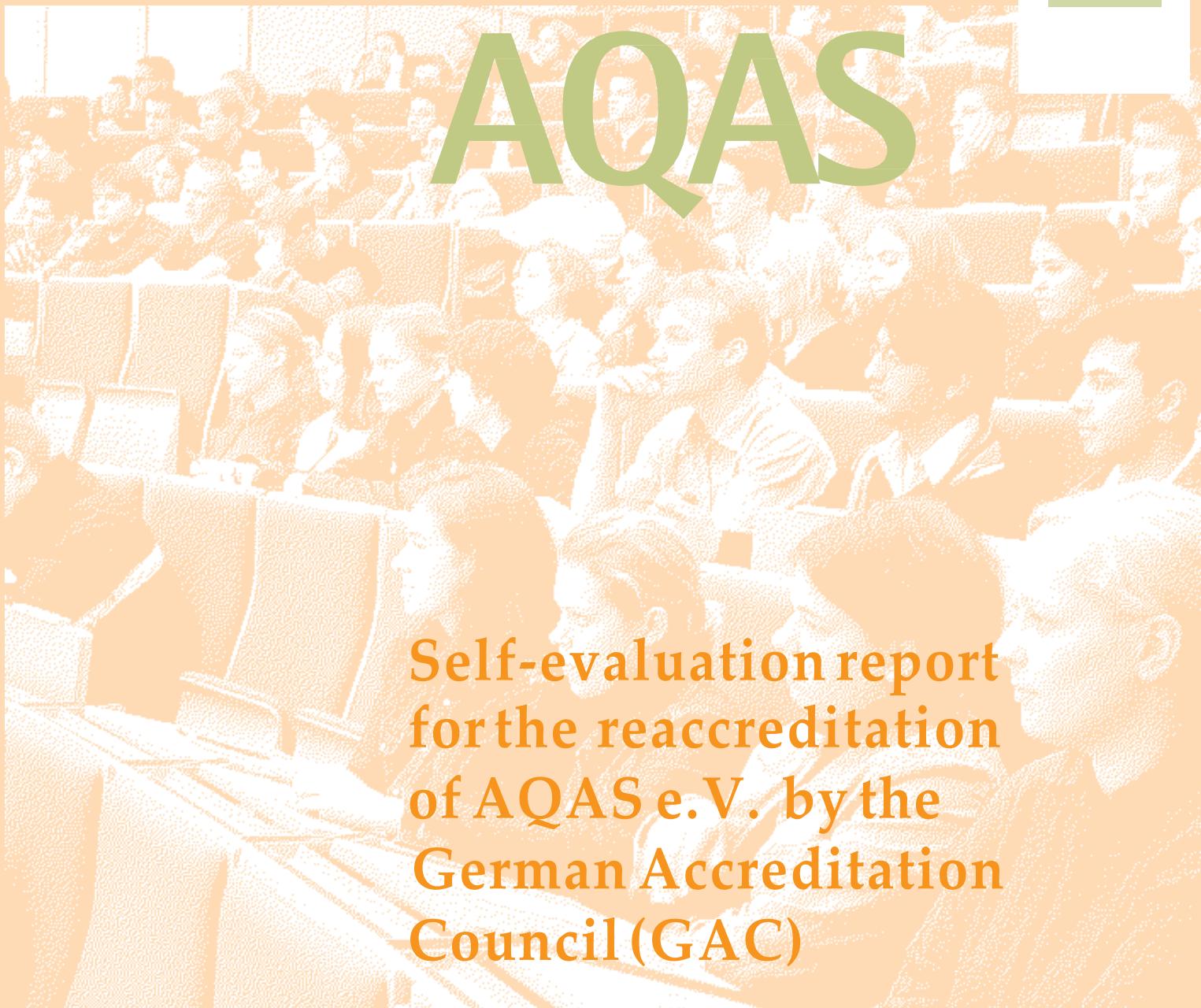


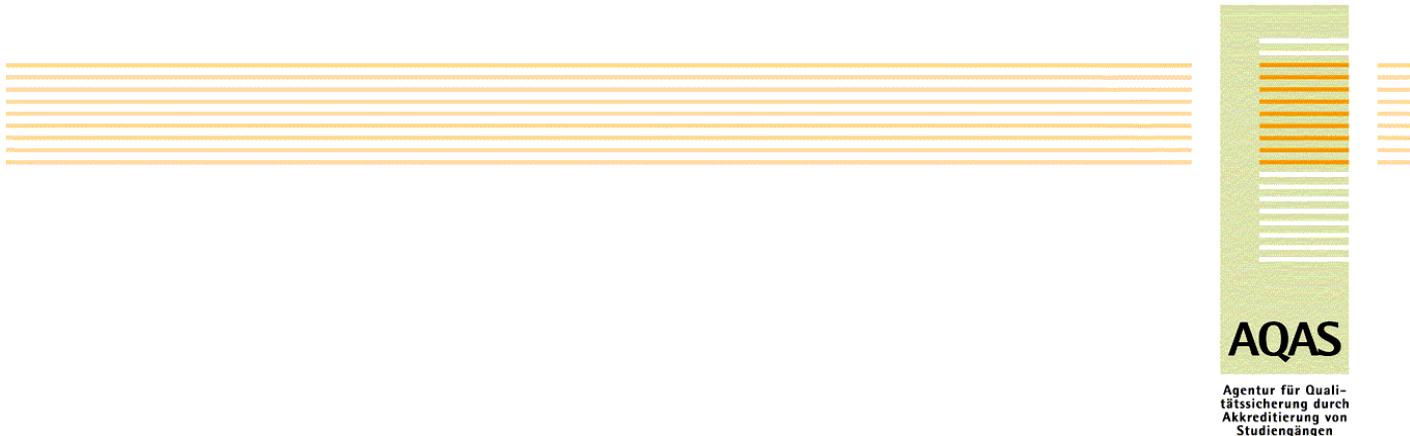


AQAS

# AQAS



**Self-evaluation report  
for the reaccreditation  
of AQAS e.V. by the  
German Accreditation  
Council (GAC)**



# **Self-evaluation report for the reaccreditation of AQAS e.V. by the German Accreditation Council (GAC)**

**of 31.08.2016**

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## **Introduction**

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With the decision of the German Accreditation Council (GAC) of 23.02.2012 AQAS was reaccredited till 31.03.2017 as an accreditation agency. AQAS is therefore entitled to carry out programme and institutional accreditation procedures in Germany. In its letter dated 11.05.2016 the AQAS Management Board requested a renewal of its reaccreditation through GAC. GAC was also asked to carry out an examination of AQAS's compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) as part of the reaccreditation procedure.

Following the fulfilment of the conditions of the previous accreditation accreditation materials, accreditation procedures and internal processes were subjected to a comprehensive revision. Furthermore, AQAS' procedures were continually examined and further enhanced. On 14./15.05. 2015 the amendment of the ESG was adopted by the Bologna follow-up conference in Eriwan. AQAS took this as an opportunity to fundamentally revise its own current internal quality assurance concept which dated back to 2008.

A newly revised version of the quality assurance concept was passed by the Management Board on 31.05.2016 and focusses on part 3 of the ESG (standards for quality assurance agencies). The concept (compare Appendix V.1) forms the basis for part II.A of the present Self-Evaluation Report/SER (see below).

The present SER for the application for reaccreditation was developed in anticipation of the new rules and regulations of GAC. It was expected that GAC's rules and regulations would closely be aligned with the ESG. With its letter of 13.07.2016 GAC confirmed the desired orientation towards the ESG (even if the new legal framework has not yet been adopted). The SER therefore has the following structure:

- Section I reflects the past accreditation period in view of the implementation of the conditions and recommendations following on from the previous accreditation. This section also makes reference to the points which were raised in the experience report published by GAC on 22.06.2016 about the work of AQAS. These points will be considered and discussed as part of the reaccreditation procedure.
- Section II describes the implementation of the ESG within the agency. For the sake of greater plausibility we decided to focus first on the standards of the quality assurance agencies (Part 2 of the ESG) where we describe the structures, responsibilities and resources of AQAS (Chapter A). Next, we describe how the standards for external quality assurance are implemented (Part 3 of the ESG) which refer to the organisation and management of the different accreditation procedures at AQAS (Chapter B). In its letter of 13.07.2016 GAC requested details about the "Additional criteria for the recognition in Germany" according to the draft of the new legal framework (Chapter C). Therefore the up-to-date criteria of GAC concerning the accreditation of agencies in the version of 10.12.2010 are fully covered in Chapter 2.
- Section III provides an outlook on future plans and developments at AQAS over the next years, outlining foreseeable challenges and changes and specifically the ramifications of the decision of The Federal Constitutional Court of February 2017 regarding the accreditation system in Germany.

The reaccreditation of AQAS should be carried out formally on the basis of the criteria of GAC in the version of 10.12.2010. In order to align the ESG oriented presentation with these criteria we added a Matrix (Appendix V.5) which should facilitate the appropriate orientation.

An extensive set of appendices has been added to the Self-Evaluation Report in order to document the described structures and processes. Aside from samples, internal rules and process documents, we also added sample documents from accreditation procedures that AQAS carried out in order to document our practical work.

These appendices are structured thematically thus:

- I. Organisation of the agency
- II. Human Resources Handbook
- III. Materials for carrying out accreditation procedures (programme/institutional accreditation)
- IV. Brochures
- V. Quality Assurance
- VI. International
- VII. AQAS ARCH GmbH

Due to financial constraints we only printed those appendices which are of a basic nature and which are key for an understanding of how AQAS is structured and how we operate. The full set of appendices (see Chapter IV Overview of Appendices) can be found on the enclosed CD.

The present Self-Evaluation Report aims to give a comprehensive overview of the work and profile of AQAS.

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## I. Review of the accreditation period

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The previous accreditation period was marked by considerable changes in the regulatory framework impacting on the remit of AQAS:

Through the introduction of the **institutional/system accreditation** and the subsequent increase for this type of accreditation the whole education market changed in which agencies operate. On the one hand, system accreditation leads to a loss of income for agencies as the costs associated in carrying out an institutional accreditation are fewer than those associated with a programme accreditation. On the other hand the **competition of agencies** for institutional accreditation procedures is more based on financial aspects, a situation which differs from the one for programme accreditation (see Chapter II.B.3.2.10). At the same time universities perceive agencies more and more as competence centres for quality assurance, requesting from AQSA a broader range of services, for instance the certification of professional training in the HE sector, evaluations or the running of workshops. AQAS e.V. decided to set up a **fully owned subsidiary** in order to react to the simultaneously growing demand of foreign universities requesting accreditation procedures by German accreditation agencies. The subsidiary will allow AQAS to react more flexibly to the needs and requirements of universities in Germany and abroad (see Chapter II.A.1.5.3).

The parameters of the German Accreditation Council (GAC) for institutional accreditation were deliberately formulated fairly open and non-descriptively in order to give universities a greater degree of scope and flexibility in introducing or enhancing their own internal quality assurance systems. This also led to a greater degree of interpretation for expert groups and the agencies tasked with carrying out accreditation procedures. From our point of view this scope for interpretation led to a significant and perceptible difference in quality between the agencies as universities perceived some agencies as „stricter“ than others (see Chapter II.B.3.2.10). There is also a growing difference in the accreditation system itself: we perceive that there is a markedly higher degree of regulation in programme accreditation than in institutional accreditations. This set of rules and regulations is noticeable in the monitoring processes of GAC (see Chapter II.A.7 und II.B.5). We could not follow the line of reasoning in GAC´s micro-level criticism; criticism for instance was aimed at expert reports in programme accreditation, adding to the bureaucratisation of this instrument.

AQAS has many years of experience in programme accreditations (see Chapter II.A.1.5.1 and II.B.3.1.10). German HEIs and the DAAD (German Academic Exchange Service) value AQAS as a competent **partner in EU projects**. Colleagues with an international remit at AQAS therefore have to familiarise themselves with the requirements and work methods of EU projects as well as international HE systems (e.g. Moldova and Egypt). The effort it takes for colleagues to learn the ropes of new work areas and to develop new instruments is high (e.g. criteria and guidance notes, handouts for reviewers, standard letters). Since 2013 this has clearly been visible at AQAS. There are no standard processes for international projects and procedures (see Chapter II.B.2.2.1), but each project has to be designed, planned and delivered on a case by case basis which is very time consuming. One positive aspect of agencies operating on a more international level is that intensive exchanges take place about HE systems and quality assurance systems. Therefore, the Europeanisation of the HE area becomes also noticeable in international conferences or in international projects. The learning transfer through international comparisons has become clearly visible at AQAS. During our Jour Fixe meetings or the annual closed-door meeting the international team feeds their experiences to the other consultants (see Chapter II.A.6.3).

The first six months of 2016 were marked by the **essential decision concerning the accreditation system by the Federal Constitutional Court (Bundesverfassungsgericht)**. Despite the Court explicitly confirming the legitimacy of study accreditation as an external quality assurance mechanism, public reactions to the decision and esp. the misleading press coverage led to a marked insecurity among universities and the accreditation system. Many universities remain in a waiting position, trying to postpone accreditation procedures till the new accreditation rules and regulations have been

fleshed out. The political and media steered discussions also led to irritation among advisory board members as well as among reviewers who act on a voluntary basis for the German accreditation system. This is also true for agency colleagues who normally bring their own experiences in university administration or student self-governance to their working lives. Staff at AQAS has a high intrinsic motivation to deal with the time consuming and thematic demands of their consultancy roles in order to improve the quality of teaching and learning. They react with frustration to the public criticism as they do not feel that their work is valued. In contrast, AQAS mainly receives positive feedback from universities and experts<sup>i</sup> regarding accreditation procedures (see Chapter II.A.6.4).

There are numerous experts who have been working for AQAS over many years. Our agency can rely on their willingness to support and contribute to our accreditation procedures. Nevertheless, recruiting experts remains a challenge for our agency. In a few programme accreditations we had to send out 10 to 15 requests before a suitable expert could be identified. Time restraints are high for professors and a voluntary role in accreditation procedures is not always perceived as being compatible with their duties at university nor is their engagement, unfortunately, sufficiently appreciated by colleagues, in contrast for instance to act as an expert in research (e.g. German Research Foundation/DFG) (see Chapter II.B.4.2). Within institutional accreditation procedures however the willingness to work as an expert is (still) high. Having said that, it is not easy to find suitable and qualified experts from university administration, quality management or the professions. The quality of the experts will, ultimately, be the yardstick of how universities are going to judge an accreditation procedure (see Chapter II.A.6.4).

#### **A. Follow-up of the conditions of the last reaccreditation**

The last reaccreditation of AQAS by the GAC took place on 23.02.2012 and was associated with four conditions. The conditions referred to were

- (1) The alignment of decisions by the Accreditation Commissions with the then current GAC decision;
- (2) The consistency of the external documentation relating to the criteria for exclusion of the impartiality of experts;
- (3) The binding participation of all stakeholders in the Accreditation Commissions for the nomination of experts in programme accreditation procedures as well as
- (4) The evidence of binding decision processes in AQAS' various commissions and internal units.

In order to fulfill all conditions the relevant Accreditation Commission examined its appropriate decisions, brought them up-to-date and aligned them with AQAS' internal appeals and complaints processes. Details regarding the impartiality of experts in information brochures for programme and institutional accreditation, handouts for experts and the declaration of impartiality letters were standardised (see Chapter II.B.3).

GAC adopted a new decision in programme accreditations procedures to ensure that all stakeholders were equally committed to nominate experts (see Chapter II.B.4). In order to regulate the modalities of this decision by GAC, AQAS adopted its own rules and procedures for all commissions and internal units (see Chapter II.A.1.).

**The fulfillment of all conditions raised during the reaccreditation and set down in the decision of GAC from 12.09.2013 were met.**

## **B. Follow-up of the recommendations of the previous reaccreditation**

In addition to the above mentioned conditions six recommendations were given in the experts report for the reaccreditation of AQAS in 2012. The way how AQAS handled these recommendations will be the subject matter of the 2016 reaccreditation procedure. Therefore, we took a look at these six recommendations in greater detail:

*Recommendation 1:*

*In light of the overlapping of personnel between the Management Board and Accreditation Commissions, AQAS should be bindingly obliged to document the functions and decision-making powers of the board members in the agency's commissions.*

AQAS took this recommendation as an opportunity to introduce a change in its statute in the General Assembly in 2013 in order to disentangle the personal connection between Management Board and the Accreditation Commissions. The Chairman of the Management Board is therefore no longer a member of the Accreditation Commissions and does no longer preside over them. There are two Accreditation Commissions (one for programme accreditations, the other one for system accreditations, AC<sup>Prog</sup> and AC<sup>Sys</sup> respectively). The members of each of the respective Accreditation Commission elect a university representative who is in charge of chairing their meetings. AQAS' internal structure has thus been placed on a firmer footing, ensuring that its Accreditation Commissions are not subject to directives (see Chapter II.A.3). With regards to the exchange between the Accreditation Commissions and the Management Board, it should be noted that this connection, which is still practiced at other agencies, no longer exists at AQAS.

*Recommendation 2:*

*AQAS should be bindingly obliged to document the modalities of the decision-making in the Accreditation Commissions.*

This recommendation is fulfilled with the fulfillment of condition 4 (see above).

*Recommendation 3:*

*AQAS should ensure the participation of all interest groups in appointing reviewers for programme accreditation and random sample programme assessments.*

This recommendation is fulfilled with the fulfillment of condition 3 (see above).

*Recommendation 4:*

*AQAS should take measures for the fundamental preparation of reviewers for programme accreditation.*

In order to prepare experts for their role in accreditation procedures AQAS developed key processes aimed at providing a systematic preparation. These include support regarding the assessment of the application for accreditation by a HEI as well as grasping and applying the criteria for the accreditation of study programmes by GAC. Comprehensive written information is also provided in advance and a half-day internal preparatory meeting with the expert group takes place the day prior to the on-site visit. During this meeting AQAS consultants present and explain the general accreditation processes and the criteria for accreditation. Specific questions relating to the accreditation procedure at hand are discussed within the group (see Chapter II.B.4.2).

Based on AQAS's experience, most experts on programme accreditations were very well informed about the basic accreditation criteria because they had already acted as experts in the past or because they had taken part in accreditation procedures at their universities. Experts clearly indicated to AQAS that a mandatory and separately organised preparatory workshop for experts would increase the efforts for programme accreditations to such an extent, that it was highly unlikely that experts would continue to participate in accreditations in the future. The first results of the INCHER-Study on

"quality assessment in teaching and learning through accreditation and evaluation procedures" confirm our arguments (see Chapter II.B.4.2).

Based on feedback by GAC and the discussions between agencies, universities and GAC we realise again and again that demands are very high on experts' time availability and performance. The German accreditation system however follows the principle of voluntary engagement. Nevertheless, experts are faced with the same demands as if agencies were working with experts whose main remit and main interest is carrying out accreditation procedures. From AQAS' point of view the system of voluntary engagement works surprisingly well but care should be taken that it is not unduly stretched.

