POLICY PAPER



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EXECUTIVE SUMMARY

The United Arab Emirates (UAE) is rapidly growing as an international hub for higher education, with a wide array of international branch campuses, as well as national public and private institutions. While a majority of this growth in international students and institutions is concentrated in the emirates of Dubai and Abu Dhabi, the tertiary education sector of Ras Al Khaimah has also expanded through a combination of public investment and educational zoning policies designed to attract foreign providers who are offering affordable higher education opportunities to the UAE's expatriate residents.

The increase in commercialized international providers, however, introduces a range of regulatory issues, including the need for quality assurance, data reporting, accountability, and sustainability. In the absence of robust monitoring and regulation of institutions operating within economic free zones, 1 students must navigate a commercial higher education market without access to impartial information. As a result, students are vulnerable to misinformation and misleading claims by institutions and may unwittingly pursue low-quality degrees that may not meet the needs of potential employers.

Drawing on survey data from students studying in the educational free zones of Ras Al Khaimah, this policy paper provides insight into who these students are, why they choose to study there, and what factors influence their decisions. It finds that students attending international institutions in Ras Al Khaimah make choices based on educational cost, convenience, and location over institutional quality and reputation and that a large majority of these students are Ras Al Khaimah residents who have few educational alternatives. It argues that Ras Al Khaimah's higher education sector is being populated by a number of low-cost commercial institutions, which may not aid the emirate or its students in their development. The paper makes several policy recommendations concerning data collection and dissemination in order to increase institutional transparency and accountability.

International and Commercial Higher Education in Ras Al Khaimah: Policies, Problem Areas, and Promise

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Introduction

Global demand for higher education is soaring amid a host of economic transformations, demographic changes, and technological innovations that reduce barriers to its access. This phenomenon is especially pronounced in the Gulf Cooperation Council (GCC) countries, where national efforts to diversify economies towards knowledge, innovation, and service industries have driven unprecedented demand for knowledge-intensive skills and qualifications. This shift is compounded by high birth rates among Gulf nationals, staggering inbound migration to meet labor needs, and the increased participation of Gulf women in higher education—all of which have placed greater pressure on institutions and policymakers to accommodate growing populations in higher education.

While the response to this demand has resulted in a steep increase in the number of higher education institutions across the region, nowhere has the growth been more dramatic than in the United Arab Emirates (UAE) (Badry & Willoughby, 2015; British Council, 2012). Having only one flagship university and a handful of technical colleges until the early 1990s, it is now home to at least 109 accredited degreegranting or vocational institutions² and nearly 150,000 national and international students,³ as higher education has been designated a key priority in the UAE's Vision 2021 national agenda (Government of the United Arab Emirates, 2010). Alongside a federal level that administers three national universities (including the Higher Colleges of Technology system), each emirate has its own range of state, private, and international institutions to meet the educational needs of a diverse population. One unique feature of the emirates of Dubai and Ras Al Khaimah is their use of academic "free zones" to attract private and international institutions. Specifically, free zones allow international degree providers to operate inside the UAE without being subject to national accreditation, which dictates program

¹ An economic development policy tool used to ease restrictions on foreign investment. For commercial higher education, international providers can operate without U.A.E. accreditation, can retain full ownership, and can repatriate all revenues tax–free.

² This figure is based on the combination of higher education institutions accredited by the federal Commission for Academic Accreditation (CAA) (78) and by Dubai's University Quality Assurance International Board (22) and institutions franchising degree programs in Ras Al Khaimah's free zones (9). These sums exclude online or distance learning degrees as well as several institutions licensed in Ras Al Khaimah but not operating there.

³ This figure is based on the combined sums of three student populations: those studying at federal and federally accredited (CAA) institutions (128,279), those in Dubai's academic free zones (18,144), and those in Ras Al Khaimah's commercial free zones (around 2,000).

length, specific content, and other requirements. Free zone-licensed providers may retain full ownership or enter a partnership with a business entity to share the upfront investment costs. Like many other economic free zones, these have flexibility that allows Dubai and Ras Al Khaimah to bring in international providers in response to market demand and with fewer barriers to entry than program startups would face outside free zones

Despite these advantages, free zones have created issues for regulation and harmonization among emirates, particularly with regard to quality management and accreditation (Farrugia, 2012; Rawazik & Carroll, 2009). Their dependence on consumer demand also exposes institutions and their students to market volatility. These consequences are in line with the global model of "demand-absorbing" private institutions (Levy, 1986, 2008), which operate as businesses do: by minimizing costlier activities (e.g., research) while targeting those degree programs that maximize returns. In the relatively liberal regulatory environment of Ras Al Khaimah's free zones, many commercial providers tend to prioritize affordability and convenience over educational quality and may engage in a range of questionable practices aimed at capitalizing on student demand. This is a problem for both expatriate students—for whom the international institutions primarily provide degrees—as well as U.A.E. nationals, who must subsequently compete with graduates of these institutions in the job market.

