

**Report of the Accreditation Council on the evaluation of first experiences with system accreditation of 12.09.2012**

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## Preface

With the introduction of system accreditation, the Accreditation Council obliged itself to assess the practicability of the criteria and rules of procedure, as well as their impact, based on an analysis of the first six procedures and, if necessary, to amend its resolutions. In addition, the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder (KMK) asked the Council to supervise the overall process of introduction and to present a report after five years – i.e. in 2012 – for evaluation.

In May 2012, six higher education institutions had successfully completed a system accreditation procedure and several other procedures were pending. This allowed the Accreditation Council to assess findings and observations from the procedures for the purpose of reporting on first experiences with system accreditation. A further source for the evaluation of first experiences with system accreditation are the recommendations of the German Council of Sciences and Humanities, which strongly correspond with the evaluation results and conclusions drawn by the Accreditation Council, and which are also considered in the analyses and assessments of this report.

The reporting members of the Accreditation Council and further individuals involved in the procedures have significantly contributed to the evaluation of the findings from the first six accreditation procedures. The Accreditation Council would like to expressly thank them.

## I. Introduction of system accreditation

It is a central task of the Accreditation Council to structure the accreditation system in Germany, across all federal states and higher education institutions, with the aim of contributing to the assurance and development of quality in learning and teaching at German higher education institutions. In this task, the Accreditation Council has always been guided by the principle that primary responsibility for quality can, in the end, only be assumed by the higher education institutions themselves.

With the introduction of system accreditation in February 2008, the Accreditation Council has taken an important step on the path to stronger self-responsibility on the part of the higher education institutions.

The subject of system accreditation is the assessment of the internal quality assurance system of a higher education institution and thereby, above all, of the structures and processes that are relevant for teaching and learning. The procedure centres on the question of whether these structures and processes ensure the achievement of the qualification objectives and a high quality of the offered study programmes in a manner that complies with the criteria of the Accreditation Council, the European Standards and Guidelines for Quality Assurance in Higher Education (ESG) and the guidelines of the KMK for each individual study programme. In the case of a successfully completed system accreditation, all study programmes of a higher education institution that have been the subject matter of the internal quality assurance system of the higher education institution receive the seal of the Accreditation Council.

The Accreditation Council already began first preparations for introducing system accreditation as an addition to the previously exclusive programme accreditation in the middle of 2006 and established a project group for the further development of the accreditation system. Particularly with regard to international recognition of accreditation decisions, the Accreditation Council was aware of its task to guarantee the value of the accreditation seal on long term and to thereby secure the reputation of German study programmes in Germany and abroad. At the same time, however, it was necessarily in the interest of the Accreditation Council to develop instruments that would promote greater responsibility for quality on the part of the higher education institutions, prevent unnecessary additional burdens for the higher education institutions, and advance the management structures of higher education institutions with the aim of a continuous development of quality. The drafting of criteria and rules of procedure for system accreditation was therefore to consider the following guiding principles:

1. The introduction of system accreditation must build on previous experiences in Germany and in foreign countries, whereby the experiences in Germany should primarily refer to relevant pilot projects for accreditation and quality assurance.
2. In the introduction of system accreditation, the stakeholders (higher education institutions, students, Länder, practitioners of professions, and agencies) and international experts are to be involved from the beginning on. This approach not only promotes acceptance but also the quality of the system because the expertise and various perspectives of the stakeholders involved in the development process are considered early and comprehensively.
3. The foremost objective of introducing system accreditation is not to increase procedural efficiency. Rationalisation efforts may not lead to a reduction of procedure- and result quality.
4. System accreditation represents an additional procedure variation that supplements programme- and cluster accreditation and does not entail a fundamental change of system.

Pursuant to these guidelines, the discussion- and consultation process that resulted in the decision for system accreditation and the adoption of corresponding criteria and rules of procedure was in fact characterised by comprehensive participation of stakeholders, involvement of experts from Germany and foreign countries, and the consideration of results from various pilot projects and study visits at foreign accreditation institutions.

## **II. Supervision of the implementation phase by the Accreditation Council**

The introduction of system accreditation was a decision with a significant impact both with regard to the responsibility that system-accredited higher education institutions assume for the quality of their study programmes and thereby, above all, toward their students, and with regard to the agencies and experts involved whose assessments, recommendations and accreditation decisions – in comparison to those in programme accreditation – are apparently tied to far more extensive consequences.

Based on this, the Accreditation Council developed a special certification procedure for agencies wishing to perform system accreditation and agreed to monitor the first two system accreditation procedures of each agency. In its statement on the “Report of Results

for Evaluation of the Foundation for the accreditation of Study Programmes in Germany”<sup>1</sup> the Accreditation Council also obliged to assess the practicability of the criteria and procedural rules, as well as their impact, based on an analysis of the first six system accreditation procedures and, if necessary, to amend its resolutions. In addition, the KMK requested by resolution of 15.06.2007 that the Accreditation Council supervises the process of introducing system accreditation and submits a report to the KMK in five years – i.e. in 2012 – on experiences gathered with system accreditation to date.<sup>2</sup>

The supervision of the procedures by the Accreditation Council only marginally served to assess the agencies’ application of the guidelines pursuant to the statutory monitoring duty. The main focus was to gain experience-based knowledge with regard to the suitability of the criteria and rules of procedure and, if necessary, to derive required measures for optimising the procedure from the analysis of the findings.

Due to the comparatively slow initial phase, a discussion ensued shortly after the introduction of system accreditation regarding admittance requirements for higher education institutions, the scope of the programme- and half-time random samples, and the non-provision of granting system accreditation with conditions in the guidelines of the Accreditation Council. Particularly these three rules of procedure were considered by many higher education institutions, according to their own statements, to be an excessively high hurdle for introducing system accreditation. To avoid endangering the introduction of system accreditation, the Accreditation Council was prompted to remove the prohibitive character of the procedure- and decision-making rules. In December 2010, the Accreditation Council agreed to dispense with the required demonstration of a certain number of programme-accredited study programmes (one accredited study programme per 2,500 enrolled students) as an admittance requirement for system accreditation procedures, and to significantly reduce the scope of the programme random sample (from 15% of study programmes to normally three study programmes, see section 4.6). In addition, the Accreditation Council introduced the instrument of system accreditation with conditions in order to minimise the risk of negative accreditation decisions in cases of established defects that could be remedied on short- to medium term.

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<sup>1</sup> Cf. Accreditation Council: Statement on the “Review report for the evaluation of the Foundation for the Accreditation of Study Programmes in Germany”, Printed Matter AR 75/2008. Resolution of 11.07.2008.

