

## **Accreditation and Power**

- **A discourse analysis of a new regime of governance in higher education**

### **Abstract**

This article studies discourses within the accreditation of Norwegian higher education conducted by the Norwegian Agency for Quality Assurance in Education (NOKUT) using one concrete case (the accreditation of bachelor programs in nursing). Analysis of policy documents and accreditation reports are influenced by two of Foucault's concepts of power; governmentality and panopticon. The analysis provides insights into, primarily, how the two forms of power are woven into the schemes used for quality control by redefining quality to be a quantifiable concept. Secondly, how the supervision of quality gives privilege to specific types of knowledge. Thirdly, how supervisory power is reformulated to require self-control mechanisms within higher education in terms of constant quality development and realization of unexploited potentials. Fourthly, how this power legitimates itself by making all parties guardians of quality control deconstructing the difference between evaluator and evaluated.

**Key words (4): accreditation, NOKUT, governmentality, higher education**

## **Higher education and accreditation**

In 2003, Norway established an independent state body to secure quality in higher education. In English, the name of the body is the Norwegian Agency for Quality Assurance in Education (NOKUT). NOKUT replaced the Norwegian Network Council which was established in 1997, and which was an advisory body for the Ministry of Church, Education and Research. NOKUT has a much stronger mandate than the former body received. Its establishment was connected to the international wave of interest in finding ways to assure the quality of higher education that occurred in the 1990s and more specifically as a result of the so-called Bologna Process, which refers to a declaration signed in 1999 by 29 European Ministers of Education. Core goals of the Bologna Process were: to strengthen European cooperation in securing the quality of education, to introduce a common, two-level degree structure (Bachelor and Master) and a common credit system for attaining the aforementioned degrees. All of the other Scandinavian countries have established similar bodies to assure the quality of higher education. While Norway established NOKUT, Denmark's Evaluation Institute (EVA) was also established, in 1999, (as a follow-up of the Center for Evaluation (Evalueringssenteret) which existed from 1992-1999) and it is responsible for evaluating education at all levels, from grade school to university-level studies. Sweden has *Høgskoleverket* (Swedish National Agency for Higher Education), which was established in 1995, with responsibility for quality control and development within the university and university college sector.

The establishment of NOKUT represented a new power factor within higher education and a new regime of governance. By governance we simply mean what government does and how policy and management is exercised. It is *technologies* of government we are referring to, not intentions or ideologies. Surveillance and control are of course not new phenomena within higher education. In the early 1990s the higher education system was characterized by detailed governmental regulations concerning content and organization of study programmes, recruitment of students and teachers, as well as management and finance (Askling 2009). According to the Universities Act of 1995, the Ministry had main responsibility for all educational activities offered by the institutions. At the same time, the institutions had an obligation for national cooperation and coordination. Formal and informal colleague

control and peer review mechanisms thus played and still play an important role. However, under the influence of the New Public Management the institutions' autonomy has been considerably increased which in turn has strengthened the demands for accountability and various forms of self-regulating practices. An implication of NOKUT was that quality control and evaluation was separated from traditional bureaucratic departmental governance and was institutionalized as an independent state body whose decisions could not be overruled by the Ministry, and this gave the agency considerable authority. Similarly to other sister organizations that exist in other countries, NOKUT can, among other things, independently decide to close down university and university college study programs. NOKUT's rejection of 27, out of a total of 31 Norwegian university college nursing programs, in 2004, provides an example of the range of the agency's authority, which we will scrutinize more carefully in this article. An example from another Scandinavian country is the decision made in 2008 by Sweden's *Høgskoleverket* to withdraw the right to administer examinations in the nursing education program at the Karolinska Institute as well as in the educational program providing specialized nurse training at Uppsala University.

In spite of the strong mandate given to NOKUT, the agency sees its task as being much more than deciding whether or not programs in higher education fail to make the grade. The supervisory practices established by NOKUT have the goal of controlling, assuring and promoting quality in higher education. NOKUT tries to work together with the educational institutions and study programs it supervises and has the ambition that these institutions take responsibility for their own development of quality education.

Accreditation is one of several supervisory practices that NOKUT utilizes. The concept of accreditation is derived from the Latin word "accredere" which can either mean to create confidence, or to give credit or authority. The concept was originally meant to be a tool to eliminate technical hindrances in business. The idea was that a product that was produced by an accredited procedure would be able to satisfy an international standard and that this would enable the free movement of the product across national boundaries. In our own day and age, accreditation has become very widespread within different public sectors as well as in various privately operated

industries. Public and private systems that provide education, health services, and technologically based industries are areas where accreditation has become established practice. In all of these areas, the goal of accreditation is to make sure that the guidelines established by the authorities are followed and thus to create user-confidence in the production systems. Within the educational sector and elsewhere, there is an obvious lack of systematic knowledge about accreditation procedures and how these are used to meet goals and fulfill mandates.

The purpose of this article is to examine how the power of accreditation unfolds within higher education contrasting two different concepts of power, governmentality and panopticon. Central questions guiding the analysis are: What shapes the discursive power within accreditation as expressed in NOKUT's strategy documents and in reports examining bachelor degree programs in nursing? What kind of logic and which concepts are used as a basis for the accreditation practices of NOKUT? How does the power of accreditation unfold in the field of tensions between an external supervisory agency and autonomous educational institutions, between the views of a panoptic agency exercising control and a governmentality?

### **Governmentality and panopticon**

Our ambition is to explore and articulate accreditation as a power phenomenon using concepts from Michel Foucault. Describing the transition to the modern state, Foucault makes us aware that governance is no longer something that a sovereign ruler could perform by issuing decrees to subordinates. In a modern state, governance is more about influencing the actions and self-understandings of others, it is "governing at distance" (Miller & Rose 1990). This means that power does no longer operate as limitations on the individual freedom. According to Foucault power is "more often productive than prohibitive" (Schaap 2000: 130). Moreover, it does not result from the choice or decision of an individual subject (Foucault 1990: 95). Foucault sees the operation of power in modern democratic societies as having a logic of its own, independent of rulers and ruled pervading all our social relations. Power analysis must therefore focus on technologies, and not intentions of power. As Donzelot explains it: "We would have then not a power and those who undergo it, but, as Foucault shows, *technologies*, that is to say always local and multiple,

intertwining coherent or contradictory forms of activating and managing a population” (Donzelot 1979:77).