Against this background we are going to adhere to our trusted modus operandi. In order to contribute to the continuous improvement of the accreditation system generally, AQAS offers thematic workshops to university representatives several times a year (incl. experts as well). These workshops cover topical issues (e.g. accreditation of joint programmes, dual degree programmes, teacher education etc.) (see Chapter II.B.4.2). Our experience shows that demand for theme-based trainings is normally high.

*Recommendation 5:*

*AQAS should bindingly document how it ensures the freedom of direction, the independence and impartiality of its committees and its members.*

The organisational structure of AQAS changed since the last reaccreditation was carried out so that there are no longer overlaps between the Board and two Accreditation Commissions (see explanations for recommendation 1). Indeed, the Board nominates the members of the Accreditation Commissions but once these members are in place, the Board has no more connections with them. Also, there is no form of accountability of the Commissions towards the Board.

During the previous accreditation period both Accreditation Commissions formulated and published a joint concept stating their definition and purpose. The committee statutes also ensure that members' independence and impartiality are safeguarded. The joint concept explicitly states that commission members exert their duties in the Accreditation Commission based on their personal competences and not as representatives of their university or company.

Both Accreditation Commissions decide about an accreditation solely on the basis of the evaluation of the expert group. In some cases, a decision is also made based on the response submitted by the university in relation to the experts report (see Chapter II.A.3).

*Recommendation 6:*

*In the composition of the independent Appeals and Complaints Commission, an overlapping of personnel with the further decision-making committees of the agency should be excluded.*

AQAS' Appeals and Complaints Commission was set up at the General Assembly meeting in 2011. In 2013 its structure and membership were adjusted as the previous format did not work out. The adjustment was thus, that all members - with the exception of the representatives of the Accreditation Commissions - are entitled to vote. Persuant to its statutes, the Appeals and Complaints Commission therefore comprises two representatives from universities and universities of applied sciences, one professional practice representative, one student representative and one representative each of AC Prog and AC Sys.

The recommendation to adjust the composition of the Appeals and Complaints Commission refers to the nomination of members for the Accreditation Commissions. This format was deliberately chosen to make allowance for the line of reasoning of the respective commission regarding the Appeals and Complaints Commission and to be able to ask feedback questions (see Chapter II.B.7).

The composition of the Appeals and Complaints Commission in its present format has lived up to expectations.

## **II. Implementation of the European Standards and Guidelines (ESG)**

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### **A. Standards for Quality Assurance Agencies**

#### **1 Activities, Policies and Processes for Quality Assurance (ESG 3.1)**

*Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.*

##### **1.1 Aims**

AQAS, the Agency for Quality Assurance through the Accreditation of Study Programmes („Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen“) is an independent non-profit organisation which was founded by both higher education institutions (HEIs) and academic associations. AQAS is dedicated to the quality assurance and quality enhancement of teaching and learning at HEIs. AQAS has not only been a firm part of the German accreditation system for the last 14 years but has also accredited more than 5.000 degree programmes and carried out 10 institutional (system) accreditations. These figures testify that AQAS not only regularly carries out quality assurance procedures in Germany and abroad but that it is also, in certain areas such as teacher training or joint study programmes, one of the most experienced agencies in Germany.

AQAS acts on the basic premise that universities take their own responsibility for the quality of teaching and learning. Quality assurance procedures however are appropriate to assess if specific quality assurance criteria have been met and if there are areas of concern for which quality improvement measures need to be developed. AQAS' understanding of quality assurance is a guiding principle and is also formulated in the **mission statement** of the agency (see Appendix I.7).

Accreditation procedures boost a variety of study programmes, ensure the quality of study offerings and create transparency. Accreditation therefore contributes to international comparability and recognition, giving students a reliable orientation when they apply for a place at university.

AQAS has become one of the key actors in creating the European Higher Education Area (EHEA) and making a contribution towards developing reliable and comparable quality assurance systems in national and international contexts.

As explained in the Mission Statement, we fulfill this mandate by:

- *Scrutinising and certifying the quality of study programmes and QA systems at universities within accreditation procedures*
- *Aligning our work with international developments in HE and QA systems and contributing to their enhancement*
- *Ensuring the implementation and compliance of national and European decisions and requirements*
- *Ensuring the participation of academics, labour market representatives and students in accreditation procedures*
- *Safeguarding the impartiality of experts as well as the committees in accreditation procedures*
- *Participating in European and international accreditation procedures*
- *Designing our procedures in a flexible and transparent manner*
- *Reflecting upon our own processes and developing these further*
- *Informing the interested public about our professional practice and the results of our procedures*

The above named aims define the operational work of AQAS. In addition, AQAS works on the basis of strategic planning which has been discussed and passed by the Management Board.

## 1.2 Structure of the agency

The organisation and responsibilities within the agency are determined by the statutes of AQAS e.V. (see I.1). Statutory commissions and internal units (§ 5) are

- the General Assembly,
- the Management Board,
- the Accreditation Commission for the accreditation of study programmes (AC<sup>Prog</sup>),
- the Accreditation Commission for the accreditation of QA systems (AC<sup>Sys</sup>) and
- the Complaints Commission (CC).

A list of all member institutions is enclosed (see Appendix I.2).

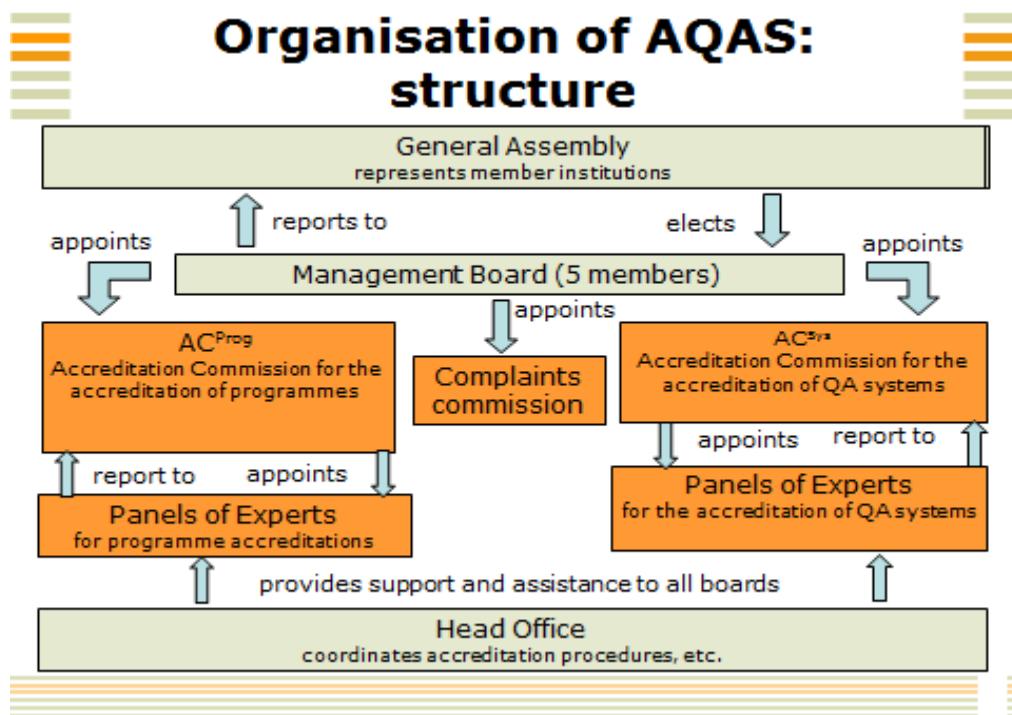


Image 1: Structure of AQAS e. V.

## 1.3 Management Board

**Members of the Management Board** are reputable academics who are experienced in the management of universities or universities of applied sciences. They identify themselves with the objectives of the Bologna process and share the understanding of quality assurance in learning and teaching as formulated in AQAS's mission statement. Great care has been taken in the composition of the Management Board, choosing personalities who have spent considerable time in industry as part of their professional career as these experiences outside academia are important for university graduates.

The present Management Board of AQAS e.V. consists of the following people:

- Prof. Dr. Eberhard Menzel, *Hochschule Ruhr West, University of Applied Sciences - Chairperson*
- Prof. Dr. Jens Hermsdorf, *President, Hochschule Worms, University of Applied Sciences - Deputy Chairperson*

- Dr. Marianne Ravenstein, *Vice Rector for Teaching and Student Affairs, Westfälischen Wilhelms-Universität Münster, University of Münster - Treasurer*
- Prof. Dr. Mechthild Dreyer, *Vice President of Learning and Teaching, Johannes Gutenberg-Universität Mainz/ Johannes Gutenberg University Mainz – Committee Member*
- Prof. Dr. Adriaan Dorresteijn, *Justus Liebig-Universität Gießen/ Gießen University – Committee Member*

In the General Assembly of 2013 the composition of the Management Board was re-adjusted in order to reflect AQAS's wider geographical area of work beyond the agency's traditional „founding Länder“ of North Rhine-Westphalia and Rhineland Palatinate. Thus Prof. Dorresteijn, the Vice President for Teaching Affairs at Gießen University (state of Hessen) was elected onto the Management Board.

#### **1.4. Accreditation Commissions**

The composition of all AQAS' commissions and internal units is based on the stakeholder principle in order to accommodate the different perspectives of the interest groups participating in accreditation procedures. AQAS therefore endeavours to include the different stakeholders into the structures and remit of the agency; academic representatives have the majority voice in all commissions. The processes for accreditation procedures were designed such that they can be closely supported by the respective commissions. In order to reflect the level of expertise within the decision-making body AQAS set up two accreditation commissions.

- The **Accreditation Commission for the accreditation of programmes (AC<sup>Prog</sup>)** decides statutorily about programme accreditations on the recommendations of the respective expert group and adopts accreditation processes and standards for the accreditation of study programmes (§ 8 of the statute)..
- The **Accreditation Commission for the accreditation of QA systems (AC<sup>Sys</sup>)** decides statutorily about system accreditations on the recommendations of the respective expert group and adopts accreditation processes and standards for system accreditation (§ 8 of the statute).
- The **Complaints Commission (CC)** is tasked, according to § 9 (1) of the statute of AQAS e. V., to assess appeals and complaints by universities raised as a result of decisions of one of the two Accreditation Commissions. If complaints cannot be solved by one of the commissions they are then tabled at the CC with a view to resolve the matter for the agency.

AQAS endeavours to win competent experts for the voluntary work in the Accreditation Commissions, who identify with the objectives of the Bologna process and who share the understanding of teaching and learning as formulated in the mission statement. According to the rules and regulations these experts are academics, representatives from the professions as well as students. International members act in both commissions.

Commission members are listed below at the time of submitting the self-evaluation report (as of August 2016):

##### **Accreditation Commission for the accreditation of programmes (AC<sup>Prog</sup>)**

- Prof. Dr.-Ing. Elisabeth Dennert-Möller, *Hochschule Hannover/ Hannover University of Applied Sciences*
- Monika Derksen, *Student at the Fachhochschule Aachen/ Aachen University of Applied Sciences*
- Dr. Edelbert Dold, *IHK Koblenz/ Coblenze Chamber of Commerce and Industry*
- Prof. Dr. Margret Flieder, *Evangelische Hochschule Darmstadt/ Darmstadt University of Applied Sciences*
- Prof. Dr. Jens Geelhaar, *Bauhaus-Universität Weimar/ Bauhaus University Weimar*
- Prof. Volker Gehmlich, *Hochschule Osnabrück/ Osnabrück University of Applied Sciences*
- Prof. Marc Grief, *Hochschule Mainz/ Mainz University of Applied Sciences*
- Prof. Dr. Jens Haustein, *Friedrich-Schiller-Universität Jena/ Friedrich Schiller University Jena*

- Horst Holzberger, *John-Andrews-Entwicklungsamt FORD-Werke/ FORD Research Centre, Cologne*
- Franziska Lappa, *Studentin der Technischen Universität Dresden/ Technical University Dresden*
- Prof. em. Dr. Wolfram Martini, *Justus-Liebig-Universität Gießen/ Gießen University*
- Prof. Dr. Ilka Mindt, *Universität Paderborn/ Paderborn University*
- Prof. Dr. Dietmar von Reeken, *Carl von Ossietzky-Universität Oldenburg/ University of Oldenburg*
- Prof. Dr. Jürgen Rekus, *Karlsruher Institut für Technologie/ Karlsruhe Institute of Technology*
- Prof. Dr. Falk Roscher, *Hochschule Esslingen/ Esslingen University of Applied Sciences*
- Prof. Dr.-Ing. Birgit Steffenhagen, *Fachhochschule Stralsund/ Stralsund University of Applied Sciences*
- Prof. Dr. Stephan Steinlechner, *Stiftung Tierärztliche Hochschule Hannover/ University of Veterinary Medicine Hannover, Foundation*
- Prof. Dr. Richard Sturm, *Karl-Franzens-Universität Graz/ University of Graz*
- Prof. Dr. Urbaan Titulaer, *Johannes-Kepler-Universität Linz/ Johannes-Kepler-University Linz (Vorsitzender der Kommission/Chairman)*
- Prof. Dr. Dr. Ewald Werner, *Technische Universität München/ Technical University of Munich*

#### **Accreditation Commission for the accreditation of QA systems (AC<sup>sys</sup>)**

- Dr. Peter Findlay, *Quality Assurance Agency for Higher Education (QAA), Great Britain*
- Prof. Dr. Ralf Haderlein, *Hochschule Koblenz/ Koblenz University of Applied Sciences*
- Prof. Dr. Manfred Hopfenmüller, *Ostbayerische Technische Hochschule Regensburg/ OTH Regensburg*
- Prof. Dr. Georg Krücken, *Internationales Zentrum für Hochschulforschung (INCHER), Kassel/ The International Centre for Higher Education Research-Kassel*
- Prof. Dr. Sabine Remdisch, *Leuphana Universität Lüneburg/ Leuphana University of Lüneburg*
- Dipl.-Kfm. Stefan Scheidgen, *Deutsche Post AG, Köln/ German Postal Service, Cologne*
- Prof. Dr. Marcus Siebolds, *Katholische Hochschule NRW/ University of Applied Sciences (Vorsitzender der Kommission/Chairman)*
- Wenzel Wittich, *Student der RWTH Aachen/ RWTH Aachen University*
- Prof. Dr. em. Reinhard Zintl, *Otto-Friedrich-Universität Bamberg/ University of Bamberg*
- N.N.

#### **Complaints Commission**

- Prof. Dr. Ralf Haderlein, *Hochschule Koblenz (beratendes Mitglied)/ Coblenz University of Applied Sciences (consulting member)*
- Prof. Dr. Thomas Kaul, *Universität zu Köln/ University of Cologne*
- Prof. Dr. Dieter Kilsch, *Technische Hochschule Bingen (Vorsitzender)/ Bingen University of Applied Sciences (Vorsitzender/Chairman)*
- Prof. Dr. Stefan Müller-Stach, *Johannes Gutenberg-Universität Mainz/ Mainz University*
- Georg Reschauer, *Akkreditierungsagentur im Bereich Gesundheit und Soziales, AHPGS*
- Prof. Dr. Falk Roscher, *Hochschule Esslingen (beratendes Mitglied)/University of Applied Sciences (consulting member)*
- Prof. Dr. Wilhelm Schneider, *Hochschule Bonn-Rhein-Sieg*
- Daniel Voll, *HHL Leipzig Graduate School, vormals (formerly)European Energy Exchange AG, Leipzig*
- N.N. (*studentisches Mitglied*)/ student representative

All commission members are elected for a length of three years by the Management Board. A re-election is permissible.

All AQAS committees have given themselves a statute (see Appendix I.3-6).

The Board's work is monitored by the Head Office which regularly provides information on relevant national and international developments.

Commission members' CVs are all enclosed in the Human Resources Handbook (see Appendix II).

## **1.5 Carrying out external quality assurance processes**

The aim of the statutes is fulfilled through establishing **processes and criteria** for the accreditation of study programmes (programme accreditation) and the quality assurance systems at universities (institutional accreditation). Accreditation procedures are carried out on the basis of these processes and criteria whose aim is to ensure quality assurance. The activities of AQAS aim to ensure a high level of education within the HE sector taking account of national and European requirements and to enhance the international recognition of university degrees. To further these aims and objectives, AQAS carries out accreditation procedures on a national and international level.

### **1.5.1 Programme Accreditation**

Within the framework of programme accreditation procedures the following key aspects are being examined: the appropriateness of the objectives as well as the competencies, the concept and the relevance of the study programme as expressed within the competencies; resources; organisation and quality assurance system at the university. These processes aim to support the enhancement of study programmes and to contribute towards the development of quality assurance.

For programme accreditation procedures the following key aspects apply:

- The procedures comply with national and international standards.
- The procedures aim at the comparability of study programmes, and therefore to equivalence, not sameness/similarity

In international procedures (without the award of the seal of GAC) the AQAS criteria form the basis upon which programme accreditation procedures with its associated indicators are carried out (see Appendix VI.2).

Since its inception in 2002 AQAS carried out 1953 programme accreditation procedures and accredited 5743 study programmes,<sup>1</sup> among them 67 Joint Programmes. 1052 procedures were carried out at universities, among them 155 teacher training procedures. 901 procedures related to study programmes at universities of applied sciences. 4760 programmes were accredited with conditions. For 974 programmes an accreditation was given without conditions. In six cases the accreditation was refused.

186 study programmes were revised following the suspension of the procedure; subsequently, they were successfully accredited. The application for accreditation was withdrawn for 10 study programmes after the evaluation had taken place, therefore no final accreditation decision was taken. In addition, 37 international accreditation procedures were carried out.

### **1.5.2 Accreditation of QA systems**

Through the accreditation of QA systems AQAS offers an alternative to programme accreditation as an institution's own responsibility is placed more centre stage within a QA system accreditation procedure. Universities carrying out a quality assessment of study programmes under their own auspices and management are given the opportunity to provide evidence that they are able to ensure the same quality within their own internal QA systems as if they were to undergo a programme accreditation. During the accreditation procedure the expert group checks if the university set up a robust and fully functional internal QA system within which it systematically ensures and regularly reviews the compliance with key criteria (GAC, KMK ((Kultusministerkonferenz - The Standing

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<sup>1</sup> Numbers for study programmes relate to the number of decisions e.g.s study programmes which were accredited by AQAS on several occasions (such as first accreditations, re.accreditations or re-reaccreditations) have been captured multiple times in the data set.

Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany), requirements on the Länder level). Universities which have successfully undergone an institutional accreditation are in a position to accredit their study programmes themselves and to award the seal of GAC.

QA institutional accreditation is based on the principle that quality development and quality assurance of study programmes form a central part of an institution's strategy and that this principle is embedded into the management system of the university.