<sup>2</sup> Cf. Standing Conference of the Ministers of Education and Cultural Affairs of the Länder: Fundamental resolution on the introduction of system accreditation. Resolution of 15.06.2007.

These facilitating procedural changes were expressly welcomed by the German Council of Sciences and Humanities in its Recommendations for Accreditation as an Instrument of Quality Assurance.<sup>3</sup> The Accreditation Council refrained from instituting farther-reaching changes at this comparatively early point in time with reference to the planned systematic evaluation to take place after completion of the first six procedures and based on more extensive experience.

### III. Procedures for the evaluation of experiences with system accreditation

The supervision of the first six system accreditation procedures took place between summer 2009 and spring 2012. For each procedure, one project officer was respectively commissioned by the Accreditation Council (from the Accreditation Council and the head office).

In total, the system accreditation procedures of four agencies at four state- and two state-recognised higher education institutions were supervised. The procedures took place in four different federal states and at three universities, two universities of applied sciences, and one cooperative state university. The supervised system accreditation procedures are shown in Table 1.

The supervision of the procedures normally comprised participation in the opening of the procedure (commission meeting of the agency), in both on-site visits, and in the decision-making meeting of the responsible commission. In some procedures, the reporting members of the Accreditation Council also took part in programme random samples. All pertinent documents (application documents of the higher education institution, reports of the expert group, draft decision templates of the agencies etc.) were made available to the reporting member by the agencies.

**Table 1: Supervised system accreditation procedures**

Higher education institution	accredited by	Reporting member
Baden-Wuerttemberg Cooperative State University	ZEvA	Professor Dr. Reinhard Zintl
Münster University of Applied Sciences	AQAS	Professor Dr. Reinhold R. Grimm
FOM – Hochschule für Oekonomie & Management	FIBAA	Professor Dr. Stefan Bartels
Johannes Gutenberg University Mainz	ACQUIN	Professor Dr. Reinhold R. Grimm Franz Börsch

<sup>3</sup> Cf. German Council of Sciences and Humanities: Recommendations for Accreditation as an Instrument of Quality Assurance. Printed Matter 2259-12. Bremen, 25.05.2012, p. 80.

Ilmenau - University of Technology	ACQUIN	Professor Dr. Reinhard Zintl
WHU - Otto Beisheim School of Management	FIBAA	Dr. Achim Hopbach

For the evaluation of the findings obtained in the procedures, the reporting members of the Accreditation Council each prepared an internal report providing information on the implementation of the individual procedural elements, on readability, completeness and cogency of the expert reports, and on feedback from the agencies and experts regarding applicability of the criteria and rules of procedure of the Accreditation Council.

In supplementation, the head office of the Foundation carried out guided interviews with the reporting members of the Accreditation Council in which targeted questions regarding applicability of individual procedural elements were again discussed.

On completion of all supervised system accreditation procedures, there were also feedback discussions between the reporting members and a selection of representatives of the agencies, expert groups and higher education institutions involved. As preparation, the discussion participants received a summarising presentation of the reporting members' experiences based on which the parties to the proceedings were then questioned in separate discussions regarding the structure of the procedure and its elements, and the criteria for system accreditation.

Taking the findings from the feedback discussions into consideration, the reporting members subsequently submitted a joint progress report to the Accreditation Council in which they referred to subjects worthy of discussion and also made recommendations for further development of individual procedural components.

With this report on first experiences with system accreditation, the Accreditation Council conclusively summarises the central findings of the reporting members and parties to the proceedings, and, on the basis of this, critically evaluates the procedure and its structuring. To this end, suggestions that have been made to the Accreditation Council in the past years have also been considered.

## IV. Analyses and assessments

The analyses and assessments presented in the following are predominantly based on the evaluation of the procedures by the reporting members of the Accreditation Council and feedback received by the Accreditation Council from parties to the proceedings including higher education institutions, agencies and expert groups. Suggestions received by the Accreditation Council from parties to the proceedings over the past years, i.e. outside of the feedback discussions, have equally been considered.

In their sum, the information, assessments and findings present a comparatively high degree of overlap with regard to the development potential of individual rules of procedure and -components of system accreditation. This impression is confirmed by the recommendations of the German Council of Sciences and Humanities, which, in their large majority, also present a similar direction.

### IV.1 System accreditation as an instrument of quality development

#### *The success potential of system accreditation*

The question of the direct impact of system accreditation on the quality of higher education institutions' internal quality assurance and management processes can currently only be answered to a rudimentary extent. Nevertheless, the Accreditation Council finds it certainly possible to make some basic assumptions regarding the success potential of system accreditation based on the concept, objective and approach of system accreditation in combination with feedback received by the Accreditation Council from higher education institutions working with system accreditation. It can be established that all higher education institutions involved have perceived system accreditation as being an innovation-promoting instrument that triggers an internal discussion process in the higher education institution regarding quality assurance and -development, and that has significantly promoted the quality of communication within the higher education institution. The circumstance that quality is no longer demonstrated to external actors based on the study programme but must be developed and ensured through self-designed procedures, processes and systems is perceived by the higher education institutions as being motivating – despite the significant challenges it entails. System accreditation's intended objective of placing responsibility for the quality of learning and teaching with the higher education institutions themselves, and to strengthen the establishment of well-developed quality awareness at higher education institutions seems, in this respect, to have been confirmed

in practice. Although the higher education institutions are bound to a number of provisions in developing and implementing their individually designed internal quality assurance systems, compliance with which must be demonstrated as part of the system accreditation procedure, a significant strengthening of the autonomy and controllability of the higher education institutions through the internalisation of quality control can be assumed. In this regard, system accreditation also complies with the requirements formulated by the German Rectors' Conference (HRK) for the central characteristics of external quality assurance procedures in its resolution of 24.04.2012 on the further development of the accreditation system: The higher education institutions are not to be assessed solely on the basis of generally binding standards but on the basis of demands formulated by the higher education institutions themselves in order to achieve suitable assessment results.<sup>4</sup>

In sum, the discussions with the representatives of the higher education institutions made it clear that the approach taken with system accreditation has, on the whole, been welcomed and that the procedure is considered to carry high potential for optimising internal quality development procedures and processes of higher education institutions. In this context, it was repeatedly indicated that system accreditation is an incentive for the compulsory establishment of an internal quality assurance system at higher education institutions, promotes the development of a quality culture at higher education institutions, and, as a result, has tangibly activating effects.