Foucault distinguishes between panopticon and governmentality as being two forms of modern power technologies (Foucault 1995, 1991). A panopticon is originally a prison construction designed by Jeremy Bentham in 1785, which allows prison wardens to observe (opticon) prisoners (pan-) from a tower without the prisoners being able to see when and by whom they are being observed. For Foucault, this type of prison became a symbol for governance that is based upon the fear that we are visible more often than we, in fact, are. The prison tower is similar to speed-cameras along a highway, a reminder that we can be seen at any time. This reminder makes patrolling controllers redundant, because the prisoner acts as *if* he were under constant surveillance.

Governmentality, for Foucault, is an even more subtle form of governance, because, as the word implies, it is internalised by individuals and guides their mentality or thinking (Foucault 1991). The term refers to a form of governance that is de-centered because the individuals play an active part in their own self-government. Foucault stresses how modern society produces technologies of the self alongside the technologies of domination or discipline such as the panopticon. The result is that “the subjects so created would produce the ends of government by fulfilling themselves rather than being merely obedient”, by being “free in specific ways” (Rose et al 2006: 89). From a governmentality perspective, freedom is therefore not the opposite of government, but one of its most important resources (Rose, 1999). It is even fair to say that this power is strongest whenever we see ourselves as being free and independent individuals. Nikolas Rose (1999) has argued that the obligation to maximize the individual freedom – the ethic of freedom - is one of the principal strategies of advanced liberal government. The power of freedom consists in creating autonomous, self-possessed, agentive, and useful individuals. Government turns into what Foucault calls “conduct of conduct” or a self-government in which “governor and governed are two aspects of the one actor” (Dean 2009: 19).

With increased autonomy, there is also a concomitant responsibility for the risks incurred by our decisions, and new technologies arise to assess, evaluate, govern and reduce the risks associated with our decisions. Audits, accreditation, quality

control systems, budgets, benchmarks, strategies with visions and goals and other new public systems of management can be seen as being examples of this. Michael Power (1997) summarized the new control practices by using the term the audit society. The characteristic of these new management practices is that they practice control by controlling control systems. Control is applied by getting people and organisms to practice self-control and self-management. It is a way of governing at distance through technologies that are both autonomizing and responsabilizing (Rose et al 2006: 91).

The panopticon and governmentality are distinguished from one another by the place where power is centered. While the panoptic tower represents an external view, governmentality is a form of power that is radically decentralized and placed within each and every individual – it is a form of power that makes all surveillance redundant, because power has become internalized. Governmentality doesn't operate by surveillance but through motivation and stimulation and by making people work together for a goal and maximize their potentials. It will be relevant to see how the accreditation discourse positions itself in relation to these two forms of power in the study presented in this article.

Even if this study is highly influenced by the Foucauldian and later theories on governmentality, it also holds that different forms of power, i.e. both the type of power that have a central locus and the one that is completely internalized in each individual, could and should be studied simultaneously. The interplay between these two forms of power (governmentality and panopticon) is more explicitly discussed in this paper than in many studies in the governmentality tradition. In addition, unlike governmentality studies that have a more organizational approach to governance (Rose 1999, Power 1997), this article focus exclusively on the role that discourse and language play in creating power networks and rendering reality governable.

## **Methods**

The purpose of this article is to study accreditation as a discourse, and the approach we have taken is to scrutinize relevant texts. This does not mean that we will strictly follow a discourse analytic scheme or model. By studying accreditation as a discourse, we want to emphasize primarily that the supervisory power that we are

curious about cannot only be studied as a hierarchic or stationary power. Supervisory power does not only reside in the institutional structure or in the methods of accreditation, and the problem of power cannot simply be solved by institutional restructuring or by introducing better methods. By using the concept of discourse we want to emphasize that power exists in the language that is used to legitimate accreditation and in the concepts that provide a fundament for this practice (Foucault 1971).

In other words; the focus of our interest is the power that circulates in and through language, the power of discourse.. A focus of this kind means that we do not view the power of accreditation as a problem we are attempting to solve. The power that resides in discourse cannot be abolished. The power of accreditation is seen as being a dilemma of which we can be more aware, and as mechanisms about which we can achieve a better understanding. By focusing upon form and the choice of words used in public management documents we will attempt to disclose the dilemmas of accreditation and its forms of power. In accordance with the discourse analytical way of thinking, we will shift focus away from what the words mean to what they do (Derrida 1969, Foucault 1971). Our focus is not on what the meaning of sentences are, but how they *produce* meaning. More precisely, we will study the technologies or logics of power that are implied and produced by the use and choice of words. We will operationalize Foucault's power theories in our textual analysis by focusing on the following technologies or rationalities of power: Central to our analysis is the identification of various definitions, especially focusing how everyday concepts are transformed into technical terms and signs of a particular kind of regulatory system. Normalizing and standardizing technologies such as the use of numbers will also be analyzed, as well as what kind of knowledge that is considered legitimate from an accreditation point of view. Another focus is how an active and autonomous ideal reader (Eco 2002) is constructed through the claim to define visions and objectives.

This approach involves a distrustful view of the production of meaning in the text, which is not the same as a critical or negative view of the practice of accreditation. Our point of departure is that the power of accreditation is necessary and productive,

but that we need more, and particularly more nuanced, knowledge about its different manifestations and how it works.

