

Quality assurance through accreditation: When resistance meets over-compliance

Dante J. Salto 

¹Department of Educational Policy and Leadership, University at Albany, State University of New York, Albany, New York

Present address

Dante J. Salto, Instituto de Humanidades (IDH), Consejo Nacional de Investigaciones Científicas y Técnicas (CONICET), Pabellón Agustín Tosco, Ciudad Universitaria, Universidad Nacional de Córdoba, 5000 Córdoba, Argentina

Abstract

A large number of countries worldwide have established quality assurance mechanisms in Higher Education, ranging from the long-engrained system (United States) to more recent developments in Europe, Latin America and other regions. This study explores the way Higher Education institutions, as examples of autonomous organisations, respond to a new set of regulatory policies. The analysis of the regulatees shows that university-wide administration has gone beyond the letter of required regulations, toward over-compliance. Far from a stereotype of a main external regulator (accreditation agency) trying to impose the stated regulations and the regulatee simply resisting, the latter adds a kind of self-regulation. Below the university-wide administration, at the programme level—the primary regulatee target of external regulators—matters take more typical, anticipated form. Mixed compliance characterises programme-level responses, including resistance strategies. Findings illuminate not only the Argentine case but also other countries that have established quality assurance agencies.

1 | INTRODUCTION

A large number of countries worldwide have established quality assurance mechanisms in Higher Education, ranging from the long-engrained system in the United States (US) (El-Khawas, 2001) to more recent developments in Europe, Latin America and other regions of the world (CINDA, 2012; Dill, 2001; Dill & Beerkens, 2012; Ewell, 2010; Lemaître, 2011). The worldwide mushrooming of quality assurance agencies takes place in a context of the changing role of government in its relationship with Higher Education institutions, in what has been named as the evaluative state (Dill, 1998; Neave, 1998). Analyses have focused on the study of the structures and regulatory frameworks in Higher Education quality assurance (Beerkens, 2015; El-Khawas, 2006; Haug, 2003; Lemaître, 2011), and increasingly so, researchers have been analysing the impact of such policies in universities and programmes (Askling, 1997; Bejan et al., 2015; Brennan & Shah, 2000; Brunetto & Farr-Wharton, 2005; Corengia, 2015; Csizmadia, Enders, & Westerheijden, 2008). Analyses of quality assurance agencies and organisational responses tend to address institutional and programmatic issues with a strong focus on undergraduate education. In some cases, such as in Argentina and some European countries, quality assurance and postgraduate education have developed on two parallel tracks, without much

convergence (Byrne, Jørgensen, & Loukkola, 2013). This research focuses on a multi-level study of organisational responses to accreditation of postgraduate programmes in Argentina.

Argentina, among other developed and developing countries, established an accreditation agency in the 1990s. The establishment of the National Commission for University Evaluation and Accreditation (CONEAU) meant a shift from an unregulated to a regulated situation at the postgraduate level (Salto, 2014). Created by law in 1995, CONEAU is a semi-autonomous agency of the National Ministry of Education. It is the only Higher Education quality assurance agency, in a feature that brings the regulatory framework closer to the French system (Continental model) than to the US model (decentred and privately run) (Clark, 1983; El-Khawas, 2001; Musselin, 1997).

The unregulated growth of postgraduate education before accreditation gave way to a grafted structure, introducing the US model (Clark, 1983) in the Higher Education system within a prevailing Latin American model (Bernasconi, 2008). Postgraduate education growth did not follow any particular policy from the national government. Moreover, due to the lack of central planning at the national level, postgraduate education growth has been rapid and without a sense of orientation, besides it has taken place in a context of discontinuity and fragmentation (Krotsch, 1996). Little is known about the organisational responses to regulation in a previously unregulated provision of postgraduate education.

Argentine postgraduate education resembles the US model in other ways as well. To a large extent, planning is driven by the demand and programmes do not follow a single pattern of development (Salto, 2014). This model emphasises the diversification regarding quality and type of programmes (Clark, 1983). In this respect, Argentine doctoral programmes had traditionally followed the German structure without a fixed curricular structure based on mentorship while many master's programmes are based on the US type (García de Fanelli, Kent Serna, Álvarez Mendiola, Ramírez García, & Trombetta, 2001). Over time, postgraduate education has become increasingly diversified. Recent doctoral programmes have also been created following a fixed curricular structure (US style).

In another feature of the US model (Clark, 1983), education at the Argentine postgraduate level is not fully subsidised by the national government, so the students at that level have to pay tuition fees, following a pattern completely different from that prevailing at the Argentine undergraduate, tuition-free level (García de Fanelli et al., 2001).

The mix of features from the US, European Continental and Latin American models bring together a relevant case for regulatory analysis. The Argentine Higher Education system gives the possibility to analyse responses to accreditation at a level (postgraduate education) that largely relies on market coordination (based on tuition fees and student demand), and that is located on the periphery of the traditional governance structures. Some researchers (Camou, 2002; García de Fanelli, 2012) wonder to what extent the new regulatory framework has led to substantial changes at the organisational level, in overall Higher Education. Some hypothesise that despite the regulatory changes, institutions continue on a path mostly signalled by organisational inertia. Those analyses are primarily grounded in changes at the governance level of public universities, and at their main undergraduate level. Hence, there is a need to explore the changes taking place at specific levels, such as postgraduate education, which are detached from traditional governance arrangements and may allow for different responses on the regulatee side. While this qualitative, case-study research does not intend to build generalisations, some findings may apply to other contexts since the focus is on how universities (as examples of highly autonomous organisations) respond to regulatory policies (in this case through accreditation).