To date, AQAS has successfully carried out ten QA system accreditation procedures (four at universities and six at universities of applied sciences). So far, there have not been any negative decisions. All 15 universities which submitted an application for initial screening were admitted to the accreditation procedure.

For universities outside Germany AQAS offers the opportunity to carry out an institutional accreditation which is aligned with the QA system accreditation. Similar to the processes in place for programme accreditation AQAS developed its own criteria and indicators aligned with the ESG standards and guidelines as an award of the GAC does not take place in international accreditation procedures (see Appendix VI.7).

So far, AQAS carried out one institutional accreditation procedure following this methodology.

### **1.5.3 Other activities and projects**

Based on the decision of the General Assembly, AQAS set up its fully-owned subsidiary on 1. January 2015, the **AQAS ARCH GmbH** in order to achieve a transparent separation between its remit of the more "classic accreditation procedures" in the e.V. and the additional projects in the field of Higher Education (e.g. evaluation and consultancy).<sup>2</sup>

The concept for a spin-off of a daughter company was discussed and approved by the General Assembly members as early as 2009. Initially, the guiding principle was to set up "consultancy" as a new business activity, focusing on demand nationally. However, the former business idea was not pursued further as several German agencies had already set up spin-offs and demand therefore for consultancies on the national level (such as preparatory consultations for system accreditation) was unlikely to rise as predicted.

Five years later (2014) the starting position had changed: as universities can now choose between institutional and programme accreditations. The business fields for accreditation agencies have changed accordingly. At the same time, there is a growing demand for services from AQAS in the national and international context. This goes considerably beyond the core business of the agency (carrying out accreditation procedures) but despite these changes AQAS remains committed to its mission statement i.e. that of enhancing education and training. The new services are provided to German universities or German and European scientific organisations (e.g. with AQAS participating as a partner in TEMPUS projects or AQAS being active in DAAD or HRK projects).

Within the European education and training system, AQAS perceives itself as a player with a specific remit and competency profile as well as a partner of German universities, supporting them in their internationalisation efforts.

### **Aims and objectives**

By separating its activities between classic accreditation procedures (leading to the award of the GAC) and international projects beyond the field of accreditation AQAS aims to achieve a greater degree of transparency internally and externally.

Against this background the Management Board of AQAS set up a separate spin-off company with a much broader educational remit, aimed at offering its services to universities and educational

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<sup>2</sup> The GmbH is a separate company; its purposes are not part of the present quality assurance concept.

organisations alike. The independent-non profit organisation (AQAS e. V.) will only fulfill its core mission e.g. the accreditation of QA systems and study programmes. In the future projects in an international context (e.g. TEMPUS or DAAD projects) will be managed by AQAS ARCH. Depending on demand by German universities for services in the quality assurance area, a new business field could be developed for the growing portfolio of the spin-off company. Therefore, the General Assembly decided on 13.11.2014 to found a daughter company. The founding of the spin-off company took place on 01.01.2015. An excerpt of the Commercial Register is enclosed as an Appendix (see Appendix VII.1).

### **Concept**

The key concept of the spin-off company corresponds with the concept that was already approved by the General Assembly in 2009:

- Founding of a spin-off company (private limited company/GmbH),
- AQAS e. V (represented through the General Assembly) as sole proprietor,
- Management Board representing the e. V. forms the shareholders meeting.

### **Legal basis**

Under charitable law, non-profit companies are entitled to set up and manage subsidiary companies which do not pursue non charitable purposes.

The current statutes of AQAS e. V. (dated: 06.11.2013) allows the founding subsidiary companies: § 2 section 4 sentence 2 explains that the organisation can set up companies and can participate in them.

The GmbH can carry out its activity in the existing rooms of AQAS e.V. and has to pay a specific user fee to the organisation. Equally personnel working for AQAS e. V. can be transferred to the GmbH, so that the daughter GmbH can use personnel and goods. Quality standards of AQAS e. V. are safeguarded within the GmbH.

Business profits are subject to corporate income tax (Körperschaftssteuer) and to trade tax (Gewerbesteuer).

### **Activities to date**

Since AQAS ARCH was set up as recently as early 2015, only four projects have been carried out so far within this early stage of development:

- Operative implementation of an evaluation of a study programme: Eastern Mediterranean University/Northern Cyprus: „Interior Architecture“ („Bachelor of Interior Architecture“) (2015) (on the basis of ESG) for the accreditation by AQAS e. V.
- Assessment of an evaluation regulation at the University of [...], Germany (2015)
- AQAS-workshops in Cologne: „Successfully organising programme accreditations“ (2016) and
- „The integration of practical elements into study programmes as a model of success in HEIs“ (2016)

Due to the low number of orders the subsidiary does not have its own personnel nor its own internal boards.

The decision by GAC regarding the relationship between system accreditation and consultancy services (of 20.02.2013) is, of course, adhered to and respected. The responsible boards and the management of AQAS are fully aware that, under no conditions, can there be a blending between consultancy and accreditation work. A potential situation where AQAS ARCH first carries out a consultancy with AQAS e. V. subsequently undertaking the accreditation can and should not take place under any circumstances. Thus, a project carried out for the University of [...] e.g. the assessment of their evaluation regulation, meant that AQAS e. V. had to decline a request for system accreditation from [...] University.

**Appendices:**

- Statute AQAS e. V. (I.1)
- List of Member Institutions of AQAS e. V. (I.2)
- Procedural Rules (Geschäftsordnung) of the Management Board (I.3)
- Procedural Rules of the Accreditation Commission for the Accreditation of Programmes (I.4)
- Procedural Rules of the Accreditation Commission for the Accreditation of QA systems (I.5)
- Procedural Rules of the Complaints Commission (I.6)
- Mission Statement (I.7)
- Human Resources Handbook (II)
- AQAS Criteria and Indicators for Programme Accreditation (VI.2)
- AQAS Criteria and Indicators for Institutional Accreditation (VI.7)
- Excerpt of the Commercial Register (Auszug aus dem Handelsregister) (AQAS ARCH GmbH) (VII.1)

## 2 Official Status (ESG 3.2)

*Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.*

### 2.1 Legal framework

AQAS e.V. is registered as an **organisation** in the Register of Association in the Municipal Court Cologne since 24 January 2013 under the number Nr. VR 17554. AQAS is recognised as a **non-profit** organisation<sup>3</sup> (see Appendices I.10 und I.11).

The General Assembly takes place once a year in the autumn. Since 2009 the General Assembly is combined with an annual conference covering a particular theme.

### 2.2 National recognition

AQAS e. V. was accredited for the first time by the **German Accreditation Council (GAC)** on 14.03.2002 and is entitled to award the GAC seal for programme accreditation and, since 2008, the seal for system accreditation (see Appendix I.12).

### 2.3 International recognition

AQAS e. V. is a full member at **ENQA** since 19.11.2008. Since 2010 AQAS e.V. is listed in the European register **EQAR** (see Appendices I.13 und I.14).

#### Appendices:

- Excerpt of the Register of Associations (Auszug aus dem Vereinsregister) (I.10)
- Notice of Exemption (Freistellungsbescheid) (I.11)
- Decision (Beschluss) for the Accreditation of AQAS through GAC (I.12)
- Decision (Beschluss) for Full ENQA Membership (I.13)
- Excerpt of the European Register (EQAR) (I.14)

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<sup>3</sup> AQAS e. V. was founded in 2002 and was registered till February 2013 in the Register of Associations (im Vereinsregister) of the Municipal Court in Bonn (des Amtsgerichts Bonn) (20 VR 8059)

### **3 Independence (ESG 3.3)**

*Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.*

#### **3.1. Organisational independence**

AQAS e. V. is an **organisation** which was set up by **universities** and which is removed from the state, so it can act freely beyond the influence of the state or its ministries.

In setting up the agency great importance was paid to the structure of AQAS so that member institutions are able to contribute to the agency's strategy but could not influence individual procedures. The General Assembly elects the members of the Management Board, decides upon the relief (Entlastung) of the Board, puts down the general principles of the costs for procedures, decides about changes in the terms of the articles and takes, if required, strategic decisions which are going to have medium-term consequences. The statute of AQAS defines the remit of the General Assembly as well as the remit of the Management Board.

The Management Board is accountable to the General Assembly, decides about the strategic detailed direction of AQAS, employs staff and appoints the members of the Accreditation Commission for the accreditation of programmes and the members of the Complaints Council. The Accreditation Commissions act independently of the General Assembly and the Management Board and are not accountable to them. Any personal interdependence has been excluded. Therefore, neither the Management Board, nor the General Assembly has an opportunity to influence the decisions of the Accreditation Commissions in terms of the content. In fact, since its inception AQAS has never had any serious problems with universities trying to influence the Accreditation Commissions in their decisions. Over the last years, universities, in some cases, instituted legal proceedings if they felt that a wrong decision had been made (see Chapter II.B.7).

Only the Complaints Commission has the option to reverse decisions by the Accreditation Commission or to initiate changes once a decision has been made; the Complaints Commission acts on the basis of AQAS's complaints procedures, operating independently of the other commissions and internal units (see Appendix I.17).

Next to German-based and international academics from both types of institution (universities/universities of applied sciences), practitioners and student representatives too participate in the Accreditation Commissions and the Complaints Commission. Most Commission members in fact do not originate from the two founding states of AQAS (North Rhine Westphalia and Rhineland Palatinate). The final decision on whether or not to accredit a study programme or a quality assurance system falls to the Commissions. They can also, in well-founded cases, decide against the vote of the expert group. Members of the Accreditation Commissions don't participate in decision-making processes or accreditation procedures pertaining to their own university.

#### **3.2. Operational independence**

Both Accreditation Commissions determine the accreditation processes having regard to the relevant guidelines. These are part of the contracts in its current form (see Appendices III.2, III.21, VI.4 and VI.9).

The Accreditation Commissions nominate the expert groups. The Head Office informs the university about the composition of the respective expert group and grant universities a deadline to raise any well-founded concerns. Justified concerns have to be submitted in writing. Universities do not have the right to propose or to veto experts.

The procedure through which experts are nominated and appointed has been established by the decisions of the Accreditation Commissions with the stakeholder principle taken into consideration.

The decisions reflect the „Principles for the Selection of Experts“ of the European Consortium for Accreditation (ECA) (see Appendix VI.10).

All experts sign a **declaration of willingness to act as experts** in which they explain their impartiality (see Appendices III.8 and III.28).

### **3.3. Impartiality of results**

AQAS is aware that the central responsibility of an agency is to ensure that the results of an accreditation procedure are impartial. Only the trust put into the impartiality of the different stakeholders guarantees the acceptance of the accreditation system overall.

The measures that AQAS takes in order to ensure impartiality operate on different levels:

- a) Appointment of members of the expert groups and members by the Accreditation Commissions
- b) Monitoring and coordinating procedures through the AQAS Head Office
- c) Separation of peer evaluation and decision levels

*Ad a)*

The Management Board developed **Criteria for the Recruitment of Members** for the Accreditation Commissions in order to safeguard the quality of the selection procedure (see Appendix I.22).

The academic members of the Accreditation Commissions as well as the professional practice representatives are distinguished by their subject specific competence as well as by relevant experience for committee work. The student representatives on the Accreditation Commissions have normally already acquired experience as student experts in other accreditation procedures.

All Commission members are aware that they perform their tasks on the basis of their personal competence and not because they are representing their organisation, even if their names have been put forward by their organisation. Both Accreditation Commissions intensely deliberated over their self identity, the results of which were written down in a decision (see Appendix I.8).

The impartiality of the results is also safeguarded on the basis of the **Criteria for the nomination and appointment of experts** (see Appendices III.7 and III.27). Members of the expert groups have to sign a declaration of impartiality in which key aspects of a potential non-impartiality are outlined.

*Ad b)*

The whole communication within an accreditation procedure takes place via the AQAS office as neutral agency which also accompanies the on-site visit and coordinates the presentation of the experts report.

If it expires that, contrary to expectations, members of the expert group pursue their own interests during the on-site visit, then it is the consultant's duty to step in and to act in a moderating manner. If this is not accepted or does not yield to results, then the relevant Accreditation Commission is asked, at the next session to discuss individual opinions of the expert group which have been included in the expert reviews and to deal with them.

*Ad c)*

It is a common procedure within accreditation procedures in the European context to separate the evaluation from the decision. In Germany, accreditation procedures are designed such that expert groups evaluate the situation at the university, formulate potential for improvement and issue a recommendation for the accreditation decision. The decision is adopted in the respective Accreditation Commission of the agency, taking into consideration the evaluation of the expert group (incl. the decision of the expert group) and the feedback report by the university. The Accreditation Commissions decide hereby autonomously and are not subject to the agency's directives (see above). This separation is also written down in each decision for an accreditation procedure.

**Appendices:**

- Self-definition of the Accreditation Commissions (I.8)
- Appeals and Complaints Procedure (I.17)
- Recruitment of members for the Accreditation Commissions (I.22)
- Sequence of the Accreditation Procedure (Programme Accreditation) (III.2)
- Nomination and appointment of experts in Programme Accreditation Procedures (III.7)
- Declaration of willingness to participate as an expert in a Procedure (Programme Accreditation) (III.8)
- Sequence of the Accreditation Procedure (Institutional Accreditation) (III.21)
- Criteria and processes for the nomination and appointment of experts in Institutional Accreditation Procedures (III.27)
- Declaration of willingness to participate as an expert in a Procedure (Institutional Accreditation) (III.28)

**International procedures**

- Sequence of the Programme Accreditation Procedure (VI.4)
- Sequence of the Institutional Accreditation Procedure (VI.9)
- AQAS Principles for the Selection of Experts (VI.10)

#### **4. Thematic Analysis (ESG 3.4)**

*Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.*

The summary of experiences and results of the German accreditation system falls upon the German Accreditation Council (GAC). In the past, therefore, AQAS provided support to GAC by submitting advisory statements/opinions and experiences as well as by participating in working groups.

In addition, AQAS was keen from the start to actively contribute to the accreditation-related discussions among all stakeholders. Hence, AQAS decided to publish or to present its results and experiences in theme-based overviews, gained over time from its accreditation procedures and projects.

AQAS' aims to reflect back into the system key findings so that other stakeholders can also benefit from them. A defined aim therefore is a „**reporting back**“; a pure presentation of publications is not the main focus. Therefore, the format in which AQAS presents its experiences can vary from case to case.

These can be:

- Contributions to conferences, lectures and presentations,
- Publications of news on our homepage and occasional newsletters,
- Offering of trainings and workshops,
- Participation in interviews and panel discussions,
- Publications.

It is highlighted in the new version of the ESG that accreditation agencies should publish their experiences and analyses. Therefore, AQAS is going to publish in the future relevant documents on its homepage. “Reporting back” however will continue to remain the aim of AQAS in order to support and strengthen discussions within the university sector.

An overview of thematic activities carried out by AQAS over the last accreditation period is attached to the Appendix (see Appendix V.4).

#### **Appendix:**

- Overview of Thematic Activities (V.4)

## 5. Resources (ESG 3.5)

*Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.*

The regulations of GAC stipulate that agencies accredited (by GAC) in Germany are not allowed to operate for profit and that costs for accreditation procedures have to be borne by universities. As AQAS e.V. is a non-profit organisation costs for procedures have to be calculated on a break-even basis and no profits can be made. The calculation of costs and the drafting of contracts form part of the examination within the monitoring procedure by GAC.

Due to the continuous increase of accreditation procedures over the last years, AQAS hired new staff to meet demand. In order to break even AQAS defined the number of accreditation procedures each consultant had to take on. The distribution of accreditation procedures among the consultants is jointly decided by the Management Directors, together with the Divisional Heads, ensuring that the work load is evenly distributed among staff.

The Management Board discusses and adopts the Business Plan at the beginning of the fourth quarter as well as the aims and the key focus areas for the coming year, the measures needed to implement these and the suitable timeframe. The General Assembly is informed about the agreed aims and key focus areas for the coming year.

The Management Directors are in charge of strategic planning, including financial planning. They regularly report to the Management Board and provide comprehensive information about the agency's development.

AQAS is not only organised independently regarding the coordination of accreditation procedures (see Chapter II.A.3), but also with regard to its administration: staff working in administration are in charge of preparatory book keeping or the processing of salaries (in liaison with a tax accountancy firm). Thereby, no recourse is made to third party resources (for instance individual member universities). This has to be considered when planning for resources.

### 5.1. Financial Planning

AQAS annual **Business Plan** is put together by the Management Board in cooperation with the Directors and the tax accountant. The budget is adopted by the General Assembly. In addition, AQAS voluntarily draws up the balance sheet in order to inform its members. An excerpt from the Annual Report has been included as an Appendix (see Appendix I.16). The 2016 budget has also been enclosed (see Appendix I.15).

The tax accountant pulls together a monthly **controlling report** for monitoring purposes of the economic development which documents, among others, sales revenue as well as costs and type of costs. Following a decision by the Management Board of 21.05.2007 controlling reports are sent to the Management Board members on a monthly basis, signed off by the treasurer.

In order to keep costs for universities as low as possible, costs associated with accreditation procedures are tightly calculated. The Management Board agreed on a **travel expenses policy** which is sent to all experts prior to an on-site visit. The policy outlines which travel expenses are reimbursed by AQAS (see Appendix I.19).

### 5.2. Material and Space Resources

AQAS currently has **offices** in the size of around 480 m<sup>2</sup> at its disposal, located in the city centre of Cologne. Two members of staff usually share an office. One of the two meeting rooms can be used for a social space.

AQAS puts great emphasis on a **suitable workspace environment**:

All work stations are equipped with ergonomical desks and chairs as well as a phone, laptop or PCs with a 21 or 24 inch VDU (visual display unit). A laser printer is in each office. Consultants have their mobile printers, work mobile phones and can use UMTS cards, if needed. If individualised technical equipment is needed for ergonomical reasons, then those needs are being addressed.

The office has a colour laser printer as well as a copy machine (incl. a scan function). In addition, the Secretariat as well as the Accountancy Office each has their desk-to-desk copy machine. All printers are connected through a local network and can be used by all staff members from their respective offices.

All data and applications are hosted (bar a few exceptions) in a virtual work environment in an external computing centre via stream on the internet („Citrix-Environment“). This also allows access from outside the office. The AQAS homepage is hosted by a third party provider.

An IT policy, adopted by the Management Board, regulates the rights and responsibilities of staff members regarding data protection (see Appendix I.18). It deals, amongst other things, with passwords, company data and company hardware. All members of staff have committed themselves in writing to adhering to these IT guidelines.

### **5.3. Human Resources**

The office is divided into several areas with clear **responsibilities**: the office is managed by the two Directors. The content-based supervision of the accreditation procedures is coordinated by the consultants who are supported by two organisational assistants. The administration is divided into the Secretariat and the preparatory Accounting Office. The Secretariat is in charge of co-ordinating dates and booking trips, the preparatory Accounting Office processes invoices and deal with human resource matters. The key overlapping areas between individual areas have been defined in writing. In addition, several administrative tasks in a more supporting function are based within individual consultants' remit (legal advice, system administration etc.). Several posts for student helpers have been created to assist with general administrative tasks.

