

Higher education and Mercosur accreditation in Brazil

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Abstract

This article analyzes Brazilian higher education and Brazil's participation in Mercosur accreditation policies.¹ First, in order to put the matter in perspective the specificities of the Brazilian higher education system are explained as well as the nation's recent policies in this field. Next, we focus on and explain the Brazilian higher education evaluation system (undergraduate and graduate). The final part is dedicated to study Brazil's participation in the Mercosur accreditation process and conclusion is that the changes in the national higher education system have taken priority over regional issues. Thus, for the purpose of participating in the regional accreditation process, Brazil had to replicate its internal structure organization intended for higher education. However, a National Accrediting Agency as required by the Mercosur agreement has not been set up so far.

KEYWORDS: Higher Education accreditation; Brazilian Educational System; Mercosur; Arcu-Sur System.

1. Brazil: general information

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The Federal Republic of Brazil is located in eastern South American, with a territory of **8,515,767,049** km² (IBGE, 2013) and a population of 208,500,000 inhabitants (IBGE, 2018), which makes Brazil the largest country in South America. Official language is Portuguese.

Brazil's gross domestic product in 2018 was \$ PPP 2.951,7 billion and its *per capita* income was \$ PPP 13.755 (UNDP, 2018). It is the 9th largest economy in the world (Weforum, 2018), but it only ranks 79th in the United Nations Human Development Index, therefore, among other medium-size human development countries (UNDP, 2018). It is a country characterized by significant social inequalities.

Public expenditure in education is 5.9% of the country's GDP (UNDP, 2018). The population's literacy rate is 91.7% of people aged 15 years and older (UNDP, 2018); Illiterate people in the country are 11,500,000 (Agência IBGE notícias, 2018).

Basic education – comprising early childhood education (0-5 years), elementary and middle school (6-14 years), and high-school (15-17 years) – is mandatory for children and teenagers between 4 and 17 years old. It is predominantly public and free of charge. At the age of 4 to 5 years, 93% of children are enrolled in early childhood education; 97.7% of children aged 6 to 14 are in elementary and middle school and 67.5% of youths between 15 and 17 years old go to high-school (Todos pela educação, 2018).

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2. Brazilian Higher Education

Brazilian higher education had a late development if compared to South American Spanish-speaking countries. Portugal, the colonizer, had itself very few universities (Coimbra and Évora, in the 16th century) and fiercely resisted to establish such institutions in the colony. In Brazil, degrees were offered in arts, philosophy and theology in Jesuit schools since 1572, intended to prepare future clergymen (Cunha, 1980). The first professional higher education degrees were created when the Crown moved to Brazil in 1808, fleeing from Napoleon Bonaparte's invasion of the Iberian Peninsula, but, actually, the very first university would be established only in 1920. This slow development of higher education was not exceptional given that, in Brazil, universal access to primary schooling is also a recent achievement which took place in the 1990s.

Brazilian higher education has two different levels: undergraduate which lasts four to five years and grants a diploma of bachelor, licentiate or technical degree) and graduate (*stricto sensu*: master and doctoral degree and *lato sensu*: specialization courses).

There are different types of higher education institutions: Universities (deemed as being of better quality); Federal Institutes of Education, Science and Technology; University Centers and Colleges. To be a University, it is required to conduct research activities; Colleges exist in greater number: 2,020 (Inep, 2017).

Institutions might be either public or private. Since 1997, private institutions can be for-profit, but there are still not-for-profit private institutions (Silva Jr. and Sguissardi, 2001). Although basic education is predominantly public, higher education is mostly provided by the private sector.

Expansion of private higher education in Brazil went through different phases: one in the 1960s and the other in the 1990s. Today, there are 2,448 institutions (2,152 of which are private) and, out of them, 199 are universities. There are 8,288,663 students enrolled (6,241,307 of which are in private institutions, which is 75 percent of supply) (Inep, 2017).

Brazilian graduate departments developed as network in the 1970s, inspired by the American model. Graduate programs are *stricto sensu* at both master and doctoral level. Currently, there are 277,569 registered students, mostly in public institutions. Only 42,375 (15.2 percent) are in the private sector (Capes, 2019). In 2017, 18.58 percent of the population aged 18 to 24 years was enrolled in higher education².