As the German Council of Sciences and Humanities establishes in its Recommendations for Accreditation as an Instrument of Quality Assurance, system accreditation, in its design, complies with the common requirements for quality development procedures pursuant to international best practice: First, responsibility for the establishment and implementation of the quality assurance system clearly lies with the higher education institution; secondly, the higher education institution can set up the quality system based on its specific requirements.<sup>5</sup> Though system accreditation currently encompasses many requirements, the German Council of Sciences and Humanities nevertheless finds it to be a fundamentally effective means of certifying the successful efforts of higher education institu-

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<sup>4</sup> Cf. German Rectors' Conference: On the further development of the accreditation system. Structuring the institutional quality audit. Resolution of the 12th GRC general assembly on 24.4.2012, p.6.

<sup>5</sup> Cf. German Council of Sciences and Humanities: Recommendations for Accreditation as an Instrument of Quality Assurance, loc. cit., p. 55.

tions in their internal quality development through the establishment and operation of own quality management and -assurance systems.<sup>6</sup>

#### *Reasons for the slow initial phase of system accreditation*

The Accreditation Council believes that the scepticism many higher education institutions demonstrated toward system accreditation in the initial years may have had the following primary causes: First of all, the introduction of system accreditation represented an extensive innovation in the accreditation system tied to a number of uncertainties and concerns, and was therefore naturally met with hesitation. This was accompanied by the comparatively high hurdles the Accreditation Council had initially set for admittance of higher education institutions to system accreditation procedures with the purpose of demonstrating the high standards of the procedure from the very beginning. These admittance hurdles, combined with the initially very extensive programme random samples, obviously deterred some higher education institutions from making a decision for system accreditation. The reaction to the procedure-simplifying measures adopted by the Accreditation Council in 2010 (see [Chapter II. "Supervision of the implementation phase by the Accreditation Council"](#)) can be interpreted as a confirmation of this assumption as the number of applications in subsequent years vastly increased. Currently, 22 system accreditation procedures are pending at higher education institutions and one procedure is pending for a unit (in this case, for a faculty). Four further higher education institutions have applied for admittance and are currently in the admittance procedure.<sup>7</sup> If one additionally follows the assumption that only a minority of German higher education institutions had implemented an university-wide, functioning quality assurance systems at the time system accreditation was introduced, then this circumstance may also be considered a possible reason for the hesitant launch of system accreditation.

#### *Procedural effort for system accreditation*

Directly after system accreditation had been introduced, a widespread misunderstanding arose regarding the new procedure. This misunderstanding resulted from the assumption that system accreditation predominantly aims to reduce the procedural effort and thereby

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<sup>6</sup> Cf. *ibid.*, p. 80.

<sup>7</sup> Status: August 2012; pending procedures: 15 universities (including 1 private university), 10 universities of applied sciences (including 2 private universities of applied sciences) and a unit of a university; in preliminary assessment: 3 universities and 1 private university of applied sciences.

to reduce the costs incurred by higher education institutions. However, after the criteria and rules of procedure for system accreditation had been adopted, it quickly became clear that the establishment of a quality assurance system that complies with the given quality standards is tied to significant (initial) effort and that the services performed by the agencies for programme accreditation must, for the most part, be performed by the system-accredited higher education institutions themselves for system accreditation. Therefore, the challenge for many higher education institutions lies not in the procedure for system accreditation itself but in the development, institution and continuous application of formalised quality assurance and management systems, along with regular and transparent documentation of the results.

It remains to be seen to what extent the effort is correspondingly reduced in the case of system *reaccreditation* after successful implementation of an internal quality assurance system of a higher education institution. However, in the Accreditation Council's assessment, it is now widely known that internal quality assurance and -development in a higher education institution involves a long-term allocation of resources – regardless of the selected procedure.

## **IV.2 Timing of the application**

### *Admittance requirements, preliminary assessment and opening of the procedure*

Pursuant to Clause 4.2 and 4.3 of the Rules for the Accreditation of Study Programmes and for System Accreditation, the higher education institution submits an application including brief presentations of the institution and its internal management- and quality assurance systems for learning and teaching. Based on these documents, the agency performs a preliminary assessment to ascertain whether the admittance requirements for higher education institutions for system accreditation are fulfilled. If no prospects of a successful system accreditation are apparent, the agency informs the higher education institution and the Accreditation Council of the result of the preliminary assessment within four weeks.

There are two main reasons for the necessity of such an obligatory preliminary assessment: First, it is to prevent the higher education institution from pursuing a time-consuming and cost-intensive procedure when its quality assurance system is still rudimentary and the prospects of success are therefore obviously poor. Secondly, an internal quality assurance system of a higher education institution can only be assessed with the random

sample elements provided for in system accreditation when the system is already functional to a minimum extent. As a future-oriented procedure, it is an essential feature of accreditation to also consider a prognosis of anticipated quality. However, considering the far-reaching consequences of such a decision both for the individual higher education institution and for the higher education system as a whole, the effectiveness of the internal system may not be solely assessed on a prognostic basis.

The findings from the first system accreditation procedures clearly indicate that the preliminary assessment led to various difficulties with regard to the timing of the application. Some procedures, for example, were apparently opened before an assessable, internal quality assurance system was even in place. This had corresponding consequences for the further course of the procedure as not only subsequent submissions were necessary following the first on-site visit for a sufficient information basis, but it was also necessary that the higher education institutions perform extensive subsequent adjustments. This, in turn, resulted in a significant extension of the timeframe of the procedure. In addition, at the time of the programme random sample, no study programmes had been the subject matter of the quality assurance system, which had been further developed over the course of the procedure.

Aside from the procedural matters, the timing of the application – at least with first-time system accreditation – also normally affects the conflicting relationship between consultation and certification. It can, for example, be assumed that a procedure opened at a very early point in time will be far more consultative in character, depending on the scope and nature of the subsequent submissions requested by the expert groups.

The Accreditation Council is aware of the special consultation needs of higher education institutions in setting up usually new systems. Although the accreditation agencies are suitable contact partners for the preparation and implementation of system accreditation procedures due to their extensive experience and far-reaching competence, it must be fundamentally ruled out that these agencies decide regarding systems that have been set up with their assistance and that consultation and certification are performed by the same institution. On long term, this problem could be counteracted through a modified task assignment between the agencies and the Accreditation Council with a clear, institutional division between consultation and implementation of the procedure on the one side and certification on the other.

However, the current question is how uncertainties on the part of the agencies and higher education institutions with regard to the timing of the application and the assessment of

the development status of the internal quality assurance system of a higher education institution are to be dealt with. The following scenarios can be contrasted:

*Scenario 1:* The majority of the study programmes should have been the subject matter of the internal quality assurance system of the higher education institution already. The system accreditation experts can then assess the functionality of the system (through random samples) based on empirical results. In practice, however, this would most likely mean that a higher education institution must handle the set up of the internal quality assurance system and the performance of programme accreditations at the same time.