This article highlights Higher Education institutions as multi-layered organisations, so findings differ by sublevels. The analysis of the regulatees shows that university-wide administration has gone beyond the letter of required regulations. Far from a stereotype of main external regulator trying to impose the stated regulations, on the one hand, and the regulatee simply resisting, on the other hand, the regulatees add a type of self-regulation. Below the university-wide administration, at the programme level—the main regulatee target of external regulators—matters take more typical, anticipated form. Even so, when the programmes only formally comply with regulations, these are regulations from both the external authority and the university self-regulatory body, the university-wide administration regulator.

The study relies on in-depth interviews ($N = 50$) administered to regulatory agency managers, administrators at the central university level and the academic units, and directors of postgraduate programmes. In many cases, the latter

have also participated as peer reviewers, so the narrative includes their opinions from those roles as well. Claims by interviewees are contrasted to document analysis on accreditation reports, programme plans and other official documentation.

The article begins with a presentation of internal factors that may play a critical role in organisational compliance to regulation, university-wide responses to accreditation. It then explores the main findings on programme responses. Finally, despite national variations, the discussion and conclusions section focuses on how the findings from this study may illuminate organisational responses not only in Argentina but in many countries that have developed quality assurance mechanisms. This section highlights policy implications for decision makers at both governmental and institutional levels.

2 | INTERNAL FACTORS AFFECTING COMPLIANCE

A branch of the regulatory literature focuses on the main problems that targeted organisations (regulatees) face to comply with regulatory policies substantially. Studies (Etienne, 2011; Nielsen & Parker, 2012) recognise external and internal factors that widen or reduce the compliance gap (see Figure 1). Based on external and internal conditions, organisations and programmes can respond to regulatory policies in different and sometimes overlapping ways: compliance can be substantive, formal, ritualistic and, in some cases, researchers have surprisingly found over-compliance.¹ Furthermore, when trying to understand how compliance works, there is a need to be aware that factors and responses are heterogeneous. While it may be possible to identify formal compliance, this does not imply that other regulatee behaviours can be of substantive compliance.

Internal factors along with external ones play a crucial role.² Extracting theoretical developments, as well as findings, from the regulatory literature, it is possible to differentiate between three different types of internal factors: economic, social and normative motivations (Nielsen & Parker, 2012). The framework easily adapts to the study of Higher Education institutions. Economic motives involve the possibilities of maximising returns to shareholders or expanding the business. If the regulatory findings are applied to this specific case study, postgraduate programmes rely on tuition fees charged to students, so if the regulatory environment threatens the continuity or stability of the programme, organisations may be willing to comply with compulsory (accreditation) and even voluntary (categorisation) processes.³

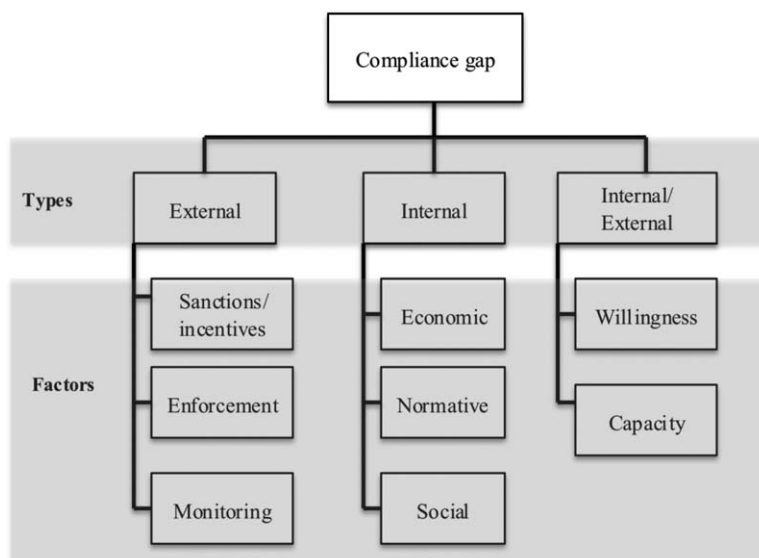


FIGURE 1 Factors affecting compliance

Source. Author's elaboration based on Nielsen and Parker (2012) and Weaver (2014)

A second internal factor relates to social motives, and it includes, but is not limited to, maintaining a good public image of the organisation (reputational measures) and to being socially responsible organisations (Nielsen & Parker, 2012). Theoretically targeted toward business behaviour, these findings can be translated to Higher Education. Academia builds core parts of its structures through reputational channels to the extent that most discussions about quality usually incorporate reputation as a key component of it (Astin, 1985; Dill & Soo, 2005).

Finally, and in addition to economic and social internal motives, studies (Nielsen & Parker, 2012) have found that the perception of the regulatory policies by the regulatee, also known as normative motives, can make a difference in the level of compliance. Normative motives refer to the extent to which an organisation is committed to obeying the regulation for its sake or because of a sense of moral agreement with regulatory policies. Normative motives may actually generate conflicts in Higher Education policies since the autonomous status of Higher Education institutions may collide with the principles of regulation and accountability.

