreciated the requirement to include stakeholders in their processes. Next came the overall Standard 4 comments with 19 barriers, as we have seen in the previous evaluations, these are related to expectations towards ACBSP as an accreditor but also considering the financial and bureaucratic burden the accreditation process places on institutions. The next item was Criterion 4.4 with 12 barriers, mostly concentrating on the closing the loop segment. Criterion 4.3 followed closely with 11 barriers with an equal spread between the segments. Finally, the least

barriers were reported on Criterion 4.2 with most concerns around the assessment process deployment.

Figure 2 Force Field Diagram Standard 4 Overall All Institutions



The researcher now reviews the findings in relation to the research questions below:

1. *What were the forces and key rationale driving the implementation of an international accreditation system in Mongolia? (General national level question) Who were the decision maker on implementation?*

This question was discussed in general with regards to the Mongolian National Higher Education framework. The interviews yielded mostly similar answers. It seems that Ministry of Education and other governmental bodies realized that they needed to improve higher education and that, to achieve this, they would look towards the already available international quality assurance and accreditation frameworks. It was not specified how the discussions started but it seems preference was given to the American quality assurance frameworks. Institutions were not specifically instructed which accreditation body to approach but ACBSP was championed perhaps also due to their extensive contacts in the region and their aggressive expansion efforts across many countries where their preferred route was to open discussions and maintain relationships with national bodies.

2. *How does the ACBSP Standard 4 framework differ from other international quality assurance and accreditation frameworks?*

The researcher has compared the ACBSP Standard 4 framework against other international accreditors and several student learning gain research projects. When it comes to the accreditors, the findings show that the ACBSP framework is a robust framework evidenced by the wide use of similar frameworks and requirements by others in the field. The same applies when compared to current and past research projects on learning gain. ACBSP firmly stands its ground when these comparisons are made (Table 3) and in many cases has additional requirements, especially when it comes to the use of direct measures, and their transparency agenda requiring institutions to report on 3-5 sets of data against the learning goals and objectives. Moreover, they require reporting on institutions' websites in line with the CHEA requirements. These show clear strengths of the ACBSP framework when measured against others and should be showcased more as good practice, especially as major projects on student learning have failed to do the same. The only negative aspect that could be brought on, is that these requirements are in place for accredited institutions and

the framework is not aimed at monitoring members schools or non-accredited schools, hence it's limited to its accredited member portfolio.

3. *What were the effects of going through international accreditation on the institution's processes overall and in relation to assessment of student learning? (Criterion 4.1 process) sub question: What are the strengths and weaknesses of the tools used to assess learning gain?*

These institutions going through the accreditation process have been affected in many ways. Just to recap the findings somewhat, let us start with positive aspects. Even though the researcher reviewed smaller and larger institutions with significant differences between private and public institutions, all reported many positive aspects, such as the development of robust outcomes assessment plans and the supporting processes. There were a number of cases where there was no or minimal assessment process in place (or mostly course level measurements) so the institutions have gone through a significant developmental phase getting the assessment related processes in place. The larger, public institutions may have had some processes in place, but these still required fine-tuning to meet ACBSP requirements. A significant number of positive comments were reported on performance measures, indicating that institutions have invested considerable time in developing proper student competencies, substantiating their measurements and starting the collection of data that perhaps was not previously available. Significant improvements took place in relation to stakeholder involvement. What better way is there to improve student learning than developing the knowledge, skillset, and competencies needed, so that students will be set towards the needs of society and the required knowledge?

Negative aspects did not highlight the stakeholder focus at all, and there were only minimal comments on the assessment plans and process requirements. Most negative comments centre on the measurement tools, in this case the Peregrine test, whether it may be translation issues or students not being motivated enough to take the test seriously enough, certainly, it seems, a common feature of and complaint against standardized testing.

4. *What are the main challenges with implementation of these processes? (Criterion 4.2-deployment)*

The question itself steers us towards the barriers or negative aspects of the deployment of the assessment measures. There were few complaints about the reporting of data cycles as indicated before and most assessment measures were accepted as aiding in measuring student learning. Concerns were mostly around the assessment process deployment, specifically additional comments on the implementation of the assessment tools. Positive aspects should be mentioned as well here. Curiously, most positive comments were received on the process deployment, perhaps showing that some institutions experienced the implementation better than others. Naturally, institutions have different strengths and weaknesses, and there was a clear division in this area.

5. *How are the results collected and then how are these results used in identifying specific improvement items from the data obtained for the programme outcome? How do comparative measures improve overall student performance? (Criterion 4.3 Results)*

Reviewing this question, the researcher found that institutions indeed use several methods outlined in their assessment plans to gather data. This may include collection of indirect data such as employer surveys, student surveys and alumni surveys, while direct assessment data is gathered through the PAS test, capstone exams, embedded measures or major end of programme projects. One institution did not comment at all on this segment. In two cases they had both positive and negative comments and in three cases there were only positive notes, which credited the PAS test for enabling them to gather comparative benchmark data and actually use this in changing teaching proficiency, which they identified as in direct relation with improved student learning.

6. *How is the institution using the results for continuous improvement of programme outcomes and improvement of its assessment processes? (Criterion 4.4 Continuous improvement)*

All institutions reported on making many improvements, which included but were not limited to: changes to the curriculum, changes to the assessment measures, changes in teaching methodologies, changes to their faculty development and support, changes into

course structures and curriculum, changes to their assessment structures and how often and what they assess, changes to research supporting their faculty's knowledge base and many more detailed changes. The changes also extended to wider institutional level matters such as strategic processes and the management data reported and used in these processes, respondents also highlighted other significant process improvements throughout the interviews, indicating that institutions reached a certain maturity not to only use the accreditation results to make changes, but to close that loop and review their processes to see whether they fully served their purposes or not.

7. *To what extent do the respondents believe accreditation improves student learning?*

There was an overwhelmingly positive response when asked about the accreditation process and how it improves student learning. In most cases, respondents referred to the overall improvements made in the assessment process and how the changes implemented due to the findings directly relate to the improvement of student learning. However, there were also some cases when unrealistic expectations somewhat shadowed an understanding of what accreditation can do for student learning. Here there were comments on window-dressing. There was one specific case when one respondent mentioned that he/she did not believe that the accreditation process amounted to anything at all. There were some comments specifically from one institution where a respondent indicated that the since ACBSP accredit institutions which are smaller and not as prestigious, that negatively affects that overall student learning.

5.4. Literature review mapped against the overall findings

Below findings are presented from the document reviews and interviews mapped against the findings in the literature.

Effects and Impact of Accreditation

The impact of accreditation is not measured systematically or accurately in the following aspects: Student learning, financial burden, administrative burden, overall quality improvement, faculty, research output, impact on society (Altbach 1999; Eaton, 2012; Eaton, 2018; Gaston, 2014; Lederman, 2013; Lowrie, 2008;).

Evaluation from this research:

The overall findings from this research indicate that indeed there are not enough large- and small-scale studies related to the impact of accreditation. There is more information available from some of the western countries but even those studies (Krzykowski and Kinser, 2014) may be not conclusive. Single studies are available for some specific accreditors (Pringle and Michel, 2007). There is a need for a concerted effort to review the impact of accreditations across the globe. Even though this research took place solely in Mongolia, during the interviews it became clear that no study has been carried out has carried out on ACBSP, hence the respondents were extremely enthusiastic about the interviews and looked forward to hearing the end results. The researcher also felt that the respondents were very willing to share information not just related to the questions but on other topics as well.

Competition between accreditors can be detrimental to institutions (Blanco-Ramirez, 2015; McFarlane, 2012; Neil and Alacbay, 2018; Studley, 2018).

Evaluation from this research:

It has been mentioned before that the competition between accreditors could be detrimental to institutions. As seen in the literature, (McFarlane, 2012; Lowrie, 2008; Knight 2005), some accreditors tend to be elitist and to keep their status they simply will not consider a certain type of institutions. The respondents from the interviews did not indicate this as an issue, due to the fact that ACBSP has been the only international accreditor present in the country, with AACSB starting to show interest in institutions and vice versa.

Accreditation decisions can be detrimental for institutions (Neil and Alacbay, 2018; Vibert, 2018).

Evaluation from this research:

Indeed, this matter is of major concern. The research report findings indicate (Lowrie, 2008) that if there is a negative decision from the accreditors, this maybe be adversely affecting the institutions' reputation. In some cases when institutions are going through initial accreditation, there is an option to withdraw when the site visit team confirms that they would be giving negative advice to the accreditor's decision-making body. However, in other cases this is not possible, and results published on accreditors' websites can cause

a major negative response from stakeholders. In some countries it is an even bigger issue where losing face would simply have horrible consequences. From the interviews it was evident that institutions appreciated the help of the mentors and the support they received from the home office. However, concerns about losing accreditation were not mentioned.

Methodology:

Accreditation is more geared towards improvement of management and administrative processes and not student outcomes: process versus outcome debate (Eaton, 2018; Neil and Alacbay, 2018; Kinser 2018).

Evaluation from this research:

Document review indicates a healthy balance between the use of student outcomes and the underlying processes. Taking ACBSP as an example (ACBSP, 2020) the accreditation itself is process-oriented: institutions need to ensure that their programmes are supported with robust administrative processes, which are then implemented and evaluated to ensure they support the desired learning outcomes. The key point is that the processes are designed and implemented specifically to support the student outcomes, and this allows for a healthy balance between them. This was evident from the interviews as well, implementation of an outcomes assessment process has prompted: the setting of learning objectives (if they were not there previously); the design of appropriate tools and measures; the setting of targets and a process of data gathering, evaluation and review. Data from the interviews suggests that accreditation impacted both processes and student outcomes. So, this debate applies less for ACBSP accredited institutions as the criteria are designed to support the balance between process and student learning.

Focus on minimal threshold requirements instead of continuous improvement. (Eaton, 2018; Neil and Alacbay, 2018; Reddy, 2008; Schwarz and Westerheijden, 2007; Eaton, 2018).

Evaluation from this research:

This is a decade old debate, criticizing accreditors for setting minimal requirement to be met instead of promoting continuous improvement. The researcher found that the interview respondents in most cases looked at the process from both points of view. They understood that they needed to meet certain criteria but there were many positive comments on the continuous improvement process. There was one instance when ACBSP was criticized for accrediting small institutions. This has been mentioned throughout the study and is linked to the minimal threshold requirement notion. Upon review of the ACBSP standards and criteria, it shows that continuous improvement is still highly supported, therefore having the processes in place for enabling that are so important and part of the standard requirements.

Focus on deliverables that are too high-level and not achievable for all institution or programmes (Urgel, 2007).

Evaluation from this research:

This matter is the opposite side of the debate on threshold requirements. ACBSP is specialized programme accreditor and is mission-oriented which means that its requirements are not so much prescriptive, but rather that they are supportive of the missions of the institution. Upon review of the standards one can find that there are a couple of percentage requirements indicated, for example under faculty qualifications and minimum percentages of curriculum content to be classified as business programmes, but this is nowhere as specific as for example AACSB requirements (AACSB 2020). So naturally the respondents did not indicate anywhere that they found the threshold standards too high. Several institutions did indicate that the doctorally-qualified faculty member percentages had to be improved, but agreed that this was positively affecting the overall view of the institution.

Assessment should be at the centre of the agenda (McFarlane, 2012; Manning, 2018).