3. Higher Education Policies

One of the greatest challenges faced by the Brazilian higher education system in the 21st century is the democratization of access, since during the 20th century it was basically a system aimed to train the local elite: in 2001, net enrollment was of 9 percent of the population 18 to 24 years old³. The unfulfilled demand and the increasing rates of high-school students reaching graduation, among other factors, forced the system to expand making it more accessible to the population at large. As a result, public policies on federal and state level were made in the first two decades of the 21st century, in order to tackle this issue. Federal policies intend to enhance admissions included the increase openings in public institutions, an approach quite different from the 1990's policies, which were basically concerned with expanding access through the private sector.

2 Personal communication by email with Professor Nelson Amaral (Federal University of Goiás).

3 According to Trow (1970), the higher education system is for the elite if net enrollment comprises 15 percent or less of the population; it is of massive access when net enrollment ranges from 16 to 50 percent. Net enrollment above 50 percent means higher education is universal in that context.

New federal schools were then created with a new institutional design: institutes of education, science and technology, focusing on technical professions, located in the countryside of the Brazilian states. From 2007 to 2012, enrollment in public universities increased by 38 percent due to the implementation of the Federal University Restructuring Plan (aka Reuni) (INEP, 2007, 2012). In technical education, enrollments went up from 20,000 in 2001 to over 80,000 in 2012 (Batista, 2015).

Another way of expanding the public sector of higher education was through distance learning to be provided by existing public institutions. In ten years, from 2003 to 2012, enrollment in face-to-face degree courses grew 53 percent. This figure goes up to 79 percent when distance learning programs are added.

Yet, policies were also devised to enhance admissions by low income students, such as the University for All Program (aka Prouni). Since 2005, this program grants scholarships to undergraduates based on socioeconomic and racial condition (as is the case of students of African or indigenous descent) so that they will be able to pursue higher education in private institutions (both for-profit and not-for-profit). According to Prouni, private institutions get tax exemptions benefitting many private for-profit institutions, which has been strongly criticized by several scholars. In 2014, Prouni gave out 306.723 full or partial scholarships (Prouni, 2015).

In 2012, an affirmative action policy, known as the “Quotas Act”, was put forward; it reserves openings in public federal institutions according to social and racial requirements (family income and/or self-declared African and indigenous descent) whose purpose is to broaden access to individuals traditionally excluded from higher education; there are no data, however, at the moment, available to assess how effective these policies have been so far.

Private sector admissions continued to increase in the first decades of the 21st century with two new features: absorption of distance learning and the existence of educational corporate holdings. This new element unleashed its influence from 2007 onward when big educational corporations (Estácio Participações S.A., Anhangüera Educacional Participações S.A and Kroton Educacional S.A) opened their capital at the São Paulo Stock Exchange and started gathering resources to purchase more than 50 private higher education institutions, resulting in oligopolies.

Recently, in 2016, new adjustment policies have been implemented which significantly reduced higher education budget for federal universities, making it more difficult for the system to expand.

4. Higher Education Evaluation

The Brazilian higher education evaluation system dates back to the 1970s when the assessment of graduate programs was conducted by a specialized commission in the Ministry of Education, known as Coordination for the Improvement of Higher Education Personnel (aka Capes). The evaluation is competitive and takes into account a variety of aspects, especially scientific publications in peer reviewed journals and on-site staff visits. According to the scores achieved in the evaluation, ranging from 3 to 7, programs receive recommendation and are entitled to federal funding, most notably scholarships.

At undergraduate level, the evaluation of both public and private higher education institutions and programs in Brazil relies on directives issued by the Federal Ministry of Education, except for state and municipal public institutions, which have their own evaluation systems. The evaluation also has regulatory purpose, since the results are required to allow an institution⁴ to operate as well as each of

4 The process that allows a higher education institution to operate is known as *credenciamento* (literally, providing accreditation), and the renewal process, conducted through a quality evaluation, is called *re-credenciamento*.

their programs⁵ in all fields of knowledge. Authorization is granted for a period of time and is subject to renewal, which is also based on the evaluative results. The lack of evaluation prevents institutions and programs from operating because their diplomas would not be validated.