A considerable number of studies and publications have given attention to Dubai's free zone institutions and policies due to its unique volume of providers; few have focused exclusively on Ras Al Khaimah. This study looks at the institutions, students, and regulatory practices in the free zones of Ras Al Khaimah, examining student choices and the challenges they face in navigating a complex and often opaque higher education market. It begins with a background on international and commercial higher education, followed by an overview of Ras Al Khaimah's higher education sector, specifically its free zone institutions and regulatory practices. The paper follows with a look at their students, drawing on findings from a questionnaire and interviews conducted to understand who studies in these institutions and how they make decisions. It concludes with a discussion of the challenges that consumers face, as well as a series of recommendations for improving transparency and accountability for students and parents.

International Higher Education and Regulation

In the wake of soaring demand for advanced skills and qualifications, international or transnational higher

education has become a lucrative global trade. While comprising all services related to education, including overseas studies and online programs, the largest mode of traded services is the export of education providers themselves, in the form of international branch campuses (IBCs), degree franchises, and partnerships (Naidoo, 2009). For importing countries, international higher education can contribute to the country's net delivery capacity and fill critical gaps where training at local institutions is in short supply (Naidoo, 2010). Studies also highlight their cost-effectiveness when delivering niche programs and the diffuse economic impact of retaining and attracting students (i.e., "brain gain") (Knight, 2013; Lien & Wang, 2012; Shams & Huisman, 2011).

The two most common models for providing international higher education are the international branch campus and degree franchise, although the distinction between them is not always clear in the UAE. Much academic literature has been published on branch campuses, including their rationales (Edelstein & Douglass, 2012; Wilkins & Huisman, 2012); different models of ownership and resourcing (Lane & Kinser, 2013; Verbik & Merkley, 2006); and outputs (Lane & Kinser, 2011a; Owens & Lane, 2014). Considerably less attention has been given to degree franchises despite their relative ubiquity (Healey, 2013a).4 Degree franchises are typically smaller, flexible operations that provide the curriculum, quality assurance, and degrees from institutions abroad while hiring local instructors at local salaries to deliver course material (Altbach, 2012). Despite having a commercial orientation, they improve students' access to internationally recognized degrees for a fraction of the cost of degrees through their home campuses (Healey, 2013b). In the context of Dubai and Ras Al Khaimah's international institutions, however, the distinction between degree franchises and branch campuses is often vaque, as both branch campuses and degree franchises come in a variety of forms and sizes. All foreign degree providers in these emirates rent their physical facilities from a third-party property developer, and facilities range from converted office floors to purpose-built educational facilities. Degree franchises in the UAE have an explicitly commercial orientation and-without public subsidy to fund their startup or operating costs—must compete for student enrollments through recruitment fairs, advertisements, and often aggressive salesmanship.

The global proliferation of commercial international institutions poses concerns for quality and regulation. In the absence of an international policy framework, national governments are required to establish and enforce regulations in order to maintain quality standards. These practices must evolve continuously to keep pace with the rapid growth in international trade in education (Lane & Kinser, 2011b). National regulatory

⁴ To illustrate in terms of the UK's total exports, in 2008 there were only 13 IBCs of U.K. universities but over 400 overseas franchise arrangements (Altbach, 2012).