Although most of the findings of the regulatory literature apply to Higher Education, students of regulation emphasise that any analysis has to take into account the specificity of the targeted organisations (Ayres & Braithwaite, 1992; La Porte & Thomas, 1995). In other words, it is not possible to disregard core features of the regulatee, mostly those that can affect the type of responses and the level of compliance to regulatory policies. Higher Education policy studies may coincide on at least three key organisational features: Higher Education institutions tend to be (highly) autonomous, loosely coupled and disciplinary (fields of studies) variegated. This analysis focuses on the first two features.

Autonomy is one of the most salient features of Higher Education institutions. It is also one of the most used concepts when referring to universities. Autonomy in Higher Education is commonly understood as the institutional autonomy of universities from external pressures (Berdahl, 1990; Neave & van Vught, 1994).

Besides the references to the autonomous nature of Higher Education institutions, researchers also refer to those organisations as loosely coupled systems (Clark, 1983; Weick, 1976). Organisational studies highlight that educational institutions are loosely coupled systems, Higher Education institutions more so, to the point of being organised anarchies (March & Olsen, 1976). These conceptualisations—adopted extensively in the Higher Education policy literature—convey an idea of how complex organisations work: goals are multiple, conflicting and indeterminate; units within organisations often have enough autonomy to frame and interpret policies in different ways. Researchers emphasise the ways educational institutions behave in a non-hierarchical way, relying on soft structures, where units and decisions are tied together weakly, or infrequently or slowly or with a minimal interdependence (Weick, 1976). These features may imply different attitudes toward regulatory policies by level: system, institutional, departmental, programme and professorial level. This core feature of Higher Education institutions marks a departure from core regulatory literature, which usually centres on hierarchically structured firms, adding another layer of complexity to the types of responses expected and to the levels of compliance. For instance, a review of resistance strategies by those different levels notes that each level may seek to renegotiate policy terms, sometimes based on legal or ideological challenges. In other cases, some levels may resist compliance by delaying action, offer incomplete information or use creative statistics. Finally, some levels may replace stringent requirements with self-interested measures (El-Khawas, 1998).

3 | UNIVERSITY-WIDE RESPONSES

Regulatory policies directed to one target (e.g., programme level) may elicit responses on other levels within the organisation (e.g., university-wide) (Brennan & Shah, 2000; El-Khawas, 1998). Central administration of universities tends to strengthen its administrative support to academic units, in most cases leading to a centralisation of certain procedures previously handled by each academic unit (CINDA, 2012). Based on the principle of university autonomy, both central levels and programmes usually generate responses to avoid compliance (El-Khawas, 1998). The cases (programmes) explored show some level of resistance, mostly through formal compliance. However, contrary to the literature findings, this study finds central administrations seeking to facilitate compliance more than resisting regulation. Their role could be conceived as a regulator within the regulatee, as this section explores in depth.

Due to the grassroots development of postgraduate programmes in Argentina and the predominant focus on undergraduate education,⁴ the traditional Higher Education institutions' focus of this study instituted university-wide policies and bureaucratic structures for postgraduate education only after the enactment of the 1995 Higher Education Law. Until then, traditional universities approved postgraduate programmes based on the recommendation of academic units but without the close oversight of the process. While the institutions already had different organisational structures to supervise postgraduate education, their role and scope were limited, and in many cases, those structures only existed on paper (formally).

The lack of a centralised working structure to control the establishment and running of postgraduate programmes is a distinctive feature of traditional public and private universities in Argentina. In those institutions, undergraduate education has been their key source of prestige and visibility while postgraduate education has been a peripheral activity (García de Fanelli, 2012). In this sense, traditional public and private universities have had a similar approach to postgraduate education development and control. Although private and public traditional universities share certain postgraduate education governance features, a nuanced analysis includes a few but relevant differences between public and private universities and how they have responded to accreditation.

A safe assumption about private university governance is that managerial practices tend to give higher priority to hierarchy than that given in public universities (Bernasconi, 2011; Levy, 1986, 2011). This generalisation is less valid for traditional private universities, but it still holds in this case.⁵ University A (private university case from now on) had a central structure with some level of control on postgraduate programme development even before 1995. A faculty council including professors and deans of the different academic units decides on developmental priorities. In 2006, the complexity of postgraduate education and the tasks related to accreditation increased, and postgraduate education gained a self-standing office.

A few years after the establishment of CONEAU, University A developed a framework based on the standards for postgraduate programme accreditation.⁶ Central university administrators at this university embarked upon a process of professionalising the postgraduate office, following the new internal mandates. The institution incorporated a consultant as part of its postgraduate office and participates in every call for accreditation and any attempt to establish a new postgraduate programme as well.

The traditional public university (University B from now on) shares many features with the private one. Yet administrative positions are not permanent or professional; the rector appoints academics to those posts.⁷ The turnaround usually generates different levels of commitment and knowledge about the administrative duties. Another feature relates to the adoption of internal policies following the creation of CONEAU. University B created a postgraduate office at the central administration level.

University B stipulates that only accredited programmes could begin enrolling students, going further ahead in the self-regulation of postgraduate programmes. It mandates that every new and existing postgraduate programme seeking accreditation has to submit its proposal to the central administration for review—and to do so even before its academic unit approves the programme. The central administration knew that once the academic unit formally created the programme, it was just a matter of formality to be approved by the university council.⁸ The new procedure activated the already existent, but hardly used, postgraduate advisory council.⁹ The council reviews new postgraduate programme proposals and new accreditation applications submitted by already existing (and accredited) postgraduate programmes. If postgraduate programmes do not follow the procedure, the central administration does not recommend its approval to the university council; a necessary step for the creation of the programme and then the submission to accreditation. Thus, recommendations from the postgraduate advisory council function as a filter.

