



*UNIVERSITY OF TORONTO SUBMISSION*

*TO*

*THE HONOURABLE BOB RAE  
ADVISOR TO THE PREMIER AND THE MINISTER OF TRAINING,  
COLLEGES AND UNIVERSITIES*

*ON  
POSTSECONDARY EDUCATION*

October 28, 2004

### ***Introduction***

This is a critical moment for Ontario universities. Each has striven in different ways to provide access and to maintain quality in the face of ever-decreasing public resources for each student. The margins have been exhausted; the limits of creative response have been tested; the early warnings have long since been sounded. As the discussion paper issued by the Honourable Bob Rae, *Higher Expectations for Higher Education* (referenced here as *Higher Expectations*) puts it, postsecondary education in Ontario is “on the edge of the choice between steady decline and great improvement.”

What is lost through each year of underinvestment in our universities cannot be regained. Our graduates are entering an increasingly globalized and interdependent world, in which their purchase on the evolutions of knowledge and their breadth and depth of cultural understanding will be critical not only to their own lives but to the shape of our society. For the good of current and future generations, and for Ontario and Canada as a whole, we must choose wisely how to chart the course of improvement.

As long-term institutions, universities gather momentum, and the direction of that momentum can be either positive or negative. For well over a decade, as the operating base has continued to erode, the underlying trajectory for Ontario’s universities has been downward.

For a time that downward trajectory was masked by infusions of funding for research and for enrolment expansion. Provincial and federal programs of funding for research and research infrastructure over the past seven years created a sense of optimism for the future, and allowed us to recruit and retain leading faculty in Ontario. Funding for enrolment expansion made it possible to accommodate the surge resulting from the double cohort. Funding for research facilities and for teaching facilities related to enrolment expansion has produced a buzz of activity around new construction.

But beneath this mask, both the base budgets of universities and the facilities available, on a per-student basis, have inexorably declined and eroded. A sense of upward momentum can simply not be sustained as long as the underlying trajectory is downward. We are now at the tipping point.

The Government of Ontario has recognized this critical juncture, and has commissioned the Rae Review to recommend solutions. The University of Toronto welcomes this review, and is heartened by the release of *Higher Expectations*, which lays out in a constructive and thoughtful way the issues that must be addressed if this province is to take the place in the world of postsecondary education as Ontarians deserve.

The University of Toronto can and must play a leadership role in charting this course. With our mission rooted in our historical designation as “the provincial university,” our current stature and potential among the leading research and teaching universities of the world, and our position as a key portal of access to education at a major university in one of the world’s most cosmopolitan population centres, we are both the flagship and the bellwether of the Ontario system. We take this responsibility very seriously, and we are eager to work with the Honourable Bob Rae and his advisors, our colleagues in the Ontario postsecondary system, the Government of Ontario and our other partners throughout the public and private sectors, to seize this moment for the benefit of our current and future students and of the people of Ontario and Canada. It is in that spirit that we make this submission.

**Foundational Principles – Objectives:**

1. ***Access to Quality:*** The Ontario postsecondary education system should provide students with a range of programs that rank with the best of their type internationally, regardless of students' financial or other life circumstances.
2. ***Student Success:*** The Ontario postsecondary education system should provide students with the conditions necessary to realize their full potential to succeed.
3. ***Public Good:*** Beyond the provision of opportunities for individual students to participate and succeed in educational opportunities at a world standard, and the ramification of those benefits throughout society, the potential of Ontario's universities to contribute to the broader public good through the advancement of knowledge, the enhancement cultural wealth and the building of communities should be fully realized.

**Foundational Principles – System Design:**

1. ***Distinctive and complementary roles:*** To provide access to quality at an international standard, each institution in the system needs to realize its own distinctive potential. No institution can be all things to all students – that way lies mediocrity for all. Rather, the system should be designed in such a way that the various institutions complement each other to provide students with a comprehensive range of options.
2. ***Institutional Responsibility and Accountability:*** The multiple distinctive and complementary roles of Ontario's universities are too complex to be managed by a single central authority. Rather, within an overall coordinating framework as necessary to ensure that the system as a whole is achieving its objectives and that resources are directed to their most effective use, the governing bodies of individual universities are the appropriate locus of responsibility for pursuing the particular missions of their respective institutions, and the appropriate locus of accountability for results.
3. ***Sustainability:*** Universities are enduring institutions. They must make multi-year commitments – to students, to faculty, to lines of inquiry. They must also be innovative, in charting the course of knowledge and exploring new ways to engage students in that pursuit. A flourishing university system requires the stability in its financial base and its regulatory framework necessary to make these long-term commitments and also to take the risks of innovation.