Table 1: Models of Regulation in International Higher Education

Model	Advantage	Disadvantage	Regulatory Agency in UAE
Curriculum Domestic accreditation/ National quali- ty assurance	Allows for direct over- sight and quality man- agement; one standard- ized set of requirements for all providers	Requirements seen as rigid; often incompatible with requirements of other accreditation models	Commission for Academic Accreditation (CAA)
Foreign accreditation "equivalency"	Allows for flexibility and recognition of different national accreditations; easier to attract international providers	Quality is managed remotely; requirements often seen as locally unresponsive; international accreditation requirements vary, leading to different degree outcomes	University Quality Assurance International Board (Dubai KHDA); Ras Al Khaimah Free Trade Zone (RAKFTZ)
Licensing	Can regulate practices not covered by accreditation (e.g., reporting, advertising); can be used to localize practices (e.g., hiring, student-consumer protections) and determine suitability for the sector	Focused on compliance and best practices from a business perspective; can be mistaken by consumers or misrepresented by institutions as accreditation	KHDA; RAKFTZ, Ras Al Khaimah Investment Authority (RAKIA, until Oct 2014)

frameworks assure the quality of international academic programs either through often rigorous domestic accreditation issued by ministries of education or higher education-such as in the UAE (excluding Dubai and Ras Al Khaimah free zones), Oman, South Korea, and Singapore-or through equivalent foreign accreditation, as seen in Qatar and Dubai. As acquiring accreditation from a host country can be cumbersome for international institutions, the equivalency model allows greater flexibility by recognizing a program's accreditation in its home country, and thereby recognizing the assurance processes of those home countries (Rawazik & Carroll, 2009). However, foreign accreditation can be a challenge for host countries due to the difficulty of maintaining consistency among international institutions and ensuring their compatibility with domestic requirements (Stella, 2006; Woodhouse, 2006).

A parallel form of regulation often used in economic free zones is the licensing process, which imposes on international institutions conditions for operating. These regulations can be more or less comprehensive depending on their contexts, but they typically stipulate practices in consumer protections, transparency, and stakeholder access to information, among others (Vincent-Lancrin & Pfotenhauer, 2012). Licensing tends to hinge on organizational compliance and preferred practices from a business perspective. While it can stipulate accreditation as a precondition for licensing,

the licensing process does not assure any academic quality practices in particular (see **Table 1**).

Free Zones and Foreign Providers in the UAE

The UAE's economic free zones present both growth opportunities and regulatory challenges. Their use as a "development tool" has been cited as a critical factor in Dubai's international higher education expansion since the zones relax ownership and operational regulations to attract foreign investment (Lane, 2010, p. 4). Free zones allow international education providers to set up offshore sites without Emirati coownership, keep all revenue from student fees, and enter partnerships with other investors to offset costs. Foreign providers inside free zones are also shielded from having to acquire licensure from the Ministry of Higher Education and Scientific Research (MoHESR) and national accreditation from the Commission for Academic Accreditation (CAA), requirements that can be onerous for foreign providers and a disincentive for prospective providers. A small number of Dubai's free zone-based foreign providers have elected to acquire CAA accreditation because it enables their graduates to work in the UAE's public sector and Emirati students to receive financial aid, both of which are advantageous for student recruitment. The majority of providers, however, only hold accreditation from their countries of origin.

Licensing higher education providers within free zones is now practiced only in Dubai and Ras Al Khaimah. Dubai houses its 28 foreign providers⁵ in five free zones, two of which are spaces zoned exclusively for education and education-related services. Their foreign providers, along with all private education providers in the emirate, are licensed and regulated by Dubai's own regulatory agency, the Knowledge and Human Development Authority (KHDA). In addition to ensuring accreditation equivalency through its University Quality Assurance International Board (UQAIB) and enforcing local regulations, the KHDA protects consumers by making institutional data—Including accreditation, enrollment numbers, costs, and degree program offerings publically available.

Ras Al Khaimah licenses its foreign providers through two zones, the Ras Al Khaimah Free Trade Zone (RAKFTZ) and Ras Al Khaimah Investment Authority (RAKIA), both of which are general free zones that license a variety of foreign commercial operations. There is no equivalent of the KHDA for licensing and regulating education providers in Ras Al Khaimah, and providers are not always physically hosted inside free zone spaces. The RAKFTZ has several staff members dedicated to academic licensing, client relations, and regulatory compliance, while RAKIA has none. Consequently, IBCs and franchises licensed through RAKFTZ must offer internationally accredited degree programs verified by RAKFTZ management and report basic data on student enrollments and completion rates to the free zone. RAKIA providers are not subject to such requirements. As of October 2014, however, Ras Al Khaimah's ruler has decreed the establishment of a dedicated academic free zone, which provides a physical space near the southern edge of the emirate and a new licensing and regulatory authority. The scope and nature of the academic zone authority has not been fully articulated, and the zone is several years from being fully implemented. The RAKFTZ has assumed ad interim licensing and oversight responsibilities for both zones as a result of the decree, and RAKIA-based providers are being consolidated under RAKFTZ licensure as their RAKIA operating licenses expire.