Evaluation from this research:

From reviewing accreditation materials and looking at several business accreditors and national and international accreditors (AACSB, 2020; ACBSP 2020; IACBE 2017), there seems to have been considerable progress on student assessment being put on the agenda of the accreditors and implemented in their standards across the world. Interviews also substantiate this, as there has been a huge difference in how Mongolian accreditation

adjusted their standards once ACBSP standards were introduced in the country and in also how institutions developed their assessment structure, which, in some cases, was nonexistent while in other cases it was partially developed.

Institutional autonomy is often not supported (Lowrie, 2008).

Evaluation from this research:

The review of ACBSP accreditation documents indicates that ACBSP is mission and outcome oriented (ACBSP, 2020). In fact, respondents also indicated the process supported mission and strategic objectives, hence this matter does not constitute a substantial issue for the Mongolian institutions who carry ACBSP accreditation.

Snapshot view of the institution instead of continuous improvement (Reddy, 2008).

Evaluation from this research:

Current accreditation standards and requirements (AACSB, 2020; ACBSP 2020; IACBE 2020) allow site visitors and board members to review at least three years of data and/or three consecutive trend data. This is already a substantial undertaking with lots of information being provided for reviewers. Next to the data reviewed the accreditors review the processes supporting continuous review. If this review shows that there is no structural background to methods institutions use for improvement, then that signals weakness. In essence the snapshot view includes the checks and balances for continuous improvement, and this is evident from the interview respondents as well. They commented on how going through accreditation improved their review systems hence the two can work together.

Accreditation is often intrusive to institutions (Altbach 2003; Pringle and Michel, 2007).

Evaluation from this research:

There was no indication from the respondents that they felt the accreditation process was intrusive. On the contrary, they felt that, since ACBSP accreditation, the national accreditation has also changed for the better. Mongolian accreditation previously dictated even the curriculum and set all requirements as to what should be delivered. Now, as part of the national accreditation process, that has changed and institutions have the right to change curriculum and set learning objectives, amongst other things.

Accreditation should not be the end-product - it's a continuous cycle. (Kis, 2015; Eaton 2018).

Evaluation from this research:

This continues to cause dilemma for both accreditors and the institutions themselves. However as indicated above, going through the accreditation exercise should go hand in hand with ensuring the implementation of a continuous improvement cycle. Respondents from the interviews indicated improvement and impact on their assessment cycles.

Involvement of more stakeholders is needed (Krzykowski and Kinser, 2014; Vibert, 2018).

Evaluation from this research:

There is significant evidence from the interviews indicating that ACBSP requires a very strong involvement of stakeholders - from identification of stakeholders to identification of their demands and an indication of their involvement in the development of curriculum and assessment strategies and finally in the evaluation and assessment. The review of ACBSP documents also signal the same results (ACBSP 2020).

Proper assessment tools for learning should be evaluated and developed (McFarlane, 2012; LeBlanc, 2018; Kinser, 2018).

Evaluation from this research:

There seem to be no consensus on the proper assessment tools for measurement in the literature. Accreditors, including ACBSP, have indicated preferred assessment tools such as the PAS test as an option, but also allowing institutions to develop their own. However, there are many questions and concerns with standardized testing. This is evident from the literature (Jaschik, 2013; Djoundourian, 2017; Bright et al., 2019) and from concerns indicated by the respondents. No solution presents itself so far, only suggestions on how to improve the specific test. However, there has been some progress on the use and development of rubrics, allowing institutions to clearly map against the learning objectives of the programme.

Peer Review:

Peer review is criticized (peer reviewer not prepared (Vibert, 2018).

Evaluation from this research:

As was discussed in previous chapters (Vibert, 2018), accreditors do their best to ensure that the peer review or site visit team is prepared for the visits and trained according to the standards. However, in some cases, it still does not work well. At the end the accreditors depend on the experts and how they carry out peer review can only be monitored and feedback given afterwards. From the interview participants there were no negative comments at all on the peer review teams. Instead, there seems to be a lot of open dialogue and a positive relationship when meeting the institution and going through the visit.

Accreditors are member driven and leaders of the accredited HEIs are on their boards and serve as commissioners which could lead to favoritism (Lederman, 2013; Vibert, 2018).

Evaluation from this research:

As discussed before, there is indeed a serious concern that some accreditors do not treat all institutions equally and show favoritism. Do friends review friends? As much as the researcher believes in the good of accreditation, it has happened before that some institutions did not go through such a rigorous review as others. However, there was no indication of this from the interview respondents.

Peer review of the accreditors themselves is missing (Tomlinson, 2015; Studley, 2018).

Evaluation from this research:

There were no indications from the interviews that the accreditors should carry out peer review visits of one another, but perhaps this would be something to consider. There is concern in the literature that accreditors in some cases are not as transparent as they should be, so even if such visits were proposed, it is not clear how many would take advantage of the possibility.

Cost:

Accreditations are not affordable in some countries (Lederman, 2013; Lowrie, 2008; Gaston, 2014).

Evaluation from this research:

Institutions in certain countries can easily afford to go for accreditation, however in all cases it requires significant investment. Next to the membership and accreditation process fees, there is high level of administrative and faculty workload expected in working to meet the standards and during the process of accreditation. This was the message from the interview respondents. Many institutions could not participate in regional or annual meetings because of the associated cost of fees and travel. Participation in these events is important because it allows for dialogue between peers; participation in training events, seminars and so on and also for personal meetings with the accreditors and their teams. For some this is already not possible and the costs may prevent some institutions from embarking on accreditation. In addition, the Triple Crown accreditors are so much more expensive that even institutions in developed countries may not be able to afford them.

Transparency:

The rise of too many accreditors creating confusion for stakeholders (Knight 2005; Zammuto, 2008).

Evaluation from this research:

With the rise of number of institutions, there has been a rise of accreditors, which, as has been discussed (Knight, 2005), brings with it questionable practices. But even with legitimate accreditors, it may be that there is too much confusion. The respondents indicated the complexity of understanding the differences between business accreditors specifically IACBE, ACBSP, and AACSB.

Accreditation discrimination takes place: faculty and student discrimination (McFarlane, 2012).

Evaluation from this research:

This specific item was not prevalent in the discussion with the respondents as there is only one international accreditor in Mongolia, but the beginnings of a developing matter were

apparent. One respondent from an institution specifically commented that ACBSP accredit both small and large institutions and even those whose research is not outstanding. She went on to indicate that going forward they are thinking about stopping ACBSP because everyone in the country can get it. She indicated they are planning to go for AACSB accreditation, and this also signals that they already feel they are above the rest of the institutions and may be on the road to developing a trend prevalent in the US, where in many cases institutions will only hire faculty who received their diploma from certain accredited institutions.

Meaningless data reported on websites under transparency/useless metrics (Eaton, 2018; Vibert, 2018).

Evaluation from this research:

This continues to be a serious problem. Institutions tend to not want to report data, in order to avoid backlash. However, from this specific research, the findings indicate that data when geared towards a certain stakeholder can be very beneficial and useful for hiring practices. Interviewed institutions indicated that based on information they provided, employers are more likely to hire their graduates and this is a significant incentive for using adequate metrics.

Institutions not initiating transparency on their own (Eaton, 2018, Kinser 2018).

Evaluation from this research:

From the interviews it was clear that Mongolian institutions tend to initiate transparency on their own. They provide data required on the website and very often they use this data to show that they outperform other institutions. It seems to be in their interest to be transparent on their objectives and results in order to achieve a higher ranking among Mongolian institutions.

Stakeholders are often not educated on accreditations, the objectives, and their differences (Knight 2005; Lowrie, 2008; Vibert, 2018, Kinser 2018).

Evaluation from this research:

There were examples shown where institutions introduced sessions for stakeholders explaining what accreditation means: they had sessions with incoming students going

through each standard and promoting accreditation and transparency for all. This positive attitude is however not shared across most institutions across the globe, it is perhaps more prevalent in Mongolia specifically as a new type of international accreditation has been introduced and they wanted to ensure that all the stakeholders understand the full impact of this quality review.

Policy:

The role of accreditation should be delinked from student funds in the US (Neil and Alacbay, 2018).

Evaluation from this research:

This specific segment does not apply to the current research report, as ACBSP is not a gatekeeper for federal funding. However, it is a serious agenda moving forward, as there is discrepancy between delegated authority from the ministry regarding students' funds and the expectations about what the accreditors should deliver in relation to the institutions and programmes. The divide seems to be substantial, so as the literature suggest there should be a different solution for identification of student funding or simple and clear instructions as to the expectations of the ministry and then accreditors would not have to interpret these expectations but rather check compliance.

Possible development of an accreditation super body (Green, 2018).

Evaluation from this research:

There were no indications from the interviews on this specific item, but the review of the literature (Green, 2018) signalled the possible need for a development of an accreditation super body that would simplify the understanding of the requirements and aid the synchronization agenda. Unfortunately, since efforts towards synchronization have not succeeded so far, it would be advisable to revisit those efforts before committing such a large-scale undertaking.

Accreditors should assume a more prominent role in policy making -should lead the discussion and not lag behind (Studley, 2018).

Evaluation from this research:

ACBSP is a US accreditor. However, they are very much involved in governmental discussions across the globe and indeed lead policy discussions in countries outside their home country. This was indicated by respondents and ACBSP members indicated several discussions took place between the accreditors and the ministry and went as far as indicating serious impact on Mongolian accreditation standards. However, in the US it seems that accreditors do not live up to their full potential in policy discussions, which are more taken up by other organizations, for example CHEA. There is more that can be achieved but it should also be noted that it is already taking place in other locations initiated by accreditors.

6. Conclusions and Recommendations

6.1 Conclusions

Several trends were identified during the analysis of the data from the interviews. In looking at the findings from the researcher's visits to the six universities and in-depth documentary review, it is clear that while there are challenges and barriers around the implementation of the ACBSP accreditation framework, there are a significant number of positive results as well. This is difficult to quantify exactly, but there are clear signs indicating overall gains – although there are still many other areas for further development.

Findings from the research:

1. One of the most important indicators discovered in this round of interviews is an increase in the alignment of **student competencies and skills to the curriculum**. In the past, the government of Mongolia played a dominant role in the planning and design of the curriculum, which was becoming increasingly outdated and irrelevant and had no active connection to either the business world or the international context. The whole process of accreditation put much more emphasis on the relevance of student competencies and skills, making a strong contribution to student learning. Many of these universities are now actively discussing with employers/organising employer surveys about the skills and knowledge they need in their graduate recruits, and the accreditation process has allowed for much more international benchmarking.
2. A related area is the opportunity presented by accreditation to make **international comparisons** – in assessments, teaching practices, curricula – and very many aspects of the way that universities operate. This was highlighted by the respondents in the interviews as well. Exposure to **quality tools** like the Malcolm Baldrige framework can be extremely useful for universities – especially with the concept of 'the customer'. In the academic context, this can be seen as a student and/or the student's future employer – but certainly, this indicates improved learning outcomes.