Technical staff support the council's duties. They review new programme proposals and requests for accreditation and re-accreditation. Technical staff not only go over mere formalities, but also suggest substantive modifications if they deem it necessary. The officer in charge of the postgraduate office revealed that the university—based on the analysis of previous accreditation reports—had developed more specific standards than those approved by the Ministry of Education. The university has established control of new postgraduate programmes following similar procedures to those used by CONEAU. In some cases, the council uses tougher standards than the accreditation agency, resulting in some levels of over-compliance.

To a different extent, both universities have developed self-regulatory bodies to oversee the establishment of postgraduate programmes and the submission of new and existing programmes for accreditation by CONEAU. Some interviewees in both universities refer to those structures as the CONEAU within the university. The establishment of administrative units that deal exclusively with regulation may reinforce the decoupling between the formal audit process and the organisational process (Ashworth, Boyne, & Walker, 2002). Although both autonomous Higher Education institutions were not mandated to generate a self-regulatory framework, those actions are voluntary responses to accreditation.

4 | PROGRAMME RESPONSES

The nested feature of this case study reveals differences between higher-level (universities) and lower-level cases (postgraduate programmes).¹⁰ The latter have responded to both, the regulators at the system level and the universities' self-regulatory bodies detailed above. This section is organised around the main findings on responses to regulatory actions.

4.1 | If it ain't broke, don't fix it!

Some interviewees mention that accreditation has slowed down modifications, even changes requested by the accreditation agency. In part, programmes respond by adapting certain features of the programme without making substantial revisions on the books. Some other interviewees claim that administrators and directors may use accreditation results to preserve the status quo, as explained later in this section.

All postgraduate programmes have an academic committee and directors who weigh in on modifications to the programme over time. Before the 1995 legislation created CONEAU, those decisions were taken based on programmes' understanding of what was needed, institutional requirements and particulars of the academic discipline. After the creation of the accreditation agency, many programmes started assessing most of their decisions based on the likelihood of whether or not they would be accredited by the agency or on the chances that their category would be downgraded. In other cases, accreditation came as a way to legitimise status quo positions within the academic unit/university.

Many programmes have devoted their efforts to comply with CONEAU. I understand that, but as CONEAU is just an accreditation body, the academic decisions have to be based on our decision as a university. Many people [referring to programme directors] say, 'We cannot change some aspect of the programme because CONEAU approved it that way' ... [That attitude] generated a situation where directors would respond in that way when asked to make changes. Whenever it was convenient for them, they would use CONEAU's accreditation reports as a way to legitimise their position. (Interviewee A02)

All interviews included a question on how programmes decided on modifications. In most cases, either the director or the academic committee brought the discussion about the impact on the accreditation status; and in the case of categorised programmes, on the earned category. Category C programmes would introduce changes to seek upward mobility or just not request categorisation at all. Although the C category is formally designated as good programmes, interviewees mention that nobody wants to get the lowest category in the rank. They would rather not request categorisation or not disclose the earned category on any advertisement or official communication. Those with category B assess their chances to move upward or, at least, look for ways to preserve their category. A downgrade is always a likelihood, so they all search for ways to protect their achieved status.

The A programme directors have another concern: how to strike a balance between a perceived need for change and the preservation of the programme's earned distinction. The interviews reveal that category A holders would rather miss out trying something new or even make minor modifications than fix something and be downgraded to B.

Accreditation has standardised programmes. In general terms, it is a good outcome, except when it stifens curricular change. After receiving a good categorisation, people tend to be more cautious about changes, to the point of not wanting to change anything. This conservative approach is not desirable in postgraduate programmes. (Interviewee A08)

Something similar happens to programmes that have earned the top category more than twice, which occurs only in (some) doctoral programmes in the hard pure (HP) disciplines. Programme directors and administrators state that the accreditation process is only a burden and that it should be voluntary for them from now on.

4.2 | Change in evaluation focus over time

CONEAU has substantial leverage to make modifications in the evaluation of postgraduate programmes. One way the accreditation agency does it is through guidelines and executive decisions on what to evaluate (Salto, 2017). A detailed document analysis of accreditation reports signals a shift over time in a fundamental aspect. CONEAU has incorporated graduation rates as a quality indicator. The case is clear. Without the need to change the standards, CONEAU moved from overlooking that aspect to considering it a vital one.

A downgrade from B to C may cause some warning at the academic unit and programme levels. As mentioned earlier, in academia a C category is perceived as a low-quality programme. CONEAU downgraded a long-standing social science programme among other reasons due to their low graduation rates. Like most programmes earning low categories, they filed a reconsideration claim to the accreditation agency, but the result did not change. According to the academic unit administrator, the result spurred a debate among administrators on the best possible course of action. Directors did not want to go through another accreditation process, but administrators started introducing modifications to the programme to comply with CONEAU. The programme has been accredited with a C category for six years, so they would have to wait until then to submit their plan for re-accreditation. However, the academic unit administrator submitted a request to voluntarily accredit before its validity expired.