Brazilian higher education evaluation processes are recent. Early discussions and projects date back to the 1980s, but implementation did not occur until 1993 with the “Program for Institutional Evaluation of Brazilian Universities” (aka Paiub), which proposed a self-evaluation system utilizing some common quantitative indicators, finalized by an external evaluation.

However, in 1996, the opening of for-profit institutions produced an exponential growth of both institutions and enrollments. As the private higher education sector expanded, the National Programs Evaluation (aka Provão) was created (Catani and Oliveira, 2000). “Provão” was an exam applied to undergraduates from selected programs every year. The results of students’ exams were published in a scale ranging from A to E, where A is the highest score.

Based on these results, a ranking of programs was released by the press, and it was thought it would be enough to regulate the new market of private education. This was a way through which the state would regulate the market (Rothen and Barreyro, 2011) because the evaluation conducted by the state. It was expected that potential consumers would dismiss lower quality institutions. Although sanctions were considered, they were never applied.

“Provão” was highly criticized by both scholars and higher education students for its technical inconsistencies, notably the focus on assessing undergraduate students, while, it was argued, other institutional elements should be taken into account. The quantitative nature of the examination was also regarded as a noticeable shortcoming.

All this changed in 2003, when Luiz Inácio Lula da Silva took on as President and a federal act created the Higher Education Evaluation System (known as SINAES). SINAES was based on the formative evaluation paradigm and began to take effect in 2004, comprising three levels: institutional evaluation, program evaluation, and student evaluation.

Institutional evaluation focuses on higher education institutions and consists of an individual self-evaluating process fed with the data input from the academic community, documented in a self-evaluation report, followed by an on-site visit.

Program evaluation is carried out through an on-site visit by a staff. Students are evaluated through an exam taken by a sample group of students from selected programs every year. SINAES aims to include qualitative information in the evaluation process (Barreyro and Rothen, 2006).

The National Commission on Higher Education Evaluation (aka Conaes) was subsequently created for the purpose of coordinating the whole system, but such commission is not in charge of the evaluation processes. The National Institute of Educational Studies and Research (aka Inep), is a division of the Ministry of Education responsible for managing the exams to all students.

SINAES began to be implemented in 2008, and since then the system has undergone important changes. An indicator called “Program’s Preliminary Grade” (aka CPC) was added which includes the results from students’ exams, qualification of professors, and students’ opinions on teaching techniques and infrastructure. Within the institutional evaluation, a “General Institutional Program Indicator” (aka IGC) was created to quantify results achieved by the programs. In both CPC and IGC, students’ exams have an unequal weight onto the final outcome of the indicators. Such indicators once again led the press to establish a ranking of the programs.

5 The process that authorizes a program to operate is known as *autorização*. *Reconhecimento* is the process that evaluates the program’s quality and *renovação de reconhecimento* is the process through which the program is re-evaluated. Universities do not need to pass through authorization procedures to offer programs since they have full autonomy to create them, but they are subject to *credenciamento* and *recredenciamento* procedures.

Results are converted into a 1-to-5 scale where 5 is the highest score. Minimum score is 3 for an institution to be approved and have its regulatory processes renewed. Sinaes attempted to create a formative evaluation system, but that only occurred in the institutional self-evaluation, because the system changed in 2008. Now it focuses mainly on indicators predominantly based on the exam results, similar to the previous “Provão” (Barreyro and Rothen, 2014).

5. Brazilian Higher Education in Mercosur: accreditation process

The role of Brazil in the accreditation of university degrees in the Common Market of South (aka Mercosur) has to do with both to the country’s political strategy for the economic bloc and to the national policies for the quality of higher education.

The creation of a regional accreditation system was developed simultaneously with the improvement of the national higher education evaluation system that took place over the 1990s. However, convergence or harmonization between regional and national policies was not a fact, due to each country’s different priorities. Since early discussions at Mercosur’s Educational Sector (aka SEM), concerns about migration of qualified workers prompted a discussion about the validation of studies and mutual recognition of diplomas in the context of globalization. In contrast, the expansion of private institutions in Brazil generated a different perception about the higher education evaluation system.