### Texts

We have studied all of the public management documents that are linked to NOKUT's web page (<http://www.nokut.no/no/Norsk-utdanning/Universitet-og-hogskole/>), and have particularly concentrated our attention upon the following documents:

- NOKUT's strategic plans (from 2004 and from 2009) with the goals and visions for its activities,
- annual reports for each calendar year,
- the handbook for applicants seeking accreditation for study programs and details regarding NOKUT's expectations,
- Ministry of Education and Research regulations on quality control, systems to assure quality control and the development of higher quality in higher education and professional education,
- NOKUT's regulations on standards, criteria for accreditation, criteria for evaluating quality control systems and competency requirements for experts used to evaluate and accredit programs of higher education,
- Documents from the committee report on expert knowledge

The other main type of texts used are reports from the first phase in the re-accreditation of Norwegian study programs in nursing (in 2004), all of which can be found on the web in NOKUT's knowledge-base (<http://www.nokut.no/no/Norsk-utdanning/Universitet-og-hogskole/Revidering-av-akkreditering/Avsluttede-revideringer/Sykepleie/Sykepleierapporter/>). There are 29 reports of this kind.

The purpose of focusing upon the accreditation of study programs for nurses is to highlight the accreditation discourse. Our intention is not to provide a comprehensive analysis of how the study programs were evaluated by NOKUT. To evaluate the evaluators is not our ambition. We will rather use the reports from this particular evaluation as an illustration of how the power of accreditation operates within one area of Norwegian higher education. This particular case provides an example of the power technologies embedded in accreditation. The sample of texts/quotes is

selected following the same procedure. All the re-accreditation reports were read searching for “answers” to the following questions: How is power expressed in the text? How does this text “think”? These analytical questions determine the focus and boundaries for selection of examples. We have selected quotes until we consider that further examples no longer bring additional insights to the research questions, when ‘theoretical saturation’ is achieved (Glaser & Strauss 1967).

### **NOKUT and the bachelor degree programs in nursing**

NOKUT’s activities are authorized by the Norwegian Law Governing Universities and University Colleges, where the agency is empowered to assure the quality of higher education at the national level, independent of any controls applied by the Ministry of Education and Research or by the University and University College Board.

NOKUT is responsible for accrediting institutions, for approving new study programs and for evaluating the quality systems of individual educational institutions. In addition, NOKUT can decide to re-evaluate formerly accredited study programs. This is called re-accreditation or auditing an existing study program. The inspection is made in accordance with existing rules and regulations, and an expert evaluation is also provided. The board of directors of NOKUT decided to audit all study programs in nursing at Norwegian institutions of higher education (according to the minutes of the Board meeting held on June 16 – 17, 2004). This was the first time that NOKUT decided to audit all of the bachelor’s degree programs in a particular field of study. In all, 31 bachelor’s degree programs and 3 master’s degree programs were audited between June 2004 and November 2005. The project was budgeted to cost 2.75 million Norwegian Crowns.

Re-accreditation on this scale requires a very extensive program of evaluation. More than 13,000 nursing students in Norway were affected and 29 different educational institutions were audited. NOKUT engaged 30 experts to make an independent evaluation of the study programs to be audited. They were organized into 7 committees which included student representatives and people who had scientific and evaluation competencies. The reports that were presented by these committees were all based upon the same measurement schemes, which included quantitative

and qualitative data. In the board meeting where these reports were treated, only one educational program was re-accredited, two others were re-accredited on appeal, and the other 27 educational programs were not approved and were required to raise the quality of their educational programs and to submit another application for accreditation. During the autumn of 2009, all of the remaining educational programs were re-accredited.

### **Scrutinizing the inspection**

The inspection of the bachelor degree programs in nursing undertaken by NOKUT has been evaluated and discussed. Raaen (2006) showed that there was a lack of cohesion and an absence of a comprehensive evaluation of the study programs. He pointed out that the requirement of having 20% of the teaching posts with educators at the associate professor level of competence was used as an overriding criteria, and that the committee submitted weak justifications for their evaluations. Karseth argued that the conclusion should have been 'yes' or 'no' to accreditation and not a nuanced evaluation of the study program. Some of the requirements which were made for the study programs provoked debate, particularly because of the specific kind of professional knowledge that is required to have a study program accredited (National Council for Health and Social Welfare Education 2006). The main reason that many of the study programs were not accredited was the fact that less than 20% of the educators in the program had achieved associate professor competence (ibid). An exchange of views was made regarding the platform for professionalism that study programs in nursing should utilize. In an education that is as oriented to practical skills as nursing, relevant experiential knowledge within the faculty would have great value in the education of practitioners (Haltbakk et al. 2007). As a consequence of this debate, NOKUT experts were seen more as bureaucrats than professional experts by some participants in the debate. It was also pointed out that a guideline was applied as if it were an absolute requirement in the accreditation of study programs in nursing (Langfeldt et al. 2008). At the same time, central areas of concern, including the lack of relevant practical placements in the field of nursing, it was argued, was a factor that was ignored in the NOKUT evaluation process (Paulsen 2009).

A more general debate has also taken place regarding the use of accreditation as a method, which has been introduced in Norway even though this has not been required by the Bologna agreement. Accreditation is seen as being a form of insurance that higher education will maintain a high and standardized level of knowledge (Brottveit 2006). It is a means to attain high quality and a security for students and for their future professional practice (ibid). Accreditation has also been valued because it provides Norwegian study programs with a raised platform of knowledge which can make them attractive within the international market (Holen 2005).<sup>1</sup> The question is not whether or not accreditation should be maintained, but what it should foster within higher educational institutions (National Council for Health and Social Welfare Education 2006). One matter being discussed is whether a result orientation should become more important in the accreditation of institutions of higher education (Isaksen 2004). An evaluation of the role played by NOKUT, undertaken by the Ministry of Education and Research in 2008, asks whether NOKUT properly administers its mandate to control the content of study programs and at the same time enable their dynamic development (Langfeldt et al. 2008).