We voluntarily submitted our programme for reaccreditation. It was an almost suicidal decision because we had assured another three years of programme validity. Before doing so, we asked them [CONEAU] whether such voluntary submission was appropriate; we explained to them that we have complied with most recommendations for addressing the problems leading to the shocking 'C' categorisation. We wanted to test if we were on the right track instead of waiting three more years to find out we were not. (Interviewee A03)

The interviewee mentions that the downgrade was a shock, adding that the situation proved challenging for the directors and students. In part, the decision to request a voluntary review was based on complaints by students that the programme they had enrolled in moved from category B to C.

The administrator's (A03) decision to directly communicate with accreditation agency officials depicts levels of familiarity and trust commonly found in cohesive regulatory systems (McCaffrey, Smith, & Martinez-Moyano, 2007). Most interviewees on the regulatee side have mentioned that CONEAU's administrators are approachable—by email, phone or even paying a visit to CONEAU's offices—without any risks of sanctions. Moreover, regulatees look for ways to build credibility because they are aware that regulators may hurt them, and regulators understand that communications with the regulatee may pave the way toward compliance (McCaffrey et al., 2007).

4.3 | We have postgraduate programmes that are not programmes: Creative compliance at its best

The 1995 law, as well as many ensuing administrative acts, restricts postgraduate programmes to three types: specialisations, master's and doctorates. Early in the 1990s, the Council of Public University Rectors (CIN) lobbied successfully to exclude *diplomaturas*¹¹ as postgraduate, degree-seeking programmes, based on low academic quality claims. Those

non-degree certificates have a market niche in professionals seeking short-term training, mostly in the applied disciplines. They are unregulated, so it is easier and faster for universities to develop and run them. In most cases, they just need academic unit approval, avoiding extra bureaucratic hurdles.

An analysis of websites and postgraduate education offices (mainly in applied disciplines) gives a clear idea that *diplomaturas* are a hot commodity in their areas and that they are advertised just next to specialisation programmes. They contribute to generating extra revenues via tuition fees. Together with postgraduate programmes, many soft-applied academic units include *diplomaturas* in the same advertisement brochures. Some of them, in small print, are advertised as a set of courses, not as degrees. Staff from the central administration of the public university (University B) mentioned that the decision to allow *diplomaturas* in postgraduate office advertisement was a negotiation between them and the academic units.

We [the central administration] requested to remove *diplomaturas* from their [academic units] postgraduate offices. They did not want to do it because professionals highly demand *diplomaturas* and moving them to another area would mean a demotion to their status. So, instead of moving them to another area, the academic units added a disclaimer to warn that *diplomaturas* are sets of courses and not degree-granting programmes. (Interviewee A12)

The self-regulatory body in University B is the one enforcing this regulation. The National University Management Bureau (DNGU) interviewee admitted that they do not have the capacity to track every situation. The academic units have responded by complying creatively. All the actors have compromised on a middle ground without breaking the law. The university's role as an enforcer of external regulation is evidence of this study's claim that the university self-regulatory bodies are in fact CONEAU within universities.

5 | DISCUSSION AND CONCLUSIONS

The classical way of analysing regulation in private companies (and highly autonomous Higher Education institutions) is through the lenses of governmental action and organisational resistance (Ashworth et al., 2002; El-Khawas, 1998). In line with Higher Education literature (Brennan & Shah, 2000; El-Khawas, 1998), this study breaks down the regulatee into two levels: university-wide and programme levels. The findings fit the organisational resistance assumption at the programme level (with mixed levels of compliance), yet do not fit the university-wide level practices.

This study finds that both universities have created extensive self-regulatory bodies. The traditional public university has even implemented a more robust internal control body than the private one. The establishment of internal regulatory bodies is neither a requirement nor a recommendation of the accreditation agency; these bodies become some type of self-regulation. Regulatory literature expects that the creation of compartmentalised units to deal with audit and evaluation may result in ceremonial approaches to compliance (Power, 1997, 2003). The consequence would be a separation between compliance and organisational change. That is, the limited compliance would not produce the effects on organisational behaviour that the regulator seeks. Opposite to this situation, a key finding of this study centres on the voluntary development of central administration bodies to monitor and enforce the external regulation. Rather than operating as internal structures to reduce the impact of external pressures, these internal bodies push external regulation. Some interviewees refer to these bodies as the CONEAU within the university, or in more conceptual understandings, the regulator within the regulatee.

Such initiatives of the regulatee do not fit the classic cases of self-regulation in the sense of organisations self-evaluating themselves without a direct relationship with external regulation (Kells, 1992). Unlike self-regulatory agencies, CONEAU does not require or even recommend such internal bodies. These new internal bodies not only monitor and enforce external regulation but also generate another set of regulations. In some cases, these regulations involve developing stricter standards, regulating areas that the external regulator does not get involved in among others.

This study finds little support for a regulatory expectation that the more autonomous an organisation is and the stronger the professional groups controlling its activities (Ashworth et al., 2002), the more prone to resist change. In

fact, instead of resistance, these autonomous organisations (universities) have generated mechanisms that could trigger over-compliance (La Porte & Thomas, 1995).

As explored in this article, the passage to compliance presents a complex scenario. While the university central administration builds a monitoring and enforcement mechanism, the programmes show variegated responses, in many cases in the shape of formal compliance, in line with the resistance assumption. As previous research has shown (Corngia, 2015), postgraduate programme responses tend to be more declarative than factual. Programmes may game the system by formally complying with the minimum regulatory requisites such as the number of credit hours but doing otherwise. This gaming involves a similar situation with content.