**Response to Rae Questions:**

*Higher Expectations for Higher Education* poses five key questions to guide discussion about possible reforms to the current system. Our responses to these questions do not stand alone: they form interlocking components of a comprehensive strategy for achieving the system of post-secondary education that Ontario can and should have.

**1. *How can we increase participation and success in higher education?***

The University of Toronto strongly believes that higher rates of participation in post-secondary education can be achieved without compromising quality or Ontario students' prospects of success. By participation, moreover, we mean access to the full range of post-secondary opportunities, including world-class undergraduate, professional and graduate studies. For access, quality and success to be assured as core attributes of the post-secondary system, the Government must take two key steps forward: institute far-reaching reforms of the student aid system, and implement a new policy framework that encourages innovation and differentiation.

Within such a new system, in order for students to have the resources necessary to participate and to succeed, they need:

- access to the necessary financial resources so that no student offered admission to a program is unable to enter or complete the program due to lack of financial means. This means reforming the current governmental system of student financial aid to:
  - simplify and streamline the currently complex system
  - extend eligibility to a broader income range
  - up-date needs assessment criteria
  - address the issue of post-graduation student debt through a repayment/relief mechanism related to income
- clear and reliable information: students need to see clear paths through the system. In particular, they require:
  - information necessary to select the programs best suited to their interests, talent, and level of preparation.
  - information about the costs of their programs and the means available to meet those costs
  - information about options and requirements for charting a educational path that combines different elements of the postsecondary system – e.g. university-college combinations, moving from first-entry programs to second-entry professional or graduate programs.
- appropriate expectations: we need to broaden the base of students and their families who see postsecondary education as a realistic option, and ensuring that they understand in turn what will be expected of them at the university level. To achieve this end, students and their families need:

- “earlier and more intensive career guidance and counseling” in high school, as recognized in *Higher Expectations*. Recent reforms to the high school curriculum in Ontario have very important implications in this regard. In moving to a four-year curriculum, Ontario has joined the North American mainstream. However, there are ramifications of this decision: high-school students now require earlier guidance counseling, given their need to make critical decisions about streaming in the late grade school and early high school years. It also means that students are arriving at university at a younger age; they need more support through the transition than universities have been positioned to provide in the past.
- more generally, *an expansion of university access and outreach programs*, which have shown great potential but so far remain limited in scale.

## ***2. How should we improve the quality of higher education?***

If students are to have an education of the international standard that Ontarians should expect, each institution in the system needs to realize its own distinctive potential. Each must have the resources it needs to offer students the best of what comparable institutions in peer jurisdictions can do.

In particular, it is critical to the future of the province that qualified students have access to the best of what a leading public research and teaching university can offer, without leaving the province or the country. As the leading public teaching and research university in Canada, the University of Toronto should offer students:

- access to faculty who are leaders in their fields
  - a comprehensive range of program offerings and varieties of learning opportunities and experiences that are the best of their type internationally
  - facilities that foster learning at the leading edge of knowledge.
- ***Markers of Quality:*** Along each of these dimensions, key measures or markers of quality suggest that the current climate of constrained operating funding in Ontario is seriously threatening the ability of Ontario universities, and of the University of Toronto in particular, to achieve fully the mandate of their distinctive missions.
    - A key marker of these limitations has been the sharp increases in *student:faculty ratios*, which in Ontario universities are dramatically above the average for the other nine provinces, and at the University of Toronto is even more dramatically above that of our international peers. Faculty who are leaders in their fields define our identity: interaction with those faculty, experience with their research, and a curriculum shaped by their ideas, is what we can distinctively offer students at all levels. *To provide a quality of education comparable to our international peers, the ratio of students to professors at the University of Toronto should be improved by more than 25 percent.*
    - In comparing the variety of learning experiences available to students in Ontario to that which students experience at our international peer universities. A fundamental marker in this respect is *class size*. *We should be able to ensure, for example, that each graduating student at U of T has had an appropriately balanced mix of seminar- and lecture-based formats through his or her program of study.* Students also need opportunities for learning formats beyond the

classroom and the laboratory – such as internships, co-op programs, community outreach projects, and international exchange – all of which are part of a rounded learning experience and many of which require significant investment.