3. Several universities in Mongolia were given the **chance to distance themselves** from the lower-ranking institutions thanks to the accreditation process – but they received the message that they still had a way to go to complete their mind-set shifts. However, this process helped to stem complacency and make it clear what a top-notch international university looks like according to a certain – especially in terms of the perception of students as important stakeholders.
4. The accreditation process by the use of ACBSP framework has certainly helped countries like Mongolia to continue to **break free from the old Soviet-style system** and adapt to a new generation of students looking for much more from their university education. Their expectations and demands have changed, and accreditation systems – even if not fully-developed – will have helped these universities to enter the 21st century. Some of the universities visited by the researcher regarded themselves as highly prestigious and superior – but the accreditation experience was something of a wake-up call for them. The students at these universities were among the main beneficiaries of improvements, as these universities were previously more faculty- and administration-driven without much focus on student learning.
5. The process of using more systematic, structured **assessment measures and rubrics** can be clearly linked to helping improve student learning, especially when many of these universities did not use measures before, so there was no way of looking at trends in student learning and a lack of before and after studies of the impact of the university experience for students. Linking it to the literature, similar positive aspects are outlined by Coates and Seifert (2011) where they point out that the increased use of structured assessment measures, for example rubrics in signalling a clear progress towards proper assessment tools, though they so also mention the possible implementation issues due to added administrative workload. In addition, they also indicated that going through accreditation and the use of various assessment tools will expose quality gaps in the system. Eventually, as institutions address these gaps, better systems, better assessment processes and tools are developed which could yield better systematic results also related to student learning. Coates and Seifert (2011) as others, argued for a critical review of the assessment methods used to measure student learning and this study aims at providing some additional insights on the topic.

6. **Improved teaching processes**, with the opportunity for more international comparison in teaching approaches, definitely impacted student learning in Mongolia. With the possibility of attending ACBSP conferences, many teachers in Mongolia have now been exposed to new teaching methods, enabling their graduates to successfully apply to and enter universities overseas. ACBSP accreditation has enabled several Mongolian students to transfer to other ACBSP-accredited schools internationally. This would have been much more difficult in the past, where Mongolian students would have struggled to apply to overseas schools and keep up with more their demanding study requirements. ACBSP accreditation emphasises faculty development, which also helps with increased student performance.
7. Gaining accreditation has often led to **increased government funding** for several institutions in Mongolia, as well as **more income from more enrolments** - and this has been used to make several improvements for the benefit of students – such as more up-to-date technology in the classroom, access to international teaching methods and aids, the opportunity to hire more faculty to allow more time for student coaching – all of this leading to improved student learning performance.
8. The fact that **employers are looking for students from accredited** schools (especially as they can get a clearer picture of their academic achievements) and offering real incentives for students to learn relevant subjects in terms of linking them to internships and jobs is definitely improving student performance – because now the students have a real reason to study. Their university years seem to be more profitable for their futures, and no longer something they need to do just to satisfy their parents and gain prestige.
9. **Accreditation has meant that local universities have been able to attract foreign students (as indicated by the respondents of the interviews)** – and exposure to them in the classroom has certainly helped domestic students in Mongolia to improve their learning outcomes and widen their horizons.

On the negative side, there is always the issue of universities not appreciating the **impact of gaining accreditation given the cost, effort and time** involved – and if the process of accreditation is not taken seriously by the faculty and staff, its benefits will certainly not be translated to the students.

Also, some of these universities were starting from a **very low base**. So, improvements of any kind were seen positively, even if they did not necessarily reflect improved student learning. There is a need for more transparency and benchmarking and clearer measures of student performance in future.

These findings however do not necessarily signal that the implementation of the accreditation process was not successful. They do effectively highlight areas that may need further time for improvement, or they accentuate areas where different, but more appropriate measures should be in place. Consideration should be given to the fact that some of the institutions chosen as a sample in this research study have gone through the accreditation process some years ago, while others received accreditation not long before the interviews took place.

There were equally many negative and many positive comments about the use of the **Peregrine exams**: that the translations were not ideal, that the students did not take them seriously and focused their learning on passing the tests rather than actual learning. At the same time, changes to the translation were made speedily and institutions have access to management data very quickly and finally have the chance to benchmark the results across programmes and institutions. The test also allows institutions to look at the link between their curriculum and their learning objectives and helps them to close the loop.

Overall, the ACBSP accreditation process has enabled many universities in Mongolia to continue the break away from the old system, but it must be emphasised that the **current political situation in Mongolia is still highly fragile** and gains made today could be reversed tomorrow.

6.2 Recommendation and Proposal for further action

The researcher will now offer general thoughts and recommendations linking the research with literature before suggesting several courses of action. Recommendations will be divided into several different levels:

In the Mongolian context:

- ***Policy related recommendations, which will be on the national and ministerial level (findings from the literature review):***

- The World Bank report of 2010 indicated that one of the issues that Mongolian HEIs face is that basic education and high schools are not educating students to the level needed for entry to HE. It would be advisable to continue closing the gap between the level of education prior to entering HE to ensure Mongolian students have a chance to succeed and that faculty can deliver the promised level of programme instead of trying to make up the missing knowledge. Dialogue needs to take place in the general education sector about both the high schools' foundation programmes and their teaching of English.

- ***Recommendations specifically for the national accrediting body MNCEA (findings from the research):***

- Institutions interviewed have reported significant changes in the national accreditation landscape, most of which have been positive. Implementing ACBSP accreditation seems to have affected the process and introduced new requirements such as assessment of student learning objectives and stakeholder input from the national level accreditors. The recommendation here would be for MNCEA to continue monitoring the higher education, quality assurance and accreditation landscape and benchmark their own requirements against internationally accepted standards. As with all accreditors their own internal processes should be subject to review and revision as needed, to ensure they inform institutions on their own developments. As respondents indicated, sometimes international accreditors charge too much for participating in their activities. It would be perhaps useful for the Mongolian accreditors to offer more activities, such as seminars on topics like student learning and stakeholder involvement, so institutions can all make such opportunities available for their faculty and staff at a much smaller cost to each institution.

- ***HEI level of recommendations for the institutions themselves (findings from the literature review and research)***

- As was mentioned in the literature review, Huisman and Westerheijden, in their 2010 study, shows concerns if institutions pay too much attention to having

accreditation simply as an indicator of legitimacy, rather than concentrating on actual improvement and support for those involved in education, teaching and research. They suggest that institutions tend to concentrate on compliance and not the actual performance, which could result in simple window-dressing instead of concentrating on actual performance of quality. These comments resonate with some of the findings from this research. As genuine as some comments on the impact of accreditation seemed to be, others concentrated more on the marketability of the institution by gaining accreditation, so that the exercise would only be to get accreditation and then relaxation of rules may follow. Institutions may need to learn that accreditation, or really implementing any quality agenda, can only make a difference if it is taken seriously and not carried out as a window dressing exercise. The preliminary objective may be on the external benefits of gaining accreditation, but the ultimate goal is to improve student learning. It is essential that the executive and leadership of HEIs support this ultimate objective, otherwise the exercise loses its ultimate purpose and become a useless exercise, creating havoc on the already rough schedules of both faculty and staff.

In the international context:

- *Policy related recommendations (findings from the literature review and from the research):*
 - Standardized testing has been widely debated as we have seen in the literature review. Naturally, there are advantages for both standardized tests and for the ones developed by the respective institutions. The homegrown tests seem to be better geared towards the learning outcomes of the respective institutions, but create the concern that they might not point out issues with the learning outcomes themselves. They would carry internal validity, but run the risk that the test banks are not large enough, or that, without external reviews, would not be sufficiently comprehensive. For external standardized tests, the external validity is high. They offer objectivity, easier administration, and certainly better benchmarking opportunities. There is still no conclusion to this debate and it continued to concern the respondents of this research. The advice is to continue checking with due diligence the type and use of these tests to ensure that they indeed measure what they set out to measure. There is

no right or wrong solution at this stage, so the continued development and revision of appropriate tools to measure student learning should remain high on the agenda.

- Previous research highlighted concerns over the purpose of accreditors and the competitive environment they create in many countries (Lowrie, 2008). Lowrie urges policymakers to review the role of accreditors to ensure they operate in the interest of those they are supposed to serve (Lowrie, 2008). In addition, more clarity is needed on the differences between the accreditation bodies, so that institutions can understand the difference and choose the accreditor that fits their institutions best.
- Consideration should be given that there may be some potentially negative impact on institutions due to the existing competition between accreditors, especially those with a growth agenda, but also those who are looking to recruit only high calibre institutions. This goes deeper than just the discussion on the fact that the mission of the institution should determine which accreditations they plan to choose; it goes as far as not considering institutions even if they would meet the threshold criteria. Accreditors must stay true to their philosophy and practices.
- A regular debate has been taking place on the role of accreditation. As it is, it should be for institutions or programmes to meet the minimum threshold standard. The question then will be, is this minimum enough or should it be raised? The public institutions raised this question: those who already started with a more significant QA base within their programmes. On the other hand, the debate must continue as to how to aid those institutions at the very early stages of development or of lower quality. How can they be helped to get to the minimum standard, perhaps as part of a capacity building exercise? How might those who have reached maturity already and need less significant changes be reviewed? Perhaps they need more of a monitoring role. This naturally may change from country to country as TEQSA and the QAA and OfS already use more of a risk-based system and AACSB has significantly reduced the reaccreditation process (AACSB 2020), which would bring with it different types of concerns.

- Another major problem looming over the HEI landscape is the discrimination against faculty and students from non-accredited institutions. There are many reasons why an institution may choose not to go for accreditation or choose one type of accreditor over another. This may be mission orientation, scope of programmes, market relevance of achieving accreditation, financial matters, programme portfolio, research or practice orientation, internationalization agenda and the like. Certain accreditors limit hiring faculty and/or staff members only to those from accredited institutions. They also limit the admission and/or transferability of students, as well as limiting faculty exchanges. The reason is understandable, having accreditation seems to equal a minimum threshold quality and these efforts provide an easier administrative overview and burden for the institutions who impose them. The researcher does not have answers how to best address this, as it is not possible to control perceptions. Perhaps in today's world when HEIs should work together to provide access to education for as many as possible, this is something to debate with the already accredited institutions. They have the responsibility to aid those of possibly lower standards not only to improve but also not create even more blocks for their students and faculty in the future.

- The main conclusion from the study is that there is very limited information available on the impact on student learning and the relationship with the accreditors, and whether systematic and accurate measurements are used in these processes. The study revealed that implementation of an accreditation framework is more than likely to improve student learning, but there were limitations to it. More extended research would be required across accreditors and across countries to evaluate the relationship between accreditation and improvements in student learning.

- The researcher found out from the study that it is crucial to involve the stakeholders in the improvement cycle of the programmes, at the end one of the major criticisms of higher education is that students graduating are not fit for the market and therefore a gap exists between the programmes and the skills needed in the workplace. This should remain high on the agenda.