As much as this study stresses a large contrast between university-wide and programme responses, the latter not only resisted through formal compliance but also responded by fully complying with certain aspects of the regulators' requirements. For instance, due to low graduation rates, many programmes have developed mechanisms to track students who have finished coursework and provide additional academic counselling and research sequence courses. In many other cases, the accreditation agency would recommend substantive modifications to postgraduate programmes, but programmes cannot make those changes visible until they have to re-accredit. As a result, programmes exploit legal loopholes to comply with CONEAU's request without jeopardising their status.

The aim of this research is to explain organisational behaviour at these universities. While there are no intentions of generalising the results, findings and conclusions from this study may signal a path not only within Argentina. As described earlier, accreditation agencies mushroomed worldwide. Within Latin America, the largest Higher Education systems (Mexico, Brazil, Argentina, Colombia and Chile) have developed similar quality assurance mechanisms (Lemaitre, 2011). Similar systems were already in place in the United States and Continental Europe (Dill, 1997; El-Khawas, 2001). National variations (Higher Education systems structures, governance, etc.) play a critical role in shaping quality assurance systems (King, 2007). Despite those variations, the study not only confirms findings from other country cases but it also indicates grey areas. Future endeavours may include the use of surveys or other quantitative tools, and thus, contribute to generalise findings to a larger population.

One critical element to take into account for future explorations is that the formal role of regulators is different from their actual role. Furthermore, universities, albeit autonomous, may tend to comply with regulation (as in the case with central-level administration) and mix-comply at the bottom of the organisational structure (programmes). The multi-level analysis findings highlight relevant differences between university/administrative and programmatic responses. The findings are in line with classic studies of organisational culture (Clark, 1983; Weick, 1976). Autonomous and loosely coupled organisations (such as universities in Argentina) are prone to variegated types of responses at different levels. The distinction may prove useful for future studies on quality assurance processes.

Although the contribution of this work is mainly toward scholarship, that scholarship may benefit policymakers to provide informed decision making in future policy developments. One way this study contributes to policymaking relates to the knowledge it generates on how highly autonomous organisations respond to external regulation. As a result, decision makers are equipped with more information on how highly autonomous organisations may respond. For instance, universities at the central level may be allies in policy implementation.

Other than government, policy recommendations reach organisational level. Central units within universities use external regulations and actors to bolster their role, in some cases by centralising tasks and in others by creating new roles within central units. In essence, public universities often are not just largely autonomous of government control, but also highly decentralised within, which is partly a way of saying that lower units are autonomous from central institutional authority.

ACKNOWLEDGEMENTS

The author thanks Daniel C. Levy, Ana Garcia de Fanelli, Kevin Kinser and David McCaffrey for their feedback and invaluable contributions. Also, the author would like to thank the anonymous reviewers for their helpful and constructive comments that greatly contributed to improving the final version of the article. All views expressed in this article are those of the author.

ENDNOTES

- ¹ Studies have found that certain organisations operating high-hazard, high-risk technologies (e.g., nuclear power plants) may not only desire to comply but also, they may incorporate external regulations with more rigorous, internally imposed regulations (La Porte & Thomas, 1995).
- ² This article focuses on the internal factors affecting compliance. For a presentation and discussion on the external factors, see Salto (2017).
- ³ Postgraduate programme accreditation is compulsory in Argentina. Besides accreditation, programmes may opt to request categorisation. Depending on the quality standards met, programmes can be categorised as A (excellent), B (very good) or C (good). Categorisation has been widely used as a tool to promote market competition (Jordana & Levi-Faur, 2004; Salto, 2017).
- ⁴ For more information on the origins of postgraduate education in Argentina, refer to García de Fanelli et al. (2001), Krotsch (1996) and Salto (2014).
- ⁵ Traditional private universities in Latin America, major Catholic ones specifically, have become less hierarchical than secular private institutions and more leaning toward academic governance structures (Levy, 1986).
- ⁶ Standards are not established by the accreditation agency. The Ministry of Education approves a set of standards created by the Council of Universities (CU). The CU is a deliberative type of organisation with representatives from various Higher Education organisations including public and private university presidents.
- ⁷ In traditional public universities, the university members (professors, students, alumni and staff) elect rectors or university presidents for a period of between three and four years.
- ⁸ Based on academic deference, the university council does not usually interfere with academic decisions already discussed and approved by academic units.
- ⁹ The members of the postgraduate advisory council are the administrators responsible for postgraduate programmes in each academic unit (one per academic unit).
- ¹⁰ Higher- and lower-level cases refer to the units of analysis of this study, the lower (programmes) being embedded in the higher level (universities), based on a nested analysis.
- ¹¹ US postgraduate certificates are the closest equivalent to *diplomaturas*. Both are short courses of study designed to meet the supplemental education needs of professionals.