*Scenario 2:* The internal quality assurance system of a higher education institution is considered as being still established and is continuously further developed during the system accreditation procedure based on the findings. This procedure spares the resources of the higher education institution; however, it easily places the experts in the function of consultants. In addition, there are not yet any results of the internal quality assurance system of the higher education institution for the experts to assess. In this case, the performance of random samples does not lead to evaluable results.

A compromise could lie in specifying the requirements for admittance to system accreditation as follows: For the preliminary assessment, higher education institutions must demonstrate the functionality of the quality assurance system based on one or several study programmes that have already been the subject matter of the system at the time of application. In this manner, the existence of an assessment subject would be guaranteed without placing excessive demands on the preliminary time leading to the certification.

The Accreditation Council will consult regarding possibilities for modifying the admittance requirements and the preliminary assessment for system accreditation.

#### *Private higher education institutions*

In the case of private higher education institutions, the timing of accreditation plays a special role because such institutions are subject to two different accreditation systems with institutional accreditation through the German Council of Sciences and Humanities and the procedure for awarding the seal of the Accreditation Council.

With their individual certification emphases, both systems make an important contribution to quality assurance in the higher education system. Despite the differing foci of the procedures – institutional accreditation criteria as a higher education institution vs. quality standards of study programmes – there are also overlapping elements in the assessment

areas or criteria. For this reason, the plausibility assessment of study programmes in institutional accreditation could be performed to date by the German Council of Sciences and Humanities with inclusion of results from programme accreditation.<sup>8</sup>

Of the monitored system accreditation procedures, two took place at private higher education institutions. In the feedback discussions, the participating higher education institutions emphasised the need to coordinate with the institutional accreditation. The German Council of Sciences and Humanities equally finds that the 'twofold burden' of private higher education institutions resulting from two separate accreditation systems is to be critically discussed<sup>9</sup> and the Accreditation Council shares this view.

Clarifying the relationship between system accreditation and institutional accreditation is not only necessary to prevent an excessive burdening of private higher education institutions, but also to avoid possible evaluation conflicts.

With the further development of its procedures, the German Council of Sciences and Humanities has already taken measures to facilitate such a coordination: Through the introduction of concept assessment, including the requirement that a higher education institution may apply for institutional accreditation after three years at the earliest and the accreditation of its study programmes is therefore first required at this time<sup>10</sup>, results from the system accreditation can be considered in the institutional accreditation. This lead time makes it possible that the study programmes of a higher education institution have been the subject matter of its internal quality assurance system and that, based on this, a system accreditation procedure with statements on the effectiveness of the system can be carried out in the first place. To be considered here, however, are the legal effects of both procedures in the individual states and, in particular, the question of at which point in time the accreditation of a study programme must be given with the founding of higher education institutions.

The Accreditation Council will seek a discussion with the German Council of Sciences and Humanities and the Länder to consult regarding the coordination of system- and institutional accreditation.

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<sup>8</sup> Cf. German Council of Sciences and Humanities: Guidelines for institutional accreditation. Printed Matter 9886-10. Potsdam, 07.05.2012, p. 21.

<sup>9</sup> German Council of Sciences and Humanities: Private and ecclesiastical higher education institutions from the view of institutional accreditation. Printed Matter 2264-12. Bremen, 25.05.2012, p. 136.

<sup>10</sup> Cf. *ibid.*, p. 137.

### IV.3 Experts

In system accreditation, the expert assessment by *peers* also is at the heart of the procedure. In contrast to programme accreditation, which is a direct assessment and certification of the quality of a concrete study programme and, as a consequence, which has the same subject for assessment and certification, experts are confronted with a much more complex cause-effect mechanism in assessing the overarching internal processes and structures of a higher education institution. The shift in perspective that must be undertaken by the experts is of particular significance: While study programmes are evaluated in programme accreditation, the assessment subject in system accreditation is different: Here, the internal structures and processes of the higher education institution must be assessed as to their suitability for evaluating, securing and continuously enhancing the quality of learning and teaching. Conveying this shift in perspective is a current challenge in the briefing of experts.

In sum, it became clear in the discussions with parties to the proceedings that the selection, briefing and support of the experts should be assigned particular importance. In the selection, the “structure compatibility”, among other things, should be considered in order to ensure that the relevant experience of experts in quality assurance and higher education management also extends to the size and type of higher education institution to be assessed. Equally of great importance is the guidance of the expert group by the responsible staff member of the agency. For this reason, the qualification of the responsible agency consultants, in addition to the briefing of expert groups, is decisive.

It is vitally necessary that experts develop a common and clear understanding of their tasks at the beginning of the procedure. It must be guaranteed that the internal quality assurance system of a higher education institution to be evaluated is always bindingly assessed in connection with the higher education institution’s own understanding of quality and not based on the individual experts’ concepts of quality.

The Accreditation Council will consult as to whether the requirements for the selection and briefing of experts for system accreditation are sufficient and also whether they are sufficiently clearly stated.

#### IV.4 On-site visits

In system accreditation, a first on-site visit primarily serves the gathering of information on the higher education institution. The actual review takes place as part of a second on-site visit, which also serves the performance of the feature random sample.

First experiences with system accreditation confirm that the separate on-site visits are not only necessary for the multiple-tier review but have proven to be beneficial for the different purposes of the first and second on-site visits.

In all supervised procedures, the first on-site visit did not yet serve the assessment in the narrower sense but was very intensively utilised by the expert groups to gather information on the higher education institution, its profile and strategic plans, its structure and its quality assurance system. Such comprehensive preliminary information corresponded in many cases with the requirements of the expert groups and is not only essential in light of the complexity of the assessment subject but, above all, also with regard to the variations of internal systems at higher education institutions.

It also proved to be beneficial that higher education institutions could close possible gaps in their documentation through requirements to subsequently submit documents. However, Accreditation Council reporting members have pointed out that subsequently requested documents were sometimes limited to matters relating to the presentation of facts and that the documentation burden for procedures was excessively high.

The Accreditation Council will consult as to how subsequently requested documents can be regulated in a practical manner that serves the purpose.

On completion of the first on-site visit, the expert groups had all information for the evaluation and assessment of the management systems at the higher education institutions for learning and teaching and their internal quality assurance systems. They were also familiar with the specific demands and individually relevant aspects resulting e.g. from special structural features or profile elements of the higher education institution. Based on this preliminary knowledge, the expert groups influenced the sequence of the second on-site visit and the conversation sessions. The Accreditation Council finds this approach suitable for the purpose. Without a doubt, a proper assessment requires the coordination of the on-site visit with the individual, specific requirements of the internal system of the higher education institution. In other respects, the Accreditation Council has intentionally left its guidelines open here to allow sufficient freedom for the concrete structure of the second on-site visit. For example, the participants for conversations are not conclusively specified

and the expert group may decide which sessions are relevant in the concrete case in addition to the discussions with the management of the higher education institution, the administrative staff, equal opportunity officers, those responsible for quality assurance, and representatives of the teachers and students.