Higher Education in Ras Al Khaimah

Ras Al Khaimah has seen steady growth in its higher education enrollments as its population expands. While its overall number of institutions accredited by the CAA have remained at four since the opening of the American University of Ras Al Khaimah (AURAK) in 2009, the student enrollment rate grew by 38.4% between 2009 and 2013, which represents the second highest growth rate within the UAE during that time (UAE MoHESR, 2014). Student enrollment and tuition cost figures for these institutions are detailed in **Table 2**.

In addition to these emirate-governed institutions, Ras Al Khaimah has a sizeable number of international degree providers operating within its free zones. Some self-identify as branch campuses—such as Abasyn University (Pakistan) or Birla Institute of Technology (India)—while others—including the University of Bolton (UK) and Madonna University (USA)—operate as franchises. While expanding in student numbers annually, these institutions each generally enroll between 100 and 400 students from a wide range of nationalities. These providers are scattered around Ras Al Khaimah and are licensed under the RAKFTZ. The remainder of providers are licensed and physically situated within the RAKIA zone and are smaller, lower-profile degree franchises.

Table 2: Nationally Accredited Institutions in Ras Al Khaimah

Institution	Total enrollments in 2015-16 academic year	International students as percent of enrollments	Tuition cost per academic year ⁶
American University of Ras Al Khaimah	724	69%	46,000 AED (12,524 USD)
Ras Al Khaimah Medical and Health Sciences University	1,300	87%	85,000 AED (23,142 USD)
Higher Colleges of Technology (Men and Women's campuses, combined)	2,411 (2014-15 academic year)	0%	Free to Emirati citizens; closed to international students

⁵ Institution names and locations are available through the KHDA directory at http://www.khda.gov.ae/en/directory

⁶ These rates are lower than those at peer institutions in other emirates, notably the American University in Dubai at 78,000 AED (21,236 USD), American University of Sharjah at 89,720 AED (24,427 USD), and University of Sharjah medical college at 97,545 AED (26.558 USD).

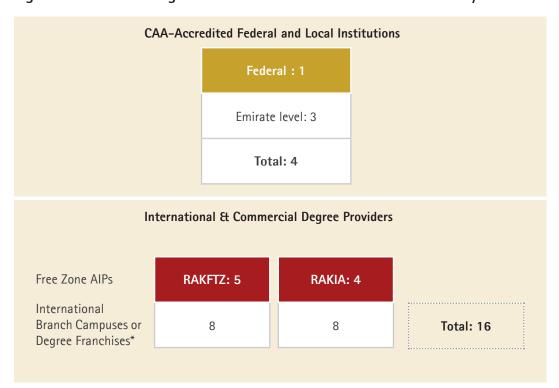
The overall number of branch campuses and degree franchises in both zones is unclear. One reason for this is the design of degree licensure in Ras Al Khaimah, wherein a foreign university entering the Ras Al Khaimah market partners with a local investor, known as an academic infrastructure provider (AIP). The AIP provides the physical facilities for operations, and, depending on the agreement, typically oversees the administration of the international partner's degree program. The AIP is an invested business partner that bears many of the licensing and operational costs, so it aims to maximize its returns by increasing student enrollment. In a majority of cases, the AIP does this by partnering with multiple foreign universities. This is especially the case in the RAKIA zone, in which a single AIP may host as many as four distinct international degree franchises from one converted office space. These AIPs typically diversify their market shares by offering a variety of international degrees that cater to various nationalities, academic pursuits, and income levels.

The second reason for this uncertainty regarding the number of branches and franchises is the regulatory environment of the free zones. Due to the minimal reporting requirements, particularly in the RAKIA zone, accurate figures related to degree franchises and student data are not easily available. It was repeatedly

found during the research that providers' websites advertised more programs than were offered at free zone institutions, and in some cases were licensed to operate in Ras Al Khaimah but had no physical presence in the emirate. To add to this, the number of programs offered by AlPs changes frequently, leading to fluctuations in student enrollment numbers. Based on site visits and interviews with stakeholders, including AlPs and franchise managers, the figures for the total AlPs with a physical presence in Ras Al Khaimah, degree franchises, and student numbers at the time of writing are provided in **Figures 1 and 2.**

In terms of quality assurance and oversight, none of the IBCs or degree franchises in Ras Al Khaimah are accredited by the CAA. This prevents their graduates from gaining public positions in the UAE, a frequently cited reason that few Emirati students enroll in free zone institutions. The only external guarantor of degree quality in the case of RAKFTZ providers is each institution's international accreditation, which varies in its requirements and oversight depending on its country of origin. Without a centralized office or agency responsible for overseeing higher education in Ras Al Khaimah, education quality is being managed by the institutions themselves, which are guided by the higher education market and public perception.