ORCID

Dante J. Salto  <http://orcid.org/0000-0002-3362-2573>

REFERENCES

- Ashworth, R., Boyne, G. A., & Walker, R. M. (2002). Regulatory problems in the public sector: Theories and cases. *Policy & Politics*, 30, 195–211. <https://doi.org/10.1332/0305573022501647>
- Asking, B. (1997). Quality monitoring as an institutional enterprise. *Quality in Higher Education*, 3, 17–26. <https://doi.org/10.1080/1353832960030103>
- Astin, A. W. (1985). *Achieving educational excellence*. San Francisco, CA: Jossey-Bass.
- Ayres, I., & Braithwaite, J. (1992). *Responsive regulation. Transcending the deregulation debate*. Oxford, England: Oxford University Press.
- Berkens, M. (2015). Quality assurance in the political context: In the midst of different expectations and conflicting goals. *Quality in Higher Education*, 21, 231–250. <https://doi.org/10.1080/13538322.2015.1111004>
- Bejan, S. A., Janatuinen, T., Jurvelin, J., Klöpping, S., Malinen, H., Minke, B., & Vacareanu, R. (2015). Quality assurance and its impact from higher education institutions' perspectives: Methodological approaches, experiences and expectations. *Quality in Higher Education*, 21, 343–371. <https://doi.org/10.1080/13538322.2015.1112546>
- Berdahl, R. (1990). Academic freedom, autonomy and accountability in British universities. *Studies in Higher Education*, 15, 169–180. <https://doi.org/10.1080/03075079012331377491>
- Bernasconi, A. (2008). Is there a Latin American model of the university? *Comparative Education Review*, 52, 27–52. <https://doi.org/10.1086/524305>
- Bernasconi, A. (2011). A legal perspective on 'privateness' and 'publicness' in Latin American higher education. *Journal of Comparative Policy Analysis: Research and Practice*, 13, 351–365. <https://doi.org/10.1080/13876988.2011.583105>
- Brennan, J., & Shah, T. (2000). *Managing quality in higher education. An international perspective on institutional assessment and change*. Philadelphia, PA: OECD, SRHE, Open University Press.

- Brunetto, Y., & Farr-Wharton, R. (2005). Academics' responses to the implementation of a quality agenda. *Quality in Higher Education*, 11, 161–180. <https://doi.org/10.1080/13538320500175175>
- Byrne, J., Jørgensen, T., & Loukkola, T. (2013). *Quality assurance in doctoral education—Results of the ARDE project*. Brussels, Belgium: European University Association. Retrieved from http://www.eua.be/Libraries/publications-homepage-list/EUA_ARDE_Publication.pdf?sfvrsn=4
- Camou, A. (2002). Reformas estatales de 'segunda generación' y reformas universitarias en la Argentina actual (O de por qué es bastante más fácil privatizar una línea aérea que reformar una universidad) ['Second generation' state reforms and university reforms in Argentina nowadays (Or why it is easier to privatise an airline than to reform a university)]. In P. Krottsch & M. Prati (Eds.), *La universidad cautiva: Legados, marcas y horizontes [The captive university: Legacies, landmarks, and horizons]*. La Plata, Argentina: Ediciones al Margen.
- CINDA. (2012). *Aseguramiento de la calidad en Iberoamérica. Educación Superior. Informe 2012 [Quality assurance in Ibero-America. Higher education. 2012 Report]*. Santiago, Chile: Author.
- Clark, B. R. (1983). *The higher education system: Academic organization in cross-national perspective*. Berkeley: University of California Press.
- Corengia, A. (2015). *El impacto de la CONEAU en universidades argentinas: Estudio de casos [Impact of CONEAU in Argentine universities: Case studies]*. Buenos Aires, Argentina: Teseo; Universidad de Austral.
- Csizmadia, T., Enders, J., & Westerheijden, D. (2008). Quality management in Hungarian higher education: Organisational responses to governmental policy. *Higher Education*, 56, 439–455. <https://doi.org/10.1007/s10734-007-9103-3>
- Dill, D. D. (1997). Higher education markets and public policy. *Higher Education Policy*, 10, 167–185. [https://doi.org/10.1016/s0952-8733\(97\)00011-1](https://doi.org/10.1016/s0952-8733(97)00011-1)
- Dill, D. D. (1998). Evaluating the 'Evaluative State': Implications for research in higher education. *European Journal of Education*, 33, 361–377.
- Dill, D. D. (2001). The regulation of public research universities: Changes in academic competition and implications for university autonomy and accountability. *Higher Education Policy*, 14, 21–35. [https://doi.org/10.1016/S0952-8733\(00\)0027-1](https://doi.org/10.1016/S0952-8733(00)0027-1)
- Dill, D. D., & Beerkens, M. (2012). Designing the framework conditions for assuring academic standards: Lessons learned about professional, market, and government regulation of academic quality. *Higher Education*, 65, 341–357. <https://doi.org/10.1007/s10734-012-9548-x>
- Dill, D. D., & Soo, M. (2005). Academic quality, league tables, and public policy: A cross-national analysis of university ranking systems. *Higher Education*, 49, 495–533. <https://doi.org/10.1007/s10734-004-1746-8>
- El-Khawas, E. (1998). Strong state action but limited results: Perspectives on university resistance. *European Journal of Education*, 33, 317–330.
- El-Khawas, E. (2001). *Accreditation in the USA: Origins, developments and future prospects*. Paris, France: International Institute for Educational Planning—UNESCO.
- El-Khawas, E. (2006). Accountability and quality assurance: New issues for academic inquiry. In J. J. F. Forest & P. G. Altbach (Eds.), *International handbook of higher education* (Vol. 18, pp. 23–37). Dordrecht, The Netherlands: Springer. Retrieved from https://doi.org/10.1007/978-1-4020-4012-2_3
- Etienne, J. (2011). Compliance theory: A goal framing approach. *Law & Policy*, 33, 305–333. <https://doi.org/10.1111/j.1467-9930.2011.00340.x>
- Ewell, P. (2010). Twenty years of quality assurance in higher education: What's happened and what's different? *Quality in Higher Education*, 16, 173–175.
- García de Fanelli, A. M. (2012). State, market, and organizational inertia: Reforms to Argentine university education between 1990 and 2010. In H. G. Schuetz & G. Alvarez Mendiola (Eds.), *State and market in higher education reforms: Trends, policies and experiences in comparative perspective* (pp. 97–111). Rotterdam, The Netherlands: Sense.
- García de Fanelli, A. M., Kent Serna, R., Álvarez Mendiola, G., Ramírez García, R., & Trombetta, A. (2001). *Entre la academia y el mercado: Posgrados en ciencias sociales y políticas públicas en Argentina y México [Between academia and market: Graduate programs in social science and public administration in Argentina and Mexico]* (Colección Biblioteca de la Educación Superior, Serie Investigaciones). Mexico City, Mexico: ANUIES—CEDES.
- Haug, G. (2003). Quality assurance/accreditation in the emerging European higher education area: A possible scenario for the future. *European Journal of Education*, 38, 229–240.
- Jordana, J., & Levi-Faur, D. (2004). The politics of regulation in the age of governance. In J. Jordana & D. Levi-Faur (Eds.), *The politics of regulation: Institutions and regulatory reforms for the age of governance* (pp. 1–29). Northampton, MA: Edward Elgar.
- Kells, H. R. (1992). *Self-regulation in higher education: A multi-national perspective on collaborative systems of quality assurance and control*. London, England: Jessica Kingsley.