- *Recommendations for international accreditors (findings from the literature review and documentary analysis):*

- As was mentioned in relation to the international policy level recommendations, international accreditors do need to address the “minimum standards’ approach. Both Reddy (2008), Schwarz and Westerheijden (2007) are concerned that taking this view, accredited institutions and/or programmes are aiming at that threshold and not aiming at a continuous improvement and high-quality delivery. Even though most accreditors emphasise the importance of the continuous review and improvement process, many institutions suddenly stop as they achieve accredited status. It is even harder when accreditors had indicated schools need to jump through a lot of loops at initial accreditation but then the system is more relaxed for the follow up reaccreditation process, as in the case with AACSB (AACSB 2020). The consensus is still not out there and Urgel (2007) does argue against this notion, claiming that certain accreditors only accredited institutions who continue to be top quality in all contexts. Nevertheless, comments indicated by the respondents that there may be a lack of follow up on institutional and programme improvement once accreditation is secured. Therefore, the suggestion is that international accreditors continuously review their requirements to ensure that institutions do not halt their programme improvements and continue measuring student learning.
- Another recommendation for accreditors is again related to their review of their requirements. Some comments from the interviews reflect what Stensaker’s (2011) concerns that external quality assurance agencies have more impact on managerial processes and organizational structures than on student learning. Stensaker (2011) went on to suggest that measuring impact in that area was still in its infancy and would require much more research in the area.
- International accreditors should also consider what it means for institutions when a significant number of new measures are introduced for their accreditation of business programmes. Pringle and Michel (2007) conducted a study where they interviewed staff members responsible for accreditation and assessment. The interviews concentrated on questions regarding faculty resistance and assessment methods. The resulting findings were quite disconcerting. It seemed that a considerable percentage of the schools would not use certain assessment methods at

all or minimize them if they were not required by the accreditors. This indicated an accreditation or assessment ‘fatigue’, which could be the result of overassessment. Very often institutions draw up complicated assessment plans and focus too much on collection of data, losing sight of the objective of improving student learning. This might be one reason why new measures actually show the gaps not addressed before, so that faculty tend to react heavily to assessment by taking it too personally or as an attack on their teaching methods. From this study, the researcher identified comments indicating that “the assessment process” seems to be never ending and that the faculty members are continuously tired. Moskal et al. (2008) also highlight these negative aspects of assessment, next to the additional bureaucratic burden, fear of negative assessment results and loss of academic freedom. This remains a major concern so the recommendation is that international accreditors certainly keep the assessment process and its methods in the standards as a core to support and motivate institutions on the student-learning journey, but they also should provide even more help in addressing how to carry out the assessment methods. It is also essential that accreditors consider more advice on faculty time and overload and ensure that good practices indicate perhaps additional time (however small) to aid the implementation of the accreditation requirements.

- The peer review process is crucial in the accreditation process, however it has been widely criticized (Vibert, 2018). There have been many cases where the site visit teams were not prepared, or they would have applied their own belief systems compared to the accreditation standards. This agenda should continue to stay at the centre, and peer review teams should continue be monitored and continuously trained especially now that there are so many visits taking place online and considerations need to be given to the type of institutions they are reviewing and the circumstances surrounding the visit.
- Documentary reviews indicate (AACSB, 2020; ACBSP, 2020; IACBE 2020) that all institutions are treated equally against all standards of the accreditors and their boards should support the fairness of accreditation judgements. However, there have been examples where institutions from different accreditation bodies were not subjected to rigorous standards because either they have been accredited a long time ago or because of their current highly ranked status. The researcher suggests

that priority must continue to be given to ensure that all institutions are treated equally against all standards.

- ***Recommendations specifically for ACBSP (findings from the literature review and documentary analysis):***

- One of the most important unresolved issues is the matter of what is the best way to measure results. Further research is needed on this matter as is highlighted by Flynn and Saladin in their 2001 study when reviewing the Baldrige framework and it seems not much has been done since then. Future research is needed in this area. ACBSP as an accreditor who uses this framework must review research conducted in this area and strengthen its threshold requirements in order to support institutions in using the best assessment methods. Lakhali and Sevigny's 2014 study comes to the same conclusions in reviewing the validity and reliability requirements for valid assessments in the Triple Crown frameworks of AACSB and EQUIS. As the researcher has identified that most accreditors have the same assessment requirements, it is essential that further studies take place in this regard.
- A recommendation for all international accreditors, but also very important to mention for ACBSP, is that accreditation seem to be more geared toward process management improvement and not student outcomes. It is important to mention that ACBSP, IACBE and AACSB are some of the accreditors who do focus on the impact on student learning, but perhaps even more effort is needed to ensure this continues to be a core element for them.
- One specific item that caught the attention of the researcher is how ACBSP phrases certain items in the unified standards. Understanding that these standards are continuously reviewed by the different boards at ACBSP and then approved by the member institutions, still some clarification could be implemented when it comes to the Standard 4 framework. Specifically, how guidelines are written in relation to Criterion 4.3.a, where it asks the institutions the following:

‘Include the current use of results by identifying the specific improvements action taken/changes made based on data obtained from the assessment for the programme outcome.’

It is not clear what is the difference between the above and Criterion 4.4. where the following is asked: *“provide evidence of using the results for continuous improvement..”*

The suggestion is then to revise the sentence under criterion 4.3 to be clearer what it is asking about improvements to the programme outcome only.

- ***Recommendations specifically for ACBSP (findings from the research):***

- When an institution has gained international accreditation, there should be opportunity for students to transfer to other ACBSP schools and that ACBSP members should get more opportunities to co-operate amongst themselves. The request then is that ACBPS should help the schools and support these initiatives.
- One of the major comments that came through the interviews is that the public is not sufficiently well-informed about accreditation. Most comments were about the gap between institutional expectations and the reality: what ACBPS indicates on its website and what it communicates to schools and how they interpret those messages. Comments focussed on areas such as student exchanges, new partnerships, and most importantly on recognition of degrees across the world. It is strongly suggested that ACBSP revisit the way it communicates to its stakeholders in order to ensure there is no miscommunication. It also should be mentioned that very often students are not aware what accreditation is or what the differences are between the accreditors: students should also be educated about this. One of the institutions included in the study does an exceptional job at this, highlighting to students, parents and stakeholders what accreditation entails and even educating students at the beginning of their programmes, so that they know what the accreditors expect from the school and its programmes.
- The researcher feels that there may be a possibility to create a ranking of HEIs/ programmes within the ACBSP system. The comments she has observed as a result of her research do raise some concerns still, in terms of the role of accreditors. In

general, accreditation processes are there to ensure that institutions meet the minimum threshold standards. However, it is normally the responsibility of the member institutions to carry out other activities within the member network, which can be supported by the accreditors to a certain extent. EQUIS, for example, is an accreditation body, and EFMD is the development framework around it that allows for different activities. However, smaller accreditors, for example ACBSP, which accredits programmes and gives short-term certificates, may not be equipped to handle this kind of request. So then, in terms of the accreditation requirements, it comes perhaps down to the question of what was promised to institutions in an effort to gain ACBSP accreditation and start this specific process.

- ***Recommendations for HEIs in general (findings from the literature review):***

- There is a general concern about how much time and effort HEIs need to invest in gaining accreditation in order that it may have a positive impact on student learning and aid in achieving their mission and objectives. Lowrie (2008) argues that all these efforts would be better spent on teaching and research, which then would yield more positive impact on student learning than accreditation itself. He insists that institutions could also save a considerable amount of money spent on fees associated with both the initial accreditation and the maintenance of accreditation. This is clearly quite a negative view of accreditation. Lowrie suggests that stakeholders should make their own decisions, based on publicly available information, as to which school or programme is the best (Lowrie, 2008). However, he does not take into account that many institutions struggle by themselves to make changes and improvements in their systems and programmes without an external catalyst pushing them towards becoming a more mature HEI. The point to take away, both from his concerns and from the case study interviews, is that the process of accreditation requires a lot of time and effort on all levels. Institutions should take time to review the available accreditations to ensure that there is a match between the institution's mission and vision and that of the accreditor. Institutions which are not aiming at breaking into the international sphere, but instead seek to serve the local population should not aim at EQUIS accreditation, as that is one of their major requirements. If an institution is not able to have a significant and

systematic research output, they should not aim at AACSB, as that is one of their main pillars. It is essential that institutions review the possibilities, so that they do not set themselves up for failure and have realistic expectations are drawn in respect to the capabilities which they can demonstrate.

- It very much seems that outcomes-based assessment is here to stay. It is also evident that there is a disconnect between using grades for assessment and performing outcomes assessment activities using rubrics to link to the student learning objectives. When faculty members are already overwhelmed with grading, institutions should possibly consider how to bring these two items closer together to make the faculty's life easier and to ensure that the system works well and will continue to be implemented. Institutions should consider looking into systems which enable changes to assessment and the grading structures to be implemented more easily, perhaps implementing mechanisms that will not add too many additional processes into the faculty's workload.

- *Recommendations for ACBSP accredited institutions (findings from the research):*

- One of the exceptional measures taken by one of the institutions included in the research was the way they educated the students about accreditation. The researcher is able to draw some comparisons with other institution as she has visited many campuses as part of site visits and also outside accreditation, but this level of commitment to showing students what accreditation means was unparalleled. As we have seen in the literature review, McFarlane (2012) also strongly suggests that both institutions and students should be educated on accreditation options in order to understand the range of possibilities. The researcher indicates that this is certainly a best practice for others to follow. Activities of the institution included, but were not limited to, meetings with students at the start of their programmes to go through what ACBSP means and review all the standards and assessments. As well as informing students, they also meet with business, alumni, and informed the public about progress on their strategic and assessment objectives. Expectations were then clear on all levels and all stakeholders could help even more in achieving these objectives.

- Another matter is the transparency agenda of accreditors towards the institutions themselves. It was mentioned already under the policy recommendations, but it should be highlighted here as well: even though it is the responsibility of the accreditors to make sure they are transparent in their communications, institutions should also ensure they gather all the information available to make the right choice as they embark on the accreditation process. This is especially the case with voluntary accreditors where the choice is with the institution.

Overall recommendation:

The findings of this specific research are overall positive.

Recommendations include building a trust relationship within the Triple Helix, as governments and HEIs should be trusting with each other, so that when they receive information on student learning, it is not used for punitive purposes, but for improvement (something the AHELO study failed to achieve (OECD, 2020)). Governments should be opening the dialogue more and more with the private sector. The involvement of the stakeholders in the assessment processes is of primary importance to ensure that students gain the skills and knowledge necessary for the workplace. ACBSP is on the right track with the requirements so prominent in their standards, but the dialogue should also be there between the governments and the private sector. Maybe the accreditors, not necessarily the nationals but those operating in the international scale, can play a significant role in this. Governmental bodies and national accreditors should sometimes try to take the route set out by international accreditors and remove limitations so that the real learning can take place, sharing information and setting objectives without fear. This will allow national accreditors to shatter the glass ceiling projected by window dressing activities under the transparency agenda.

6.3 Relevance and Contribution to the Literature

The original contribution of this study centres around several items:

The research looked at a country whose higher education institutions are going through international programme accreditation for the first time. No other business accreditors were present in the country at the time of the study and initial discussions were only starting to take place with other accreditors, but no institution and/or programme has started the process.

There are a limited number of studies available related to the implementation of a specific accreditation quality framework. Reasons for this are manifold, but a major obstacle has been that those institutions and/or countries are hesitant to share information on the implementation and student achievement. One reason behind this reluctance could be fear of punishment or losing face. This is a substantial gap, as most accreditors claim that institutions improve student learning as a result of going through the accreditation process. This study then hopes to help with closing this gap while looking at the changes and barriers of the implementation of the ACBSP accreditation framework specifically in relation to student learning.

Finally, the researcher could not find any major studies conducted in Mongolia and in the wider Asian region. The researcher hopes that this study, while on a small scale, will contribute to understanding the topic of student learning especially in relation to the effectiveness of an accreditation framework.

6.4 Limitations and areas for further Research

There are a number of limitations to the study:

The research study concentrates only on Mongolia, so the applicability of the study to other countries may be limited.

Interviews were conducted with a translator and interview questions and answers had to be translated in some cases. In other cases, respondents understood English, but did not speak English very well, hence they preferred answering in Mongolian. In other cases, there was no need for translation.

The next limitation is the scope of the research. There were six institutions included with 21 interviews taking place. This would need to be extended for a more comprehensive study.

There are also cultural aspects to be taken into consideration: the setting was such that respondents may not have felt comfortable sharing information freely. However, as discussed before, to be able to carry out the interviews, the leadership of each institution had to be contacted as first step. The letter to the rectors explained the objective of the interviews and asked for access to different level staff members. This could have caused concern as to the freedom of the respondents both in the choice and in their answers, however the choice to participate remained with the faculty and staff members and the participants were clearly chosen based on their involvement and knowledge of the accreditation process. The limitation was that without this introduction, the researcher could not have secured interviews.