Questions about accreditation relate to a broader field of research on evaluation and the governance and control of education at all levels, from grade school to higher education. For example, Carlgren & Klette (2008) used perspectives from ideologies and reforms that were current in the 1990s for educational work. Foss Hansen & Borum (1999) and Broadhead (2002) have used the Danish university sector as a case example of efforts to standardize evaluation. The topic regarding the way in which different political trends influence evaluation criteria, and particularly the control aspect of evaluation, has been studied by Marshall (1985), Scriven (1979), Hemlin & Rasmussen (2006) in addition to Waldow (2009). A related theme in evaluation concerns the relationship between the intentions of evaluation methods and what they measure in practice, and this has been treated in research by Nystrøm (2004), and by Supovitz & Taylor (2005). In short, this research raises questions about the design of educational programs and the possible consequences of choosing one design over another. Questions about the consequences of the choice of design

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<sup>1</sup> <http://www.forskning.no/artikler/2005/desember/1133943796.73>

have been elucidated by Foss Hansen (2005) and specifically related to management and nursing by O'Neil et al. (2008).

### **Standardized quality**

In NOKUT's strategy documents, "standards" and "criteria" are fundamentally connected to the idea of accreditation.

*NOKUT's supervision is based upon the premise that the educational institution is responsible for the quality of its own educational programs. The authority to inspect the study programs offered by the educational institution is conveyed in the Norwegian Law Governing Universities and University Colleges and the Norwegian Law Governing Vocational Schools and the relevant regulations that have been approved by the Ministry of Education and Research. Ministerial regulations contain, amongst other things, national standards and criteria. NOKUT sets supplementary standards and criteria according to its own regulations. Together, these rules and regulations make up the national standard that NOKUT's inspection is built to uphold (NOKUT's strategy plan).*

A central locus for the power to accredit is found in the two concepts, "standards" and "criteria", which function as a kind of panoptical tower. Even if the "educational institution is responsible for the quality of its own educational programs", the quality of work is defined by using neutral measurements that are exterior to the place where the creation of value occurs. "Standards" and "criteria" represent a way of "governing at distance": NOKUT is always potentially present through their "national standard that NOKUT's inspection is built to uphold" reminding the institution that it could be inspected at any time. Nicholas Rose has named this effect "the shadow of the law" (Rose 1999:155).

The term "standard", refers to a model or a normal measurement which makes normality and deviation a structuring principles for the accrediting activity. This dichotomy represents one of the main procedures of exclusion that according to Foucault forms the way in which discourse and knowledge operate in our society (Foucault 1981). Quality is identified by the absence of deviation from the standard or normal measurement. Exceptions from the norm must be labeled a "deviation" and

deviations are returned to the norm by undergoing corrective efforts. Although one of the goals of national standards is to ensure equal treatment, one can fairly say that accreditation is based upon the logic of averageness, where the ideal is not to be extraordinarily good, but to have a normal measurement. What is normal, or average, functions as a panoptic center of power from which quality control springs.

The nursing case is characterized by the logic of averageness. A minimum standard must be reached before bachelor study programs can be accredited, according to NOKUT's criteria, dated May 5th, 2003. "At least 20 % of the faculty should normally have attained associate professor competence". With a few exceptions, this was given as the main reason why study programs in nursing were not re-accredited in 2004.

It is interesting to note that this requirement was used to justify rejection, even though the study programs were given very high marks by the expert committees. Two examples from the University College of Bergen and the Diakonissehjemmetts University College, respectively, follow:

*The committee finds that the study program in nursing at the University College of Bergen does provide an educational plan that is in accord with the national framework for higher education and NOKUT's requirements for bachelor's degree programs. The profile of the study program appears to be well thought out and very closely tied to the field of practice. The committee wants to commend the faculty for the efforts made to integrate theory and practice (NOKUT report 2004, University College of Bergen).*

*The Diakonissehjemmetts University College is a good educational institution with very good students and faculty who show interest and the ability to act in efforts to develop competence. The graduates from the university college are highly respected in working life, where they have primarily taken positions in hospitals and in municipal health services (NOKUT report 2004, Diakonissehjemmetts University College).*

However, as long as study programs do not meet one of the requirements made by the authorities, these qualities will have no importance for accreditation applications:

*The committee finds that the bachelor degree program in nursing at Bergen University College does not satisfy the requirements for re-accreditation (NOKUT report 2004, Bergen University College).*

...

*The bachelor degree program in nursing at Diakonissehjemmetts University College is developing nicely. However, at this time, the study program does not meet the necessary requirements for re-accreditation (NOKUT report 2004, Diakonissehjemmetts University College).*

The requirement in the regulations from 2003, that 20 % of the faculty members should have achieved associate professor competence, is not an absolute rule. It is a guideline that should “normally” be followed. However, in practice, it was impossible for any of the educational institutions to be able to compensate for failing this minimum requirement. Having an excellent study program was insufficient in the final evaluation. The discretionary expert evaluations agreed to honor the panoptic central requirement concerning a minimum of 20 % associate professors in the teaching faculty.

### **Quality = quantity**

Charlton (2002) has pointed out that the reform wave which is often referred to as New Public Management has created a new language where several everyday concepts have been given a new and technical content. Among other changes, he writes the following regarding the requirements for quality assurance and how the concept of quality has been given a different meaning: “Quality Assurance has transformed ‘quality’ into an abstract requirement for a particular kind of regulatory system. Quality Assurance now refers to auditable systems, not to guaranteed excellence” (ibid.). The analysis above shows that the accreditation discourse has affected the concept of quality in a similar way: Quality is emptied of its everyday meaning, as something having a high degree of excellence, and has become the technical requirement to maintain minimum standards. In connection to accrediting practices, quality no longer means a high degree of excellence, it simply means good enough. The concept of quality has come to mean *standardized* quality. It is measured by technical quality indicators and has become a quantitative concept. Following a panoptic logic quality has been translated into systems that can be regulated and controlled.