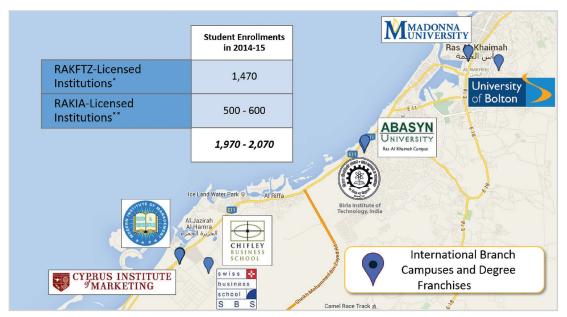
Figure 1: Number of Higher Education Providers in Ras Al Khaimah by Sector



^{*} Figures on degree franchises based on visits with institutions and are believed to be accurate as of June 2015. Only programs with face-to-face instruction delivered in Ras Al Khaimah are included.

⁷ This again is due to the relatively relaxed licensing process for higher education providers in Ras Al Khaimah. AIPs such as "Westford School of Management" hold a license with RAKIA but operate in other emirates only.

Figure 2: International and Commercial Higher Education Student Numbers and Degree Providers in Ras Al Khaimah



^{*} Based on institutional data provided by RAKFTZ Academic Zone

The Study

This study drew on two research tools—semi-structured interviews and questionnaires—between October 2014 and May 2015. In total, eight of the nine known institutions participated. The data comprises interviews with 10 students and 19 professionals in Ras Al Khaimah's higher education sector, including managers and marketing directors at free zone institutions and policymakers and staff at the free zone head offices. It also draws on responses from a short questionnaire given to 103 students at four of the free zone institutions. Despite the low overall sample size of the questionnaire, the participating institutions represent a wide dispersion of student nationalities, ages, and objectives, allowing the sample to complement the interview findings and researcher's observations.

Free Zone Student Demographics and Decision-Making

Based on figures provided by institution managers, the estimated total number of students studying in free zone institutions is around 2,000. While a small figure in the UAE's total student pool, it comprises nearly one-third of Ras Al Khaimah's higher education students when added to the 4,500 who are studying at non-free zone institutions. Among those surveyed in the questionnaire (n=103), two-thirds were female, and the median age was 22 years old.⁸ In general, students' nationalities mirrored those of the UAE with regard to origin and

proportion, with Indian, Pakistani, and Bangladeshi students comprising the largest groups by nationality, alongside students from the Philippines, Nigeria, Sudan, and other countries in the Arab region. As international students are more likely to study at an institution originating from their home country, the institutions offering degrees from Pakistani or Indian universities are attended primarily by students of similar national origins. The student bodies at institutions that offer American or British degrees tend to be more diverse in terms of ethnicity. In some cases, the distribution of students appears to correspond with the nationality of AIP owners or managers. For example, one AIP owned and managed by a Syrian entrepreneur has a high number of Syrian students relative to other institutions. This trend may be due to recruitment practices and the social networks of both managers and students at such institutions.

Although the borders among the emirates do not prevent intra-national student mobility, a majority of students who live and work in Ras Al Khaimah frequently cite wanting to study locally as a reason for studying in the emirate. The students in the sample who do not reside in Ras Al Khaimah primarily come from other northern emirates (including Sharjah). Half of these students report choosing to study in Ras Al Khaimah in order to attend a particular institution while the other half cite qualities of the emirate as important factors in their decisions, including Ras Al Khaimah's accessibility and affordability (see **Figure 3**).

^{**} Based on estimates provided by institutional representatives

⁸ This figure includes a class of working professionals studying for an advanced certificate. When their ages are excluded from the sample, the median age is 20.