The Accreditation Council will consult as to how these structural freedoms can be made expressly clear in the rules of procedure without negatively affecting the comparability of the procedures due to procedural routines that too strongly deviate from each other.

Pursuant to the rules of procedure, the second on-site visit serves the performance of the feature random sample in addition to the in-depth analysis of the submitted documents. This combination of two equally important evaluation components, provided for in the rules, has proven to be sensible for reasons of efficiency. It may, however, not have the effect that one of the two elements is neglected or does not take place. In this respect, it is to be emphasised in conclusion that the second on-site visit is expectably more time-consuming than e.g. the on-site visit as part of programme accreditation.

#### **IV.5 Random samples**

The rules for system accreditation provide for programme random samples and “feature random samples”. The purpose of the random samples is to assess whether the effects strived for by the evaluated quality assurance system are actually given at the level of the study programmes and thereby whether quality is guaranteed in learning and teaching.

The random samples carried out in the first system accreditation procedures have raised a number of questions primarily relating to the informative value of the findings. If valid statements on the effects of the evaluated quality assurance system are to be made then the subject of the random samples is less the individual study programme or single feature and more the impact correlation between the quality assurance- and management system on the one side and the quality or established lack of quality of the evaluated study programmes on the other side. To systematically examine this causal connection, at least the following requirements must be fulfilled:

1. (*Applies for the programme- and feature random sample*): The study programme or study programmes to be assessed must already have been the subject matter of the internal quality assurance system of the higher education institution. Otherwise, the random samples will not allow any valid statements on the functionality of the system.

2. (*Applies for the programme random sample*): The experts commissioned with performing the programme random sample must have comprehensive knowledge of the quality assurance system in order to be able to assess the impact correlation described above.

3. (*Applies for the programme random sample*): The expert groups commissioned with performing the programme random sample must, above all, demonstrate expertise in the field of internal quality assurance in higher education.

#### *Programme random sample*

As the programme random samples are carried out in separate procedures and analogously to the rules for programme accreditation (without leading to an independent accreditation decision), it is questionable to what extent the requirements stipulated in Clauses 2 and 3 are actually given. Some agencies have attempted to solve this problem by overlapping the individuals in the expert groups with the aim of closing the communication gap between system evaluation and programme random samples. However, particularly with the disciplinary and content-related evaluation of a study programme in a programme random sample, there is a risk of not assessing systemic impact correlations but merely the results of the external evaluation to be carried out by the higher education institution anyway, and thereby the disciplinary and content-related evaluation of other external experts.

In light of these considerations, there is the question of whether the achieved benefit justifies the comparatively intense effort required by the programme random sample. The number of experts alone reflects a certain lack of proportion here: While the actual system evaluation is normally carried out by five experts, at least 15 experts are normally required for programme random samples.

#### *Feature random sample*

With regard to the feature random sample, the questioning of the benefit by some parties to the proceedings could also be the result of the novelty of these procedural components and corresponding uncertainties on the part of the agencies. This is also indicated by the varying implementation of the feature random sample in monitored procedures. However, as an in-depth, comparative assessment of relevant features extending to all Bachelor's- and Master's study programmes, the feature random sample is also fundamentally only sensible when the study programmes to be examined have already been the subject mat-

ter of the internal quality assurance. In addition, there is the question of whether the definition and selection of the features *by drawing lots* is suitable for utilising the potential of this procedural component. There is especially the “danger” that relevant assessment subjects are not on the list of possible features or not drawn by lot with the first on-site visit.

If the feature random sample is performed pursuant to the rules, this procedural component is – depending on the selected or drawn features – tied to enormous efforts, especially for large higher education institutions. Therefore, the question of the relation between cost and benefit should be posed here as well and it should be considered as to whether the random sample character could not be more emphasised with regard to the number of study programmes to be examined.

#### *Half-time random sample*

Pursuant to Clause 4.14 of the rules for system accreditation, a system-accredited higher education institution must carry out an in-depth evaluation of study programmes after half of the accreditation term has expired. One study programme per 2500 students enrolled in the last winter semester is evaluated, however, at least one Bachelor’s- and one Master’s study programme. In the case of a corresponding offer at the higher education institution, the evaluation additionally extends to a state regulated study programme and a teacher-training related Bachelor’s- or Master’s study programme.

Although the Accreditation Council does not yet have experiences with the implementation of the half-time random sample, the considerations above regarding the benefit of the programme random sample and the anticipated informative value equally apply to the half-time random sample. However, with the half-time random sample, there is the additional aspect that the impact correlation between the internal quality assurance system of a higher education institution and the quality or the defects established in the random samples will most likely be even more difficult to derive because there is no parallel assessment of the (possibly already vastly changed) quality assurance system. A consideration of cost and benefit of the half-time random sample is therefore urgently necessary. As the scope of the half-time random sample – in contrast to that of the programme random sample – was not reduced as part of the revisions of the rules for system accreditation in 2010 (see [Chapter II](#)), there is most certainly the need to take measures here.

#### *Fundamental importance of random sample elements*

Nevertheless, the instrument of the random sample – understood as an empirical procedural element for examining the practical suitability of a higher education institution's internal quality assurance system – does fundamentally have relevant potential. However, this potential could possibly be better utilised through a changed focus: The random samples should e.g. focus less on the establishment of defects and serve more to examine the functional suitability of the procedures and processes defined by the higher education institution in the concrete individual case.

If one follows the considerations of the Accreditation Council reporting members, effectiveness and efficiency of the procedure could be possibly significantly increased through a stronger integration of the random sample elements in the system evaluation.

The Accreditation Council will consult as to how the random sample elements in system accreditation can be further developed and the relation between cost and benefit improved.

#### **IV.6 Criteria for system accreditation**

The Accreditation Council has established a total of six criteria for system accreditation. These define standards for the structures and processes relating to learning and teaching that must be fulfilled so that the quality of study programmes can be effectively ensured and developed. They comprise application of the ESG, the guidelines of the KMK, and the criteria of the Accreditation Council. The Accreditation Council has intentionally refrained from issuing narrowly defined assessment parameters. This approach was positively appraised without limitation by the German Council of Sciences and Humanities in its Recommendations for Accreditation.<sup>11</sup>

In the first system accreditation procedures, none of the six criteria proved to be irrelevant. The criteria were predominantly assessed as being comprehensible and applicable by the parties to the proceedings. However, the criteria for system accreditation sometimes use terminology with a level of generality that apparently lead to uncertainties in the first procedures.