Brazil took a path that is not characterized by well-defined public policies, but rather by certain perennial elements deeply rooted in the practice of higher education evaluation, such as the connection between evaluation and regulation processes and the sharing of responsibilities among bodies in charge of these processes. Consequently, Brazil got far away from regional guidelines, whose aim was to define a quality assessment process for higher education in order to consolidate other policies in the Mercosur Educational Sector.

One possible reason for the discrepancies between the national public policies and regional negotiations lies in the fact that Brazil disregards Mercosur. An old aspiration of the country’s foreign policy since the 1970s, pointed out by Bernal-Meza (2002), is to consolidate its role of middle regional power and global trader and to achieve a permanent seat at the United Nations Security Council. This would cause shifts of positions in the new geopolitical structure that emerged after the end of the Cold War. Although Brazil intended to use Mercosur as a strategic tool to fulfill such goals, disagreements with Argentina made Mercosur not a priority for the country.

6. Brazil and the Experimental Mechanism for the Accreditation of Undergraduate Courses in Mercosur (Mexa)

Since the beginning, Mercosur assumed that integration would pave the way for regional development going beyond economic and commercial aspects. Education was one of the pillars ensuring the development of the human capital of its member-states (Herme, 2011). Higher education was then perceived as a relevant tool in the process of training a qualified workforce. Thus, quality certification was perceived as a *sine qua non* step towards the validation of diplomas that would make it easier for professionals to move about in different countries of the region.

Bearing this in mind, a “Memorandum of Understanding on the Implementation of an the Experimental Mechanism for Accreditation of Undergraduate Courses to Validate Graduation Diplomas in the countries of Mercosur, Bolivia and Chile” (aka Mexa) was signed in 1998. A pilot program was to be applied to check the viability of implementing an accreditation system in the bloc. The aforementioned document presented the grounds, the general principles, the glossary and framework. Also, specific bodies were established to manage and operate the system; procedures in each country would be

conducted by National Accrediting Agencies (aka ANA) to be created by the relevant Ministry of Education, while the regional management would be performed by a integrated network consisting of such national agencies, named Network of National Accrediting Agencies (aka Rana).

Between 1998 and 2000, three Brazilian universities⁶, one of each course that would be submitted to the Mechanism (agronomy, engineering, and medicine), took part in a pre-test to check if Mexa criteria and indicators were adequate. Unfortunately, it was not possible to access data concerning how these pre-tests were conducted or even which body was in charge of conducting them. As a general rule, very few official records involving Brazil's participation in the regional accreditation process are available, notwithstanding the country's responsibility to provide and maintain the Communication Information System for the Mercosur Educational Sector.

It is worth noting when the first draft of the Memorandum establishing Mexa was signed on June 19th, 1998, and upon the approval of the final modified document on June 14th, 2002, Brazil was the only country whose Minister of Education was not present. According to the minutes of the 01/98 and 02/02 Meetings of Ministers of Education (aka RME), Brazil was represented by the International Affairs Aide of the Office of the Minister of Education, a sign that the theme was not a top priority for the Brazilian government at that time. The appointment of a Brazilian representative for the meetings of Mercosur's Educational Sector depended on the topic being addressed in each meeting, since regional educational actions did not figure in the national agenda and were regarded as of secondary importance (Hizume, 2013).

Politically, participation of any sort in Mexa was of crucial for countries aiming at securing their regional position in the discussions on the movement of scholars and the qualified workforce. That is because Brazil with Chile and Argentina were by far the countries most experienced in the field of higher education evaluation, which was just getting started at the time.

20 Mexa was applied from 2003 to 2006 to courses indicated by the Ministry of Education of each country. A total of 62 courses were accredited at the end of the process, 12 of which provided by Brazilian institutions (Mercosul, 2008), as shown below:

Table 1 – Brazilian Courses accredited at MEXA per Institution

Course		Institution
Agronomy		University of Brasília (UnB)
State University of Londrina (UEL)		
Federal University of Viçosa (UFV)		
Engineering	Electrical	University of São Paulo (USP)
		Federal University of Campina Grande (UFCG)
	Mechanical	Federal University Uberlândia (UFU)
		Federal University of Rio de Janeiro (UFRJ)
	Chemical	Catholic University of Rio de Janeiro (PUC-RIO)
		State University of Campinas (Unicamp)
Medical School		Holy House of Health of São Paulo
State University of Londrina (UEL)		
Federal University of São Paulo (Unifesp)		

Source: Hizume, 2013.