Other (personal choice or suggestion of friend): 4%

Residency in Ras Al Khaimah: 39%

Ras Al Khaimah is a desirable place to live: 8%

Ras Al Khaimah is affordable: 6%

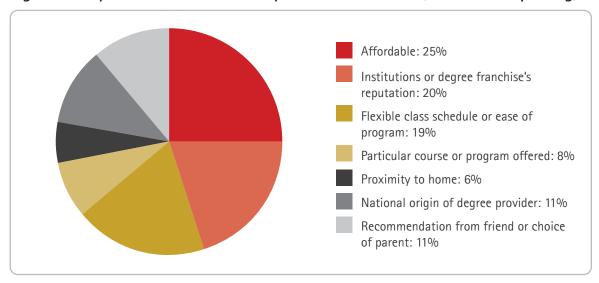
Ras Al Khaimah is nearby or easy to reach for non-residents: 12%

Ras Al Khaimah has good higher education options: 1%

Because of a particular institution: 30%

Figure 3: Why Students Choose to Study in Ras Al Khaimah (n=103, 87 responding)

Figure 4: Why Students Choose to Study at Their Institutions (n=103, 99 responding)



The most frequent reason for choosing an institution given by students was its affordability relative to its international competitors in Dubai (see **Figure 4**). Second to affordability was the reputation of the institution or degree franchise, a response that is tied to recommendations from friends, colleagues, or family members (perceptions of international institutions are strongly shaped by personal relationships, according to Wilkins & Huisman, 2014). Because these free zone institutions are often demand-absorbing operations, they also cater to working students by offering evening and weekend classes and course flexibility; the median age of respondents citing these features was 31 years old.

The second key purpose of the questionnaire was to investigate the source of the information that students used to guide their higher education choices. The questions were concerned with how students first learned about their institutions and on what information they based

their enrollment decisions. When students began looking into higher education, their primary source of information was friends, colleagues, and family members (70%), while the second most common source of information was websites (12%, including institutional and other sites) (see Figure 5). Importantly, although students relied heavily on friends and colleagues for gathering information about higher education, the influence of this group decreased when students were making their enrollment decisions (55%). The role of institutional representatives and recruiters showed a marked increase, with nearly three times as many students citing institutional agents as a key factor in shaping students' enrollment decisions (21%) than in their initial gathering of information on higher educational options (8%). The influence of advertising on students also increased (4% to 9%) from their initial look into program options to their final selections. What these trends suggest is that,

while recommendations from peers and family continue to play the largest role in shaping impressions and choices, students are also influenced by offers made by advertisements or admissions and recruiting staff once they have begun their search for a suitable institution.

Together, these figures suggest the channels of information accessed by students are dominated by social networks and informal metrics rather than by independent sources that could provide comparative data on educational options (including school counselors or third-party websites). Students' reliance on informal networks and institutional representatives is likely due to the fact that there is no known government or third-party resource for comparing the institutions available to students in Ras Al Khaimah. As a result, students' decisions on which institution to enroll in or even whether to enroll in the commercial sector are subject to personal impressions, reputations, recruitment practices, and the experiences of their peers.

Navigating an Uncertain Terrain: The Pitfalls of Loosely Regulated Commercial Higher Education

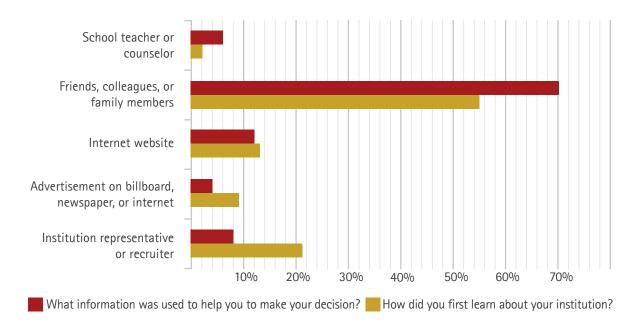
The minimal regulation and oversight in Ras Al Khaimah's commercial higher education market allows for a variety of practices that limit students' ability to make informed choices. In the absence of objective information about higher education providers in Ras Al Khaimah, commercial providers can make dubious claims about their institutions or their competitors when recruiting or advertising. Many of the institutions' websites and prospectuses depict students and

educational settings that do not reflect those seen at the actual institutions. For example, foreign providers often use images of graduates/professionals of white European origin or pictures of home campuses that lie outside of the UAE. On billboards lining the boulevards in downtown Ras Al Khaimah, one provider advertises a little-known American university that it franchises as "America's top ranking" while another offering an MBA from a for-profit Swiss program similarly describes its program as "top ranking." Neither of the statements appears to be independently verifiable.