At the time of the previous accreditation in 2011 AQAS e.V. employed 23 people (incl. four student helpers). At the time of submitting the self-accreditation report in 2016 a total of 25 people were employed for AQAS (as of August 2016): Next to the two Directors these are 12 consultants (incl. three so-called senior consultants), two administrative staff members for the preparatory accountancy, three secretaries and two organisational assistants. Four student helpers assist with general administrative tasks.

Up until early 2016 AQAS was organised into a team structure: the consultants were divided into two teams under the supervision of one senior consultant. Both teams coordinated programme accreditation procedures with slightly different focal points. With the separation into two teams two aims were intended:

- Ensuring and enhancing quality assurance (e.g. through the discussion of procedures in team meetings)
- Providing support to the two Directors on the operational level

In the previous two years the regulatory framework changed which noticeably impacted on AQAS's work: although programme accreditation remains the main business area for AQAS, demand is decreasing whilst demand for system accreditation procedures is increasing.

At the same time, the strategic importance for international projects has considerably increased; this area has most potential for growth. Against this background, the division into teams no longer has any meaning in practical terms, as many national projects are managed by several small teams (such as the model accreditation at the University of Cologne, teacher training accreditation procedures). Consultants gradually start working for institutional accreditation procedures and two consultants, almost exclusively, deal with international projects. Therefore, in reality, a matrix organisation has

evolved. AQAS is active in three areas, for which one senior consultant (two senior consultants for international projects) acts as point of contact:

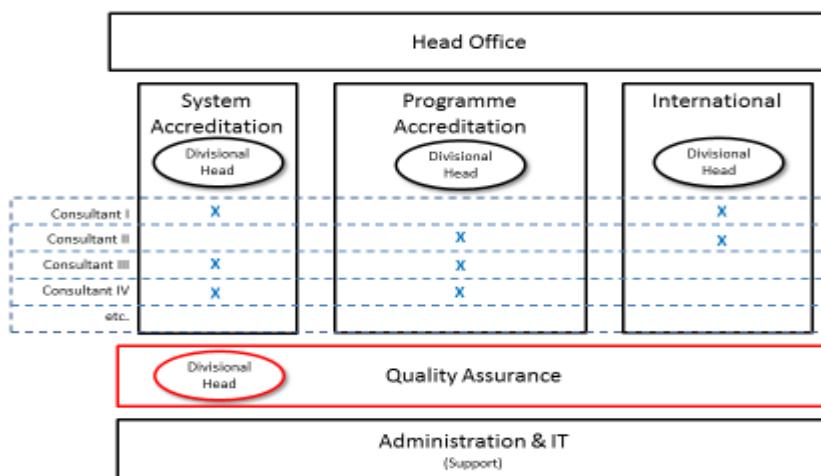
*National Projects*

- Programme Accreditation: Ms Dr. Kroschel
- System Accreditation: Ms Dr. Kloeters

*International Projects*

- International projects and activities: Ms Herrmann / Mr Heintze

Against this background the Board requested that the Directors officially „transferred“ the current organisational structure into the „matrix-organisation“ as described above in order to take account of the new framework conditions. Hence, quality assurance [...] will be set up as an independent cross-sectional work area. AQAS's organisational structure can thus be presented from the second part of 2016:



**Image 2: Organisation of the Office**

Both Managing Directors, Ms Herrmann and Ms Dr. Kloeters work 50% in operations (programme and system accreditation) and also manage, in this context, the divisions within the international area (Herrmann) and system accreditation (Dr. Kloeters). Ms Herrmann is supported by Mr Heintze in his function as international commissioner. Due to the current changes in the business environment, each consultant must be able to work in both areas in the intermediate term. This is represented by the blue x in the above organigram. At the time of submitting the self-evaluation report for 01.09.2016 individual tasks in AQAS were divided as follows:

*Names*

*Remit*

[...]

The recruitment of new staff is based on previously approved criteria (as related to the post in question) and within a suitable application and selection process. AQAS puts great emphasis upon the fact that all consultants have appropriate **experiences in the higher education** sector. The CVs of consultants and the Managing Directors are included in the Human Resources Handbook (see Appendix II).

The Management Office developed measures to induct new consultants, providing a suitable preparation for their new work (see Appendix I.23): before coordinating their own accreditation procedures new consultants work shadow and observe experienced consultants during an on-site visit. Each new consultant takes part in a basic seminar in moderation techniques.

**Staff development** (e.g. in house-training) takes place regularly. Special training is offered on demand. The participation of consultants in relevant conferences, such as the HRK convention, is desired and is especially supported. An overview of all conference participation over the previous accreditation period is enclosed (see Appendix V.3). The annual internal break-away day represents staff development as well. New trends and developments in the education sector are being discussed, as well as solutions to problems and responsibilities/appointments are being agreed upon. Competences of individual staff members are catered to through appropriate training and development opportunities.

In 2010 the Management Board adopted a **policy for personal and professional staff development** for all members of staff (see Appendix I.20): AQAS puts a budget of [...] € annually per staff member at its disposal for training not related to work. This money can be used for training within the framework of the so-called "Bildungsurlaub" which is regulated by the state. These monies can be combined for two years. Work-related training measures are not affected by this regulation and are covered by AQAS. If staff members wish they can use this budget (since 2014) also for **work-related health care measures paid by the employer**. For the **reconciliation of family and work/ work-life balance** the Management Board also adopted a policy in 2012 (see Appendix I.21).

In the last years AQAS had three people on work placements, gaining an insight into the different internal processes. One of them went through all the steps of a programme accreditation, took part in pre-accreditation talks and on-site visit and participated in the compilation of different accreditation documents. Finally, she also took part in a session of the Accreditation Commission for Programme Accreditation.

Another person from the DAAD used her time at AQAS to familiarise herself with the contents and process modalities of external quality assurance as this aspect becomes more and more important for international projects. An Egyptian student of a joint programme did her placement at AQAS in order to learn more about accreditation procedures as she intended to carry out accreditation procedures in Egypt after her studies. She was particularly interested in peer-based QM procedures and E-Learning. Concrete learning outcomes were developed for this placement and the placement was designed accordingly. The student reflected upon her placement in a comprehensive internet blog which can be accessed here: <https://internshipaqas.wordpress.com/>.

The experiences made with these placement students were positive, because they led to an intensive exchange with AQAS staff members who, in turn, reflected upon their own learning processes. The feedback of placement students about their learning outcomes was also very high. Expectations on both sides were met in all three cases. In the last two years, a new measure was introduced at AQAS: members of staff working in administration and accounting are given the opportunity to take part in an on-site visit during a programme accreditation procedure. Key objectives were to provide a hands-on experience of the exchange between consultants, expert groups and the universities but also to foster a mutual understanding for the practical aspects of accreditation procedures and to possibly improve thereby the internal processes at AQAS. In the meantime all administrative staff took part in an on-site visit. Feedback by administrative staff as well as by consultants has been exclusively positive. This measure also contributed to improving the work climate at AQAS and on-site visits continue to be part of the induction process for new administrative staff members.

**Appendices:**

- Business Plan 2016 (I.15)
- Excerpt Annual Final Report 2015 (I.16)
- AQAS IT Regulations Policy (I.18)
- Information regarding the reimbursement of travel costs through AQAS e. V. (AQAS travel policy) (I.19)
- Decision „Supporting Staff Training and Health Care at Work“ (I.20)
- Decision „Work-Life Balance“ (I.21)
- Induction Training for New Consultants (I.23)
- Human Resources Handbook (II)
- Overview of professional development training seminars and conferences attended by consultants (2011–2016) (V.3)

## **6. Internal Quality Assurance and Professional Conduct (ESG 3.6)**

*Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.*

AQAS has a quality assurance concept which is aligned with Part III of the ESG. The concept describes measures and steps which ensure the alignment of AQAS' activities with the ESG and upon which the present Self-Evaluation Report is based.

The starting point for AQAS is the quality assurance concept which is formulated in its mission statement. This mission statement is binding for all quality assurance procedures in the HE sector that AQAS carries out. Within the QM-concept reference is made to the various rules, basic terms and materials of AQAS which have been adopted by the relevant committee for the concrete design of accreditation procedures.

The concept has been published on the AQAS homepage and is enclosed as an Appendix (see Appendix V.1).

### **6.1. Accountability and transparency**

The **reporting** of AQAS takes place internally and externally:

The internal reporting takes place by the management vis a vis the committees, incl. the Management Board. Against this background the **agenda item „Report from the Management Directors“** is a set agenda item for all committee meetings. The Board itself is accountable to the members of AQAS e.V. The Board annually reports back during the General Assembly.

Externally, AQAS is contractually responsible to report to GAC. In addition, AQAS is committed, in the spirit of transparency, to also inform the ministries about the outcomes of accreditation procedures. The responsible ministries receive a copy of the accreditation certificate after each successfully concluded procedure.

GAC is informed about the outcomes of all accreditation procedures. After each session of the AC Prog GAC receives copies of all expert reports that were adopted in a session, as well as an excerpt of the relevant minutes. As far as system accreditation procedures are concerned GAC is informed about all newly initialised procedures, the composition of expert groups as well as about all concluded procedures. GAC also receives copies of all expert reviews.

Expert reviews about all concluded accreditation procedures are published on the AQAS website. As far as programme accredited study programmes in Germany are concerned, there is an additional entry in the database of all accredited study programmes that GAC maintains. The homepage also informs about the current activities of AQAS. This allows the interested public to obtain information.

The **transparency** of quality assurance procedures carried out by AQAS is safeguarded specifically through the following individual measures:

The responsible accreditation commission adopts the following documents which are relevant for their field of activity. These documents are published in the appropriate information brochures for the procedure or on the AQAS homepage:

- **Sequence of the Procedure** (see Appendices III.2 and III.21),
- **Guidelines for the design** of the self-documentation for the programme and system accreditation in Germany (see Appendices III.18, III.38 and III.39),
- **AQAS criteria** which mirror GAC criteria on the content-level and which contain exemplary indicators which are used to ascertain that a specific criterium has been fulfilled (see Appendices III.17, III.36 and III.37).

In preparation of an accreditation procedure the consultants put together the following documents (see Chapter II.B.2.6):

- **Cost estimate** (incl. a timeframe),
- **Contract**.

For each procedure a consultant is nominated early on as the main **contact person** which is communicated to the university. Institutional accreditation procedures are normally managed by two consultants. The university regularly receives feedback from the consultant about the state and progress of the procedure.

The selection criteria as well as the process for the **nomination and appointment of experts** have been set by each of the two Accreditation Commissions. The decisions have been published (see Appendices III.7 and III.27).

Each programme accreditation procedure is formally initialised by the responsible Accreditation Commission of AQAS. The university is informed about the outcome in a timely manner. In institutional accreditation procedures the initialisation happens during the pre-screening stage.

The AQAS Accreditation Commissions make their final decisions about programme and institutional accreditation based on the relevant decisions by GAC, esp. the regulations for the accreditation of study programmes and for institutional accreditation in the current relevant version and for international procedures on the basis of the specific regulations. Both commissions have set out their relevant **principles of decision** in an explicit paper that has been published (see Appendix III.16 and III.34).

## **6.2. Professionalism and integrity**

The professionalism and integrity of all stakeholders involved with procedures is safeguarded as follows:

### ***Consultants***

The appointment and further training of consultants at AQAS follows the requirements as described in Chapter II.A.5.3. Their professional expertise is a core element of their work.

Consultants are, on principle, not involved in procedures at universities where they studied or where they did their doctorate and/or where they were employed as staff members.

AQAS consultants regularly reflect their role (e.g. during the annual internal break-away day) and have put down in writing their own self-definition (see Appendix I.9).

### ***Accreditation Commissions***

As far as the selection of members for the Accreditation Commissions is concerned, AQAS endeavours to win reputable experts who were previously engaged in the areas of „student affairs/learning and teaching“ and/or who have genuine experience in quality assurance. The same applies to representatives of professional practice. The student representatives for both Accreditation Commissions are generally put forward by the Student Accreditation Pool. The Board nominates the student representatives.

The Managing Directors and consultants keep the Accreditation Commissions up-to-date about current trends and decisions within the accreditation system.

### ***Experts***

The **nomination and appointment** of experts is based upon the relevant decision by the responsible Accreditation Commission (see above).

During procedures **each status group is treated equally**, i.e. each member of an expert group has the same rights and responsibilities to participate in the accreditation procedure and receives the same honorary allowance.

Every expert signs a **declaration** in which they declare their willingness to cooperate in the procedure and in which they confirm their impartiality in the respective accreditation procedure (see Appendices III.8 and III.28).

All experts in programme accreditation procedures receive a written **handout** to prepare them for their activity as experts. The handout has been adopted by the AC<sup>Prog</sup> and has additional information about the accreditation procedure (see Appendices III.6 and VI.5).

The preparation of expert groups for system accreditation takes place in a **separate one-day workshop** at the AQAS premises.

Experts receive the **criteria for accreditation** which were adopted by the respective Accreditation Commission.

Each on-site visit for programme accreditation is normally preceded by a half-day workshop in which the concrete procedure is discussed. The outcome is handed out to experts in the form of **interview guidelines** before the visit takes place.

Each year AQAS offers **workshops on specific issues** which also serve as professional training development for experts.

### **6.3. Internal feedback mechanisms**

The following mechanisms have been implemented on the **level of the commissions**:

AQAS places great emphasis on a dialogue-oriented cooperation with its commissions. Therefore, feedback about organisational, technical or content-related problems is already provided during the meetings. All consultants meet up directly after the meetings of the accreditation Commissions have taken place in order to reflect together on the outcomes. If any potential for improvement is noted, issues are dealt with in a timely manner.

The Accreditation Commissions receive the results of the ZEM survey (see Chapter II.A.6.4) and discuss these. Often universities and experts relay back issues of a systemic nature which do not fall within AQAS' responsibility.

Once a year AQAS carries out a feedback meeting with commission members where problems and improvement opportunities are discussed. Over the last years AQAS received a lot of praise, esp. for the preparation of committee meeting documents. Normally, any criticism is voiced in a timely manner (for instance criticism relating to the external access of data) and dealt with swiftly by AQAS.

Since AQAS perceives programme accreditation and system accreditation as mutually complementary procedures – with a certain degree of overlap in system accreditation (e.g. random samples on the degree programme level) – it is important to foster an exchange of experience between the commissions so the agency can develop further. Once a year the committee meetings of both commissions are organised in a specific format, thereby facilitating an intensive exchange (lasting over several hours) on the experiences and typical problems encountered during programme and system accreditation. Both commissions and the Managing Directors perceive this as an important step towards internal quality assurance and the transfer of know-how.

On the **Management level**:

From the start of its operation, AQAS has been deeply conscious that good and acceptable work results can only be achieved on an ongoing basis if a regular exchange and a critical-constructive reflection of one's own work take place. On the formal level the following elements have been put into place: a regular **Jour Fixe** (twice a month) formalises the exchange of information among staff. Thus, weak points within procedures and processes can be picked up at an early stage, allowing staff members to work towards solutions. The Jour Fixe also serves as a platform to discuss current national and international decisions and requirements. If needed, these can then be incorporated into the documentation materials and implemented during the procedures. The findings are written down in

the minutes of the Jour Fixes. The Chair of the Management Board generally attends a Jour Fixe once a month.

Once a year all consultants take part in a **one-day internal retreat** where current trends in education are discussed and a reflection process of one's work is carried out. The outcomes of these discussions are written down in separate minutes.

**Internal working groups** are regularly set up at AQAS in order to take forward up-to-date questions, themes and developments in Higher Education (e.g. cooperative study programmes, recognition of work-based learning, ESG-conformity etc.). The working groups present their findings usually during a Jour Fixe or the internal one-day retreat. If required, procedure materials are then matched up with the new findings. These theme-based working groups do not only ensure that AQAS' documents are regularly updated and aligned with current requirements but that consultants continually engage with further developments in the quality assurance process of study programmes and teaching.

To support the reflection process of current procedures a senior consultant **regular chairs meetings** at AQAS.

The internal meetings are set up in such a way so that a **good work-life balance** can be achieved.

Beyond the formal occasions **mutual work-related exchanges** are a key element upon which daily work at AQAS is based. It is common practice, for instance, that consultants discuss controversial or new questions with their team leaders or with more experienced colleagues, consulting them whenever something is unclear. In addition, project teams are set up to take forward bigger projects (e.g. accreditation procedures of combined study programmes at one university). Members of these project teams closely supervise all accreditation procedures connected with the project and jointly solve cross-sectional tasks.

Daily discussion about concrete and general procedural questions as well as the formalised meetings and trainings are regularly taken as a starting point to critically reflect the function and the instruments of accreditation as well as the role of the agencies and the consultants and to explore the scope for improvement. Thus, it is aimed to create a work atmosphere where the ability for self-criticism and the willingness to develop oneself further is perceived as a sign of professionalism, a professionalism which is also lived in daily practice. This aspect also comes to the fore in the consultants' self-definition (see Appendix I.9)

#### 6.4. External feedback mechanisms

Since December 2007 all universities as well as experts have been surveyed about the quality of AQAS-coordinated accreditation procedures once a procedure has been finalised.<sup>4</sup> For reasons of objectivity the coordination of this survey was rolled out to an external organisation. The survey is conducted by ZEM, the **Zentrum für Evaluation und Methoden at Bonn University (ZEM)/ Center for Evaluation and Methods**. Results are summarised in half-yearly reports which are sent to the Management Board, the appropriate Accreditation Commission (AC<sup>Prog</sup>) and the Managing Directors.

On the basis of these surveys a constantly positive image has emerged over the years. Experts are generally satisfied with the cooperation by the Managing Directors and esp. the consultants. Experts feel that they are well and suitably informed and rate the preparatory consultation as highly structured. With regards to the question about the competent support of the evaluation answers are based in the above 20% area of the table (see following image).<sup>5</sup>

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<sup>4</sup> Due to the low numbers of system accreditations a similar survey for these has not been necessary until now. AQAS normally receives verbal feedback on system accreditation.

<sup>5</sup> For the above questions experts could choose between "applies", „rather applies“, „rather applies not“ and „does not apply“. The respective difference to 100 % results from the distribution among the other three answers. The proportion between „rather applies not“ and „does not apply“ are in total between 0 and 1 %.