- Facilities are greatly strained. At U of T, as further discussed below, the sheer capacity of our physical infrastructure is well below Council of Ontario Universities (COU) guidelines on each of our three campuses. The problem is further compounded by the fact that much of this space requires repair and renovation. Capital for new facilities and for the maintenance of existing space is an integral component of what is needed to ensure quality, as further discussed below..
- ***Quality in different spheres:*** Most important, providing quality in higher education means recognizing different needs within this complex sector. In the university realm, there are *three different “worlds” or spheres: first-entry undergraduate; second-entry undergraduate; and graduate*. Each of these worlds differs – in the areas from which students come, in the learning formats they need, and in what graduates do when they leave. Accordingly, there are different markers of quality and different international peers and competitors for programs in each of these worlds, even within a given institution.
  - Given its intimate linkage to the frontiers of knowledge, *graduate education must be concentrated in centres of research and scholarship*, as is the case internationally. As an international centre of excellence in graduate education and research, the University of Toronto must be able to arrest the shrinkage of doctoral enrolment as a proportion of our total enrolment, bringing it at least to the average level of our international peers.
  - It is also essential to *recognize the importance of high-quality professional programs* at the second-entry level. The University of Toronto, with its strong research base and its comprehensive scope, has a key role to play in contributing to the leadership of the professions and the knowledge base on which they rest, including the fostering of new knowledge and new perspectives in the areas where different professions intersect with each other and with arts and science disciplines.
  - The experience of students at the *first-entry* level, while different from that in the other two worlds, can nonetheless be shaped by interaction with them. It is in fact the *mix* of these worlds within a given university that defines its identity and what it can offer students. Students at strong research and teaching universities, whether they are in the first-entry, second-entry or graduate world, have leading scholars and researchers as their teachers, participate in a curriculum shaped by ideas at the leading edge of knowledge, share in the facilities necessary to support a major research and teaching enterprise, and interact with graduate and professional students both formally (for example, with graduate students as teaching assistants) or informally in a variety of dimensions of campus life.
- Recognizing both the differences and the intersections among these worlds has important implications. At the University of Toronto, it is critically apparent that *the current cap on graduate enrolment must be immediately lifted*. Ontario must join the front ranks of jurisdictions internationally in our commitment to graduate education. This is true not only because of the importance of education at the graduate level itself, but because first- and second-entry students in Ontario must have, among the range of options available to them, access to the kind of education that can be offered only at a university with a vigorous programs of research and graduate education.

- ***Internationalization:*** In an interdependent world, a high-quality of education must include perspectives on and connections to other nations and other cultures. This has at least two components:
  - International experience: In a climate of constrained resources, study abroad programs are one of the program enhancements that can be offered to only a limited number of students. *In considering the resources necessary to provide a fully rounded education, at first-entry and second-entry as well as graduate levels, the importance of providing students with international experience should be taken into account.*
  - International students: Currently, Ontario universities receive no operating funding for international students. Furthermore, concerted attempts to bring international students to Ontario universities have been few, although this varies somewhat across the three worlds of university education. Again, considering the importance of exchange across nations and within international networks in the world of the twenty-first century, this is a short-sighted policy. *The policy framework for postsecondary education in Ontario should encourage the participation of international students.*

**3. *How can we make sure that our institutions constitute a coherent, coordinated system to meet Ontario's goals for higher education?***

The current system is a diverse one. There are significant differences in mission and role not only between university and college sectors (according to the original design for the college sector) but also within each of these sectors. A well-coordinated system will ensure that these distinctive institutional roles complement each other to provide students with a clear and comprehensive range of options at an excellent standard of quality.

- At the *college-university* interface, it is important to provide students with clarity as to their options for pursuing an overall course of study that combines elements of both college and university education. Possible approaches include:
  - particular “purpose-built” programs offered by college and university partners, that combine elements from the partner institutions in areas of complementary and mutually reinforcing strength, to provide students with coherent and well-designed programs, including programs that lead to both a college diploma and a university degree.
  - a mechanism of credit transfer between colleges and universities that lets students know up-front how to go about combining college and university education, ensures that students have the preparation necessary to succeed, avoids unnecessary duplication of effort and is as streamlined as possible. *The University of Toronto is prepared to play a leading role with other university and college partners in exploring the potential for such a mechanism.* One promising possibility is a model allowing for block transfers of credit from college to university, based on performance on standard examinations in relevant fields of study.
- Within the university sector itself, it is important to recognize the different character and different requirements of the three “worlds” of university education outlined in the last section. Not all universities participate in these worlds to the same degree and in the same way.