- King, R. (2007). Governing universities: Varieties of national regulation. In J. Enders & B. Jongbloed (Eds.), *Public-private dynamics in higher education: Expectations, developments and outcomes* (pp. 63–88). Bielefeld, Germany: transcript Verlag.
- Krotsch, P. (1996). El posgrado en la Argentina: Una historia de discontinuidad y fragmentación [Graduate education in Argentina: A history of discontinuity and fragmentation]. *Pensamiento Universitario*, 4, 43–56.
- La Porte, T. R., & Thomas, C. W. (1995). Regulatory compliance and the ethos of quality enhancement: Surprises in nuclear power plant operations. *Journal of Public Administration Research and Theory*, 5, 109–137.
- Lemaitre, M. J. (2011). Accountability in Latin America: Focusing on quality assurance and funding mechanisms. In B. Stensaker & L. Harvey (Eds.), *Accountability in higher education: Global perspectives on trust and power* (pp. 133–156). New York, NY: Routledge.
- Levy, D. C. (1986). *Higher education and the state in Latin America*. Chicago, IL: The University of Chicago Press.
- Levy, D. C. (2011). Public policy for private higher education: A global analysis. *Journal of Comparative Policy Analysis: Research and Practice*, 13, 383–396. <https://doi.org/10.1080/13876988.2011.583107>.
- March, J. G., & Olsen, J. P. (1976). Organizational choice under ambiguity. In J. G. March & J. P. Olsen (Eds.), *Ambiguity and choice in organizations* (pp. 10–23). Bergen, Norway: Universitetsforlaget.
- McCaffrey, D. P., Smith, A. E., & Martinez-Moyano, I. J. (2007). 'Then let's have a dialogue': Interdependence and negotiation in a cohesive regulatory system. *Journal of Public Administration Research and Theory*, 17, 307–334. <https://doi.org/10.1093/jopart/muj020>
- Musselin, C. (1997). State/university relations and how to change them: The case of France and Germany. *European Journal of Education*, 32, 145–164.
- Neave, G. (1998). The evaluative state reconsidered. *European Journal of Education*, 33, 265–284.
- Neave, G., & van Vught, F. (1994). Conclusions. In G. Neave & F. van Vught (Eds.), *Government and higher education relationships across three continents: The winds of change* (Vol. 2, pp. 269–271). Oxford, England: Pergamon Press.
- Nielsen, V. L., & Parker, C. (2012). Mixed motives: Economic, social, and normative motivations in business compliance. *Law & Policy*, 34, 428–462. <https://doi.org/10.1111/j.1467-9930.2012.00369.x>
- Power, M. (1997). *The audit society: Rituals of verification*. New York, NY: Oxford University Press.
- Power, M. (2003). Evaluating the audit explosion. *Law & Policy*, 25, 185–202. <https://doi.org/10.1111/j.1467-9930.2003.00147.x>
- Salto, D. J. (2014). Governance through the market and the state: Postgraduate education in Argentina. *Bordón. Revista de Pedagogía*, 66(1), 61–74. <https://doi.org/10.13042/Bordon.2014.66104>
- Salto, D. J. (2017). Attractive carrots, bland sticks: Organizational responses to regulatory policy in Argentine graduate education. *Studies in Higher Education*, 1–13. <https://doi.org/10.1080/03075079.2017.1301415>
- Weick, K. E. (1976). Educational organizations as loosely coupled systems. *Administrative Science Quarterly*, 21, 1–19.
- Weaver, R. K. (2014). Compliance regimes and barriers to behavioral change. *Governance: An International Journal of Policy, Administration, and Institutions*, 27(2), 243–265. <https://doi.org/10.1111/gove.12032>

How to cite this article: Salto DJ. Quality assurance through accreditation: When resistance meets over-compliance. *Higher Educ Q.* 2017;00:1–12. <https://doi.org/10.1111/hequ.12151>