To further compound the misrepresentative signals sent to student-consumers, six of the free zone AIPs use "college" or "university" in their names when they are, in fact, only infrastructure and service providers facilitating the delivery of international university franchises. A hypothetical example might be "European College of Management Studies," which misleadingly communicates that the local business providing the learning facilities is an institution of higher education and that it is owned and managed by a Western organization. These names, together with the imagery of Western-looking people and places, are intended to build associations between local AIPs and popular geographies of academic quality or prestige. However, these presentations potentially mislead studentconsumers regarding the value of the experiences and the degrees they receive. Also, as illustrated in the case of rankings, such practices misrepresent those international institutions that may not be highly ranked in their countries of origin.

At the time of this research, choosing educational providers appeared confusing for consumers since most

Figure 5: Sources of Information in Student Decision-Making (n=103, 93 responding)



of the free zone AIPs franchised multiple, separate degree programs within a single facility and since the same international degree program was sometimes franchised at two or three different AIPs. This means that students can earn a degree from the same university from different educational operations within Ras AI Khaimah, and conversely, students can study on several different degree programs from a single location, or as one AIP describes itself, from "one place, many solutions." This situation creates the potential for confusion and misunderstanding among student-consumers, who must acquire their information from peers or the commercial institutions themselves in order to understand how each program or institution differs.

Through interviews, AIP staff at RAKIA-zone institutions noted that students frequently transfer among international degree programs within the same AIP. This typically happens when students are faced with academic or financial hardships, as the academic rigor of programs and tuition fees vary by provider. Student respondents at the same institutions appeared to show little knowledge of or affiliation with their own degree programs. One student of Arab origin reported that she studies "MBA in healthcare administration or management through the Indian university." Although she had just been counseled into changing programs within the same AIP, she was not able to state the full name of her new degree provider. In the case of overlapping programs offered at different institutions, students were asked why they had chosen a particular AIP. Their responses often suggested they either did not know their program was offered elsewhere or that they believed the one they attended was better based on information shared among their peers.

The shifting market and policy environment also contribute to the displacement of students using commercial higher education providers. In the past year, two degree franchises have opened in Ras Al Khaimah and two have been discontinued, a considerable rate of change for a sector of approximately 16 degree providers. With this degree of fluctuation, an operation can sometimes open and close in fewer than the three to four years typically needed for students to complete a degree program. One student interviewee attested to the experience of having to transfer after her original degree program suddenly shut down. When asked how she became a student at her present institution, she replied, "I didn't choose this university. It chose me." She had been enrolled for two years in her first program when it was discontinued due to low enrollments, a common problem for new programs competing in Ras Al Khaimah's higher education market. Her experience of being displaced is reminiscent of the larger collapse

of the George Mason University IBC in Ras Al Khaimah in 2009, which also had to resettle its students after consistently low enrollments forced it to close within three years of beginning operations (Stripling, 2009). In a case of changing regulations, two Indian university programs popularly franchised in Ras Al Khaimah were abruptly discontinued in 2015 due to policies in India that limit distance higher education programs, forcing between 100-200 students to transfer or discontinue their studies in the middle of the semester (Devasia, 2015). This uncertainty surrounding the operation of degree franchises is described by global higher education scholar Philip Altbach, who writes that when "an easy exit" from an education market "is possible," there is "the possibility of leaving students in the lurch" (Altbach, 2012, p. 7). This displacement of students appears to happen with some regularity in Ras Al Khaimah as a result of the low level of regulation and few barriers to a provider's entry into the market

Putting It Together

The problem areas discussed above highlight the importance of making unbiased information about higher education options available to potential students. As this study found that most students appear to base their enrollment decisions on recommendations from friends and colleagues as well as on information provided by admissions officers and recruiters, inaccurate or misleading information can be circulated among consumers who have no access to third-party verification. In an interview with a staff member at RAKFTZ, the stakeholder noted, "Students often take the word of admissions officers rather than check for themselves. They are not often aware of the difference between an affiliation and accreditation, or how to check for accreditation."

The potential harm to students includes sunken financial and time investments or low returns on an earned degree; this is compelling considering that two of the institutions in Ras Al Khaimah, one in RAKIA and one in the RAKFTZ, were offering unaccredited degrees at the time of this research. In the case of unaccredited degrees, recipients may still be employable within the UAE's private sector because the institution offering it is licensed, but students cannot use unaccredited degrees to enroll in further studies or to seek employment outside the UAE. Without a resource for understanding and verifying accreditation, students bear the burden of protecting themselves from fraudulent programs or misleading claims.

