

Summary of Research Report on the Understanding of the Certified Evaluation and Accreditation Scheme (2024-2026)

Abstract

This study provides a comprehensive empirical and theoretical analysis of the certified evaluation and accreditation (CEA) system in Japanese higher education, marking its 20-year trajectory since its inception in 2004. In light of impending state-driven educational reforms heavily influenced by rapid demographic decline and tightening fiscal discipline, this report deconstructs the structural challenges facing the Japan University Accreditation Association (JUAA). Following recent policy shifts by the Central Council for Education, the state is rapidly moving toward mandatory program-specific assessments, multi-tiered "staged" qualitative ratings, and automated data-driven accountability. Utilizing a mixed-methods approach including a rigorous nationwide population-wide (census) survey of Japanese universities with a 32.4% response rate, which yielded rich qualitative data totaling approximately 12 pages of text per open-ended question compiled across institutions, a five-nation international comparative review covering Europe, the US, the UK, Germany, and Denmark, and an internal organizational audit of JUAA's institutional capacity, the study captures deep university-level apprehensions regarding the introduction of staged ratings and the escalating burden of accreditations. The core of this research culminates in a robust, actionable set of strategic recommendations addressed directly to JUAA's executive leadership and internal committees. The study argues that JUAA should pragmatically accommodate the state's new data platforms while steadfastly defending peer-review methodologies. Crucially, the analysis demonstrates that for JUAA to remain a next-generation quality assurance agency, it should simultaneously upgrade its internal governance, secure financial resilience, and modernize its Staff Development (SD) systems to cultivate deep field-specific expertise.

1. Members of the Research Committee

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2. Introduction and Background

2.1. Socio-Political Shifts and the Paradigm of Higher Education

CEA system in Japan has reached a critical historical juncture. For two decades, the system operated under a relatively stable governance framework designed to balance deregulation with institutional responsibility for assuring and improving educational quality. However, the contemporary landscape of Japanese higher education is experiencing severe turbulence driven by a structural shift from neoliberal deregulation to state-guided regional stabilization. Confronted by an unprecedented, accelerated decline in the student-age population, the state has increasingly prioritized absolute fiscal discipline, national resource efficiency, and the strategic down-sizing of the higher education sector.

2.2. The Core Conflict: State Mandates versus Institutional Autonomy

This socio-political realignment has manifested in drastic policy shifts spearheaded by the Central Council for Education, notably its landmark Report on reconstructing the higher education system to maximize the national "Total Sum of Knowledge." The state's evolving blueprint aims to fundamentally alter the nature of quality assurance by transitioning from traditional, autonomous institutional-level peer reviews toward high-stakes, program-specific evaluations.

Most critically, the state has advanced a framework to introduce multi-tiered "staged" ratings at the departmental or degree-program level. Under this proposed system, positive evaluation outcomes are tied to fiscal incentives, whereas failures to meet minimum quality standards could potentially trigger direct administrative penalties. These penalties include the reduction or non-allocation of private school subsidies, or forced institutional exit. This sudden pivot signals a potential for severe friction between the state's mandate for bureaucratic, data-driven structural adjustment and the universities' insistence on academic freedom, diverse institutional missions, and the mitigation of overwhelming administrative evaluation burdens.

3. Methodology

To ensure a robust, empirically sound foundation for its findings and recommendations, the

Research Committee deployed a comprehensive, multi-layered approach consisting of four primary components:

- **Nationwide Institutional Survey:** An exhaustive, population-wide online survey administered to all universities across Japan via two distinct instruments, with one targeting institutional leadership for strategic outlooks and another targeting operational staff. It achieved a response rate of 32.4%, providing a reliable baseline of both quantitative and qualitative feedback on internal quality assurance practices.
- **Legislative and Historical Analysis:** The study conducted a detailed legal and historical review of the CEA system's evolution since 2004, scrutinizing the widening gap between the original legislative intent of deregulation and the current trend toward rigid administrative interventions.
- **International Comparative Review:** To contextualize domestic challenges within global trends, the committee executed an in-depth comparative analysis of advanced quality assurance frameworks across five regions covering Europe as a holistic system, the United States, the United Kingdom, Germany, and Denmark. This focused on how foreign jurisdictions utilize Qualifications Frameworks not as tools for crude institutional ranking but as standard references for learning outcomes, student workloads, and international credit recognition. The review particularly examined how these nations navigate the severe operational side effects of staged qualitative ratings, the legal protections of academic freedom against bureaucratic overreach, and the post-pandemic survival of physical site visits.
- **Internal Governance and SD Audit:** The study evaluated JUAA's internal operational capacity, analyzing its unique historical status as a voluntary association, its 97% budgetary reliance on membership and accreditation fees, and its internal training frameworks against domestic statutory peer-reviews and international benchmarks, specifically the guidelines set by the International Network for Quality Assurance Agencies in Higher Education (INQAAHE).

4. Findings and Discussion: Analysis of the Policy Change and Strategic Responses

4.1. Empirical Reflection on JUAA's 20-Year Trajectory and Institutional Anxiety

The empirical data reconfirmed that JUAA's accreditation framework has successfully fostered a deep-seated culture of internal quality assurance and autonomous institutional improvement over the past 20 years. However, university faculty and staff continue to experience severe

operational anxiety regarding over-complicated accreditation procedures and duplicating administrative workloads. Furthermore, the qualitative analysis captured a profound sense of bewilderment regarding the government's newly proposed accreditation paradigm shift. Respondents expressed strong preferences for maintaining the foundational framework of institutional-level accreditation. While the empirical data revealed a tension within universities regarding how to balance institution-wide governance standards with the unique identities and characteristics of individual faculties, they viewed the state's sudden pivot toward mandatory program-specific assessments and multi-tiered staged ratings of student growth with deep caution, primarily because operationalizing valid "value-added" or growth metrics remains methodologically precarious and highly burdensome for individual institutions.

4.2. International Benchmarks on Staged Ratings and Qualifications Frameworks

The international comparative reviews provided critical insights into how other nations manage the inherent limitations and negative side effects of multi-tiered staged ratings while simultaneously elevating learning outcomes assessment. The data demonstrated that rigid, state-enforced ranking systems, such as the UK's Teaching Excellence Framework (TEF), often devolve into highly bureaucratic, "one-size-fits-all" data-submission exercises that inflict severe administrative workloads rather than fostering genuine educational improvement.

Additionally, the study explored how foreign systems utilize learning frameworks. The Danish model demonstrates that European Qualifications Frameworks can be directly integrated into institutional accreditation standards to verify structural learning outcomes and student workloads, provided they focus on supporting student-centered learning rather than creating monolithic quantitative scores. Crucially, while Denmark utilizes a three-tier accreditation rating to grant successful universities greater autonomy, the current Japanese policy shift leans heavily toward punitive administrative sanctions. Furthermore, the legal and historical reality of Germany offers a vital warning against direct state intervention into curriculum content. Following a landmark Federal Constitutional Court ruling, German accreditation robustly safeguards "the inherent rationality of science and academia" (*Eigenrationalität der Wissenschaft*) by ensuring that peer reviews are dominated by university faculty and focused on the rationality of educational processes rather than punitive outcomes. The UK's recent institutional crisis, in which the Quality Assurance Agency (QAA) lost its international European registration (EQAR) due to conflicts between rigid government mandates and international quality standards, serves as a further warning against erasing the boundary between

independent peer-review and state-driven regulatory adjustment. This review confirmed that for JUAA to adapt effectively, it should develop sophisticated accreditation methodologies that respect diverse university characteristics.

4.3. Deconstruction of the New Government-Driven Accreditation Architecture

A critical focus of this report was the deconstruction of the new accreditation architecture outlined in recent Ministry working group papers. The government's blueprint introduces an unprecedented, highly complex two-stage accreditation flow:

- Stage 1 (Institutional Level): A simplified verification of the university-wide internal quality assurance system and basic legal compliance. Passing this stage is a mandatory prerequisite.
- Stage 2 (Departmental/Program Level): A rigorous evaluation of specific departments or fields, focusing heavily on the visibility of learning outcomes and the primary institutional policies regarding admission, curriculum, and graduation.