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<sup>11</sup> Cf. German Council of Sciences and Humanities: Recommendations for Accreditation as an Instrument of Quality Assurance, loc. cit., p. 59.

In the feedback discussions, some references were made to unclear terminology in the criteria and a request was made to the Accreditation Council to provide further information materials, aids for interpretation, or manuals.

### *Management system and quality assurance system*

The titular separation between management and quality assurance particularly raised questions leading to fundamental discussions regarding the structure of internal management- and quality assurance systems of higher education institutions over the course of the procedures. As the term already indicates, system accreditation requires the existence of systematic, formalised and regulated processes. This basic requirement is reflected in the wording of the corresponding criteria when requirements are established with regard to a *management system*, a *quality assurance system*, and a *reporting system*. This emphasises that the existence of unconnected instruments and mechanisms is not sufficient to meet the requirements for accreditation.

Controlling and quality assurance are most certainly set in relation to each other in the criteria for system accreditation: The management system considers the results of the internal quality assurance of the higher education institution in the further development of study programmes (Criterion 2). Vice-versa, it is one of the tasks of the internal quality assurance system to also assess the effectiveness of the internal management processes in learning and teaching, and to perform independent quality assessments for this purpose (Criterion 3).

In this context, however, it should be emphasised that the criteria developed by the Accreditation Council are not based on a concrete model of quality assurance or quality management, and that they intentionally leave room for interpretation and structural freedoms. How the internal structures and processes of the higher education institution are to be designed, and in what kind of relationship they stand to each other, is not defined by the Accreditation Council. This structural freedom is a fixed principle of accreditation and a requirement for the primary responsibility of higher education institutions for quality assurance and -development of their study programmes.

The first six system accreditation procedures showed to what a large extent the higher education institutions vary with regard to size, structure and constitution, but also with regard to their traditions and self-image, and what direct influence this diversity bears on the systems to be accredited. In the view of the Accreditation Council, it is therefore neither

sensible nor desirable to provide a concrete model of internal quality assurance for higher education institutions; this includes the relationship between management and quality assurance.

#### *Effects of the criteria at the study programme level*

On long-term, the question as to what extent the criteria for system accreditation achieve the intended effects will need to be considered: As an instrument of external quality assurance, system accreditation targets high quality in learning and teaching. However, unlike as with programme accreditation, the quality of study programmes in system accreditation is indirectly evaluated, and internal management of the higher education institution and quality assurance are assessed as to their suitability and reliability for ensuring quality of the study programmes. The criteria for system accreditation thereby attain a dual objective whereby the requirements on the systemic level tied to them are to positively influence quality at the study programme level. Consequently, an evaluation of the criteria for system accreditation always involves the question of their impact and/or perception at the study programme level. Not lastly due to its tight staff resources, such an assessment should not be carried out by the Accreditation Council itself. The Accreditation Council therefore agreed to commission a research institution with the implementation of an assessment using external funds to still be procured.

Overall, the Accreditation Council finds that the criteria for system accreditation have proven to be effective. The Accreditation Council will therefore not currently undertake any fundamental revisions of the criteria. It will, however, consult as to whether the comprehensibility of the criteria could be improved by specifying some formulations – particularly with regard to the relation between management and quality assurance.

The request for interpretation aids or manuals is understandable; however, such interpretations or concrete examples always carry the risk of an implicit densification of the rules. In this regard, the Accreditation Council expressly gives preference to a responsible treatment of the freedoms intentionally granted in the current criteria. It is of particular importance to achieve a common understanding not only of the intended impact and the requirements of the criteria but also of the existing structural freedoms. The Accreditation Council will seek ways to further intensify the exchange between the higher education institutions, the agencies and the Accreditation Council.

## IV.7 Transparency and documentation

Accreditation is fundamentally tied to the overarching aim to create transparency with regard to the nature and quality of Bachelor's- and Master's study programmes.<sup>12</sup> System accreditation supports this objective in two ways: Transparent documentation and publication of information on offered study programmes, procedures and results of quality assurance measures in learning and teaching are part of the requirements to be fulfilled by a higher education institution. In addition, system accreditation offers further information to the interested public through publication of its results and, in particular, of the reports.

### *Report system, data collection and documentation*

Pursuant to the requirements for system accreditation, and in addition to publishing information on study programmes, higher education institutions must inform the bodies in charge of teaching and learning at least once per year and in addition the general public and the responsible ministry in an appropriate manner about the procedures and results of the quality assurance measures in the field of teaching and learning. Consequently, they must have an internal report system that documents the structures and processes in the development and implementation of study programmes, as well as the structures, processes and measures of quality assurance, their results and effects.

In addition to the inner-institutional consequences of this provision, the report system itself also gains importance in the context of a system accreditation procedure: If a higher education institution has already comprehensively implemented a report system pursuant to Criterion 5.4.4 of the criteria for system accreditation, the administrative burden in the review process is reduced because the documents required for the review do not need to be separately prepared. In the first procedures, this was obviously not the case and all parties to the proceedings confirm a comparably high documentation burden. In addition to possible uncertainties in implementing this criterion and its requirements, the development status of the internal systems at the higher education institutions could be a reason for this. If procedures are carried out at a very early point in time, the structures and processes in the development, implementation and quality assurance of study programmes cannot yet be documented in the report systems set up for this purpose (see also **Chapter**

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<sup>12</sup> Cf. German Rectors' Conference: Accreditation procedures. Resolution of 06.07.1998; Standing Conference of the Ministers of Education and Cultural Affairs of the Länder: Introduction of an accreditation procedure for Bachelor's- and Master's study programmes. Resolution of 03.12.1998.

III.2). It remains to be seen how the successive development and extension of the internal systems of higher education institutions affects the impact of this criterion.

#### *Publication of accreditation data*

With the database of accredited study programmes, the Accreditation Council provides an instrument that publicly and transparently documents the results of programme- and system accreditation. The entry and updating of the accreditation data is currently performed by the agencies certified by the Accreditation Council, while the release of the data sets is performed by the head office of the Foundation after they have been formally inspected. The database and the statistics generated from this database are both characterised by a relatively strong demand.<sup>13</sup>

Currently, it is not possible to access a list of all system-accredited higher education institutions. A corresponding concept for further development of the database has been drafted and is to be implemented in the upcoming year. This equally comprises the documentation of conditions in system accreditation procedures. In addition, the concept includes the consideration to have higher education institutions themselves enter study programmes accredited through system accreditation in the future in order to demonstrate the self-accreditation authority of a higher education institution in this framework as well.