The expert reports which were written to determine whether or not an educational program in nursing was to be re-accredited, show several examples of the

transformation of the general meaning of quality to a technical or quantitative concept. Quality, and quality assurance, function as mutually legitimating concepts, as is seen in the following case:

*Independent and strong students manage well in this system, which may even be a system that increases the independence of that group of students. However, less independent and less self-motivated students can easily lose their way, become weak and function at a low level because they do not receive the support they need through the study program. This is because the quality and cooperation within student groups lack quality assurance; a system which to a great extent depends on the efforts made by student groups may actually hinder the learning of some students and result in lower grades than the individual student may deserve (NOKUT report 2004 Oslo University College).*

The quote likens quality to a technical concept and argues that this is the way that students experience quality. The text presupposes that quality can be measured by the absence or presence of quality assurance systems. It goes as far as making the assumption that there is a connection between system quality and experienced quality. The lack of a quality assurance system, which would satisfy the demands of the authorities, becomes equivalent to the absence of quality as this is experienced by users. In particular, the quote points to quality as this is experienced by weak students, who are threatened because of the lack of a quality assurance system. But the connection is not explained or supported in any way. The writer even assumes that there is a causal effect between the lack of a quality assurance system and the limited learning and poor grades that some students experience (“this is because the quality and cooperation in student groups lack quality assurance”).

The relationship between quality, as it is normally used, and quality as a technical measurement of quality assurance is made explicit in the following formulation from the same report: “In order to become one of the best bachelor degree programs in nursing in this country, quality assurance systems at the college must be increased, and the percentage of students who complete their studies must be increased.” Quality assurance systems are spoken of as being a necessary precondition “to become one of the best bachelor degree programs in nursing”. The report presupposes a one-to-one relationship between quality assurance systems and quality. But the text goes even further in re-making quality into a quantitative measure. The text positions the percentage of students who complete the study

program as a goal of quality. In this view, quality is something that can be counted. This quantification of quality can be interpreted as a sign of the close link between numbers and governing that Foucault points out by reminding us that statistics originally means science of the state (Foucault et al 1991). As Ian Hacking explains: “The bureaucracy of statistics imposes not just by creating administrative rulings but by determining classifications within which people must think of themselves and of the actions that are open to them” (Foucault et al 1991: 194). This internalization of the bureaucracy of statistics in the way of thinking is expressed in the formulation above through the translation from quality to quantity: “In order to become one of the best bachelor degree programs [...]the percentage of students who complete their studies must be increased.”

### **Privileged knowledge**

Another key word in the pre-understanding of the power that NOKUT represents is “documentation”. The concept is continuously used in NOKUT’s public management documents, one of which is the accreditation handbook. “In each application, the educational institution shall describe, evaluate and document the criteria that must be fulfilled to achieve accreditation. Accreditation presupposes that all criteria are met in a satisfactory way.” (Accreditation handbook for applicants)

Foucault stresses on several occasions how power regimes give rise to and are informed by various forms of knowledge (Foucault 1995; Foucault et al 1991). The documentation requirement contributes to privileging a specific form of knowledge. It is the form of knowledge that insists that good professional practice is solely what can be documented as being good. The educational institution cannot be accredited if all of the required criteria for accreditation are not fully *documented*. According to the logic of the panopticon quality has to be clearly visible. A presupposition for speaking about quality in the context of accreditation is that quality is articulated and written down in available evidence. Any claim of quality must be based upon available evidence. Characteristics that cannot be documented or where no evidence is available cannot be the basis for quality in the discourse of accreditation. Tacit knowledge, professional discretion and skills that comprise the core elements within professional practice and which affect student learning are eliminated by necessity

from any evaluation in the accreditation process. For that reason, one can make the claim that the current view of accreditation is anchored in a specific view of knowledge, which focuses upon documentation and evidence and which amounts to a panoptic center of power within the discourse of accreditation.

This is the background needed to understand the importance of meeting the 20 % minimum criteria for decisions made in accrediting study programs in nursing. This is the easiest criteria to apply in the NOKUT guidelines. The other criteria provide openings for the use of a greater degree of professional discretion, i.e., "The content of the study program must be at a level that is comparable to equivalent study programs at university or university colleges." Since the 20 % criteria is easier to document than the professional level of a bachelor's degree study program, it is easier to use as a basis for making a decision on whether or not to provide accreditation. In the case examples of nursing study program accreditation, the requirement that at least 20 % of all teaching faculty have associate professor competence is not one of several criteria, but a super-criteria because it is a criteria that can easily be measured (Raaen 2006).

Using the same logic of measurement, one notices a tendency in the reports to translate or transform discretionary criteria into countable characteristics. Here is an example from an evaluation of the professional level of a study program in nursing:

"The required readings must contain international scientific articles and doctoral dissertations, students should receive current research studies and findings and the bachelor's essay must be built upon current research findings found in scientific literature" (NOKUT report 2004 Bergen University College)

International articles and doctoral dissertations are used here as an indicator that the study program is at the proper level. There are certainly reasons for doing so and for using these as indicators in evaluations. However, one should also note that the author ignores qualitative criteria (professional level) and gives preference to measurements that can be counted (the presence of scientific articles and doctoral dissertations in the required readings). The evaluation in this text builds upon a constructed measurement which is presented as if it were an absolute gold standard.

One must assume that this focus upon documentation and measurements will necessarily affect the professional practitioner's understanding of his or her own responsibility and competence (Solbrekke and Heggen 2009). In any case, attention is shifted from the provision of services to a documentation of the services that have been provided. This shift makes demands that require new forms of professional expertise. Accreditation creates professional practitioners who are experts at describing processes, at using electronic document regulation systems, quality-control systems, statistical calculations, variation coefficients and median values. In addition, accreditation requires the professional practitioner to ask new questions about the work he or she is doing. Do we have the documentation that we need? Have we written the report in the way that we are supposed to have done? Is the quality of our services in a format that can be measured? Like the prisoner in Bentham's prison the practitioner must act *as if* he were under constant surveillance. "The spread of this 'litigious mentality' ensures that 'the shadow of the law' itself acts as a means of managing professional activity" (Rose 1999: 156). Several researchers have pointed out that this demand for documentation has reduced the room available for the practitioner's context-dependent decision-making and discretionary evaluations (Hammersley, 2002, Heggen & Engebretsen 2009).