Crucially, the government intends to mandate a three-tier staged accreditation at the departmental level, categorizing outcomes as "Below standard," "Meets standard," or "Outstanding/Exceptional." This system introduces a severe paradigm shift where positive outcomes may yield institutional incentives, whereas a failure to meet basic quality assurance standards will trigger direct state-driven administrative penalties, including the reduction or non-allocation of private school subsidies, or forced market exit.

4.4. Internal Governance Realities and Capacity Constraints of JUAA

The report analyzes JUAA's unique position as an autonomous, self-governing voluntary association of universities founded in 1947, completely independent of government subsidies or bureaucratic appointments. While this membership-based structure guarantees strict neutrality and resistance to state pressure, it faces severe resource constraints due to a shrinking student population and a decline in member universities.

The Ministry of Education's Review Committee, in its December 2025 review of JUAA's statutory self-evaluation, highly praised JUAA's unique value-added services, such as student participation in accreditations, study programs, and post-accreditation follow-ups. These initiatives are only possible because JUAA operates as a university cooperative rather than a regulatory tool. However, the audit highlighted opportunities to strengthen JUAA's Staff Development (SD) system. While generic business skills are well-supported, systematic training regarding higher

education policy and quality assurance is largely confined to novice staff. Consequently, JUAA's continuous professional development for mid-level and senior personnel remains largely unstructured, relying heavily on individual self-directed learning rather than a formalized framework to cultivate the sophisticated legal, administrative, and field-specific expertise required for the upcoming reforms.

5. Strategic Recommendations

This section articulates a comprehensive, actionable set of recommendations addressed directly to JUAA's executive leadership, the Standards Committee, and the University Accreditation Committee. Given that the government's new framework is rapidly advancing, these recommendations do not seek to simply oppose the state's policy. Rather, they serve as a strategic roadmap to respect the state's overarching framework while steadfastly defending and embedding JUAA's traditional core values, namely, institutional autonomy, mutual peer assistance, and student-centered learning interests.

5.1. Core Principles of the Policy Approach

To operationalize these values, the recommendations are systematically structured across three tightly linked dimensions:

- The Government Blueprint: An analytical overview of the state's impending macro-level policy and technical design.
- The Strategic Proposal to JUAA: Concrete organizational directives indicating how JUAA should position itself and transform its internal systems.
- Specific Issues requiring immediate, prioritized deliberation: A targeted list of high-priority operational items requiring immediate, deep institutional reflection and committee debate.

5.2. Actionable Proposals for JUAA's System Transformation

To navigate this structural transition, the report advances specific recommendations across key operational pillars:

- Inter-Agency Coordination and Governance: JUAA should closely monitor and strategically participate in the newly proposed state-controlled Coordination Agency designed to standardize accreditation standards across different accrediting bodies. To prevent the erosion of accreditation independence, a risk clearly illustrated by the structural collapse of the UK's co-governance model, JUAA could spearhead the creation of an independent,

voluntary Consortium of Accrediting Agencies to amplify the collective voice of accreditation bodies and defend peer-review autonomy vis-à-vis the state. JUAA should also establish a systematic internal quality assurance mechanism for itself to prepare for the government's impending accreditation renewal system.