Another issue this study's findings highlight is the lack of affordable, quality-assured, higher education

alternatives for low-income students and families in the emirate. A significant number of respondents suggested that they had no choice of which institution to attend, either due to their financial circumstances or their need to study locally. One justified a choice in program by explaining that the choice was made "because I live in Ras Al Khaimah and can't go outside of Ras Al Khaimah" while another wrote, "My parents took me from [country of origin] so they may have the chance to take care of me while I'm still immature. It's not because I want to study here." In follow-ups to these responses, students commented that transportation was not an issue but that they were limited to educational options in Ras Al Khaimah over other emirates due to its affordability, in terms of both living and educational costs. As indicated in Figure 4, the most cited reason for choosing an institution was its affordability, a response shared equally by residents of Ras Al Khaimah and those from other emirates. These data support comments made by local policymakers in interviews that Ras Al Khaimah has a comparative advantage over other emirates in providing affordable degree options for expatriate and Emirati students. A challenge for policymakers, they noted, is to preserve its affordability while turning their focus on quality and accountability.

Policy Recommendations

The following are recommendations for improving institutional oversight and students' access to impartial information needed to make their choices about higher education. Improving the regulatory environment, and by extension the quality of the services provided, is in the interest of Ras Al Khaimah's long-term economic development goals. Having a high concentration of skilled and credentialed residents is essential in moving towards a knowledge-based economy, and Ras Al Khaimah is well positioned to achieve its higher education needs by combining its affordability with a strengthened focus on quality.

The recommendations are aimed at complementing tentative plans for the establishment of an oversight agency within Ras Al Khaimah's decreed, but not-yet-established, academic zone. With this development, there is also an opportunity to implement new regulatory practices that address the issues described above. The structure and reach of this agency have not yet been publically articulated; however, the recommendations would be most effectively carried out through an independently-run regulatory body dedicated exclusively to institutional monitoring, reporting, and policy enforcement.

Transparency and Reporting

- Improve consumer awareness and informed decision-making through mandatory reporting and publishing of essential institutional data. All higher education providers in the emirate should be required to report on the following:
 - Program offerings
 - · Accreditations and foreign attestations
 - Student enrollments
 - Degree completion rates
 - Employment outcomes (when possible)
 - Faculty qualifications
 - Student-to-faculty ratios
 - Average times to degree completion
 - Total study costs

These figures could be published and made publically available through a website or student portal managed by Ras Al Khaimah's future academic zone, which would allow students to verify claims made by recruiters and friends. The website might also include a discussion forum through which potential students could connect with, share experiences with, and flag any problematic practices by talking with current and former students. There are existing reporting models to use as starting points for developing this kind of oversight, including Dubai's KHDA website and smartphone application or *Al Fanar Media's* regionwide university quide.

2. Invest in additional training and resources for secondary school career counselors and teachers. The questionnaire revealed that a low proportion of respondents (<7%) learned about their institutions through their secondary school staff. Increasing resources for such staff would not impact older, professional students who seek flexibility in studying. Yet, qualified and knowledgeable advisors might serve younger students who have minimal exposure to higher education options and little consumer literacy by increasing their knowledge of educational options.</p>

Accountability and Oversight

3. Regulate advertisements and monitor them for dubious claims. Ras Al Khaimah's landscape is scattered with billboards advertising commercial higher education providers, and some make misleading claims about quality or cost. While the RAKFTZ states that it already regulates billboard advertisements, a more proactive approach could include monitoring websites and pre-approving advertisements featured in newspapers and on

- the radio. This degree of enforcement is effectively practiced in the commercial education market in Dubai, where there is a KHDA staff role dedicated to regulatory enforcement.
- 4. Expand the criteria for operating licenses. The current process for obtaining a license to operate a branch campus or degree franchise through either free zone focuses almost entirely on commercial interests (i.e., its viability from a business perspective). The

licensure process does not evaluate an institution's suitability for Ras Al Khaimah's current educational needs or its envisioned academic zone. A more robust series of considerations could be informed and overseen by a joint academic and government advisory panel that evaluates a degree provider's value or unique contribution to the emirate and its students—including its affordability, reputation, and long-term viability.⁹

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⁹ The Al Fanar Media guide mentioned above is available at http://www.al-fanarmedia.org/2015/05/internationally-accredited-schools-and-institutions/.

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