Institutional limitations included decisions taken at a certain management level, meaning that respondents had no option to decide whether it would be useful to go for the accreditation or not. The decision was imposed on them. In essence, they were carrying out direct orders from higher management. In other cases, the institution itself did not have many options to choose from, as other institutions had already paved the way with ACBSP, so it was for them peer pressure to go through this accreditation.

The researcher did not interview government level actors, but rather she concentrated on the institutions themselves. However, some of the findings allow the researcher to advise on both national and international policy level, this is discussed in the conclusions and recommendations section.

Since the ACBSP framework is a specialized business accreditation framework, the researcher mostly concentrated on accreditors related to business education except for

some cases of institutional accreditation where assurance of learning and outcomes type assessment is prevalent.

The focus of the study is student learning assessment in the context of management education, and it does not extensively discuss education policy transfer and its implications in this research study. It would be interesting to extend this research outside the scope of specialized business accreditation to quality assurance in general in higher education to consider education policy transfer and education borrowing in detail.

Most importantly, student learning can be affected by many activities taking place during the programmes. This specific study concentrates on the Standard 4 framework only and while most standards are interconnected and going through accreditation affects various aspects of delivery, the researcher concentrated on those matters that can be directly linked to student learning and its associated processes.

Finally, only staff and faculty members of institutions were interviewed, other stakeholders were not. This includes students, alumni, employers, parents, etc. It would be beneficial to have a study to review the stakeholders' views on accreditation.

6.5 Conclusions

Accreditation has been in the centre of attention of higher education now for years. Expectations of society, its stakeholders (students and businesses among others) are increasing, and accreditors, or quality assurance regimes, are struggling to measure up to these ever-growing needs. There have been efforts to centralize, manage, and enhance quality assurance schemes such as the Bologna Declaration and subsequently the ESG development in Europe, and even CHEA to a certain extent, but the results lag behind the initial expectations and seem to be far away from the actual learning environment (Huisman and Westerheijden, 2010). There is a considerable lack of certainty about what accreditation in the future may look like, especially considering the turbulent times with the COVID-19 pandemic. The pandemic most certainly will change the already turbulent higher education landscape and delivery. Announcements of the changing views and differences between national and regional accreditors in the US will further add to the tension. Will the accreditation scene remain an elitist structure with only a couple of accreditors in the driving seat? Alternatively, will the status quo be disturbed by new accreditors placing the priority on whether student learning was achieved or not and not caring about the “how”? Maybe none of the current accreditors are ready to make that move, but there may be enough signals calling for transparency from the public, from governments, from students and other stakeholders (Eaton, 2018; Kinser, 2018).

Both the public and private Mongolian institutions contacted in this research were positive about their experience of accreditation, whether it came to continuous curriculum review and development or inclusion of stakeholders in curriculum development, with the result of positively affecting student learning. Negative comments about accreditation were aimed at different aspects, albeit still important ones, which still need to be reviewed and considered if accreditation is to have a fully positive impact on institutional and programme development across the world.

A final recommendation of the current study would be to present these findings at one of many conferences organized by the accreditors. It would also be useful to present the findings in Mongolia and especially those institutions included in the research as they have shown significant interest in the study and as appreciation of taking part and supporting the efforts of the researcher.

7. REFERENCE LIST

- AACSB International, Globalization of Management Education Taskforce, 2011. *Globalization of Management Education: Changing International Structures, Adaptive Strategies, and the Impact on Institutions*. Bingley: Emerald Group Publishing Limited.
- AACSB International. 2013. *Eligibility Procedures and Accreditation Standards for Business Accreditation* [Online]. Available from: <http://www.aacsb.edu/accreditation/business/eligibility> [Accessed 2 January 2018].
- AACSB International. 2020. *Eligibility Procedures and Accreditation Standards for Business Accreditation* [Online]. Available from: <https://www.aacsb.edu/about> [Accessed 13 March 2020].
- AACSB International. 2017. *Eligibility Procedures and Accreditation Standards for Business Accreditation*. [Online]. Available from: <https://www.aacsb.edu/-/media/aacsb/docs/accreditation/standards/business-accreditation-2017-update.ashx?la=en> [Accessed 15 May 2018].
- Accreditation Council for Business Schools and Programmes-ACBSP. 2017. *Standards and Criteria for Demonstrating Excellence in Baccalaureate/Graduate Degree Programmes* [Online]. Available from: http://c.ymcdn.com/sites/www.acbsp.org/resource/collection/EB5F486D-441E-4156-9991-00D6C3A44ED1/ACBSP_Standards_and_Criteria_-_Bacc-Grad.pdf. [Accessed 23 March 2018].
- Accreditation Council for Business Schools and Programmes-ACBSP. 2020. *ACBSP Accreditation Overview*. ACBSP. [Online]. Available from: <https://acbsp.org/page/accreditation-overview> [Accessed 23 October 2020].
- Altbach, P. 1999. *Private Prometheus: Private higher education and development in the 21st century*. Westport, CT: Greenwood.
- Altbach, P. 2003. *American Accreditation of Foreign Universities: Colonialism in Action*, *International Higher Education*, 0 (32).
- Asian Development Bank. 2008. *Key Indicators for Asia and the Pacific* [Online]. Available from: <https://www.adb.org/publications/key-indicators-asia-and-pacific-2008> [Accessed 20 June 2019].
- Asian Development Bank. 2011. *Sector Assessment (Summary): Education* [Online]. Available from: <https://www.adb.org/sites/default/files/linked-documents/43007-023-mon-ssa.pdf> [Accessed 31 March 2020].
- Asian Development Bank, 2016. *Mongolia: Higher Education Reform Project. Internal QA structures based on learning outcome-based approach and NQF*. Ulaanbaatar. Available from: <http://www.maed.mn/wp-content/uploads/2019/01/HERP-GUIDELINE-Internal-QA-structures-based-on-learning-outcome-based-approach-and-NQF-.pdf> [Accessed 31 March 2020].
- Asia Pacific Quality Register. 2020. *About APQR* [Online]. Available from: <https://www.apqr.co/> [Accessed 13 October 2020].

- Association of MBAs. 2014. *Criteria for the accreditation of MBA programmes*. *Electronic Document* [Online]. Available from: <http://www.mbaworld.com/~media/Files/Accreditation/MBA-criteria-for-accreditation.ashx> [Accessed 13 February 2014].
- Baird, Jeanette. 2013. *TEQSA and risk-based regulation*. Considerations for university governing bodies. 55 (2).
- Berman, R.C. and Tyyska, V. 2011. *A Critical Reflection on the use of Translators/Interpreters in a Qualitative Cross-Language Research Project*. *International Institute for Qualitative Methods*.10 (1). pp. 178-190.
- Business Graduates Association (BGA) 2020. *The BGA Charter* [Online]. Available from: <https://businessgraduatesassociation.com/about-us/bga-charter/> [Accessed 13 August 2020].
- Blanco-Ramirez, G. 2015. *Translating quality in higher education: US approaches to accreditation of institutions from around the world*. *Assessment & Evaluation in Higher Education*, 40 (7), pp. 943-957.
- Bloomberg, B., Cooper, D. and Schindler, P. 2005. *Business Research Methods*. Berkshire: McGraw-Hill Higher Education. Second Ed.
- Bogue, G. 1998. *Quality Assurance in Higher Education: The Evolution of Systems and Design Ideals*. *Quality Assurance in Higher Education: An International Perspective*. 25 (3), pp.7-18.
- Brennan, J. And Shah, T. 2000. *Managing Quality in Higher Education: An International Perspective on Institutional Assessment and Change*. Buckingham: Open University Press.
- Bright, C. F., Bathe, J. and Babb, D. 2019. *The Relationship Between Stimulation Strategies and Exit Exam Scores: A Correlational Assessment of Glo-Bus and Peregrine*. *American Journal of Business Education*. 12 (4). pp. 53-60.
- Bryant, M. 2013. *International Accreditation as Drivers of Business School Quality Improvement*. *Journal of Teaching in International Business*. 24(4), pp. 155-167.
- Bryman A. 2012. *Social Research Methods*. Oxford: Oxford University Fourth Ed. Press.
- Burke-Smalley, A. 2017. *The Reality of Assessment in Business Schools: Rejoinder to "Why Assessment Will Never Work at Many Business Schools: A Call for Better Utilization of Pedagogical Research"*. *Journal of Management Education*. 41 (2). pp. 201-205.
- Burnes, B. and Cooke, B. 2013. *Kurt Lewin's Field Theory: A Review and Re-evaluation*. *International Journal of Management Reviews*.15. pp. 408-425.
- Castiglia, B. and Turi, D. 2011. *The Impact of Voluntary Accountability on the Design of Higher Education Assessment*. *Academy of Educational Leadership Journal*. 15 (3). Pp. 119-130.

The Council of the British Educational Research Association. 2011. *Ethical Guidelines for Educational Research* [Online]. BERA. Available from: <https://www.bera.ac.uk/publication/ethical-guidelines-for-educational-research-2011> [Accessed 1 February 2018].

Council for Higher Education Accreditation. 2019. *Recognition of Accrediting Organizations Policy and Procedures* [Online]. Available from: https://www.chea.org/sites/default/files/other-content/Recognition-Polic-FINAL-Dec-2018_2.pdf [Accessed 13 February 2020].

Chowdhury, M. I and Wheeling, B. 2013. *Determinants of major Field Test (MFT) Score for Graduating Seniors of a Business School in a Small Mid-Western University*. *Academy of Educational Leadership Journal*. 17 (1), pp. 59-71.

Coates, H and Seifert T. 2011. *Linking assessment for learning, improvement and accountability*. *Quality in Higher Education*. 17(12), pp. 179-194.

Colling, C., & Harvey, L. 1995. *Quality control, assurance and assessment. The link to continuous improvement*. *Quality Assurance in Education*, 3(4), pp. 30-34.

Committee of Sponsoring Organizations of the Treadway Commission 2004. *Enterprise Risk Management-Integrated Framework Executive Summary* [Online]. Available from: <https://www.coso.org/Documents/COSO-ERM-Executive-Summary.pdf> [Accessed 2 January 2018].

Council of the British Educational Research Association-BERA. 2011. *Ethical Guidelines for Educational Research* [Online]. Available from: <https://www.bera.ac.uk/wp-content/uploads/2014/02/BERA-Ethical-Guidelines-2011.pdf> [Accessed 13 April 2018].

Cret, B. 2011. *Accreditations as local management tools*. *Higher Education* 61, pp. 415-429.

Davidson, L. 2015. *Demystifying Assurance of Learning: Q&A With Kathryn Martell* [Online]. AACSB. Unpublished. Available from: <https://www.aacsb.edu/insights/2015/October/demystifying-assurance-of-learning-q-and-a-with-kathryn-martell> [Accessed 13 August 2020].

Djoundourian, S. 2017. *Assessment of learning in business education: Standardized or homegrown?* *Journal of Education for Business*, 92 (5). pp. 238-244.

Eaton, J. 2012. *The Future of Accreditation. Can the collegial model flourish in the context of the government's assertiveness and the impact of nationalization and technology? How?* *Planning for Higher Education*. Special Themed Issue: The Future of Accreditation. 40(3).

Eaton, J. 2012. *An overview of U.S. Accreditation*. Washington DC: Council for Higher Education Accreditation (CHEA).