6 Agronomy: Federal University of Lavras (UFLA); engineering: State University of Campinas (Unicamp); Medicine: Federal University of São Paulo (Unifesp).

Mexa is a three-fold process: analysis of the self-evaluation report submitted by higher education institutions on the program; analysis of the report issued by the on-site staff visit; and grant or denial of accreditation. However, despite its being simple Mexa did not easily develop in Brazil for two important reasons: accreditation was not a reality within the Brazilian system and the country lacked a National Accrediting Agency (ANA) in compliance with regional standards. The same was happening other countries and, among Mercosur's founding member states, only Argentina had already a national accrediting agency that fulfilled the prerequisites⁷. In view of this, Mexa's Call allowed the participation of *ad hoc* staff from the countries with no established national agency (Hizume and Barreyro, 2017).

Contrary to the recommendation of the Call, instead of appointing an *ad hoc* commission and following the logic of its own system, Brazil assigned two boards to take part in ANA: the National Council on Education (aka CNE), a mainly normative and deliberative body in support of the Ministry of Education on issues of federal relevance and the Office of Higher Education (aka SESu), a division in the Ministry of Education, in charge at the time of procedures involving evaluation and regulation of undergraduate courses and higher education institutions. Oddly, none of them had an active role in the evaluation processes (Hizume, 2013). However, despite both the CNE and SESu being considered National Accrediting Agencies, in official Mercosur documents, such as the Minutes of Meeting 02/04 of the RME, Guilayn (2012) says Mexa procedures were conducted exclusively by SESu; according to Hizume (2013), the entire procedure was put under the care of the International Affairs Aide in Office of Higher Education.

More effective Brazilian participation in the regional accreditation process and stability in the representation of the Ministry of Education was observed after Mexa began to be applied.

7. The Implementation of the Arcu-Sur System in Brazil

Inspired by Mexa, the Decision 17/08 of the Common Market Council (CMC) established the Arcu-Sur System as a permanent regional accreditation process. Although the first cycle of calls for the Arcu-Sur System had been released in July 2008, the first Brazilian accreditations took place only in March 2013. Brazil's delay in implementing the regional accreditation process was noted by the Mercosur's Regional Commission Coordinator of Higher Education (aka CRC-ES) and a record was included about Brazil's delay in implementing the regional accreditation process in the Minutes of Meeting 02/2011. It read as follows:

“The CRC-ES reiterates its concern about the status of accreditations in Brazil, given that until now this country has not accredited any degree in the Arcu-Sur System, which deeply undermines the aforementioned system as well as the development of the Marca Program.”

Such inaction resulted from bureaucratic problems related to the body initially assigned to act as the National Accrediting Agency in the Arcu-Sur System, the National Commission on Evaluation of Higher Education (aka Conaes). Replacing SESu, which previously played the role of ANA in Mexa, with Conaes happened as the government saw its appropriateness in Brazil's national system to take charge of coordination and its directives. However, as an advisory body of the Ministry of Education, Conaes does not manage its own budget or has the resources to implement evaluation processes. Especially because, according to its internal legal structure, evaluation must be carried out by the National Institute of Educational Research (Inep). Therefore, Conaes was unable to pursue the procedures pertaining to Arcu-Sur System due to operational and legal constraints; in other words, Brazil assigned a body that could not fulfill its responsibilities as a regional accrediting agency given the absence of the elements of a proper ANA (Hizume, 2010).

7 In order to have the status of a National Accreditation Agency, it is necessary: to be a public institution operating in conformity with local legal and constitutional requirements; be directed by a board of directors; be autonomous and impartial; to be staffed by reputable individuals and have procedures in accordance with international good practices.