We find signs of a shift in professional responsibilities in the nursing re-accreditation cases, for example, in the following quote from the report from Bodø and Mo i Rana:

*There is a lack of literature that is anchored unambiguously in the new requirements that exist for nurses who have a bachelor's degree in nursing. The study program is supposed to strengthen the nurse's independent responsibility, for example, by underscoring the knowledge that is based upon nursing research (evidence-based) and by distinguishing it from knowledge which is based upon tried and tested experience. The importance of the student / nurse becoming an active user of research is not clearly expressed and is almost totally lacking (NOKUT report 2004, Mo i Rana University College).*

In this quote, the concept of responsibility is explicitly connected to knowing which knowledge is based upon nursing research (evidence-based). The nurse and student are spoken of as being users of research. This way of articulating professional responsibility contributes to shifting other aspects of the practice of nursing out of focus, and gives the provision of nursing care less attention.

## Controlling self-control

NOKUT describes its overarching goals in the following way:

*NOKUT will contribute to promote and assure quality by*

- *supervising and stimulating the development of quality in educational programs at Norwegian universities, university colleges and trade schools*
- *approving higher foreign education in relation to the Norwegian educational system when individual applicants request this*

*NOKUT's work will contribute to society's confidence in the quality of Norwegian higher education and trade school education and to approved foreign higher education (NOKUT's strategic plan)*

The formulation, “stimulating the development of quality in educational programs” presupposes that development and change are internal needs of each and every educational institution and that an institution will always have this need, which can never be fully satisfied. The text presupposes that the processes that NOKUT wants to support are already accepted and begun by the institutions themselves. This is also expressed several times in other places within the strategy plan:

[NOKUT]...provides supervision and counsel on how the institution can further develop quality education and the work to assure quality (*our emphasis*). “Stimulate” and “supervision and counsel” further imply that the development cannot be undertaken by NOKUT, and that the institution itself must do this. This, too, is expressed elsewhere in the document: “NOKUT’s supervision begins by pointing out that the responsibility for the quality of education rests with the institution that is providing the educational program.” The help that is provided by NOKUT is support for the realization of the institution’s own potentials. This is a form of “discipline of freedom” (Rose 1999: 67)) which encourages institutions to administer their own autonomy in a better way, by fulfilling their potential through their own endeavours and by determining the course of their own existence through acts of choice (Rose 1999:84). Surveillance here turns into what Foucault calls “conduct of conduct” where governor and governed are one and the same actor.

The ideal of self-control is also expressed in the nursing study program cases, for example, in a quotation from the evaluation of the nursing program at Agder University College:

*The focus upon public health is described as a vision, but it is understood as being an important question regarding the university college's profile and the possibility of creating synergy effects with other programs within the same faculty (...)*

*It appears that the nursing study programs at both campuses after the unification have lost their own freedom and special characteristics. They have been unable to build upon one another's strengths and utilize those strengths to create the synergy effect that was possible after unification. The public health perspective is too new to be integrated into the study program's profile. The study program appears to have no explicit professional profile (NOKUT report 2004, Agder University College).*

Accreditation is not directly spoken about in this selection from the text, but its role is indirectly present by the specific reference to "freedom". The text contrasts "vision" with "profile". A profile, according to the text, is characterized by being "explicit", articulated and realized, while a vision is seen as being "too new to be integrated", which is something akin to an unexploited potential. Freedom is something that is assumed to be obtained through integration, implementation, articulation and profiling, or in other words through active and conscious self-control. The role of accreditation is to contribute to active and conscious self-management, to an ethic of freedom (Rose 1999). The ideal reader (Eco 2002) of this report is expected to accept the idea that accreditation provides the institution with the help it needs to realize its potential and the freedom to transform the public health vision into an "explicit professional profile".

The principle of self-management is also expressed in the accreditation of nursing studies by the emphasis placed upon the "implementation" of management systems. "Implementation" is a recurring theme in the reports. It reflects an ideal that makes management invisible by having it imbued into the inclinations of students and faculty members. The following quotation from the evaluation report of the nursing program at the University College of Sør Tronderlag illustrates this mode of thought: "One of the reasons why current students are more satisfied, and why the class that is graduating is more satisfied may be because PBL (Problem-based learning) as a

method of teaching has been well-implemented and is functioning well for the great majority of students and faculty members.”

The explanation for the reason why students are currently satisfied is due to the fact that their management has become absolute and fully under control, i.e. a governmentality is now operating, one that unifies the thought and will of individuals. The PBL method has not been *changed* to satisfy the desires of students, but it has been *implemented* in accordance with their inclinations. The will of students has been adjusted to the method, and not the reverse.

### **We are one another's quality-control watchdogs**

NOKUT's description of the method it uses in accreditation reinforces the image of a controller which is not external to the institution being controlled. The evaluations are made by appointed experts who, with the exception of one representative from the general society or more extensive working life, have insider competencies from the sector under scrutiny, either as academic employees, as students or as administrators (according to the Ministry of Education and Research and NOKUT regulations).

Even though a rule requires that appointed experts do not have "duties at the institution or the study program under investigation", their connections to the sector are what qualifies them as appointed experts. NOKUT's use of the term 'appointed expert' can probably be compared to the use of juries in the field of legal justice. Just as jury members are expected to be a cross-section of the population, NOKUT's appointed experts are expected to represent a cross-section of life at an educational institution.

In a sense, this structure contributes to making everyone a watchdog for what others do. A person, who in one instance applies control, is in the next instance the object of the very same kind of control. The governmentality perspective becomes everyone's perspective on everyone else (Foucault 1991). This way of pulverizing every center of power is characteristic for the method of accreditation. The point of view of those who have power can no longer be located because it now belongs to everyone and it is found everywhere.