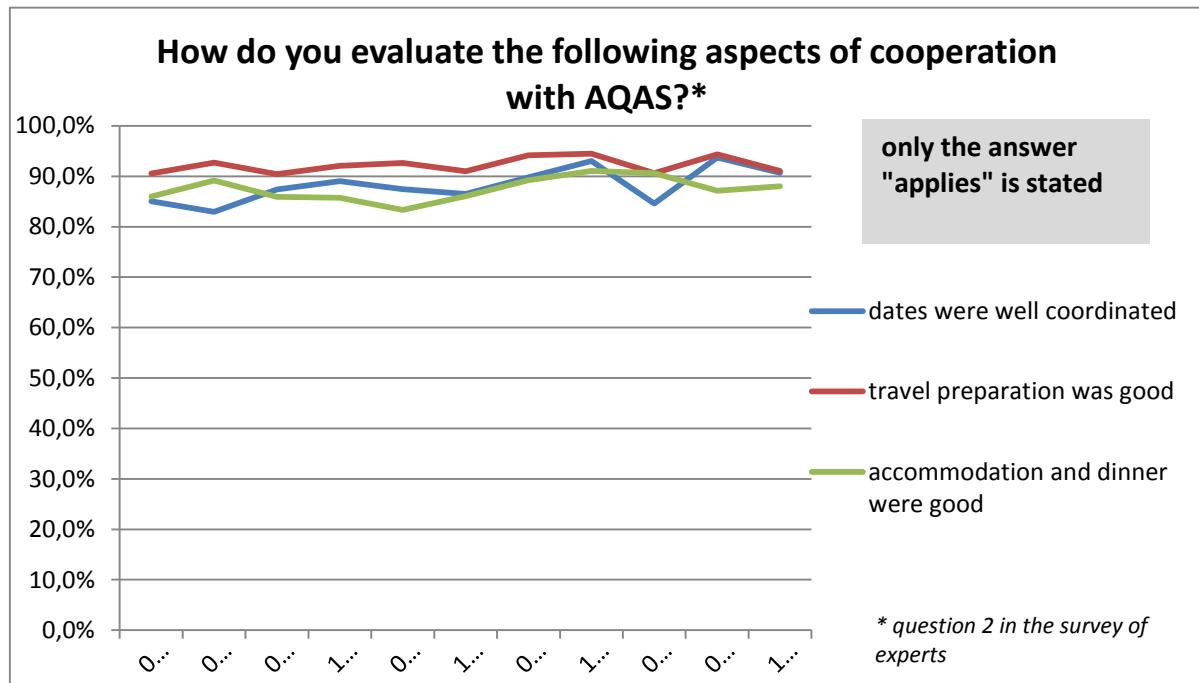


Image 3: Evaluation of the cooperation with AQAS

Experts were also asked to evaluate the process involved in an on-site visit (including the preparatory meeting) (see next image). The result was that they were positive about the cooperation within the experts' group and the appropriate facilitating capacity of the consultant.

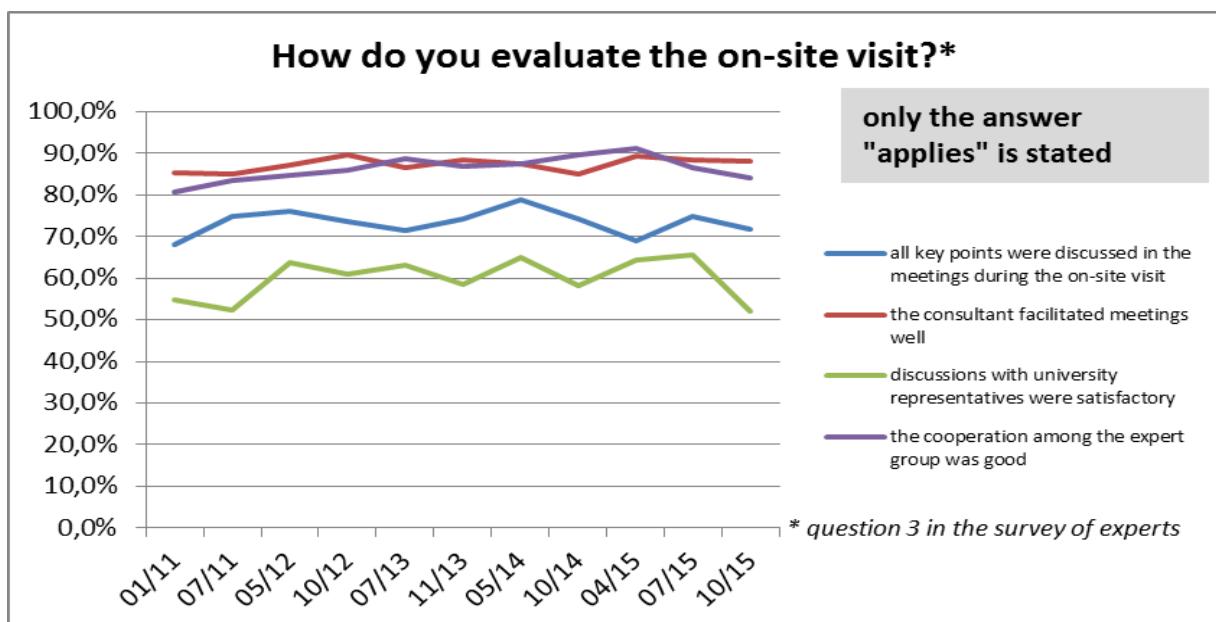


Image 4: Evaluation – steps of an on-site visit

In addition, experts gave AQAS an average overall grade of 1,2 – 1,3, with satisfaction rates being continually high over the period that had been surveyed. Almost all experts said they were happy to support AQAS again as experts (see table below). Interviewees who did not want to take part again

stated on several occasions that they rejected the accreditation system on principle, thought that the allowance was too low or were about to retire.

Periods of survey	1	2	3	4	5	6	7	8	9	10	11
Related to finalised procedures from	01/11	07/11	05/12	10/12	07/13	11/13	05/14	10/14	04/15	07/15	10/15
Participation experts <sup>6</sup>	196	320	223	339	248	282	225	201	149	143	214
Return rate	71,0%	71,0%	65,6%	70,9%	60,5%	68,1%	65,6%	65,0%	53,2%	58,8%	61,0%
Willingness to act again as an expert for AQAS	97,9%	98,1%	98,2%	98,1%	98,0%	98,2%	96,8%	97,0%	98,0%	96,5%	96,2%
Evaluation of the cooperation with AQAS/ school grades	1,26	1,29	1,25	1,22	1,29	1,28	1,24	1,23	1,25	1,24	1,23

Image 5: Feedback by university-based experts

Feedback received by the university contacts show a greater variety than those received by experts.

Overall data show that AQAS uses suitably qualified experts. University-based contacts rate the professional composition of expert groups as adequate over the course of the last accreditation period – figures here vary from 58% to 80% satisfaction rates. This range is surprising because universities are entitled to propose a qualification profile for an expert group before the procedure is open. Universities are also entitled to raise concerns regarding a nominated expert group. From AQAS' point of view there are sufficient mechanisms in place for universities to actively contribute to the procedures. AQAS presumes that this critical assessment stems from cluster accreditations as expert groups are cross-disciplinary and not all experts are from the same academic subject area. Because universities' decision to apply for a cluster accreditation is based upon financial considerations, they are aware that the composition of an expert group represents a compromise in terms of the academic disciplines represented. This basic problem is intrinsic to cluster accreditations and can't be resolved by AQAS.

With regards to satisfaction rates of on-site visits and the evaluation report an overall positive image emerges. Universities agree that the reports correctly capture the current situation as it was discussed during the on-site visit. The good result, in our views, stems from a process that AQAS introduced, aimed at improving the quality of expert reports over the years. Consultants, Team Leaders as well as the Managing Directors continually strive, through incorporating feedback loops, to optimise the quality of the expert structure and the narrative texts.

Based on the timing of the survey, 28% to 57% of universities state that the accreditation procedure contributed to the enhancement of a study programme or study programmes. AQAS discussed in the General Assembly the reasons which led to this not wholly satisfactory result. Putting aside a generally critical view that (some) universities (may) have with regards to accreditation procedures generally, there are – from our perspective – different reasons for this assessment. This assessment can be divided into two main lines of argument:

- Over the last years many universities implemented processes within the framework of quality assurance which contributed to a regular improvement of study programmes. To clarify, by the

<sup>6</sup> The number of the absolute participants varies according to the number of closed procedures in the commissions which were summarised in one given survey period..

time an accreditation procedure opens study programmes have already gone through internal quality assurance loops, resulting therefore in the necessary adjustments. From universities' point of view, the external accreditation procedures are a necessity to complement the regularly ongoing internal processes.

- Many universities share the view that the GAC criteria focus too strongly on the compliance with formal requirements. Thus, in the perception of universities accreditation procedures concentrate too much on formal aspects such as the correct number of credit points per module, the number of examinations or the correct description of a module, rather than fostering discussions around contents and concepts i.e. the meaningfulness and suitability of degree programmes and their potential for further growth. From many universities' point of view, therefore, accreditations are more of a formal, scrutinising nature rather than facilitating the enhancement of quality assurance.

Even if AQAS can appreciate universities' criticism up to a certain point, we consider programme accreditation as a fundamentally meaningful instrument for quality assurance because peers from similar disciplines, acting in a co-operative manner, can give concrete feedback on teaching and learning. In order to achieve a greater acceptance of accreditation procedures by universities, it is recommended to adapt the criteria and procedural processes on the programme level towards strengthening the quality enhancement aspect. This perspective, for instance, is embedded by AQAS into a project within the framework of the experimental clause (Experimentierklausel) of GAC. The project's aim is to develop a model where the scrutinising of formal aspects will be significantly reduced in favour of quality assurance aspects.

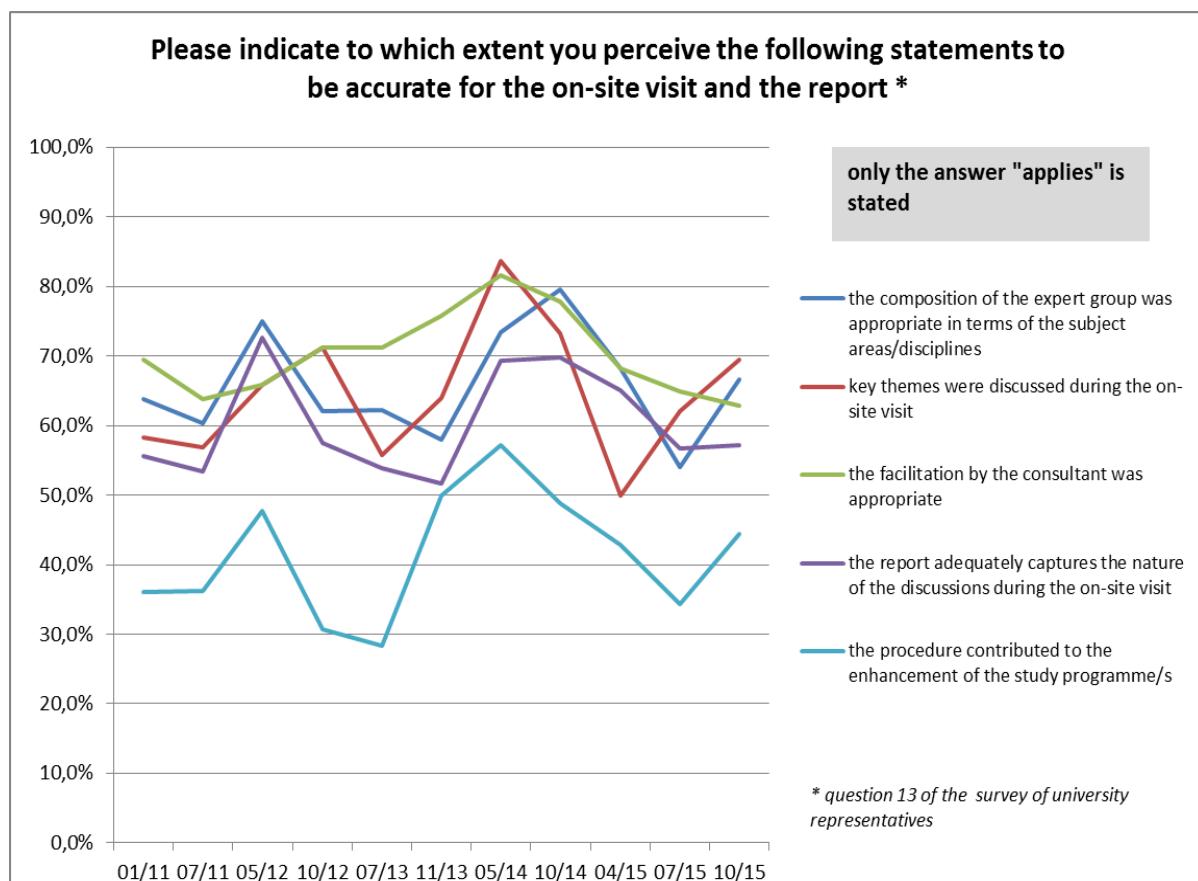


Image 6: Evaluation on-site visit and report by contacts

University contacts evaluate the cooperation with AQAS on average on a scale between 1,4 and 2,1 (using school grades).

Survey wave	1	2	3	4	5	6	7	8	9	10	11
Related to completed accreditations	01/11	07/11	05/12	10/12	07/13	11/13	05/14	10/14	04/15	07/15	10/15
Participating universities	33	49	39	46	49	41	37	49	23	21	41
Return quote	52,2%	54,2%	54,1%	60,3%	53,3%	60,2%	57,5%	47,9%	66,2%	68,2%	46,8%
Evaluation of the cooperation with AQAS (school grades)	1,6	1,8	1,8	1,9	2,1	1,6	1,4	1,5	1,6	1,8	1,6

Image 7: Evaluation of the cooperation with AQAS

The Managing Directors regularly pick up feedback from experts and university representatives regarding the improvement of procedural documents and processes. If required, documents and processes will be updated and customised. The programme accreditation brochure is regularly updated, including all improvements; the same applies to the AQAS website. In order to receive even more concrete feedback for future improvement opportunities, the Managing Directors and consultants reviewed the questionnaire in 2015, specifying questions and incorporating numerous free text fields (see Appendix V.2).

Even through **feedback from GAC** (e.g. within the monitoring framework) AQAS adapts its procedural processes and the interpretation of criteria which are systematically integrated into all procedural materials (see Chapter II.A.7).

## 6.5 Compliance with formal requirements (GAC/KMK/ESG)

Besides the main task of developing the quality of learning and teaching, AQAS has the remit to scrutinise the compliance with formal criteria in all external quality assurance procedures. These criteria, as well as the rules and regulations for programme and system accreditation, were set up by GAC and the KMK; on the European level the ESG are the basis for evaluation procedures. AQAS ensures on different levels that these external requirements are complied with:

- The Head Office informs the universities about relevant decisions taken by GAC, the KMK and/or European institutions. Information dissemination takes place, for instance, through bespoke brochures as well as on the homepage of AQAS. The Head Office developed checking criteria for national programme and institutional accreditations on the basis of GAC and the KMK; for international accreditations AQAS developed its own criteria on the basis of the ESG. AQAS provides universities with guidance notes on how to apply for an accreditation; these handouts explain the relevant criteria and pre-requisites. The Head Office scrutinises all applications for accreditation, checking if they comply with formal requirements and gives feedback to the university if there are gaps in the application documents.
- AQAS informs the panel of experts in all evaluation procedures about the criteria and the requirements which form the basis of the procedure in question and which need to be considered. In the guidelines for experts AQAS formulated key questions which resort to the relevant criteria and requirements. These key questions give experts an orientation once they formulate the

evaluation. Hence, the Head Office ensures that all reports by experts are complete e.g. that all criteria and formal requirements have been assessed.

- The Head Office regularly informs members of the Accreditation Commissions about current changes in the relevant decisions of the KMK, GAC and/or European institutions. The Head Office prepares all documents for the Accreditation Commissions taking account of the relevant rules and regulations of national and international bodies. The Accreditation Commissions include these requirements in their decisions. The decisions of the Accreditation Commissions are aligned with the "Rules of the Accreditation Decisions" adopted by the appropriate commission (see Appendix III.18 and III.34).

AQAS set up a working group tasked to align the ESG 2015 standards and guidelines with the criteria which are in place in Germany, adopted by GAC (see Chapter II.B.1). The Working Group's objective was to identify potential gaps in order so that these could be resolved for a review of the criteria and instruments used in Germany.

#### **Appendices:**

- Self-Definition (Selbstverständnis) of AQAS consultants (I.9)
- Sequence of a Procedure (Programme Accreditation) (III.2)
- Guidelines for Experts in Programme Accreditation Procedures (III.6)
- Nomination and appointment of experts for Programme Accreditation (III.7)
- Declaration of willingness to act as an expert in procedures (Programme Accreditation) (III.8)
- Rules on decisions in accreditation procedures (Programme Accreditation) (III.16)
- Criteria for the accreditation of study programmes (III.17)
- Guidelines for the preparation of an application for accreditation (Programme Accreditation) (III.18)
- Stages of a procedure (Institutional Accreditation) (III.21)
- Criteria and process for the nomination and appointment of experts for Institutional Accreditation (III.27)
- Declaration of willingness to act as an expert in procedures (Institutional Accreditation) (III.28)
- Decision rules for Institutional Accreditation (III.34)
- Criteria for the acceptance of universities for Institutional Accreditation (III.36)
- Criteria for Institutional Accreditation (III.37)
- Guidelines for the compilation of an application for admittance to an Institutional Accreditation procedure (pre-screening) (III.38)
- Guidelines for Institutional Accreditation (III.39)
- Quality assurance concept of AQAS e.V. (V.1)
- Questionnaire of the ZEM-survey (V.2)

#### **International procedures**

- Guidelines on Preparing an Application for Programme Accreditation (VI.3)
- Guidelines for Experts in AQAS procedures for Programme Accreditation (VI.5)
- Guidelines on Preparing an Application for Institutional Accreditation (VI.8)

## 7. Cyclical External Review of Agencies (ESG 3.7)

*Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.*

Every five years AQAS undergoes a **reaccreditation through GAC** (refer to Appendix I.12). As the rules and regulations of GAC are mostly based on the ESG, these are discussed by the GAC experts as part of the external evaluation. Also, within the regularly framework of GAC, GAC scrutinises the quality of agencies' work by means of the monitoring procedure ("**observation**"). AQAS discusses the feedback of GAC from the monitoring procedures with the consultants in the Head Office as well as with the relevant Accreditation Commissions and the Management Board. Advice from GAC referring to the improvement of the procedural practice of AQAS generally are incorporated into the processes and included in the procedural documents.

As of 2014 GAC expanded its toolkit of monitoring instruments, putting less emphasis on general document-based checking procedures. Instead, a stronger orientation towards dialogue takes place. Hereby, the focus is on developing the quality assurance of the agency rather than trying to find mistakes. In this context, programme and system accreditations at AQAS have been accompanied by a member of GAC respectively. In June 2016 a feedback-conversation of GAC took place with AQAS at the University of [...], focusing on an accreditation procedure for teacher training degree programmes. We considered these more dialogue-oriented procedures as very positive, amongst other things because universities were involved in the procedures. We thererfore consider that these types of monitoring procedues are also advantageous for the development of the accreditation system on the basis of lived practice.