- As noted under question 2, graduate education needs to be concentrated in universities that can offer the critical mass of research and scholarship in which students at the graduate level must be engaged and to which they in turn contribute greatly.
- Similarly, second-entry professional education, especially as professions are evolving in an interdependent world, can benefit from being located in institutions with a strong research base and a substantial range of professional programs, so that students can participate in the development of knowledge in their respective professions as well as in related arts and science disciplines, and can explore the intersections among them.
- First-entry undergraduate education is a core function of all universities. Different universities nonetheless offer quite different types of student experience at this level. They offer different balances between learning in the context of leading-edge research and in the atmosphere of a “liberal arts college,” different emphases on regional needs and national and international perspectives, different community environs.

We need to ensure that the overall system is designed in such a way as to maximize the complementary among these different missions and roles, to the benefit of students and of society as a whole.

This does not mean that the system needs to be planned and directed in detail by government. In a complex sector whose dynamics are driven by the evolving world of knowledge itself, that degree of directiveness is neither feasible nor desirable. It does mean, however, than the overall financial and regulatory framework needs to be designed in such a way that it both respects and promotes differences in institutional missions and encourages collaboration and coordination, as further discussed in the next two sections.

#### **4. *How do we pay for higher education to ensure opportunity and excellence?***

##### ***Bridging the funding gap:***

Ensuring opportunity and excellence in higher education in Ontario requires, at base, redressing the chronic under-funding of the system as acknowledged in *Higher Expectations*. Public funding falls far below the average for the other nine Canadian provinces, and even more dramatically below the levels of peer jurisdictions in the United States. Increasing the level of public funding at least to the average of the other nine provinces is a necessary first step toward a balanced funding framework that will provide the levels of opportunity and excellence that Ontarians deserve in their universities.

Increasing public funding to the national average, as important as it is, only fills in the financial trough created by reduced operating funding over the past decade and more. Beyond that, universities need leverage on additional sources of funding as necessary to realize their distinctive missions.



***Balancing modes and sources of support:***

Paying for higher education requires finding the right balance among operating grants, tuition fees and financial aid as necessary to provide both quality and access, and the equitable and feasible balance across sources of funding – governments, students and their families, and private supporters. The effort to find these balances is a feature of public policymaking in a number of other nations, and there is a good deal that we can learn from their experiences.

The need for this balance derives from a number of factors:

- the balance of individual and social benefits of university education
  - the need for public funders to weigh post-secondary education against competing public priorities
  - the need for sustainability of funding through changes of government and shifts in public priorities
  - the advantages to students that can accrue when institutions have the flexibility, at the level of particular programs to determine the funding necessary to provide access and quality
  - the potential to allocate public funding in a way that can leverage additional funding from other sources, including partners at other levels of government as well as in the private sector
- In finding this balance, we need to recognize differences in the different “worlds” of university education: first-entry undergraduate, second-entry undergraduate, and graduate.

- At the first-entry level, the fundamental importance of these programs for further opportunities, the diversity of paths followed by graduates, and the fact that the students served are largely drawn from local areas, create a powerful argument for substantial public support from the host jurisdiction. These characteristics also imply an operating grant-tuition fee balance relatively heavily weighted to the former, and needs-based financial aid relatively heavily weighted toward non-repayable forms of support.
- At the second-entry level, students tend to be drawn from a wider geographic area, and institutions therefore compete with a broader range of peer institutions than is typically the case at the first-entry level. These programs, largely because of their need for more intensive student-faculty interaction and in some cases more sophisticated facilities, are typically more costly to deliver on a per-student basis than are first-entry programs. The career path for graduates tends on balance to be relatively well-paying, although there is considerable diversity in the career options they choose.

Given the important social and economic role of the professions, public investment should continue to be a strong component of the funding package for these programs. Building upon that strong base and taking into account the different program peers, costs, and career paths for graduates, second-entry programs may require operating grant/tuition/financial aid packages that rely relatively more heavily on tuition fees and repayable forms of financial aid than is the case for first-entry programs.