This mechanism is very clearly expressed in the nursing study program cases, where several of the appointed experts contributed to the evaluations of one institution while they themselves were employed by other institutions which were also being evaluated. On the one hand, this may be seen as an expression of the idea that academic institutions should be autonomous in order to ensure academic freedom. But on the other hand, and from a governmentality perspective it can be interpreted as a subtle form of decentralized surveillance. The fact that “governor and governed” in this way become “two aspects of the one actor” (Dean 2009: 19) may be one reason why it has been difficult to find a position to criticize this series of accreditation cases after the fact. One might say that those who have been found guilty have given their support to the basis for making that judgment by functioning as judges in other similar cases. This makes it very difficult for the institutions to criticize the determinations made in their own cases without at the same time criticizing judgments that they themselves have participated in making.

In the institutions’ commentary or response to NOKUT’s assessment, we see that in spite of critical remarks about the conclusions of the reports, they accept the *principle* that the accrediting body provides the institution with developmental help, as in this example: “The re-accreditation of the nursing study program is a useful corrective to assure and correct the quality of the study program so that graduates are well-qualified and reflective, even in those areas where the appointed expert committee has evaluated the program as being weak.”

This is the way that the institution confirms that there is a connection between satisfying the demands of external authorities and the inner development of better quality in the study program. Re-accreditation is referred to as “a useful corrective” that affects the institution from within and contributes to its further development. “Well-qualified and reflective” graduates are connected to the consequences of accreditation. This also confirms the idea that accreditation has a democratic task to fulfil, by satisfying the need that future users will have for being able to trust and have confidence in those who receive an education in the study program. It is important to note that the formulations do not see students as being the final product. The formulations presuppose that students have a societal function that is more extensive than that: “Well-qualified and reflective” graduates are expected to provide good

service to those who are dependent upon the services that they can provide. Future users of the services that these nursing candidates will one day provide are the audience being addressed here. Accreditation is consequently not simply a matter that concerns internal relationships within the study program, or the study program's relationship to its "customers", which are its students, but it is also needed to guarantee a fundamental element in a democratic society, the confidence that citizens/voters have in their state. In this way, the institution itself emphasizes that accreditation is a practice that stems from a need that all of us have.

### **Conclusion:**

Our analysis of the accreditation of nurse education shows how the conflict between confidence and supervision in the mandate of the accrediting organization generates a dialectical discourse in the texts between an external governing point of view and an internal governmentality that maintains an ideal of self-control. First of all, the article shows how power is woven into quality control and how quality is reconstructed to become a quantifiable concept. Secondly, the article shows how the supervision of quality privileges certain kinds of knowledge. Thirdly, the article shows how supervisory power is reconstructed in the form of a requirement that educational institutions create their own systems to assure the quality of the education they provide. Fourthly, the article shows how power legitimates itself by turning all parties into one another's quality controllers.

The conflict between confidence and supervision in the discourse of accreditation primarily shows how power is given expression in the form of an ideal of self-control. This provides the discourses with rhetorical force, by "elegantly" merging educational policies with democratic and liberal fundamentals. Self-control is an ideal that can be connected to strengthening the authority of citizens and to weakening the state's intervention in the freedom of individuals. We are all bound – voluntarily – hand and foot, by the ideal of power converted into self-control.

Our contribution in this article has been to reveal the inherent power dynamics within accreditation. The intention is neither to assess the assessment undertaken by NOKUT, nor to provide a comprehensive analysis of NOKUT's accreditation process as a whole. Reports from this particular evaluation, however, serve as illustrations of how the power of accreditation operates within one area of Norwegian higher education. By analysing power technologies embedded in this example of an accreditation process we hopefully have strengthened the argumentative basis for those who want to renew accreditation practices and current educational policies and governance.

## References

- Asking, B. (2009). On the use of expert knowledge in national evaluations and quality audits. In: *Assessing educational quality: Knowledge production and the role of experts*. ENQA-workshop-report, no 6
- Broadhead, P. (2002). The Making of a Curriculum: how history, politics and personal perspectives shape emerging policy and practice: *Scandinavian Journal of Educational Research*. Volume 46, no. :1, 47–64.
- Brottveit, K. A. (2006). Gransking av balletthøyskolen, *Forskerforum*. (Examining the Academy of Art and Bally] Retrieved April 5, 2010 from [http://www.forskerforum.no/module\\_info/index2\\_forskerforum.php?level=2&xid=1110](http://www.forskerforum.no/module_info/index2_forskerforum.php?level=2&xid=1110)
- Carlgrén, I., & Klette, K. (2008). Reconstructions of Nordic Teachers: Reform policies and teachers' work during the 1990s. *Scandinavian Journal of Educational Research* Vol. 52, no. :2, 117–133.
- Charlton, B. (2002). Audit, accountability, quality and all that: The growth of managerial technologies in UK Universities. In: S. Prickett & P. Erskine-Hill. *Education! Education! Education! - Managerial ethics and the law of unintended consequences*.
- Dean, M. (2009). *Governmentality. Power and rule in modern society*. London: Sage
- Derrida, J.(1969). *De la grammatologie*. Paris: Minuit
- Donzelot, J. (1979). The poverty of political culture. *Ideol. Conscious*. 5:73–86
- Eco, U. (2002). *De la littérature*. Paris: Bernard Grasset
- Foss Hansen, H. (2005). Choosing Evaluation Models: A Discussion on Evaluation Design. *Evaluation*. Vol. 11, no. 4, 447–462.
- Foss Hansen, H., & Borum, F. (1999). The Construction and Standardization of Evaluation: The Case of the Danish University Sector. *Evaluation*, vol. 5, no. 3, pp. 303–329.
- Foucault, M. (1971). *L'Ordre du discours*, Paris: Gallimard
- Foucault, M. (1990). *The History of Sexuality. Volum 1*. London: Penguin