- Eaton, J. 2018. *New-Normal Accreditation: role, Practice, and Values*. In: S. Phillips, K. Kinser eds., *Accreditation on the Edge: Challenging Quality Assurance in Higher Education*. 1st ed. Baltimore: John Hopkins University Press, pp. VII-XI.
- Edwards, F. 2012. *The evidence for risk-based approach to Australian higher education regulation and quality assurance*. *Journal of Higher Education Policy and Management*. 34 (3). pp. 295-307.
- El-Khawas, E. 2001. *Accreditation in the USA: origins, developments and future prospects*. International Institute for Education Planning. Paris: UNESCO.
- The EFMD Quality Improvement System-EQUIS. 2018. *EQUIS Standards and Criteria* [Online]. Available from: https://www.efmd.org/images/stories/efmd/EQUIS/2018/EQUIS_Standards_and_Criteria.pdf [Accessed 15 May 2018].
- Evans, C. Kandiko Howson, C & A. Forsythe A. (2018). *Making sense of learning gain in higher education*. *Higher Education Pedagogies*. 3(1), pp. 1-45.
- Flynn, B and Saladin, B. 2001. *Further evidence on the validity of the theoretical models underlying the Baldrige criteria*. *Journal of Operation Management*. 19. pp. 617-652.
- Gaston, P. 2014. *Higher Education Accreditation. How it is changing and why it must*. Sterling: Stylus Publishing, LLC.
- George, B. 2018. *Choosing the Right Kind of Accreditation for a Business School: A Comparison between AACSB, ACBSP, and IACBE*. *Journal of Research in Higher Education*. Vol. II, (2) pp. 45-61.
- Global Foundation for Management Education, 2008. *The Global Management Education Landscape: Shaping the Future of Business Schools*. [Online]. Electronic document, Available from: <http://strategicplan.aomonline.org/attachments/GFME-Report.pdf> [Accessed 2 August 2013].
- Government of Mongolia. 2007. *Millennium Development Goals Based Comprehensive National Development Strategy of Mongolia* (Draft). Government of Mongolia: Ulaanbaatar City.
- Green, J.J., Stone, C.C., and Zegeye A. 2014. *The Major Field Test in Business: A Solution to the Problem of Assurance of Learning Assessment?* *Journal of Education for Business*. 89 (1) pp. 20-26.
- Green, M. F. 2018. *Accreditations and Quality assurance in a Globalized World*. In: S. Phillips, K. Kinser eds., *Accreditation on the Edge: Challenging Quality Assurance in Higher Education*. 1st ed. Baltimore: John Hopkins University Press, pp. 172-192.
- Hacking, I. 1983. *Positivism, in Representing and Intervening: Introductory Topics in the Philosophy of Natural Science*. Cambridge: Cambridge University Press, pp. 41–57.
- Hall, D and Thomas, H. 1999. *Higher education reform in a transitional economy: a case study from the School of Economics Studies in Mongolia*. *Higher Education* 38. pp. 441-460.

- Harvey, L. 2004. *The power of accreditation: views of academics*. Journal of Higher Education Policy and Management. 26 (2). pp. 207-223.
- Harvey, J. and McCrohan, K. 2017. *Improving AACSB Assurance of learning with Importance-Performance and learning Growth: A Case Study*. Marketing Education Review. 27 (3). pp. 172-186.
- Hazelkorn, E. 2011 *Rankings and the Reshaping of Higher Education: the Battle for World Class Excellence*. Houndmills: Palgrave Macmillan.
- Helsloot, I. and Jong, W. 2006. *Risk Management in Higher Education and Research in the Netherlands*. Journal of Contingencies and Crisis Management. 14 (3) pp. 142-159.
- Hendel, D and Lewis, D. 2005. *Quality assurance of higher education in transition countries: Accreditation-accountability and assessment*. Tertiary Education and Management. 11 (3). pp. 239-258.
- Hommel, U. and King R. 2013. *The emergence of risk-based regulation in higher education. Relevance for entrepreneurial risk taking by business schools*. Journal of Management Development. 32 (5). pp. 537-547.
- Hou, A. YC., Ince, M., Tsai, S. and Chiang, CL. 2015. *Quality assurance of quality assurance agencies from an Asian perspective: regulation, autonomy, and accountability*. Asia Pacific Education Review. 16. Pp. 95-106.
- Hou, YC., Morse, R., Ince, M.; Chen, HJ., Chiang, CL. and Chan, Y. 2013. *Is the Asian quality assurance system for higher education going glonacal? Assessing the impact of three types of programme accreditation on Taiwanese universities*. Studies in Higher Education. 40 (1). pp. 83-105.
- Huber, C. 2009. *Risks and Risk-Based Regulation in Higher Education Institutions*. Tertiary Education and Management. 15 (2) pp. 83-95.
- Huber, M. and H. Rothstein. 2013. *The risk organization: or how organizations reconcile themselves to failure*. Journal of Risk Research, 16 (6,) pp. 651-675.
- Huisman, J and Currie, J. 2004. *Accountability in higher education: bridge over troubled water?* Higher Education 48, pp. 529-552.
- Huisman, J. and Westerheijden, D. 2010. *Bologna and Quality Assurance: Progress Made or Pulling the Wrong Cart?* Quality in Higher Education, 16(1), pp. 63-66.
- The International Accreditation Council for Business Education-IACBE. 2017. *Accreditation Principles and Evaluation Criteria for the Accreditation of Business Programmes* [Online]. Available from: <http://iacbe.org/wp-content/uploads/2018/01/APPROVED-Self-Study-Manual-December-2017-1.pdf> [Accessed 15 May 2018].

- The International Accreditation Council for Business Education-IACBE. 2020. *Mission, Vision, Values, Governance* [Online]. Available from: <https://iacbe.org/about-page/mission-vision-values-governance/> [Accessed 13 July 2020].
- Istileulova, Y. and Peljhan, D. 2011. *Pros and Cons of International Accreditation: A Path of Business Schools Towards Quality Seal*. *Economics and Business Review Journal* 17 (3). pp. 291-312. [Online]. Available from: http://editorialexpress.com/cgi-bin/conference/download.cgi?db_name=EBR2011&paper_id=32 [Accessed 12 July 2013].
- Istileulova, Y. and Peljhan, D. 2013. *How Accreditation Stimulates Business School Change: Evidence from the Commonwealth of Independent States*. *Dynamic Relationships Management Journal* May 2013. pp. 15-30.
- Jaschik, S. 2013. *Tests With and Without Motivation*. Inside Higher Ed. Inside Higher Ed: Accreditation and Student Learning: A selection of Inside Higher Ed articles and essays. pp. 21-24.
- King, R. 2006. *Analysing the Higher Education Regulatory State. Centre for Analysis of risk and regulation*. [Online]. ESRC Research Centre for Analysis of Risk and Risk Regulation. The London School of Economics and Political Science. Discussion Paper 38. Available from: <http://eprints.lse.ac.uk/36119/1/Disspaper38.pdf> [Accessed 2 January 2018].
- King, R. 2013. *Governing Risk in Higher Education: Managing and Regulating the Risk University, Leadership and Governance in Higher Education*. 4 pp. 1-16.
- King, R. 2014. *Risky Business: Academic Capitalism, Globalization and the Risk University*. In: *Academic Capitalism in the Age of Globalization* Baltimore, John Hopkins University Press, pp. 228-245.
- Kis, V: 2005. *Quality Assurance in Tertiary Education: Current Practices in OECD countries and Literature Review on Potential Effects*. *Tertiary Review of Tertiary Education*.
- Kelley, C.; Tong, P; Choi, B. 2010. *A Review of Assessment of Student Learning Programmes at AACSB Schools: A Dean's Perspective*. *Journal of Education for Business*. 85 (5). pp. 299-306.
- Killen, R. and Hattingh, S.A. 2004. *A theoretical framework for measuring the quality of student learning in outcomes-based education*. *South African Journal of Higher Education*. 18(1). pp. 72-86.
- King, R. 2013. *Governing Risk in Higher Education: Managing and Regulating the Risk University, Leadership and Governance in Higher Education*. 4 pp. 1-16.
- Kinser, K and Phillips, S.D. 2018. *Accreditation. Critical Issues for the Path Forward*. In: S. Phillips, K. Kinser eds., *Accreditation on the Edge: Challenging Quality Assurance in Higher Education*. 1st ed. Baltimore: John Hopkins University Press, pp. 251-275.
- Knight, J. 2005. *The International Race for Accreditation*. *International Higher Education*, 0(40). pp. 2-3.

- Krzykowski, L. and Kinser K. 2014. *Transparency in Student Learning Assessment: Can Accreditation Standards Make a Difference?* Change: The Magazine of Higher Learning, 46 (3), pp. 67-73.
- Lakhal, S and Sevigny, S. 2014. *The AACSB Assurance of Learning process. An assessment of current practices within the perspective of the unified view of validity.* The Internal Journal of Management Education. 13. pp. 1-10.
- Lennon, M. C et al. 2018. *Global assessments of disciplinary learning outcomes: what we learned from AHELO.* In: Hazelkorn, E. et al. eds. Research Handbook on Quality, Performance and Accountability in Higher Education. Cheltenham UK: Edward Elgar Publishing. pp 264-274.
- LeBlanc, P. J. 2018. Regulatory Experimentation, Accreditation, and Innovation. EQUIP as a Blueprint for the Future of Higher Education. In: S. Phillips, K. Kinser eds., *Accreditation on the Edge: Challenging Quality Assurance in Higher Education.* 1st ed. Baltimore: John Hopkins University Press, pp. 102-116.
- Lederman, D. 2013. *More Accountable Accreditation.* Inside Higher Ed: Accreditation and Student Learning: A selection of Inside Higher Ed articles and essays. pp. 12-14.
- Lejeune, C. 2011. *Is Continuous improvement through accreditation sustainable?* Management Decision. 49(9), pp. 1535-1747.
- Lock, A. 1999. *Accreditation in business education.* Quality Assurance in Education. Volume 7 (2) pp. 68-76.
- Loder, C. (ed), Lewis, R. (contributor), Williams, G. (contributor), 1990. *Quality assurance and accountability in higher education,* London: Kogan Page in association with The Institute of Education, University of London.
- Loo, B. 2017. *Mongolia: Higher Education and Mobility.* International Higher Education. 89. pp. 19-21.
- Lopez. C. 2002. *Assessment of Student Learning: Challenges and Strategies.* The Journal of Academic Librarianship. 28 (6) pp. 356-367.
- Lowrie, A. 2008. *The relevance of aggression and the aggression of relevance; The rise of the accreditation marketing machine.* International Journal of Education Management. 22(4) pp. 352-364.
- Manning, S. 2018. Quality Assurance and Quality Improvement. Why and How Accreditation Works. In: S. Phillips, K. Kinser eds., *Accreditation on the Edge: Challenging Quality Assurance in Higher Education.* 1st ed. Baltimore: John Hopkins University Press, pp. 13-30.
- McFarlane, D.A. 2012, *Business Accreditation Competition: American Higher Education and Global Perspectives.* Business Leadership Review 9(2) April 2012. Available from: www.mbaworld.com/blr [Accessed 2 August 2013].