- At the graduate level, universities compete internationally for the best students, on the basis of the quality of faculty, of programs and of facilities, and on the basis of the level of financial support they can provide to students. Upon the completion of their programs, PhD graduates even more than those of most other programs enter an international market.

For all of these reasons, the operating grant/tuition/financial aid package for doctoral students is very different from that for other program levels. Graduate education, as an integral part of the international research enterprise and with a central one-to-one model of student-faculty interaction, requires a substantial public investment through the governmental operating grant. Tuition fees are an important complement to reflect the full costs of doctoral education, but they are typically met from a variety of university and external sources as part of an overall funding package for each student.

- *The setting of tuition fee levels needs to take account of these differences across spheres of higher education and across institutions. It needs to take place within a stable, multi-year framework of mutual obligations. And that is best done at the level of the governing bodies of universities themselves, within an overall framework of accountability for ensuring access.*
- Tuition policy must always be set in conjunction with student aid. As noted under question 1 above, *the reform of government student aid is well overdue, and is an essential condition for getting the balance of funding for the system right.* In addition, funding for student aid needs to be augmented on a continuing basis from private sources. The past decade has seen a transformation of the culture of private giving in support of needs-based student aid. This is attributable in large part to breakthroughs made under the Ontario Student Opportunity Trust Fund (OSOTF), which provides provincial government matching funds for private donations for needs-based aid. The generosity of donors, including many first-time donors, in response to this program has not only benefited a very large number of needy students, but has also had a “demonstration effect” that is spreading across the donor base for all universities. The recent announcement that the OSOTF program is being reconsidered threatens to have a profound chilling effect that will set back for years the momentum that has been established. *As a key component of a balanced system of student aid, the OSOTF program or one modeled on its principles should be maintained and enhanced.*

### ***Funding for research:***

As stated in our introduction, the importance of the major enhancements of provincial and federal funding for university-based research and research infrastructure over the past seven years cannot be overstated. It has been the single most important factor in establishing the sense of upward momentum that has been critical to attracting and retaining the leading faculty who define our mission and what we can offer our students. As the gap in basic operating funds is closed, it is equally important that we maintain this upward trajectory in research funding if the gains of the past few years are not to be dissipated. And given the inherently unpredictable nature of the world of discovery and insight, it is critical that this research funding support the full range of research and scholarship, across disciplines and across the full spectrum from the most basic research that is the well-spring of new ideas to the creative invention of solutions to social problems and new ways of viewing the world, past, present and future.

A very important feature of the programs established over the past seven years has been the complementarity between provincial and federal programs. In particular, provincial matching of federal research infrastructure awards has had a great leveraging effect, making possible substantial federal and well as provincial investments in university-based research. As these programs at both levels of government are reviewed and (as in the case of the new Ontario Research Fund) reconfigured, it is crucially important that the overall level of investment be enhanced, and the complementarity across federal and provincial sources be maintained.

A key breakthrough over the past several years has been the increasing recognition by both levels of government of the importance of funding the full costs of research, both direct and indirect. In

the absence of funding for indirect costs, the University must subsidize research from its operating budget, on the order of 40 cents for every dollar received in direct costs. Both the federal indirect costs program and the provincial Research Performance Fund, which “tops up” indirect cost funding for research supported from provincial sources, have been important steps toward the full funding of research. Both of these programs are capped, however, and neither yet covers the full costs of research. As the Research Performance Fund is consolidated within the new Ontario Research Fund, the full funding of the costs of research must continue to be a priority.

Another critical element of infrastructure is our library system. The University of Toronto Library ranks fourth among major research libraries in the United States and Canada, behind Harvard, Yale, and University of California, Berkeley. This is the backbone of our research infrastructure, especially in the social sciences and humanities. It is an enormous resource, not just to our own faculty and students but to the province and indeed the nation as a whole. Accordingly, even in the face of shrinking operating funds, we have preserved the acquisitions budget of our Library in real terms as the inflation rate for those acquisitions has been far above the general rate of inflation. Moving more and more into the world of electronic sharing of information has allowed our library to be an even greater resource both within and beyond the University of Toronto, but it has been accompanied by increases, not decreases, in our costs. In considering differences in the missions of universities, special recognition needs to be given to the importance of flagship resources such as the University of Toronto Library.