Based on an agreement that GAC drew up with ENQA and due to the fact that the GAC standards are fundamentally based on the ESG, the renewal of the **ENQA membership** can be processed on the basis of the evaluation and the decision of GAC regarding the accreditation of AQAS (see Appendix I.13). In individual cases, the German agency may receive feedback from ENQA which goes beyond conditions and recommendations expressed in the GAC evaluation. In such cases the comments from ENQA would be discussed internally in the Head Office and with the Board to ascertain if additional improvements should be taken. The situation is similar in relation to the renewal of the **Registration** in the **EQAR** (see Appendix I.14). Basis of the decision by EQAR is the assessment and decision of GAC. The Register reserves the right to report back, for instance, its own views about the structure and the work of the agency, aspects which would then be discussed within AQAS with a view to continually improve processes.

### **Appendices:**

- Accreditation Decision of AQAS through GAC (I.12)
- Decision for Full membership at ENQA (I.13)
- Excerpt of the European Register (EQAR) (I.14)

## B. Standards and guidelines for external quality assurance

### 1 Consideration of internal quality assurance (ESG 2.1)

*External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.*

The scrutinising criteria used by AQAS in all its accreditation procedures in Germany are based, both for programme and system accreditation, on the appropriate criteria of the GAC. These, in turn, were adopted in accordance with the ESG of 2005 which were in force at the time. This measure ensures that the ESG are adhered to in all AQAS-coordinated procedures.

In May 2015 a new version of the ESG was adopted in Eriwan. The new version opened up new perspectives in some areas, whilst other aspects (such as student-centered learning) were newly introduced. AQAS, therefore, faces a situation where the rules of the GAC, which refer to the 2005 ESG version, are not wholly compatible with all aspects of the new ESG or can only be implicitly inferred from the old requirements. To give an example, "compensation for disadvantages" (Nachteilsausgleich) is explicitly mentioned in the old rules, whereas the aspect „diversity“ is only implicitly referred to.

The rules of the GAC will be revised in the near future and will reflect more strongly the ESG 2015. AQAS very much welcomes this process and supports it within the GAC Working Group which is tasked to revise the rules. In addition, AQAS set up an internal Working Group which carried out a detailed matching of the current standards of GAC, the guidelines and scrutinising criteria of AQAS and the new ESG (2015). The results for the programme as well as system accreditation are presented each in one table (see Appendix V.6 and V.7).

During the matching exercise of the standards of the GAC with the ESG we noted that the currently valid requirements of the GAC reflect, in parts, a more formal interpretation of some aspects, which have now come much stronger to the foreground in the new ESG. Thus, for instance, the old standards of the GAC demand evaluations whereas the new ESG rather expects a complaints system. There is also a new approach in the ESG which goes hand in hand with a new terminology, such as "fair", "easily understandable" and "current". These concepts were not considered in the currently valid standards of the GAC. These differences are commented upon in the tables to make them transparent (see Appendix V.6 and V.7). The matching also brought out that AQAS has already interpreted in certain areas during past accreditation procedures - the current standards of the GAC in light of the new ESG. The matching will considerably facilitate the review of the materials for German accreditation procedures once the new criteria have been adopted by the GAC.

In international accreditation procedures AQAS is not bound to the standards of the GAC but operates instead on the basis of its own set of criteria which was adopted by each respective accreditation commission. Within the scope of its ENQA-membership AQAS actively followed the discussions and matching processes of the ESG 2015 and was therefore in a position to decide on a new set of criteria based on the ESG 2015, shortly after the ESG 2015 were adopted. The same applies to accreditations on the institutional level (see Appendices VI.2 and VI.7).

#### **Appendices:**

- Alignment of Criteria for Programme Accreditation/ESG (V.6)
- Alignment of Criteria for System Accreditation/ESG (V.7)

#### **International procedures**

- Criteria and Indicators for Programme Accreditation (VI.2)
- Criteria and Indicators for Institutional Accreditation (VI.7)

## 2 Designing methodologies fit for purpose (ESG 2.2)

*External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.*

The aims and purposes of the accreditation procedures in Germany have been set by the KMK and the GAC and have been published in the relevant regulations. Through a contractual agreement with the GAC, agencies are bound to the GAC and its standards. A sample contract can be viewed on the homepage of the GAC (see [http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR\\_Mustervereinbarung.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Mustervereinbarung.pdf)). Moreover, the European level sets guidelines (like the ESG) to which AQAS feels committed in all its activities. This applies to national as well as international accreditation procedures.

AQAS defines and carries out programme and system accreditation procedures so that these can achieve the expected aims and targets and, in addition, take account of the relevant legal framework e.g. the criteria of the GAC, the resolutions of the federal states of the KMK as well as rules specific to the individual German Länder.

### 2.1 Aims and self-understanding of AQAS e. V.

The objectives of the quality assurance at AQAS were defined, inter alia, internally in a **Mission Statement** which was adopted on 7. July 2007 by the Board and which was updated on 31. May 2016.

According to the **self-definition** of AQAS accreditation procedures should facilitate the diversity of degree programmes and ensure the quality of course offerings. Through creating transparency and assuring a quality dimension accreditation procedures contribute to the international comparability and the recognition of study programmes and their qualifications. In programme accreditation procedures expert groups scrutinise especially the so-called feasibility (Studierbarkeit). Expert groups also scrutinise how well degrees offered by all types of HE provision prepare university graduates for a profession or the labour market. AQAS therefore wishes to support the further development of universities and to contribute to improving its quality assurance system.

AQAS also offers – as an alternative to programme accreditation - system accreditation procedures with the university taking greater responsibility in the process. Universities which carry out the quality assurance of their study programmes under their own auspices obtain the possibility to provide evidence that they are capable of ensuring the same quality as within programme accreditation.

The responsibility for teaching and learning and its quality assurance however rests with the university.

**The objectives** of AQAS e.V. are set down in the pre-amble of its statutes and are defined there as **purpose of the association**.

## **2.2 Objectives of the procedures**

### **2.2.1 Programme Accreditation**

Bachelor and Master degree programmes run by state or state-recognised universities are the subject of programme accreditation procedures coordinated by AQAS. GAC awards its seal exclusively to German universities. Within the framework of the procedure the following aspects are scrutinised so objectives can be met: the appropriateness of aims and the competences embedded therein, the concept, the suitability of the study programme, resources, the organization and the quality assurance concept of universities. The examination/ scrutinising of degree programmes through AQAS is aligned with the aims set by the university itself as well as the criteria and conditions stipulated by the GAC (see above). The procedure is aimed at the comparability of study programmes and therefore at equivalency, not uniformity.

At the **first-time accreditation** of study programmes the focus is on the question if *fitness for purpose* and *fitness of purpose* can be claimed for each programme. *Fitness for purpose* refers to the quality of the design and the management of a study programme and whether it is feasible to achieve the stated aims of the study programme. *Fitness of purpose* assesses whether the objectives of each study programme are suitable. Therefore, only the “anticipated effectiveness” of how a study programme has been designed can be assessed.

The **reaccreditation** of study programmes regarding the effectiveness of internal quality assurance is simplified to a certain extent because the university has to provide evidence on a range of issues. Thus, the university has to prove in its application document how the quality assurance system functions on the level of the degree programme, if the programme design has been sustainable and fit for study, how the student numbers have evolved over the last years and which measures the university took on the basis of their data and the results of QM processes in order to react to potential problems. Also, within reaccreditation procedures all criteria of the GAC have to be scrutinised. In addition, AQAS aims to organise the accreditation procedure in such a way that it focusses on the question as to how the study programme was developed further since it was first accredited.

### **2.2.2 System Accreditation**

Within system accreditation German universities are given the option/ possibility to provide evidence that they are able to ensure the same quality of study programmes with their internal QA system than with programme accreditation. The subject of system accreditation, therefore, is the quality assurance system of a university for the areas of learning and teaching. Within system accreditation procedures it is examined whether the university has a closed QA system within which the university is able to safeguard and regularly review the relevant criteria (GAC, KMK, ESG). In addition, system accreditation presumes that the QA development and assurance of study programmes is embedded into university management. A successful system accreditation gives universities the right to forego a programme accreditation and to accredit their study programmes under their own auspices e.g. to award themselves the seal of the GAC.

AQAS assumes that system accreditation is an attractive alternative to programme accreditation for universities which pursue a more quality-oriented steering with regards to their overall concept management concept. For their part, system accreditation contributes to further developing the processes for the quality of learning and teaching.

### **2.2.3 International Procedures**

Outside Germany AQAS offers a procedure for programme accreditation as well as procedures focussing on institutional accreditation. Programme accreditation procedures test whether a programme fulfils the AQAS-criteria for programme accreditation, which have been developed in alignment with the ESG 2015. Apart from focusing on the assessment of teaching and learning, another focus is also on whether the suitable level of the EQF has been achieved. The decision of the Accreditation Commission is not legally binding. The reports and decisions are published on AQAS' homepage.

Within the international context AQAS does not offer system accreditations but offers accreditations on the institutional level aligned with the standards and guidelines of the ESG. The subject of the procedure is also the institutional QA system, however, the focus here is to assess whether the system meets the criteria deducted from the ESG. AQAS pays particular attention in these procedures to the suitability regarding the quality of study programmes at the institution. In accordance with the ESG research and governance are not explicitly part of the procedure and are only discussed in the overlap between learning and teaching. This procedure too has no direct legal consequence.

## **2.3 Involvement of stakeholder groups**

All procedural documents of AQAS (guidance notes, workflow descriptions, handouts etc.) are first discussed in the appropriate accreditation commission, modified, if need be, and then adopted (through a corresponding composition of the commission), thereby ensuring the **participation of all stakeholders** (universities, students, professional representatives).

When selecting the **commission** members – esp. the members for the accreditation commissions – the AQAS Board managed to gain experts who were previously engaged in the areas of “learning and teaching” and/or who were genuinely involved in quality assurance. The student representatives for both accreditation commissions are generally appointed by the Student Accreditation Pool (Studentischer Pool) and are, in our experience, very well prepared.

Due to the varied and comprehensive expertise that experts, committee members and staff members of the Head Office bring to the procedures, AQAS regularly receives positive feedback indicating that the processes developed by AQAS and the optimisation of procedures generally are fit for purpose. By regularly conducting surveys among university contacts and experts through the ZEM at Bonn University, AQAS implemented a systematic instrument (see relevant details in Chapter II.A.6). Comments and recommendations are either incorporated directly into the process stages and materials of accrediting procedures or - if themes relate to the accreditation system generally – are relayed back to the other agencies and the GAC.

## **2.4 Consideration of the relevant legal framework**

The accreditation materials of AQAS pick up the relevant external requirements and legal rules and implement these. The Head Office takes care that the responsible committees are informed about changes within the regulatory framework and adjusts procedure materials accordingly.

All documents relevant for an accreditation can be found on AQAS' homepage and are, furthermore, also published in the AQAS-brochures for programme and system accreditation. AQAS published bespoke separate brochures for teacher training accreditation procedures, listing any specific conditions applying to the Länder (federal German states) where AQAS is active and has carried out accreditation procedures. These brochures assist in ensuring that teacher training accreditation procedures are put on a firm footing (e.g. by complying with Länder-specific teacher training policies, laws and regulations).

## 2.5 Providing support to universities

AQAS seeks to have an intensive PR policy in place aimed to inform universities about current developments at AQAS and within the accreditation system generally. Key information tools are AQAS' homepage and the AQAS brochures (see Appendices IV.1 and IV.2). Newsletters are published for specific themes or key events and activities.

AQAS also tries to take account of the specific needs and requirements of individual universities when carrying out accreditation procedures. Within **Programme Accreditation** there is the option to combine **programme clusters** (e.g. combining programmes within related disciplines), thereby ensuring greater efficiency in the procedures. Programme clusters create synergy effects on different levels, for instance during the preparatory phases of an accreditation as well as during on-site visit by expert groups and the organisation of the procedure by the Head Office.

In addition, different **procedural models** (Verfahrensmodelle) are offered. Within this context, the so-called **model observation** (Modellbetrachtung) should be highlighted as AQAS developed this procedure for the accreditation of complex study programme combinations such as two-subject study programmes or teacher training programmes:

When assessing individual programme clusters a fundamental evaluation of the study structure takes place ("model observation"). Focus are the basic structure and cross-disciplinary aspects of each respective study model (such as university-wide services to advise and support students, measures to facilitate studies where modules do not overlap or university-wide quality assurance measures). The model observation basically has two aims:

- The university should receive feedback concerning structural aspects which can only be partially addressed when assessing individual subject-specific programmes,
- It is aimed to carry out subject-specific as well as structural evaluations which assess to which extent criteria of the GAC have already been implemented on the model level (e.g. requirements in the exam regulations),
- It is aimed to capture questions for the evaluation of the programme clusters which result from the model in order to ensure that these are addressed cross-disciplinary and that the connection between model and subject level is guaranteed.

In order to carry out a model observation a „central peer group“ is set up whose members should also, if possible, participate in the evaluation of the programme clusters. Thereby members also fulfill the function of being multipliers in expert groups. The university presents a self-evaluation report for the model observation which deals with study-related aspects beyond a specific subject. The AQAS' guidelines provide support to universities in putting together their self-evaluation. Within the context of a model observation a one-day visit takes place for which a report is published. The report contains assessments relating to cross-disciplinary aspects and, where applicable, raises questions the peer groups ought to consider in connection with the programme clusters observation. If there is no requirement to change the model, then the basic programme structure will not be assessed during the observation of the programme clusters. The decision by the GAC for combined study programmes in their totality follows after the observation of individual programme clusters.

Due to the strict regulatory framework by the GAC for **system accreditation** there are few options for flexibility for carrying out a procedure or adapting the corresponding process steps. Here, AQAS gives consideration to universities with regards to how the expert group is set up, the timeframe of the on-site visit and the selection of samples (see Chapter II.B.3.2.4).

A comprehensive level of **transparency** is embedded in all procedures of AQAS (for programme as well as for system accreditation) and intensive feedback is central. Therefore, universities receive consistent feedback for all key aspects of an accreditation procedure (see Chapter II.B.3).

In addition, AQAS puts great emphasis in appointing fixed contact people within the agency in order to ensure a constant **flow of information** and, if possible, to avoid changing consultants. In order to ensure continuity within system accreditation procedures there are always two consultants supervising these procedures. Normally, all consultants take part in the on-site visit for model observations within programme accreditation (see above). Consultants also have responsibility for the supervision of the clusters afterwards.

## 2.6 Calculation, contracts and accounting

As a non-profit organisation AQAS e.V. is not allowed to make profits. Nonetheless, AQAS is an organisation under private law which has to finance itself and therefore has to act as a business and to calculate costs in order to break even. Thus, AQAS in principle works with lump sums to keep administrative costs low. These lump sums were empirically examined through a sample project review and were found to be realistic. For more information on carrying out procedures on a full-costing basis see Chapter II.C.

All figures in the following chapters include VAT within the current legal framework (currently 7 %).

### 2.6.1 Programme accreditation

An **individual procedure** (= programme accreditation of a single programme or a consecutive Bachelor/Master programme) currently costs [...] € at AQAS ([...] € for member institutions). Costs are divided into a basic lump sum of [...] € (or [...] € for member institutions) and a procedural lump sum of [...] €. The basic lump sum covers staff and material costs for the duration of the whole procedure and has to be paid directly once the contract has been signed off. The procedural lump sum covers the costs associated with the on-site visit, incl. travel costs and the allowance paid to experts. The costs for experts are calculated at [...] € per head e.g. the lump sum includes costs for an expert group consisting of four people (= two academic peers from universities, one professional practice representative and a student expert).

In addition, AQAS offers the option to review study programmes in a combined format (“**cluster accreditation**”). Based on the current decision by the GAC the condition is that the study programmes under review have a high subject-specific affinity.

Following the conditions set by the GAC this is the case if, apart from the closeness to a subject culture (arts and cultural studies, social studies or natural sciences), a disciplinary nearness of the study programmes is given.

AQAS stresses that the number of clustered study programmes remains manageable so that all study programmes can be discussed during the on-site visit. In addition, we take care that all cluster accreditations are covered by experts with the appropriate level of subject-specific expertise and that expert groups are set up thus so that synergies can be created and experts are in a position to make a group decision regarding the cluster accreditation. A cluster accreditation presumes that all application documents are handed in to AQAS as a batch well ahead of time.

AQAS' contracts refer to the current rules of the GAC (see Appendix III.1 and III.20). Costs proposals at AQAS also take account of the current GAC regulations, specifically for procedures of packet accreditations. However, whilst these contribute to the transparency of procedures, these often lead to competition disadvantages.

The following principles apply to the calculation of clusters.

Each cluster is first calculated based on the costs for one study programme ([...] € for member institutions and [...] € for non-member institutions). A Bachelor and a Master study programme are treated each as one programme for the purpose of cost calculation. For each additional study programme in a cluster, depending on structural overlaps of study programmes, we calculate between [...] €. For each additional expert who takes part in a cluster evaluation, we budget [...] €.

Each cost proposal is included with the AQAS information brochure for the programme accreditation which can be found in the Appendix. In the following chapters we explicitly refer to this brochure.

The placing of an order for AQAS is done through the office of the Vice-Chancellor. The university receives the contract signed off by the Board's Chair and the Managing Director. The contract is, on principle, between AQAS and the university management. The contract regulates the procedural steps, costings and the targeted timeframe.

The basic flat rate is due immediately after the signing of the contract; the procedural rate is due after the decision by the GAC following the on-site visit. The university also receives a separate bill. The contract always forms the basis for issuing an invoice. This is the case, for instance, if a university withdraws the application for the accreditation of a single study programme within a current cluster accreditation procedure.

If an accreditation for one or more study programmes, based on the relevant regulations of GAC, is suspended, then an additional procedural lump sum will be accrued for the evaluation of the reviewed documents. We took this decision due to the significant rise in the number of suspended accreditations. Re-opening a suspended accreditation is associated with significant costs on several levels. Experts, for instance, have to review again all the documents for which they receive an honorary allowance; in some cases, the review can be followed by another on-site visit of the university. Because we did not want to increase prices, and following the „user pays principle“, we bill all costs associated with a renewed accreditation to the university which caused these expenditures. This second procedural lump sum is due once the Accreditation Commission has taken its decision related to the accreditation.

The calculation of international programme accreditations follows the same principles as those for national accreditations. Due to the varied nature of each international accreditation, AQAS calculates costs on a case-by-case basis. Fixed costs are covered by a basic lump sum which takes account of the higher internal input in terms of staff time and resources (compared to national procedures). The lump sum includes costs associated with the on-site visit as well as expenditures related to the experts. Costs are calculated individually, taking account of longer travel journeys to the destination, possible adverse flight conditions as well as a higher honorary allowance for experts.