- Foucault, M. (1995). *Discipline and Punish: The Birth of the Prison*. NY: Vintage Books
- Foucault, M. (1991). 'Governmentality', In G. Burchell, C. Gordon, & P. Miller (eds). *The Foucault Effect: Studies in Governmentality*, pp. 87–104. Chicago, IL: University of Chicago Press.
- Glaser, B. G., & Strauss, A. L. (1967). *The discovery of grounded theory*. Chicago: Aldine.
- Haltbakk, J., Johansson, S., Utne, L., & Wågsæther, K. (2007). Sykepleierutdanningens forskningstilknytning. *Sykepleien forskning*. No. 2. pp. 104–110
- Hammersley, M. (2002). *Educational Research, Policymaking and Practice*. London: Sage Publication Company.
- Heggen, K. & Engebretsen, E. (2009): Tvetydig om kunnskapsbasert praksis – en dekonstruktiv nærlesning av arbeidsbok for sykepleiere. *Sykepleien Forskning* nr. 4
- Hemlin, S., & Rasmussen, S. B. (2006). The Shift in Academic Quality Control. *Science Technology Human Values*. Volume 31, no. 2, 173–198.
- Holen, S. (2005). Inga overraskning. (No surprise) *Forskning.no* Retrieved December 2005. <http://www.forskning.no/artikler/2005/desember/1133943796.73>
- Isaksen, R. (2004). Høy kvalitet på senket nivå er ingen reell kvalitetssikring. (High quality on a lowered level is not a real quality assurance) *Forskerforum*, no. 10. [http://www.forskerforum.no/module\\_info/index2\\_forskerforum.php?level=2&xid=1416](http://www.forskerforum.no/module_info/index2_forskerforum.php?level=2&xid=1416)
- Langfeldt, L., Harvey, L., Huisman, J., Westerheijden, D., & Stensaker, B. (2008). *Evaluation of NOKUT – The Norwegian Agency for Quality Assurance in Education*. Report 2: NOKUT's National Role: Kunnskapsdepartementet [Ministry for Education and Research].
- Marshall, C. (1985). Politics of evaluation: the competition for control of educational policy. *Urban Education*, vol. 19, no. 4.
- Miller P, Rose N. (1990). Governing economic life. *Econ. Soc.* 19:1–31
- Nasjonalt råd for helse- og sosialfagutdanning (2006): *Nasjonal strategi for kompetanseutvikling innenfor helse- og sosialfagutdanningene* [A National Strategy for Competence Development in Health and Social Welfare Education] Retrieved February 2010. [http://www.uhr.no/documents/Nasjonal\\_strategi\\_for\\_kompetanseutvikling\\_innenfor\\_helse\\_1](http://www.uhr.no/documents/Nasjonal_strategi_for_kompetanseutvikling_innenfor_helse_1).
- NOKUT's strategic plan 2004 and 2009. Retrieved September 2009. from [www.nokut.no](http://www.nokut.no)
- Accreditation handbook for applicants Retrieved September 2009. from [www.nokut.no](http://www.nokut.no)
- NOKUT report 2004, University College of Bergen. Retrieved August 2009. from [www.nokut.no](http://www.nokut.no)
- NOKUT report 2004, Diakonissehjemmets University College. Retrieved August 2009, from [www.nokut.no](http://www.nokut.no)
- NOKUT report 2004, Bodø and Mo i Rana Retrieved August 2009, from [www.nokut.no](http://www.nokut.no)
- NOKUT report 2004, Agder University College. Retrieved August 2009, from [www.nokut.no](http://www.nokut.no)
- NOKUT report 2004, University College of Sør Tronderlag. Retrieved August 2009, from [www.nokut.no](http://www.nokut.no)
- Nystrøm, P. (2004). Reliability of educational assessments: the case of classification accuracy: *Scandinavian Journal of Educational Research*. Volume 48, no. 4, 427–440.

- O'Neil, E., Morjikian, R. L., Cherner, D., Hirschhorn, C., West, T (2008). Developing nursing leaders: an overview of trends and programs: *The Journal of Nursing Administration*: April, 38(4): 178–83.
- Paulsen, M.-B. (2009). Tar selvkritikk for manglende kontroll [Regretting lack of control]. *Dagsavisen*, 30 January 2009. <http://www.dagsavisen.no/innenriks/article395489.ece?status=showall>
- Power, M. (1997): *The Audit Society. Rituals of Verification*. Oxford University Press.
- Rose, N. (1999). *Powers of Freedom: reframing political thought*. Cambridge: Cambridge University Press.
- Rose, N, O'Malley, P and Valverde, M, 'Governmentality' (2006) 2 Annual Review of Law and Social Science 83-104
- Raaen, F. D. (2006). *Akkreditering og sakkyndighet : en analyse av den reviderte akkrediteringen av bachelorgradsstudiene i sykepleie i Norge*. [Accreditation and expert competence: exploring the accreditation of Norwegian bachelor programs in nursing]. HiO rapport nr 13.
- Scriven, M. (1979). Viewpoints on Education Evaluation. *Educational Evaluation and Policy Analysis*, vol. 1, no. 2, 66–72.
- Schaap, A (2000). [Power and Responsibility: Should We Spare the King's Head?](#). *Politics* 20 (3)
- Solbrekke, T. D. & Heggen, K. (2009). Sykepleieansvar - fra profesjonelt moralsk ansvar til teknisk regnskapsplikt? (Professional Responsibility in Nursing – focusing the tensions between moral values and audit) *Tidsskrift for Arbejdsliv*, Volum 11.(3), 49-61
- Supovitz, J. A., Taylor, B. S. (2005). Systemic Education Evaluation: Evaluating the Impact of Systemwide Reform in Education. *American Journal of Evaluation*, vol. 26 no. 2, 204–230.
- Waldow, F. (2009). Economic Cycles or International Reform Models? Explaining Transformations of the Educational Policy-making Discourse in Sweden, 1930–2000. *Scandinavian Journal of Educational Research*, vol. 52, no. 3. 243–258.