- Mongolian National Council for Education Accreditation. 2020. *Introduction* [Online]. Ulaanbaatar: MNCEA. Available from: <http://accmon.mn/introduction/> [Accessed 31 March 2020].
- Moskal, P. Ellis, T. and Keon, T. 2008. *Summary Assessment in Higher Education and the Management of Student-Learning Data*. Academy of Management Learning and Education. 7 (2) pp. 269-278.
- Naidoo, V. 2008. *Transitional higher education. A stock take of current activity*. Journal of Studies in International Education (Online) pp.1-18.
- Nason, R. 2017. *Rethinking Risk Management, Critically Examining Old Ideas and New Concepts*. Finance and Financial Management Collection. New York, Business Expert Press. First Ed.
- Natsag, U. 2010. *Mongolia: Strengthening Higher and Vocational Education Project*. Asian Development Bank. Technical Assistance Consultant's Report.
- Neave, G. 2014. *Quality Enhancement: A New Step in a Risky Business? A Few Adumbrations on Its Prospect for Higher Education in Europe*. In: Quality Assurance in Higher Education. New York, Palgrave Macmillan. pp. 32-49.
- Neal, A.D and Alacbay, A. 2018. *Fixing a Broken Accreditation System. How to Bring Quality Assurance into the Twenty-First Century*. In: S. Phillips, K. Kinser eds., *Accreditation on the Edge: Challenging Quality Assurance in Higher Education*. 1st ed. Baltimore: John Hopkins University Press, pp. 67-81.
- The National Institute of Standards and Technology. 2020. *Baldrige by Sector: Education*. [Online]. Gaithersburg: NIST. Available from: <https://www.nist.gov/baldrige/self-assessing/baldrige-sector/education> [Accessed 13 October 2020].
- OECD. 2012. *Assessment of Higher Education Learning Outcomes: Feasibility Study*. Paris: OECD.
- Office for Students (OfS). 2019. *Higher Education Learning Gain Analysis (HELGA). Can administrative data be used to measure learning gain* [Online]. London: OFS. Available from: <https://www.officeforstudents.org.uk/media/614623ac-b603-4922-ae2d-422afa354590/helga-report.pdf> [Accessed 10 June 2020].
- Office for Students (OFS). 2019. *National Mixed Methodology Learning Gain project* [Online]. London: OFS. Available from: <https://www.officeforstudents.org.uk/advice-and-guidance/teaching/learning-gain/national-mixed-methodology-learning-gain-project/> [Accessed 01 June 2020].
- Orkhon Gantogtokh, O. 2018. *Higher Education Systems and Institutions, Mongolia*. Encyclopedia of International Higher Education Systems and Institutions.
- Padro, Fernando F. 2014. *A conceptual framework on establishing a risk management framework within existing university assessment and evaluation practices*. Studies in Learning, Evaluation, Innovation and Development. 10 (1).

- Peregrine Academic Services. 2018. *Assessment Service Validity and Reliability* (Report No. 2018-1). Gillette, WY: Peregrine Academic Services.
- Phillips, D. 2009. *Aspects of Educational Transfer*. In: Cowen, R. and A.M. Kazamias (eds). *International Handbook of Comparative Education*. Berlin: Springer Science+Business Media B.V. pp. 1061-1077.
- Phillips, D and Ochs, K. 2003.a. *Processes of Policy Borrowing in Education: Some analytical and explanatory devices*. *Comparative Education*. 39 (4), pp. 451-461.
- Phillips, S. D. and Kinser, K. 2018. Accreditation, Introduction to a Contested Space. In: S. Phillips, K. Kinser eds., *Accreditation on the Edge: Challenging Quality Assurance in Higher Education*. 1st ed. Baltimore: John Hopkins University Press, pp. 1-10.
- Power, M. 1997. *The Audit Society: Rituals of Verification*. Oxford, Oxford University Press.
- Power, M. 2004. *The risk management of everything*. *The Journal of Risk Finance*, 5 (3) pp. 58-65.
- Postiglione, G. A. 2011. *Global recession and higher education in eastern Asia: China, Mongolia and Vietnam*. *Higher Education*. 62. pp. 789-814.
- Postiglione, G. A. 2010. *Mongolia's Challenge: Becoming Asian in Higher Education*. *International Higher Education*.
- Pringle, C. and Michel, M. 2007. *Assessment Practices in AACSB-Accredited Business Schools*. *Journal of Education for Business*. 82 (4). pp. 202-211.
- QAA. 2020. *Quality Code* [Online]. Available from: <https://www.qaa.ac.uk/quality-code> [Accessed 13 October 2020].
- Raban, C. 2005. *Managing Academic Risk*. Final report on HEFCE GMP250: Quality Risk Management in Higher Education.
- Raban, C. and Turner, E. 2006. *Quality risk management. Modernising the architecture of quality assurance*. *Perspectives: Policy and Practice in Higher Education*. 10 (02) pp. 39-44.
- Raban, C. 2014. *Risk, Trust, and Accountability*. In: Rosa, M. J. and Amaral, A. *Quality Assurance and Higher Education*. New York. Palgrave Macmillan. pp. 88-109.
- RAND, 2015. *Learning gain in higher education*. Cambridge, UK: RAND Corporation.
- Randles, R. and Cotgrave, A. 2017. *Measuring student learning gain: a review of transatlantic measurements of assessments in higher education*. *Innovations in Practice*. 1191). pp. 50-59.
- Redden, E. 2013. *U.S. accreditors expand their activities overseas* [Online]. *Inside Higher Ed*. Available from: www.insidehighered.com [Accessed 2 August 2013].

- Reddy, Y.M, 2008. *Global Accreditation Systems in Management Education: A Critical Analysis*. South Asian Journal of Management. 15(2), pp.61-81.
- Redmond, R. et al. 2008. *Quality in higher education: The contribution of Edward Deming's principles*. International Journal of Educational Management. 22 (5). pp. 432-441.
- Romzek, B.S 2000. *Dynamics of public accountability in an era of reform*. International Review of Administrative Sciences 66 (1) pp. 21-44.
- Ruben, B. and Gigliotti, R. 2019. *The excellence in higher education model: A Baldrige-based tool for organizational assessment improvement for colleges and universities*. Global Business and Organizational Excellence. 38 (4). 26-37.
- Santos, H.P.O; Black, A. M. and Sandelowski, M. 2015. *Timing of Translation in Cross-Language Qualitative Research*. Qualitative Health Research. 25(1). pp. 134-144.
- Saunders, M., Lewis, P. and Thornhill, A. 2007. *Research Methods for Business Students*. Harlow: Pearson Education Limited. Fourth Ed.
- Schwarz, S. and Westerheijden D. F. eds., 2007. *Accreditation and Evaluation in the European Higher Education Area*. Dordrecht: Springer.
- Shah, M. and L. Jarzabkowski. 2013. *The Australian higher education quality assurance framework*. Perspectives: Policy and Practice in Higher Education. 17:3 pp. 96-106.
- Sibolski, E. 2012. *What's an Accrediting Agency Supposed to Do? Institutional Quality and Improvement vs Regulatory Compliance*. Planning for Higher Education. Special Themed Issue: The Future of Accreditation. 40(3).
- Silova, I. and G. Steiner-Khamsi. 2008. *Introduction: Unwrapping the Post-Socialist Education Reform Package*. In: Silova, I. and G. Steiner-Khamsi. How NGOs React: Globalisation and Education reform in the Causasus, Central Asia, and Mongolia. Connecticut: Kumarian Press Inc. pp.1-11.
- Slover, E. and Mandernach, J. 2018: *Beyond Online Versus Face-to-Face Comparisons: The Interaction of Student Age and Mode of Instruction on Academic Achievement*. Journal of Educators Online. 15(1). pp. 105-113.
- Steiner-Khamsi, G. 2006. *The Economics of Policy Borrowing and Lending: a study of late adopters*. Oxford Review of Education. 32 (5). Pp. 665-678.
- Steiner-Khamsi, G. and I. Stolpe. 2006. *Educational Import: Local Encounters with Global Forces in Mongolia*. New York: Palgrave Macmillan.
- Stensaker, B. 2003. *Trance, Transparency and Transformation: the impact of external quality monitoring on higher education*. Quality in Higher Education. 9 (2). pp. 151-159.
- Stensaker, B., 2011, *Accreditation of higher education in Europe— moving towards the US model?* Journal of Education Policy, 26(6), pp.757-769.

- Studley, J. S. 2018. Accreditors as Policy Leaders. Promoting Transparency, Judgement, and Culture Change. In: S. Phillips, K. Kinser eds., *Accreditation on the Edge: Challenging Quality Assurance in Higher Education*. 1st ed. Baltimore: John Hopkins University Press, pp. 157-171.
- Suprunova, L. 2007. *Education in Mongolia: The Difficulties and Achievements of the Period of Transition*. *Russian Education and Society*. 49 (1). pp. 78-97
- Suskie, L. 2018. *Assessing Student Learning: A Common Sense Guide*. Third Ed. San Francisco. John Wiley and Sons.
- Sutrisno, A.; Nguyen. N.T. and Tangen, D. 2014. *Incorporating translation in qualitative studies: two case studies in education*. *International Journal of Qualitative Studies in Education*. 27(10). pp. 1337-1353.
- Swanson, D. J. and Creed A. S. 2014. *Sharpening the Focus of Force Field Analysis*. *Journal of Change Management*. 14(1). pp. 28-47.
- Temple, B.; Edwards, R, and Alexander, C. 2006. *Grasping the Context: Cross Language Qualitative Research as Secondary Qualitative Data Analysis*. *Qualitative Social Research*. 7 (4). Art. 10.
- Tertiary Education Quality and Standards Agency. 2015. *A risk and standards based approach to quality assurance in Australia's diverse higher education sector* [Online]. Available from: <https://www.teqsa.gov.au/sites/g/files/net2046/f/risk-and-standards-based-approach-to-quality-assurance-in-australias-diverse-he-sector.pdf?v=1508891448> [Accessed 15 August, 2016].
- Tertiary Education Quality and Standards Agency. 2016. *TEQSA's Risk Assessment Framework* [Online]. Available from: <https://www.teqsa.gov.au/sites/g/files/net2046/f/risk-assessment-framework-v2-1.pdf?v=1507171079> [Accessed 15 October 2017].
- Thomas, J. 1985. *Force Field Analysis: A New Way to Evaluate Your Strategy*. *Long Range Planning*, 18(6) pp. 54-59.
- Tserendagva, B. and T. Jamts. 2017. *Quality Assurance Mechanisms in Mongolian Higher Education*. In: Shah, M. and Q. T.N. Do. *The Rise of Quality Assurance in Asian Higher Education*. pp. 143-160.
- Tomlinson, M. 2015. *The Evolution of External Quality Assurance of Higher Education*. *Advanced Research and Innovation in Quality Assurance (ARIQA)*. Spec Edition: 15th anniversary of the Office for National Education Standards and Quality Assessment (ONESQA) pp. Unknown.
- Trow, M. 1996. *Trust, markets and accountability in higher education: A comparative perspective*, *Higher Education Policy* 9(4), pp. 309-324.
- UK Higher Education Academy (UKES). 2017. *UK Engagement Survey* [Online]. Available from: <https://www.heacademy.ac.uk/institutions/surveys/uk-engagement-survey>. [Accessed 20 March, 2018].