#### *Reports in system accreditation*

In 2011, after a trial phase in programme accreditation, the Accreditation Council established the publication of reports for system accreditation as well. Only this comprehensive publication practice thoroughly fulfils the transparency requirement of external quality assurance.<sup>14</sup>

Here, the Accreditation Council assigns particular importance to the quality of the reports: As a central reporting element, they serve the documentation of the procedure results toward third parties; in addition, they form the basis for internal communication in the course of the accreditation procedure.

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<sup>13</sup> On the website of the Accreditation Council, the database of accredited study programmes is one of the five most frequently visited pages.

<sup>14</sup> The publication of reports is an element of Standard 2.5 of the Standards and Guidelines for Quality Assurance in the European Higher Education Area. Cf. ENQA: Standards and Guidelines for Quality Assurance in the European Higher Education Area. Helsinki<sup>3</sup>2009, p. 21f.

The Accreditation Council has been convinced that the assessment results can, for the most part, be comprehensibly taken from the reports. The reports thereby represent a good basis for decision making in the corresponding committees of the agencies. However, the design and structure of the reports for system accreditation presented to date do not thoroughly make it clear to what degree the criteria of the Accreditation Council have actually been a subject of the review. The quality and completeness of the reports represent an important requirement for the transparency of procedures and assessment in the accreditation system and thereby also for international recognition of the accreditation decision.

The Accreditation Council will therefore consult regarding the necessity of standards for increasing the quality of reports.

#### **IV.8 Teacher training programmes and supplementary determinations in terms of professional law**

A total of three of the first six system accreditation procedures were carried out at higher education institutions that offer teacher training programmes or participate in their implementation. The design and accreditation of such study programmes involve fundamentally special demands. In particular, they are subject to specific provisions for securing state responsibility and ensuring reciprocal state recognition. In accordance with the relevant resolutions of the KMK<sup>15</sup> this pertains to provisions for supplementary determinations in terms of professional law in addition to the mandatory accreditation and compliance with special requirements relating to study structure and content, and thereby for the qualifications required for admission to the *Vorbereitungsdienst* (preparatory service).

##### *Provisions for teacher training programmes in system accreditation*

With the introduction of system accreditation, the KMK adopted further provisions intended to ensure that the special requirements of teacher training programmes are considered in the then new approach. In particular, it established for accreditation procedures at higher education institutions offering teacher-training related Bachelor's- and Master's

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<sup>15</sup> Cf. Standing Conference of the Ministers of Education and Cultural Affairs of the Länder: Key issues for reciprocal recognition of Bachelor's- and Master's degrees in study programmes with which the educational requirements for a teaching post are instructed. Resolution of 02.06.2005 and the same: Participation of third parties in accreditation procedures. Resolution of 10.10.2008.

study programmes that the arrangements pertaining to these study programmes require the agreement of the ministry responsible for the school system.<sup>16</sup>

The Accreditation Council has thoroughly included these state provisions for teacher training programmes in its rules for system accreditation and has thereby considered both content and the level of the procedure:

- With regard to content, the accreditation requirement for teacher training programmes is implemented in the definition of the accreditation subject and, in particular, in the establishment of the legal consequence of the system accreditation: The internal quality assurance system of a higher education institution is assessed, which – in the case of success – has the accreditation of the study programmes as a consequence. However, system accreditation only accredits study programmes that have also been set up in this system or that have already been the subject matter of the internal quality assurance (Cl. 6.1.1 of the rules). The requirements for the system comprise the special provisions for teacher training study programmes relating to study structure and content, and the participation of third parties for determinations in terms of professional law. The higher education institution must therefore guarantee compliance with the statutory provisions, in particular the common and state-specific structural guidelines of the Länder, and possibly existing special provisions for study programmes that prepare for state-regulated professions (Cl. 5.4.2 of the rules, bullet point 3). In addition, it is required that the corresponding experts are involved in the development and reform of study programmes leading to state-regulated professions (Cl. 5.4.2 of the rules).
- At the level of the procedure, all procedural elements comply with the resolutions of the KMK and, above all, the special state responsibility for teacher training. For example, an expert is to be additionally included in the system assessment when supplementary determinations in terms of professional law are to be decided as part of the system accreditation and state provisions require this (Cl. 4.5 of the rules). For the programme random sample as well, one study programme of each respective type of teacher training offered is to be included and compliance with the special requirements relating to study structure and content (Cl. 4.6 and 4.7 of the rules) is to be assessed. The assessment focus in both procedural elements, as well as in the feature random

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<sup>16</sup> Cf. Standing Conference of the Ministers of Education and Cultural Affairs of the Länder: Introduction of system accreditation. Resolution of 13.12.2007, Cl. 2 and the same: Fundamental decision on the introduction of system accreditation. Resolution of 15.06.2007.

sample, always lies on the question of whether the higher education institution is able – and systematically able, not only in the concrete individual case – to guarantee compliance with the requirements mentioned above.

The Accreditation Council has refrained from issuing detailed guidelines. It is e.g. not determined what manner and scope the participation of third parties in a higher education institution's system should take. The assessment role and decision-making authority of additional experts in the system assessment, along with their participation in the programme random samples, are also not narrowly defined.

The Accreditation Council thereby adheres to the fundamental principle of system accreditation that responsibility for structuring the management system for learning and teaching lies solely with the respective higher education institution. In addition, it promotes the diversity of rules and norms for teacher training programmes in the individual states and their manifestations in the respective internal systems of the higher education institutions. Consequently, the rules for system accreditation do not restrict the necessary structural freedom of the higher education institutions and simultaneously grant the greatest possible measure-taking freedom with regard to corresponding state-statutory provisions and the respectively required coordination with the ministry responsible for the higher education institution.

However, the first experiences with system accreditation show that this flexibility can lead to problems if the structuring of a procedure would have to be coordinated anew each time with the ministry responsible for the school. This would not only negatively affect comparability of the procedures but also excessively strain the complexity of the procedure preparation for all involved. For this reason, the agencies should be informed of the concrete consideration of matters tied to teacher training study programmes in system accreditation procedures and, for this purpose, the provisions in the individual states – particularly with regard to the nature and scope of the participation of third parties (assessment role, decision-making authority) – should be enquired.

With concern, the Accreditation Council establishes that Bachelor's- and Master's study programmes for teacher training are not included in system accreditation procedures in all states. Corresponding feedback from higher education institutions raises the concern that this will directly affect the acceptance and attractiveness of the procedure. This impression has already been confirmed several times. For this reason, the Accreditation Council has asked the KMK to consult regarding this matter as soon as possible. The aim should

be to further develop individual state provisions in such a manner that teacher training programmes are not excluded from system accreditation.