- Professionalization of the Secretariat Through Advanced SD: JUAA should upgrade its internal SD into a systematic, long-term curriculum for mid-career and senior staff. Training should shift from generic business skills to specialized quality assurance tracks, transforming administrative officers into expert liaisons capable of navigating the distinct regulations, market norms, and pedagogical nuances of diverse academic fields.
- Strengthening of Research and Development Capabilities: To respond proactively to the radical restructuring of the CEA system, JUAA's Research Institute for Quality Assurance of Higher Education (RIQAHE) should strategically repurpose its research agenda toward "field-engaged, practical research." Future research initiatives should focus on resolving frontline institutional anxieties, demystifying international qualification frameworks, and exploring advanced IT integration for workload reduction. Crucially, JUAA should actively pursue joint research projects and collaborative inquiries with other accrediting agencies to foster systemic alignment across the sector.
- Guarantee of Institutional Due Process and Rights Protection: Given that new evaluation outcomes may directly trigger state administrative actions or resource-allocation adjustments, JUAA should explicitly institutionalize the principles of due process within its evaluation procedures. This includes formalizing robust mechanisms for listening to institutional feedback, providing comprehensive face-to-face consultative services, and guiding universities closely through the complex transition to help shield them from arbitrary disadvantages.
- Preservation and Optimization of the Membership System: JUAA should actively articulate the public value of its membership model, transforming it from a closed network into an open, socially accountable structure. JUAA should also leverage experienced evaluators to provide customized consulting and qualitative support to member universities facing the threat of state sanctions. Concurrently, in light of severe resource constraints, JUAA need to carefully review and streamline its current Medium-Term Goals and Plans (2025–2029) to prioritize core functions and phase out low-demand operations.
- Methodological Innovations in Learning Assessments and Curriculum Alignment: JUAA should refine its evaluation methodologies regarding student learning assessments to encourage a shift from the mere accumulation of course grades toward tracing students'

developmental trajectories. This requires auditing how universities integrate indirect methods, such as the National Student Survey, with rigorous direct methods, including rubrics, portfolios, and capstone thesis evaluations embedded within pivotal courses. JUAA should also establish a flexible Course Suitability Evaluation to verify whether faculty research achievements are organically integrated into specific curriculum components. Furthermore, the agency should develop precise rubrics and training manuals for evaluators to ensure consistency and fairness in the new three-tier staged accreditation process, thereby guiding universities to design degree programs where diploma policies and empirical assessments are robustly aligned.

- **Bifurcation of Accreditation Standards:** JUAA should swiftly develop its own unique accreditation standards based on the state's models. While aligning its minimum quality assurance standards with state regulations to shield universities from administrative penalties, JUAA should codify the numerous good practices accumulated through its historical peer-review processes into an advanced set of quality enhancement standards. This will allow JUAA to identify and validate institutions eligible for state incentives.
- **Database Integration and Workload Mitigation:** To prevent the two-stage accreditation framework from crushing universities under administrative burdens, JUAA should align its procedures with the state's proposed Data Platform. JUAA should transition its reporting systems toward direct digital database entry and exploit advanced IT infrastructure to streamline data retrieval, thereby proactively reducing the evaluation burden on both institutional self-assessments and JUAA's internal staff.
- **Enhancement of Accreditation Utilization and Post-Accreditation Follow-Up:** JUAA should thoroughly re-verify the efficacy of its monitoring and follow-up mechanisms to ensure the enduring credibility and impact of evaluation outcomes. This requires developing clear procedures for addressing institutions undergoing structural adjustments or shifting from other accrediting bodies, while carefully calibrating how accreditation results interface with government mechanisms, such as the Ministry's post-approval fulfillment surveys and potential fiscal sanctions.

6. Conclusion

The Japanese higher education quality assurance ecosystem has entered a period of unprecedented volatility. Under intense fiscal pressure driven by rapid demographic decline, the state is transforming certified evaluation from an autonomous instrument of educational

improvement into a bureaucratic tool for structural adjustment.

JUAA's survival and relevance depend on a dual-track strategy where it should pragmatically accommodate the state's administrative mandates and digital data platforms while simultaneously upgrading its own peer-review methodology to defend the diversity, unique character, and academic freedom of Japanese universities. While navigating this digital transition, JUAA should remain mindful of global counter-trends, such as Germany's recent statutory reaffirmation of physical, face-to-face site visits as the indispensable baseline for qualitative evaluation in the post-pandemic era. By institutionalizing the detailed actionable proposals outlined in this blueprint, ranging from systemic evaluator training, streamlined medium-term plans, and internal SD to the co-existence of minimum assurance and enhancement standards, JUAA can successfully transition into a next-generation quality assurance agency. Continuous, proactive dialogue between JUAA, its member institutions, and the Ministry of Education, Culture, Sports, Science and Technology (MEXT) will remain indispensable to ensure that the ultimate destination of this reform genuinely serves the learning interests of students and the sustainable advancement of society.