***Funding for physical facilities and infrastructure:***

As mentioned in the introduction to this submission, there has been a considerable infusion of funding over the past several for physical facilities from both federal and provincial governments, which has also leveraged funding from private sources. While essential and welcome, this funding has not been sufficient to cover fully the costs of the research and teaching infrastructure we require both to maintain the vigour of the research enterprise and to expand enrolment.

The result is twofold: increased debt for universities, yet reduced space per student. At the University of Toronto, our external borrowing has grown from \$60 million in 2001 to over \$415 million in 2004 to finance an on-going \$900 million construction program, yet our available space relative to our needs, as assessed according to COU standards, continues to decline.

Furthermore, the reductions in operating funding and in funding for facilities renewal over the past decades have prevented the University from spending the money necessary to maintain existing buildings; and the problem of deferred maintenance (currently estimated at \$315 million for UofT) has grown to a level that will require very large investments just to prevent further deterioration. This problem is particularly acute at the University of Toronto, with our many heritage buildings. Of the 176 buildings on the St. George campus (including our federated universities), 73 buildings, or 41 percent, have been listed or designated in the City of Toronto Inventory of Heritage Properties. We hold an important part of the public cultural heritage, yet as one of recent internal reports on our inventory of deferred maintenance starkly put it, “the foundations are crumbling.” Bridging the gap in operating funding for Ontario universities must include as a corollary providing the funding necessary to build and maintain the accompanying physical plant.

***Accountability for results:***

Given their important public roles and their legitimate claim on public resources, public universities must be accountable for fulfilling those roles and for responsible and effective deployment of those resources. Accountability mechanisms are not ends in themselves, however – they should serve the goal of fostering a more differentiated and agile system that enables students to find the right institutional settings for the postsecondary education best suited to their ambitions and abilities. In this light, we emphasize the importance of avoiding micro-management of universities from the centre and favouring instead a results-based model of system oversight.

- Along these lines, *Higher Expectations* presents as an option a funding framework that would “pay for delivery of key results.” This option would represent an evolution of the current system, in which funding is related to Enrolment Target Agreements, as well as (on a much more modest scale) to Key Performance Indicators (graduation rates, employment rates, and OSAP default rates).
- *Appropriately designed, funding on the basis of a multi-year agreement with agreed-upon measures of performance with respect to dimensions such as accessibility, quality of the learning environment and student success could respect distinctive institutional missions while serving overall system objectives.* Clearly, the design of an overall accountability framework along these lines, as well as the appropriate measures to be included in university-specific agreements, is a challenging enterprise, but it is one worth exploring.

*“Give students the money”?*

Finally, *Higher Expectations* raises one option for a funding model that deserves some comment. It is suggested that additional funding be directed to students and their families as opposed to institutions. It is not clear, however, how effectively different this would be from the current model under which students are free to attend any program in any institution for which they qualify, and attract the same level of funding regardless of which institution they attend. Furthermore, any such process would need to include as well some mechanism for recognizing and rewarding the “public good” dimensions of universities (such as regional mandates) that are not directly related to enrolment levels, as well as a smoothing mechanism to provide the stability necessary for universities as long-term institutions with multi-year commitments.

***5. Do we have the right structures in place to know our system is achieving the results we want?***

The accountability framework discussed in the last section raises the question of the appropriate agency to administer such a framework.

Consistent with the argument we have made throughout this submission, any accountability structure must be premised on the principle that the appropriate locus of responsibility and accountability is the governing structure of each university. *There may nonetheless be some merit to the establishment of a body at the provincial level with a mandate for research and analysis to support the development of meaningful accountability measures.* Such a body would have a comprehensive overview of the system and a sustained body of expertise.

The importance of having a body of sustained and impartial expertise is demonstrated by the Rae Review process itself. As in the case of a number of previous reviews, the appointment of the Honourable Bob Rae and his panel of advisors, and the drawing together of an expert staff,

represents the consolidation of an impressive research and analysis trust. However, this substantial resource will be dispersed upon the conclusion of the Review.

Some potential models for such a body can be found in other sectors. In particular, we would point to the health sector and the example of the Institute for Clinical Evaluative Sciences (ICES), an independent body housed at Sunnybrook and Women's Health Science Centre that was initially established as a joint undertaking of the Ontario government and the Ontario Medical Association, and now involves a broader set of stakeholders.

Drawing and building upon established expertise in a centre of excellence for the development of accountability mechanisms in higher education in Ontario is an option worth pursuing. The purview of such a body could include both college and university sectors.