The solution to this conundrum was once again temporary: drawing from the Brazilian practice of competence-sharing in the evaluation processes, Inep and the Secretary of Regulation and Supervision of Higher Education (Seres) were assigned to, together with Conaes, represent Brazil in the Network of National Accrediting Agencies (aka ANAs). Conaes was then “responsible for establishing criteria to be used for the functioning of Arcu-Sur System in Brazil, according to definitions imposed by ANA and Inep, for the implementation of the evaluation process of courses”⁸. Seres’s role was not clearly defined and its mission is probably justified by the fact that, in Brazil, it is responsible to regulate higher education, since 2011. According to Hizume (2013), this change allowed the national bodies to conform with the regional system requirements. However, it is worth noting that only Conaes has signed the document that grants the accreditations.

Table 2 – Comparison between Arcu-Sur System and the Brazilian National Evaluation System

	Arcu-Sur System	Brazil
Body/Action	Rana	Conaes
	Coordinates the regional system	Coordinates the national system
	ANA	Inep
	Performs the national evaluative activities and grants accreditation.	Performs the evaluative activities
		Seres
		Regulatory acts
Type of Declaration	Accreditation	Authorization and renewal of authorization
Requirement	Voluntary	Mandatory
Purpose	Quality certification/ accreditation	Regulation
Funding	Funds come from countries. May be shared with the higher education institution.	Shared between the state, which funds Enade, and higher education institutions, which fund all other procedures.
Frequency	6 years	3 years

Source: Hizume, 2013.

In order to select national courses to participate in the Arcu-Sur System, SESu⁹ and Conaes invited Higher Education Institutions to apply for the regional process. In addition to the minimum conditions regionally required, Agencies may establish, at their discretion, eligibility conditions for application. In Brazil, the criteria for the first stage, involving seven courses – agronomy, architecture, nursing, engineering, medicine, odontology and veterinary – are not always the same, depending on specificities of each area. The additional national conditions are: a) the program must have university status (defined as performing activities such as teaching, research and community services), b) must have been effectively operating for 10 years, and c) must be in the evaluation processes of Sinaes, the national evaluation system, with a score of 4 or above. Other elements such as course seniority, scores in national evaluations, and history of such evaluations may also generally be considered.

Score 4 in Sinaes is the minimum requirement to participate in the Arcu-Sur System, which means academic quality domestically validated is required to take part in the regional process. Since the Sinaes score scale varies from 0 to 5, the regional process serves as a tool to confirm the quality of the national

8 According to the Ministerial Order n. 1.734 from December 9th, 2011, Ministry of Education.

9 As of now, SESu acts as a member of MERCOSUR's Regional Commission Coordinator of Higher Education (CRC-ES).

evaluation process, as the regional accreditation is added with the national evaluation. Therefore, for Brazil, the objective of quality improvement by the Arcu-Sur System was not accomplished.

Despite the delay to set forth regional evaluation procedures, Brazil has benefitted from its domestic experience and utilized its electronic follow-up procedure that manages Sinaes, known as e-MEC, with Arcu-Sur. It was the only country to implement an *online* methodology, a qualitative step forward to streamline the operations with activities and information (Hizume, 2013).

In order to fund domestic procedures for Arcu-Sur System, Brazil made a commitment to grant public money to pay for all national processes of regional accreditation. This is the opposite of what happens with Sinaes, where higher education institutions must bear the cost of the evaluation processes. Each State member is free to decide how Arcu-Sur accreditation is funded, whether sharing costs with universities applying for accreditation or taking the costs in full (Guilayn, 2012).

Brazil ratified the Agreement on the Arcu-Sur System in 2012 and on March 12th, the ratifying instrument was set¹⁰. The first Brazilian courses accredited by the Arcu-Sur System are listed in the table below:

Despite the mishaps, Brazil is the country with the highest number of courses accredited by the Arcu-Sur System, in close relation with the size of its national higher education system.

Table 3 - Courses accredited by the Arcu-Sur System (up to August 21st, 2017)¹¹

Courses accredited by the Arcu-Sul System	Argentina	Brasil	Paraguay	Uruguay	Total
Agronomy	13	17	1	1	32
Architecture	10	8	2	2	22
Nursing	4	12	2	1	19
Engineering	16	29	7	7	59
Medicine	4	2	3	1	10
Dentistry	2	2	1	1	6
Veterinary	8	11	1	1	21
Total	57	81	17	14	169

Source: Barreyro (2017) based on Arcu-Sur data (2017).