- UK Research Integrity Office (UKRIO). 2009. *Code of Practice for Research. Promoting good practice and preventing misconduct* [Online]. Available from: <http://ukrio.org/publications/code-of-practice-for-research/> [Accessed 13 April 2018].
- University of Bath. 2018. *Code of Good Practice in Research Integrity*. [Online] Available from: <https://www.bath.ac.uk/corporate-information/code-of-good-practice-in-research-integrity/> [Accessed 23 January 2019].
- Urgel, J., 2007. *EQUIS Accreditation: value and benefits for international business schools*, 2007. *Journal of Management Development*. 26(1) pp 73-83.
- US Department of Education (USDoE). 2019. *Proposed Rulemaking* [Online]. Washington D.C.: DoE. Available from: <https://www.govinfo.gov/content/pkg/FR-2019-06-12/pdf/2019-12371.pdf> [Accessed 13 March 2020].
- US Department of Education (DoE) 2020. *Accreditation in the United States* [Online]. Washington DC: DoE. Available from: https://www2.ed.gov/admins/finaid/accred/accreditation_pg6.html [Accessed 19 January 2020].
- Vermunt, J. D. and Vignoles, A. 2018. *Building the foundations for measuring learning gain in higher education: a conceptual framework and measurement instrument*. *Higher Education Pedagogies*. 3910. Pp. 266-301.
- Vibert, J. 2018. *The Evolving Context of Quality Assurance. A Perspective from Specialized and Professional Accreditation*. In: S. Phillips, K. Kinser eds., *Accreditation on the Edge: Challenging Quality Assurance in Higher Education*. 1st ed. Baltimore: John Hopkins University Press, pp. 44-63.
- Walters, B. et al. 1999. *Institutional change in a transitional economy: the reform of economics higher education in Mongolia*. *International Journal of Educational Development* 19 pp. 423-439.
- Walliman, N. 2006. *Social Research Methods*. Sage Publications. ProQuest Ebook central. Available from: <http://ebookcentral.proquest.com/lib/bath/detail.action?docID=334534>. [Accessed 21 July 2020].
- Webb, Taylor. 2011. *The evolution of accountability*. *Journal of Education Policy* 26 (6), pp. 735-756.
- Weert, de E. and Boezeroy, P. 2007. *Higher Education in the Netherlands-Country Report*. Center for Higher Education on Policy Studies (CHEPS). Enschede: International Higher Education Monitor.
- Westerheijden, D.F. et al.(eds), 2007. *Quality Assurance in Higher Education: Trends in Regulation, Translation and Transformation*, pp.1-11. Dordrecht: Springer.
- Weidman, J. and Yoder, B. 2010. *Policy and Practice in Education Reform in Mongolia and Uzbekistan during the First Two Decades of the Post-Soviet Era*. *Excellence in Higher Education* 1, pp. 57-68.

Wildawsky, B, 2010. *The Great Brain Race: How Global Universities Are Reshaping the World*. Princeton: Princeton University Press.

World Bank. 2010. *Tertiary Education in Mongolia: Meeting the Challenges of the Global Economy* [Online]. Washington, DC. World Bank. Available from: <https://openknowledge.worldbank.org/handle/10986/19470> [Accessed 1 February 2018]

World Bank. 2018. *The World Bank in Mongolia* [Online]. Washington DC. World Bank. Available from: <https://www.worldbank.org/en/country/mongolia/overview>. [Accessed 10 January 2018].

Yin, R.K. 1989. *Case Study Research: Design and Methods*. Newbury Park: Sage.

Yin, R.K. 2003. *Case Study Research: Design and Methods*. London: Sage. Third Ed.

Yano, S. 2012. *Overeducated? The Impact of Higher Education Expansion in Post-Transition Mongolia*. Dissertation (PhD). Columbia University, New York.

Zammuto, R.F. 2008. *Accreditation and the Globalization of Business*. *Academy of Management Learning and Education*, 7(2) pp. 256-268.

8. Appendices

Appendix 1 Glossary of Abbreviations

AACSB International: The Association to Advance Collegiate Business Education

AARTS: Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission

ACBSP: Accreditation Council for Business Schools and Programmes

ACCSC: Accrediting Commission of Career Schools and Colleges

ACCET: Accrediting Council for Continuing Education and Training

ACE: American Council on Education

ACICS: Accrediting Council for Independent Colleges and Schools

ACS WASC: Accrediting Commission for Schools, Western Association of Schools and Colleges

AIJS: Association of Institutions of Jewish Studies

ADF: Asian Development Fund

ADB: Asian Development Bank

AHELO: Assessment of Learning Outcomes in Higher Education

ALIS: Advanced Level Information System

AMBA: Association of MBAs

AOL: Assurance of Learning

APQN: Asia Pacific Quality Network

APQR: Asia Pacific Quality Register

APTT: Academic Progress Tracking Tool

ATHEA: The Association for Transnational Higher Education Accreditation

BGA: Business Graduates Association

BOC: Board of Commissioners

CAE: Council for Aid to Education

CALOHEE: The Measuring and Comparing Achievements of Learning Outcomes in Higher Education in Europe

CBL: Competency Based Learning

CHEA: Council for Higher Education Accreditation

CIS: Commonwealth of Independent States

CIQG: CHEA International Quality Group

CLA: Collegiate Learning Assessment

COE: Council on Occupational Education

COSO: Committee of Sponsoring Organizations of the Treadway Commission

CPC: Common Professional Component

DBA: Doctor of Business Administration Programme

DEAC: Distance Education Accrediting Commission

EC: European Commission

EFMD: European Foundation for Management Development

ENQA: The European Association for Quality Assurance in Higher Education

EPAS: EFMD Programme Accreditation System

EQAR: European Quality Assurance Register for Higher Education

EQUIS: EFMD Quality Improvement System

EQUIP: Educational Quality through Innovative Partnerships

EQUIP: Enhancing Quality through Innovative Policy and Practice

ESG: Standards and Guidelines for Quality Assurance in the European Higher Education Area

ETS: Educational Testing Service

EU/TACIS: European Union Technical Assistance

FAFSA: Free Application for Federal Student Aid

GPA: Grade Point Average

HE: Higher Education

HEI: Higher Education Institutions

HEFCE: The Higher Education Funding Council for England

HELGA: Higher Education Learning Gain Analysis

HLC: Higher Learning Commission

IACBE: The International Accreditation Council for Business Education

IIE: Institutes for International Education

KHDA: The Knowledge and Human Development Authority

MAPP: Measure of Academic Proficiency for Progress

MDG: Millennium Development Goals

MESC: Ministry of Education, Science and Culture

MNCEA: Mongolian National Council for Education Accreditation

MPRP: The Mongolian People's Revolutionary Party

MSCHE: Middle States Commission on Higher Education

NACIQI: National Advisory Committee on Institutional Quality and Integrity

NCA: North Central Association

NECHE: New England Commission on Higher Education

NQF: National Qualification Framework

NSS: National Student Survey

NVAO: The Accreditation Organisation of the Netherlands and Flanders

NWCCU: Northwest Commission on Colleges and Universities

OECD: The Organisation for Economic Co-operation and Development

OfS: Office for Students

PAS: Peregrine Academic Services

PDCA: Plan-Do-Check-Act

PRC: People's Republic of China

QA: Quality Assurance

QAA: The Quality Assurance Agency for Higher Education

QC: Quality Control

QSR: The Quality and Standards Review

RAF: Risk Assessment Framework

SACSCOC: Southern Association of Colleges and Schools Commission on Colleges

SER: Self Evaluation Report

TEQSA: The Tertiary Education Quality and Standards Agency

TRACS: Transnational Association of Christian Colleges and Schools, Accreditation Commission

TVET: Technical and Vocational Education and Training

UAE: United Arab Emirates

UKES: UK Engagement Survey

USDoE: The US Department of Education

VUCA: Volatility, uncertainty, complexity and ambiguity

Appendix 2 Letter of introduction

Dear Sir,

My name is Katalin Kovacs (Hungarian living in the Netherlands) and I am a doctoral student at the University of Bath (student number: 129455680) in the UK and currently undertaking research dissertation on the topic of “How does an international accreditation process impact student learning in the Mongolian higher education sector?”. A central part of the research is to undertake interviews at selected Mongolian Universities, and I would very much like to include your institution.

The study seeks to shed light on a number of questions on student learning gain achieved by introduction of an accreditation system to a specific country (including but not limited to):

- What were the forces and motivators driving the implementation of an international accreditation system in Mongolia?
- Did it have any effect on the institution’s processes related to assessment of student learning and if yes what?
- What are the main challenges with this specific accreditation framework in relations to other accreditors?
- What factors have an effect on student learning and performance (outside of the institution and inside it)?
- How did the institution evaluate the results of the Peregrine Academic Services Inbound and Outbound test?
- What additional measures does the institution have in place to measure student performance? Are those implemented across all of the business programmes? Is the data regularly reviewed?
- What are the changes that could be measured after achieving accreditation? Which ones are positive and which ones are potentially negative.
- To what extent do faculty and administrators believe accreditation improves student learning?

I would be grateful if you could grant me access to interview on the following levels at your institution:

1. Higher level board member who is responsible for the strategic direction and is part of the decision-making process on management level

2. Higher level faculty member who oversees the full programme implementation and faculty assignments and responsible for the QA reviews across the board
3. Faculty member who is involved in teaching and QA on course level
4. Administrative staff member who is involved in the implementation of the accreditation process

I will share the interview questions ahead of time. I will have a translator arranged for each interview and I will record the interviews. I will spend the shortest amount of time on your campus to ensure that I do not disturb the operations of the institution.

While anticipating your kind cooperation in this activity, I would like to assure you that I will conduct the interviews in the strictest compliance with the general research ethics and specifically those of the University of Bath, accessible at:

<https://www.bath.ac.uk/corporate-information/code-of-good-practice-in-research-integrity/>

In addition, the interviewees have the right to not answer questions, they can request me to stop the interview at any time, and even after the interview has taken place, they can request exclusion. I will not reveal persons, nor institutions.

If you have any further questions or if you would need any additional information on my research project, please do let me know and I will be happy to answer any questions you may have.

My contact details are as follows:

Email: [REDACTED]

Phone number: [REDACTED]

Thank you in advance for your help, guidance and support.

Kind regards,

Katalin Kovacs

October 21, 2018, Maastricht, The Netherlands

Appendix 3 Interview Questions

How does the ACBSP accreditation process impact student learning performance in the Mongolian higher education?

The aim of the interview is to determine how going through ACBSP accreditation impacts student learning in the Mongolian higher education. All collected data will be used exclusively for scientific purposes. Participation in the interview is anonymous.

I Questions regarding accreditation / the accreditation process/ the results of accreditation

1. What does international accreditation mean to you? What are the advantages of international accreditation to your institution? What benefits do you expect to get from it?

2. What is your role in the accreditation process at your institution?

3. What are the changes your institution had to implement in order to meet the accreditation standards? What changes were specifically related to student learning in your opinion?

4. What are the comments/notes/improvement points did your institution receive after the site visit and what actions were taken as a result of these with regards to teaching, teaching strategies, curriculum, assessment, record keeping etc?

II. Questions regarding the tests by Peregrine Academic Services (PAS)

5. Your institution has implemented the inbound and outbound test by PAS. Do you believe the test is a good measure of learning? How could this tests be improved in terms of measuring learning?

6. What are the results and findings from analysing the data received from the tests? Did you implement any changes as a result of the tests to improve student leaning?

7. Please explain how was the test implemented. What were the arrangements and what was your job in implementing these tests?

8. How did the students view the test? How did you motivate them and how did you give the results to the them?

III Questions regarding student learning gain

9. Are there any other existing institutional measures, frameworks, or strategies that your institune uses in order to improve student learning (before gaining accreditation and/or next to the international accreditation process)?

10. Is there anything else you would like to share with regards to accreditation and student learning?

Thank you very much for cooperation and time!