## **2.6.2 System accreditation**

It is repeatedly stated in the press that universities expect a reduction of costs and effort when carrying out system accreditation procedures (compared to programme accreditation). A system accreditation carried out by an agency seems less bureaucratic (and costly) in comparison to a programme accreditation for the whole institution. However, discussions often fail to note, that the effort for a system accreditation procedure is transferred from the agency to the university. Following a successful system accreditation universities themselves have to organise the systematic review of their study programmes based on the compliance with relevant criteria, including the external assessment (compare Chapter II.B.3.1.10).

AQAS calculates overall costs of [...] € (plus VAT)<sup>7</sup> for the review of a QM system and the finalisation of a system accreditation procedure. Included in this figure are also costs for a one-day preparatory workshop for experts involved in system evaluation, focussing specifically on the procedure in question (compare Chapter II.B.4); costs related to a potential subject-specific enlargement of the expert group to carry out sample reviews are also included in this figure. The first on site-visit ("information-related on-site visit") includes 1,5 days at the HEI; two days are envisaged for the second on-site visit where discussions with staff and sample reviews are carried out.

The costs for the first scrutiny of the application for accreditation are around [...] €. These costs are due in full once the contract has been signed. Costs for the actual procedure comprise different lump sums, facilitating a spread of costs over the duration of the project. Also, expenses in relation to a university withdrawing from a system accreditation procedure are clearly regulated. Set against this background, procedures are divided into different phases in the contract:

### **(1) Phase I – information-related on-site visit:**

The first procedural phase starts once a university has been admitted to the system accreditation procedure. This phase includes the initialisation of the procedure, the nomination of experts by the Accreditation Commission for System Accreditation<sup>ii</sup>, the first on-site visit as well as the production of minutes (short report) summarising the key results of the first on-site visit.

The basic lump sum for phase I [...] € is due once the university has been admitted to the system accreditation procedure.

The procedural lump sum for phase I [...] € is due once this phase has been completed upon the receipt of the short report of the first on-site visit.

### **(2) Phase II – sample reviews:**

The second procedural phase comprises the preparation and realisation of the second on-site visit (samples). This phase starts with the decision of the Commission for System Accreditation and ends with the finalisation of the second on-site visit.

The basic lump sum for phase II [...] € is due four weeks after AQAS informed the university about the decision of the Accreditation Commission for System Accreditation regarding the composition of the sample (Zusammensetzung der Stichprobe).

The procedural lump sum for phase II [...] € is due after the second on-site visit has taken place.

### **(3) Phase III – preparation of the expert reviews:**

The third procedural phase comprises the coordination and the preparation of the expert review for system accreditation. This phase starts after the second on-site visit and ends with the decision by the Accreditation Commission for System Accreditation.

The lump sum for the third procedural phase [...] € is due after the decision of the Accreditation Commission for System Accreditation regarding the system accreditation.

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<sup>7</sup> If the university offers regulated study programmes (e.g. for teacher training) then the additional costs to carry out a sample evaluation as part of the on-site visit would be calculated separately, based on the GAC regulations.

There are always several appendices to the contract for system accreditation, namely the procedural process (as agreed with the relevant Accreditation Commission), the timescale (as agreed with the university) and the cost estimate.

***Samples to illustrate the connection between cost estimate, contract and invoices*** (see Appendices III.3 and III.22).

To date, AQAS carried out one institutional procedure abroad. Costs for this procedure were calculated individually, following the principle of cost recovery. Future procedures will allow to gather more empirical data on cost calculation.

**Appendices:**

**Programme accreditation**

- AQAS sample contract for Programme Accreditation (III.1)
- Sample of a calculation for procedure costs and invoice of a procedure (III.3)
- Programme Accreditation brochure (IV.1)

**System accreditation**

- AQAS sample contract for System Accreditation (III.20)
- Sample of a calculation for procedure costs and invoice of a procedure (III.22)
- System Accreditation brochure (IV.2)

### 3 Implementing processes (ESG 2.3)

*External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include*

- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow-up.

The basic principles for external quality assurance in Germany have been further developed - not least through European organisations such as ENQA and ECA - and tested on many occasions so that there should be no doubts about the fundamental fitness for purpose of external quality assurance in the EHEA.

The appropriate **self-evaluation** of the university forms the basis of each accreditation procedure of AQAS (programme as well as system accreditation). For this purpose, AQAS provides specific **guidelines** to universities prior to submitting an application for accreditation. In the context of national procedures these guidelines mirror the content and criteria of the GAC for programme and system accreditations. For international procedures these guidelines pick up the purposes and principles of the ESG.

An evaluation of external experts with one (programme accreditation) or with several (system accreditation) **on-site visits** also forms part of each accreditation procedure. The nomination of experts (m/f) is carried out by the appropriate Accreditation Commission.

All experts working for AQAS confirm their impartiality for each procedure in writing (compare Chapters II.A.3 and II.B.4 und Appendices III.8 and III.28).

The final **report** consists of assessments by the experts which are aligned to AQAS' criteria (and hence to the appropriate national and international criteria), the relevant accreditation decision by the Accreditation Commission and, in some cases, **conditions and/or recommendations** as stipulated by the Accreditation Commission (see Chapter II.B.6). The report is published. If, alternatively, a procedure is suspended, the accreditation procedure can be resumed again provided the university carried out all necessary revisions and resubmitted their application. The expert group will then re-engage with the procedure.

If **conditions** have been issued in a procedure, AQAS will examine – together with the expert group – if the university has fulfilled these conditions. The process to monitor if conditions have been met, the assessment of revised documents after a suspension as well as the actual reaccreditation are considered as **follow-up processes**.

AQAS follows an internationally recognised process consisting of several steps:

1. **Self evaluation**
2. **On-site visit with experts (m/f)**
3. **Final report**
4. **Follow-Up**

This process is going to be described in the following chapters for both accreditation procedures.

The appropriate processes are documented in the AQAS procedural manuals and the relevant information brochures for programme and system accreditation as well as published on the AQAS homepage.

### **3.1 Programme accreditation: the step-by-step process of a procedure**

#### ***3.1.1. Preparation of an accreditation procedure***

Before awarding a contract universities normally request an estimate of costs or invite AQAS to participate in a call for tender. AQAS sends out an estimate of costs together with an AQAS-brochure for programme accreditation. This allows universities to obtain information about the criteria of a procedure and to familiarise themselves with AQAS as an agency.

Once universities decided to place an order AQAS signs a contract with the university in question regarding the accreditation procedure. The contract has an annex which outlines the sequence of the procedure. This annex has been agreed by the Accreditation Commission (compare Appendix III.2). The contract is signed off by the University's senior administration and by the dean of the respective faculty/department which offers or will offer the study programme. At AQAS, the contract is signed by the chairman of the Management Board and the Management Directors. A sample contract can be found in Appendix III.1.

As part of the cost estimate AQAS invites the university to a preliminary briefing session to the AQAS premises. This briefing is free of charge and non-binding for the HEI. A sample of how the costs for a procedure are calculated as well as a sample of an invoice for a procedure can be found in the appendices (Appendix III.3). The aim of this briefing is to scope out the procedure, the criteria and the work methodology of AQAS, as well as to agree on a timescale and to discuss any questions the university might have. We would like to stress that this information session focusses exclusively on formal questions of a procedure and does not constitute a content-related consultation. Over the last couple of years only few universities have made use of this briefing; we attribute this to the fact that most universities are familiar by now with the process of programme accreditation and thus have lower levels of information needs.

In comparison, the number of open call for tenders has risen considerably. Generally speaking, the terms and conditions of these tenders are not tailored to the requirements of an accreditation procedure. Universities very often use standard procurement forms which do not (or insufficiently) take into account the procedural steps of an accreditation procedure or which require irrelevant data (such as the confirmation of a minimum wage, information about social security etc.).

Within the context of awarding contracts we have been noticing heightened competition between agencies as far as the acquisition of clients is concerned. For example, we often receive feedback that other agencies offer markedly higher numbers of cluster accreditations because these are less expensive for universities. In our view, this contradicts the regulations of GAC as an appropriate evaluation of (part-) study programmes is questionable under these conditions. Our view is that GAC should act as a much stronger competition guardian in this area.

#### ***3.1.2 Self evaluation***

Once a contract has been signed off, as described above, the university writes up its Self-Evaluation Report (SER) or application for accreditation („Akkreditierungsantrag“) based on the criteria of AQAS' guidance note (see Appendix III.18). A complete application for a first-time accreditation is made up of the following **documents**:

- Application for accreditation,
- Module handbook (current version),
- Exam and study regulations (current version),
- Sample for a Diploma Supplement.

In the case of a reaccreditation the following additional documents have to be included:

- Exam and student number statistics as well as data and KPI of how many students have successfully completed their studies. An overview listing the titles of the last 50 theses.
- Final reports of the previous accreditation/accreditation decision.
- If required, proof that the conditions of the previous accreditation have been met.
- Evaluations of the internal quality assessment of the study programme.

### **3.1.3 Initialisation of a procedure**

The Head Office carries out an initial scrutiny of all documents to check if the formal requirements of the KMK and GAC have been met and if the documentation is complete. The Head Office also informs the University if the application requires any clarifications or additions.

For each new accreditation procedure a member of the Accreditation Commission will be nominated that acts as a rapporteur for this procedure. A special feature of the accreditation procedures that AQAS carries out is that the relevant Accreditation Commission (AC<sup>Prog</sup>) is involved in the procedure from the start i.e. the AC Prog makes a decision about the **initialisation of the procedure**. This allows the AC Prog to refuse applications where there is obvious that these applications will not be successful. Procedures are initialised if the application set is complete and comply in principle with formal requirements. If a procedure is not initialised, the Head Office informs the university about the reasons; the university has the option to resubmit their application once the documentation has been revised (by the university). Once a procedure has been initialised, the university will be informed about the decision of the Commission. Samples for initialisation letters can be found in Appendix III.4.

### **3.1.4 Nomination of experts**

After the procedure has been initialised the university is requested to submit a proposal to AQAS specifying the **academic profile of the expert group**. The university is not allowed to name specific individuals it wishes to nominate for the expert group. The Accreditation Commission decides, within the framework of the initialisation, whether it accepts the proposal or if the qualification profile of the expert group needs to be amended, for instance if the proposal is too narrow in terms of the represented disciplines or if the proposal shows any discriminatory aspects. Samples of proposals for expert groups are enclosed in Appendix III.5.

The Head Office contacts the experts proposed by the Accreditation Commission and puts together an expert group which corresponds to the required profile. The expert group is then appointed by the rapporteur, the Chair of the Accreditation Commission, the two representatives of professional practice and the student representative. Thereby, all stakeholders are involved in the nomination and appointment of experts.

The Head Office informs the university about the composition of the expert group and gives the university a deadline to submit any concerns to the AC<sup>Prog</sup> for a decision. The university does not have a right to make a proposal or submit a veto. In addition, the Head Office informs the university about the data and the exact sequence of an on-site visit.

### **3.1.5 On-site visit**

The application documents are sent to all experts who are requested to submit an initial written feedback (Vorabstellungnahme) to the Head Office. Samples are enclosed in the Appendix (see Appendix III.9). Experts can follow the assessment criteria (**Prüfkriterien**) that AQAS set up which mirror the content related aspects of the GAC criteria. The AQAS criteria also include paradigmatic indicators (beispielhafte Indikatoren) which help to assess if a criterium has been met.

Feedback reports are made available to the university and other members of the expert group prior to the on-site visit. These reports are also sent to external representatives (for instance representatives of the Ministry of Education or the Churches) if they take part in an on-site visit. This mechanism ensures that all stakeholders carrying out an on-site visit are adequately prepared. Universities and experts regularly tell us how much they appreciate this process as it ensures that on-site visits are well prepared and discussions well structured and focussed.

The preliminary meeting of the panel of experts on the day prior to the on-site visit aims to discuss in detail the underlying criteria of the accreditation procedure, to go over the application documents and to jointly develop a step-by-step discussion handout. This handout serves as a useful tool to help along experts in their discussions at the university. As part of the **on-site visit**, there will normally be discussions with the university management, the faculty/department management and study programme coordinators as well as with lecturing staff and students. In addition, any facilities associated with the programme of study, will be inspected. A sample for the agenda of a preliminary meeting as well as samples of an on-site visit can be found in the Appendices (see Appendix III.10, III.11 and III.12).

### **3.1.6 Experts evaluations**

Following the on-site visit the experts jointly write up a written **assessment report** with a recommendation for accreditation. This report forms the basis upon which the Accreditation Commission makes their decision. The report follows a certain structure developed by AQAS which was agreed by the Accreditation Commission (regarding the writing up of assessments reports, see also Chapter II.B.6).

The Head Office forwards the assessment report, once it is complete, to the university (following the rules of GAC, omitting the experts' recommendations). The university is given the option to submit a **statement** which must be submitted, in general, within a week (in writing).

### **3.1.7 Finalisation of a procedure**

The Accreditation Commission makes a decision on the basis of the experts' report and the recommendation by the panel of experts. The decision takes into account the statement by the university. The Accreditation Commission discusses the report and issues a **decision for accreditation**. On the basis of the university's statement and in consultation and agreement with the panel of experts the Commission can correct factual errors. The basis for the decision are the relevant decisions by the GAC, esp. the rules and regulations for programme and system accreditations in their current version. The AC<sup>Prog</sup> laid down their respective decision-making principles in an explicit resolution (see Appendix III.16). In addition, AQAS does not make any agecny-specific rules.

The Head Office forwards the decision of the Accreditation Commission to the university. The university can submit a written appeal against the decision or any conditions associated with the decisions. At this point the complaints and procedures process at AQAS takes effect (see Chapter II.B.7). In the absence of a written appeal AQAS publishes the result of the accreditation procedure, the experts' report and the name of the experts. Since 01.01.2016 negative decisions have to be published as well. The GAC is also continually kept up to date and regularly receives all experts' reports as well as the minutes of the Commission sessions relating to the decisions. Samples for expert reports can be viewed in Appendix III.15 as well as VI.6.

### **3.1.8 Follow Up: (1) Suspension of a procedure**

In accordance with the rules of GAC the AQAS Accreditation Commission can suspend an accreditation procedure. Procedures are suspended if the quality criteria for an accreditation are not met. However, the expectation is that the university will be capable to rectify the defects within 18 months. The university has the opportunity to submit a response before a procedure is suspended.

After 18 months at most the university has to apply for the re-opening of the procedure and must, at the same time, submit revised documents. If the university fails to apply for a re-opening of the procedure within the given timescale, then AQAS initialises the procedure and rejects the accreditation.

If the university requests a re-opening of the procedure and submits revised documents these will be sent to the experts. Experts are asked to scrutinise the application documents and to check if all defects have been addressed. An additonal on-site visit may take place if the panel of experts deems

this necessary. The panel of experts writes up another assessment report in compliance with the rules of GAC and with a recommendation for a decision. The report forms the basis for the decision by the Accreditation Commission as well as the new response by the university. The Accreditation Commission can make a decision with or without conditions or decide to reject the accreditation. Another suspension of the accreditation is not possible.

### **3.1.9 Follow-Up: (2) Publication and documentation of meeting conditions**

If an accreditation is issued with conditions the university has to fulfill the conditions and document this in an adequate manner. The timescale within which the university must document that it has met all conditions is normally 9 months.

The university is requested to describe how it has fulfilled the conditions and which changes have been implemented and in which manner. In order to show evidence that the conditions have been met the university must enclose all appropriate documents (e.g. module handbook, exam regulations etc.).

The Head Office of AQAS scrutinised the implementation of conditions that refer to formalities (e.g. publication of exam regulations). One or several members of the panel of experts scrutinise conditions that refer to content-related aspects of the accreditation procedure.

The Accreditation Commission decides upon the fulfillment of the conditions once all documents have been scrutinised. The result of the decision is communicated in writing to the university. If additional documents are required or further revisions deemed necessary, an additional deadline can be set (usually three months).

Once all conditions have successfully been met, these are included in the experts report which is published on our homepage. For all national accreditation procedures there will also be an entry in GAC's database.

### **3.1.10 Experiences**

#### *National Programme Accreditation*

Based on our experiences we have implemented successful and highly sophisticated processes in our programme accreditation procedures. These processes have been tested and adapted over many years within a continually changing regulatory framework. All our processes comply with the current and up-to-date accreditation related requirements. To give an example, a few years ago we revised the format that expert reports take and set up a clear division between the accreditation decision and the assessment report.

On the part of the Accreditation Commission for Programme Accreditation we developed and strengthened a decision practice that has led to a high degree of accountability, fairness and transparency for universities. The fact that the Complaints Commission (Beschwerdekommission) only met twice confirms this impression as there have rarely been any complaints.

However, the decision by the Federal Constitutional Court and the partly misleading press coverage as a result have had a negative effect. The number of experts declining to take part in an accreditation procedure increased. Universities and experts objected that too many documents of little informative value were required in accreditation procedures (see below). There are also time factors which are of concern for experts. Our experiences show that the duration of accreditation procedures has increased over the last couple of years because experts offer us only very restrictive timeslots for on-site visits, giving other commitments a higher priority.

Within the current accreditation timeframe one content-related focus was on the accreditation of teacher training programmes. AQAS carried out numerous procedures for first-time and reaccreditation in the German federal states of Schleswig-Holstein, Lower Saxony, North Rhine-Westphalia and Rhineland Palatinate as well as pilot projects in Hessen, Bavaria and Baden-Württemberg.

Based on feedback by stakeholders the accreditation of teacher training programmes significantly contributed to the fact that teacher training became a much greater focus at universities and that a noticeable quality development took place. The compliance with KMK standards, the integration of practical phases and the further development of a research-based pedagogy are examples which show the positive and sustainable effects that accreditation procedures had on teacher training programmes. Within the context of system accreditation we recommend that GAC also examines in-depth and with the relevant expertise if universities which have undergone an institutional accreditation also comply with these established standards and criteria.