#### *Teacher training programmes in the random samples*

The informative value of the assessment at study programme level was also low for procedures in which the programme random sample regularly comprises teacher training. Impact correlations between the management- and quality assurance system and the quality of the assessed study programmes can hardly be established. In contrast, the described increased flexibility of the feature random sample (see [Chapter IV.5](#)) could lead to a more informative assessment of actual compliance with special requirements for teacher training programmes. The selection of a corresponding feature can be sensible for an expert group when, for example, the teacher training is assigned high importance in the profile of the respective higher education institution. Such a type of in-depth assessment through a representative number of Bachelor's- and Master's study programmes can then be used to also assess further, specific quality requirements for teacher training programmes in addition to the systematic compliance with guidelines relating to study structure and content. Various agencies have already made positive experiences with a comparable practice in programme accreditation. Prior to the assessment of a single teacher training programme, overarching aspects of the entire teacher training portfolio of a higher education institution were assessed. This allowed a targeted assessment of e.g. the lack of overlap in the instructional offer, the relationship between disciplinary didactics and disciplinary subject knowledge, the quality of the integration of practical elements, or also the role and involvement of certain centres of teacher training.

#### *Further supplementary determinations in terms of professional law*

Aside from the teacher training programmes, the decision on accreditation is also tied to a supplementary determination in terms of professional law in some further study programmes. This pertains to e.g. access to a career in senior services for graduates of Master's study programmes at universities of applied sciences or the education of *Wirtschaftsprüfer* (German public accountants) pursuant to the respective legal provisions. Already at the introduction of the new procedure, the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder and the Interior Ministers' Conference unconditionally agreed to apply the legal framework to date on service law assignment of

accredited Master's study programmes at universities of applied sciences to system accreditation as well.<sup>17</sup> Some misunderstandings regarding this could be cleared with the result that, based on present knowledge, the fulfilment of the educational requirements for the access to a career in senior services through Master's degrees at universities of applied sciences is not to be separately assessed.

Further experiences with organisationally tying system accreditation procedures to procedures that decide the suitability of a study programme for the purpose of professional recognition have not been made at this time. Nevertheless, the structural freedoms required for this have been provided in the rules for system accreditation pursuant to the procedural principles on the participation of third parties in accreditation procedures. Consequently, the Accreditation Council does not see a need for revisions.

#### **IV.9 System accreditation of units of a higher education institution**

The subject of system accreditation is the internal quality assurance system of a higher education institution for learning and teaching. This underlines one of the essential principles of the procedure: As an institution, and not merely as the sum of individual or separately-functioning units, it carries responsibility for the quality of the study programmes it offers and must, therefore, as a basic requirement for system accreditation, possess structures and processes that allow it to fulfil this institutional responsibility.

However, under certain conditions, it can certainly be sensible to not, or not yet, pursue system accreditation for the entire higher education institution. This could be the case e.g. with study-related organisational units in a higher education institution that have management competency and operative responsibility for learning and teaching i.e. for planning and implementing the study programmes it offers and for quality assurance in learning and teaching.

The Accreditation Council has established the following requirements for system accreditation of such units: First, the quality assurance system of the unit must be integrated in that of the higher education institution. Secondly, the management of the higher education institution must assume the initiative and responsibility for the internal organisation of the

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<sup>17</sup> Cf. on the resolution framework the agreement "Admittance to careers in the higher grade of civil service through Master's degrees at universities of applied sciences". Resolution of the Interior Ministers' Conference of 07.12.2007 and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder of 20.09.2007. The Interior Ministers' Conference granted its approval pursuant to Section II, No. 1 of this agreement by resolution of 17./18.04.2008.

procedure. In addition, it must be comprehensibly explained why the accreditation of the quality assurance system for the entire higher education institution is not yet sensible or practicable.

These requirements for an integrated system and the active role assigned to the management of the higher education institution do not fundamentally represent an exclusive demand for systems that are centrally structured and administered. On the contrary, the experiences made to date indicate that the structural freedoms in the requirements for system accreditation are sufficiently broad for accommodating the significant inner-institutional particularities in the systems.

Although the Accreditation Council acknowledges the arguments for a system accreditation of study-related organisational units – particularly in view of its development-oriented influence on the establishment of quality assurance systems encompassing the higher education institutions as a whole – the Council continues to find it necessary to prevent the accreditation of systems in which the relevant processes and structures independently coexist and impact correlations are not recognisable.

As no system accreditation procedure for a unit has been completed to date, no evaluable practical experiences are given at this time. Nevertheless, the Accreditation Council will consult as to whether the currently applicable requirements for system accreditation of study-related organisational units prevent a development-oriented impact for the establishment of quality assurance systems encompassing the higher education institution as a whole.

## **V. Concluding remarks and perspectives**

In sum, the Accreditation Council concludes that the orientation, objective and design of system accreditation are to be positively assessed in general. The assessment of the reporting members of the Accreditation Council and also the feedback received from parties to the proceedings show that the rules for system accreditation have proven to be effective in concrete accreditation practice, both with regard to their practicability and with regard to the pursued objectives of system accreditation.

If one considers the complexity of the procedure, the consequences of the decisions to be made in system accreditation, and the challenges tied to the introduction of an entirely new procedure for quality assurance and development for all involved in the procedure, then the evaluation of the first six procedures can, for now, only represent a first review

that may result in a need for readjustment measures in indisputable points. The Accreditation Council finds it sensible to utilise the findings from the five-year pilot phase now for the further development of system accreditation, for increasing effectiveness and efficiency of the procedure, for improving acceptance of the procedure, and for enhancing the incentive to apply for system accreditation. However, this should expressly not encompass a readjustment of the system. This would require waiting for a sufficiently high number of completed system accreditations to allow a conclusive assessment of the cost and benefit tied to this procedure based on an empirically mature basis, as the German Council of Sciences and Humanities rightly remarked in its recommendations.<sup>18</sup>

The Accreditation Council further believes that the parallel existence of programme accreditation and system accreditation has proven to be effective and that higher education institutions should continue to be able to choose between the two quality assurance procedures. This possibility to choose not only promotes diversity in German higher education, particularly with regard to the number of study programmes offered, but also considers the circumstance that the current establishment and extension of internal quality assurance systems of higher education institutions present highly varying development stages.

On the basis of this report, the Accreditation Council will consult regarding necessary readjustment measures for further development of system accreditation and, with involvement of the accreditation agencies, may possibly undertake corresponding revisions of the rules for system accreditation.

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<sup>18</sup> Cf. German Council of Sciences and Humanities: Recommendations for accreditation as an instrument of quality assurance, loc. cit., p. 60.