The Arcu-Sur agreement did not enter into force because Paraguay did not ratify it. According to the Agreement, it will come into effect only 30 days after the ratification of the four original member states of the bloc has been deposited. For this reason, the accreditations are essentially granted based upon international custom at the moment.

10 Consultation made at http://www.mre.gov.py/tratados/public_web/DetallesTratado.aspx?id=b01yrkj1D7QFrwQ3mHF2BA==&em=lc4aLYHVB0dF+kNrtEvsmZ96BovjLlz0mcrZruYPcn8=>. Access: 09 April 2019.

11 For this table, the original member states of the bloc were considered. There is no distinction on the site about whether accredited courses correspond to Mexa or to the 1st or 2nd cycle of the Arcu-Sur System; therefore, the distinction between Mexa and Arcu-Sur was made on a case-by-case basis. The 2nd Arcu-Sur cycle was planned to take place between 2015 and 31 July, 2017. Therefore, some of the accreditations may have been granted during this cycle, which should include the Economics, Pharmacy and Geology courses, as well as the participation of Ecuador (Barreyro, Hizume, Lagoria, 2015), although Arcu-Sur, as mentioned before, seems outdated since 2015. Several emails were sent to the address available for contact but an automatic response was returned.

8. Prospects for Regional Accreditation

In case of Draft Project n. 4.372/2012 is approved to create the National Institute for the Supervision and Evaluation of Higher Education (aka Insaes), the two technical conflicting points between Sinaes and Arcu-Sur System would finally be overcome, that is, the lack of accreditation and ANA in Brazil.

According to this draft proposal, in addition to adding accreditation as another national evaluating process, Insaes would replace the network of bodies currently sharing managerial and executing competences associated with national evaluation and regulation, with the purpose of improving the operational and methodological apparatus of its national and international practices, absorbing the tasks of a real National Accrediting Agency.

If Insaes is approved and given the task of international, technical and financial bilateral cooperation, Brazil would prove the country is interested and really cares about the internationalization processes of higher education accreditation.

The Project is processed on an emergency basis since 2012 and the last status shows a report in favor of approval by the Commission of Constitution and Justice, and Citizenship in Brazil's House of Representatives¹².

9. Final Remarks

The Brazilian delay in granting accreditation through the Arcu-Sur System could be seen as a result of the country's lack of commitment to Mercosur. However, several factors should be considered as well as the circumstances in order not to blame the political unwillingness for all of the challenges. Throughout this article some elements were presented to corroborate the fact that implementing a regional accreditation process is not a priority for Brazil, including the gap between the Arcu-Sur System and the domestic higher education evaluation process. There are also other problems related to changes at the international level affecting decisively Brazil's foreign affairs.

The circuitous route taken by Brazil regarding the Arcu-Sur System stems from the uncertainty in relation to its national higher education public policies. They have been basically devised as responses to social demands and to the expansion of the private sector rather than to its rational structuring. This can be observed in the constant changes enforced on the evaluation system, its operating tools and indicators or on the public bodies in charge of evaluation, notably its regulatory nature.

Yet, Mercosur's proposal, conceived by six states represented by their respective Ministers of Education, prioritized to establish a quality accreditation process for higher education courses in support of the movement of a qualified workforce in order to enhance regional integration.

The main differences in establishing these two evaluation systems indicate different perspectives: on one hand, evaluation as a means for the state to regulate national higher education and, on the other, accreditation as a means to grant quality certification for courses with mutual diploma validation in the region. The possible convergence between these two systems could be realized through the creation of Insaes, a flag of Brazil's intention to take a more active role in the process of internationalization of higher education by adopting accreditation and setting up a centralized board whose function would be to perform international accreditation procedures.

In this regard, it could be said that a more intensive participation in the regional accreditation process since Mexa and the difficulties to implement the Arcu-Sur System, even if Mercosur is not a top priority in Brazil's foreign policy, are crucial to rethink the prospects of national higher education.

12 Consulted at: <<https://www.camara.leg.br/proposicoesWeb/fichadetramitacao?idProposicao=554202>>. Access: 09 April 2019.

These changes will also help Brazil achieve its goal of reinforcing its status as a global trader, since accreditation is the main tool to validate foreign university diplomas, subject to negotiations involving the *General Agreement on Trade Services (GATS)*.

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