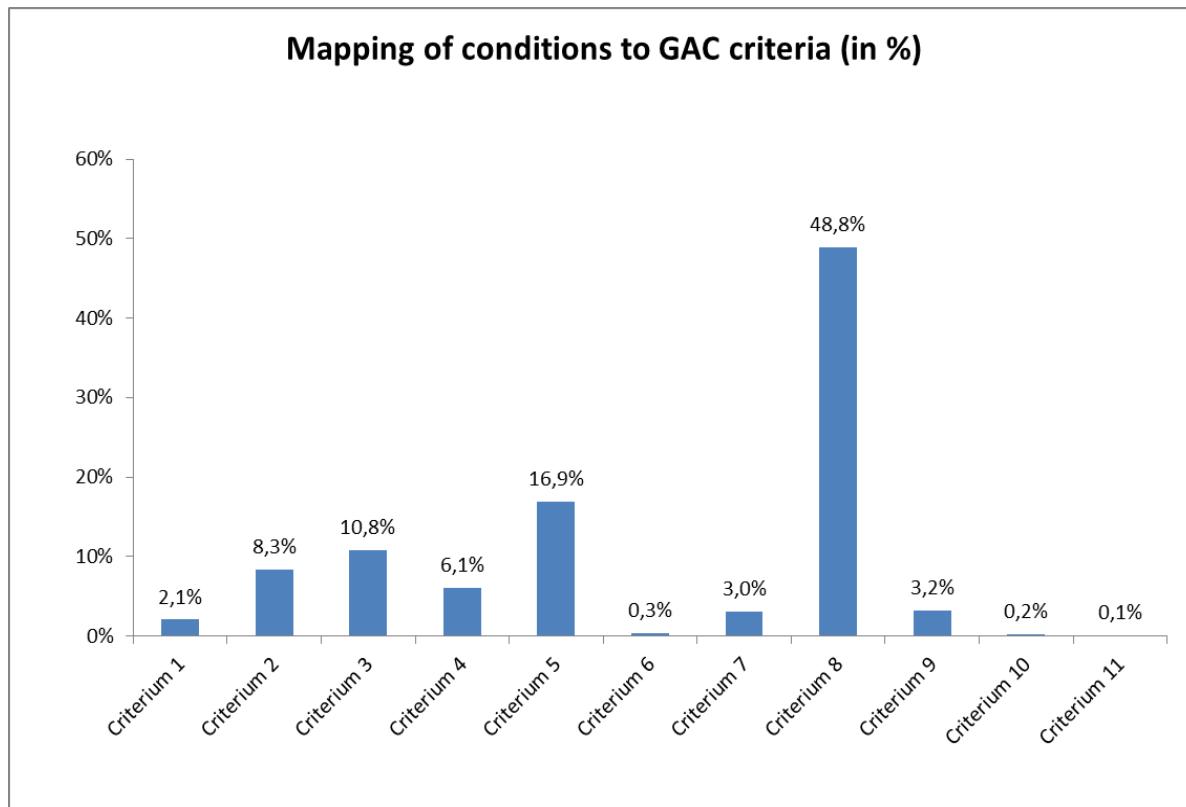
Another focus of our accreditation procedures has been on study programmes within the context of lifelong learning and the linkage between different educational systems. These programmes include esp. further training, dual study programmes and programmes relating to the field of extra-occupational learning and the recognition of study periods. There is a great diversity in this area with many different models in operation and which therefore require an individual, case by case assessment. The GAC guidelines for study programmes with a special profile forms a good basis for the accreditation of these study programmes. The guidelines contribute to a systematisation and clarification of terminology and establish standards which can be demanded by universities. The compliance with these standards does not only improve the quality of these study programmes but also increases the transparency and comparability of accreditation procedures.

We see two trends in the context of study programmes with a special profile. Firstly, there are many more dubious course providers and course offerings than in the area of first cycle education as most of these courses are subject to fees. Due to the competition some trustworthy course providers are also put under pressure, for instance by awarding credits that are not sufficiently backed up by learning outcomes. We perceive a lack of robust regulations as to which extend it is possible to study whilst holding down a job at the same time. Here, at least some guiding principles are required. An accreditation agency which currently practices a strict interpretation of the study feasibility risks to discriminate its clients in the competition for students and therefore may lose their own clients to other agencies.

Secondly, it can be observed that there are great concerns on the part of the scientific community, including experts, about increasing the transfer between and permeability of different education systems and the linkages between academic and non-academic educational pathways (although these developments are politically endorsed). As a result, innovative aspects in programme accreditation procedures are viewed, in some cases, very critically by experts. It would be helpful here to enter into a dialogue with the accreditation agencies to explore if further regulations may be necessary – also to offer some level of protection against developments driven by political considerations.

All in all, experience shows that the quality of study programmes has been improving through the accreditation cycles. This impression is backed by an evaluation of the conditions given within a selected timeframe: in the 643 accreditation procedures that were finalised between February 2015 and February 2016, 85% of the study programmes were accredited with conditions and 13% of study programmes without conditions. In 2% of cases accreditation procedures were suspended. There was not one single rejection within this timescale.

An internal analysis by AQAS of all conditions that were issued during this timescale showed the following mapping of conditions to the GAC criteria:



**Image 8: Mapping of conditions to GAC criteria**

It should be borne in mind though that the GAC criteria can't always be distinctly separated from each other and that certain conditions can be mapped onto several criteria: if, for instance, the condition is not fulfilled that an exam should normally be included in each module, several GAC criteria are not complied with. Besides criterium 2.5 (exam system) also criterium 2.2 (conceptual integration of the study programme into the study system) is affected because the structural conditions of the KMK are not met. In part, criterium 2.4 (study feasibility) is also not complied with because too many exams can negatively affect the study feasibility.

Most of the given conditions refer to the following aspects: revision of the module handbook, publication of exam regulations, adaptations for exam conditions, reductions of the number of exams, publications or corrections of the study plans, correction of study documents, definition of the types of exams and the revision of practical/work-related elements.

The condition to publish the exam regulations is not just one of the most common conditions but often also the only condition that has to be fulfilled. This is in line with the practice that universities include drafts with their first time accreditations and exam regulations with their reaccreditations, the reason being because internal university processes stipulate that an adoption and publication is only possible after an accreditation. This allows to include potential changes in the documentation as required by the conditions and recommendations. Thus, there is no need for universities to take accreditation-related paperwork twice through their internal committees, which results in a reduction of revised versions. As there are never any problems regarding the implementation of criterium 2.8. (the reduction of documentation and bureaucratic processes) one way forward would be to ask universities to submit their revised exam regulations during an accreditation procedure. Universities would then confirm that they would publish their exam regulations after the accreditation has been finalised.

The conditions show, esp. during reaccreditation procedures, that there are rarely content-related issues about study programmes but that there is potential to improve the implementation of

documentation materials. In most cases, it is the exam system which has not been properly implemented, for instance because there is not enough variety in the exam types or because there are too many exams. There are also problems with the construction of so-called “portfolio exams” which are not real portfolios but have been set up in order to avoid offering modular exams.

Mistakes in documentation materials concern primarily module handbooks, including for instance content-related or formal inconsistencies or a lack in presenting learning outcomes as competencies. Often, it is also criticised that useful concepts that were discussed effectively with the panel of experts are not mirrored in the written format of the module handbook.

Our experiences show that the second-level degree programmes have widely been adopted and implemented in line with political requirements although certain points of criticism remain. The exam system and the study feasibility call for a constant critical monitoring/ observation. Here, particular attention should be given to study programmes with a special focus as these have grown over the last couple of years and represent particular challenges for accreditation procedures.

The basically positive development can be explained by the fact that first-time accreditations are very efficient, leading to a sharpening of study programmes’ profiles. On the other hand, it has been shown that numerous universities have professionalised their preparation for accreditation by intensive internal guidance and examination meetings within their institutions. This has led to better accreditation results.

Despite these tendencies there are number of universities that do not want to switch to system accreditation, for instance because

- they perceive the decisions of external organisations to be more objective and hence more acceptable to universities,
- universities are made up of different units and sub-units which do not want to set up a university-wide accreditation system with far-reaching competences,
- programme accreditation is less expensive for universities,
- the university finds itself in a situation (e.g. reduction of posts) where a clear division of internal accreditation decisions and strategic decisions seems difficult,
- the effort to set up an internal QM system which is robust enough for a system accreditation is far to great, esp. for smaller universities

Therefore, many universities would welcome if programme accreditation could be kept as a tested and sophisticated alternative for system accreditation and developed further. Processes could be streamlined in order to reduce the (often criticised) amount of paperwork by tightening up criteria and assessing their informative value. The question for instance if a study programme enhances a student’s personal development plays to a university’s or experts’ argumentative power. It is a question that can, in principle, be asked of every study programme.

Study programmes in particular that have successfully undergone a first-time or reaccreditation could be assessed in future procedures by focusing on key areas such as the further development of the programme or study-related, relevant data. Thus, stable basic parameters (such as gender equality or university-wide counselling and guidance opportunities) could be passed on.

By participating in the “experiment clause” (Experimentierklausel“) of GAC AQAS wishes to develop this idea further, in cooperation with the University of Applied Sciences Pforzheim in the project “programme accreditation in faculty review” („Programmakkreditierung im Fakultätsreview“). The aim of this project is to safeguard the high learning and teaching standards by drawing on the faculty’s strategic planning and steering mechanisms.

### *Joint Programmes:*

Over the last years AQAS has positioned itself as an agency with a specific expertise in the accreditation of Joint Programmes. Thus, the German Academic Exchange Service (DAAD) approaches AQAS to hold presentations on JPs; AQAS also offers its own workshops on Joint Programmes. The Managing Director for international projects, Ms Herrmann, also represented German agencies in a working group on JP within GAC.

Based on the experiences of AQAS, the following points can be made:

- The terminology is unclear in Germany, therefore universities repeatedly state that their study programmes are not „Joint Programmes“ but „international programmes“ in order to avoid a time-consuming and expensive accreditation by involving their foreign partner institution. In addition, student numbers of Joint Programmes are often low so that universities generally shun the effort of undergoing an accreditation. The GAC working group at GAC developed a proposal on how to define Joint Programmes in Germany. It is envisaged that this proposal/ these criteria will be of use in the future in helping to avoid the problems outlined above.
- Almost every Joint Programme represents an individual case which requires a bespoke format for several aspects of the accreditation e.g. such as the location and the duration of the on-site visit and the documentation.
- In general, AQAS has always been able to involve foreign experts in expert groups and/or to attract German experts with the relevant international expertise. However, it takes a lot of effort for an agency to work with international expert groups with regards to the selection of experts, the facilitation of expert groups during the on-site visit as well as the administrative organisation before and the follow-up after a visit.
- Over the last couple of years AQAS has intensified its cooperation with international accreditation agencies. Thus AQAS is represented at key European conferences and keeps the respective agency informed if on-site visits take place in the country where the agency is based. This allows the foreign agency to send observers to the on-site visit. AQAS signed a partnership agreement with the ECA (MULTRA) which strengthens the cooperation between agencies based on trust and facilitates the mutual recognition of accreditation decisions.

The respective national requirements for study programmes vary within Europe and esp. in comparison to countries outside Europe. The KMK standards - such as size of modules, degree titles and exam requirements – differ from foreign standards and often present a problem in international accreditation procedures. In some cases, special exemptions had to be sought from GAC. Foreign universities are, in some parts, subjected to more stringent legal parameters than German HEIs which complicates the compliance with criteria. In the future, the European Approach (accreditation without national criteria) should facilitate the accreditation procedures for Joint Programmes.

On the basis of experiences with a range of different Joint Programmes AQAS believes that „real“ Joint Programmes are generally well thought through international study programmes on the basis of established cooperations. They offer added value for students and boost their intercultural competencies. In addition, they are an important contribution to the internationalisation of German universities as well as to the creation of the European Higher Education Area (EHEA). International accreditation procedures are associated with higher expenditure for all stakeholders as foreign language texts have to be written and read, experts with an international experience have to be sought and the effort for travels are partly higher than for national procedures. We cannot confirm the - often voiced - view that the quality of Joint Programmes is lower and that they are more difficult to carry out. If international accreditation procedures are prepared well, processes for both international and national procedures are broadly comparable.

### *International programme accreditations*

Since its inception AQAS carried out 37 programme accreditations at universities abroad. The first procedures were basically learning processes for both parties as the instruments for international programme accreditation had to be partly developed and tested first. We usually tried to match up the German criteria with the ESG (back then in the version of 2005). From 2013 onwards the international business area at AQAS has become more professional, expanding its portfolio and further enhancing its instrument and expanded its portfolio which the further enhancement of its instruments testify. These are now based on the ESG.

More than half of the programme accreditations carried out abroad took place from 2013 onwards. 15 procedures were carried out at HEIs in Moldova. Only a few general experiences can be deducted from these procedures insofar as they have a higher degree of individuality than national procedures in Germany. Thus differences in the cultural, geographical or linguistic context impact upon the sequence of the procedures and the time planning process (e.g. longer meetings and discussions due to the involvement of interpreters, taking account of unsuitable travel times, differences of climate). AQAS also had to adapt established processes for programme accreditation as they could not be transferred to an international context. Because on-site visits take longer abroad than the usual 1,5 days in Germany dates could not be agreed upon with the experts. Dates were first chosen with the universities and then relayed to the experts and agreed with them.

To sum up, it can be stated that the standard process for on-site visits in Europe worked well in those countries in which AQAS was active (preparation of a self-evaluation report, on-site-visit, preparation of a report and follow-up). The AQAS ESG-based criteria could easily be put into practice in Moldova and the Oman as we had briefed the universities about the basics of accreditation prior to the actual procedure. AQAS prepared a report for the Ministry of Education in Moldova summarising our experiences and findings which had resulted from the 15 accreditation procedures we carried out in that country.

### **Appendices:**

#### **Programme Accreditation**

- AQAS sample contract for Programme Accreditation (III.1)
- Sequence of the procedure - Programme Accreditation (III.2)
- Sample for a calculation for procedural costs and the invoice for a procedure (III.3)
- Samples initialisation letters (III.4)
- Sample suggestions for experts profiles (III.5)
- Declaration of willingness to act as experts in a procedure (III.8)
- Samples for preliminary experts reports (III.9)
- Sample for a preliminary briefing of an expert group (III.10)
- Sample for a on-site visit: individual procedure (III.11)
- Sample for an on-site visit: cluster procedure (III.12)
- Samples for experts reports (III.15)
- Rules governing accreditation decisions (III.16)
- Guidelines for the production of an application for accreditation (III.18)
- Sample report for Programme Accreditation (VI.6)

### 3.2 System accreditation: Sequence of a procedure

#### 3.2.1. Preparation of a procedure

The sequence of a system accreditation that AQAS coordinates follows the relevant GAC rules. The process is explained below (without taking account of teacher training programmes).<sup>8</sup>

First of all, the Head Office (normally the Managing Directors) carries out an informal and free-of-charge initial consultation with the university representatives, informing them about the aims, objectives and processes of the procedure as well as the underlying criteria. Once a university decides to undergo a system accreditation AQAS signs a contract with the respective institution (see Appendix III.20). As part of each contract, the university is sent the intended schedule, the budget and the timescale (see Appendix III.21 and III.22).

In order to manage each payment/ financial instalment as well as to fix the conditions under which a university can cancel a contract, AQAS set up three phases within the main procedure:

- (1) Phase I - on-site visit for information purposes
- (2) Phase II - sample evaluation
- (3) Phase III - production of an expert report

First of all, the AQAS Head Office checks if a university that has applied for system accreditation meets the relevant pre-conditions (initial scrutiny).

The chart below illustrates the different stages of the process of a procedure:

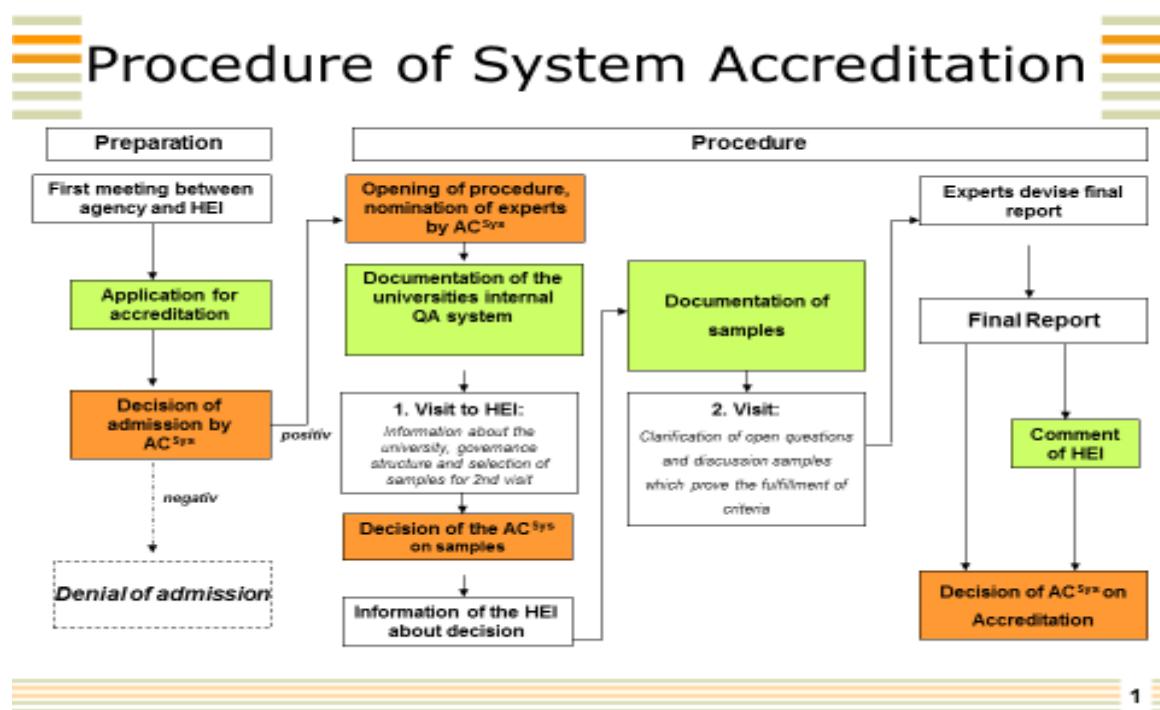


Image 9: Chart of Procedure for Accreditation of QA-System

<sup>8</sup> If a university offers teacher training programmes only one programme will be assessed by way of a sample, in line with the conditions set by GAC. AQAS evaluates the basic model of teacher training education at the university as well as the design and integration of several teacher training courses into the university's QA system. The Ministry of Education of the respective German state (Land) is involved in this process.

### **3.2.2. Initial Report**

The initial report serves to ensure that only universities that fulfill the relevant conditions formulated by GAC are admitted to a system accreditation. The university puts together all their documents for the initial scrutiny by following the guidelines that AQAS developed (see Appendix III.38). These documents contain all relevant quantitative data and also provide evidence that there is a formalised university wide quality assurance system in teaching and learning in place. A sample programme of study is used as a test case. A sample for a report for an initial report can be found in Appendix III.23. The AC<sup>Sys</sup> discusses the application documents and decides on the basis of the relevant checking criteria (see Appendix III.36) if the university can be admitted to the system accreditation and therefore decides on the initialisation of the procedure (see Appendix III.24).

### **3.2.3 Appointment and nomination of experts**

Once the procedure has been initialised the AC<sup>Sys</sup> appoints and nominates the expert group (see chapter II.B.4). The university has the option, as in programme accreditation procedures, to submit a proposal for the subject-specific profile of the expert group. A sample is included as an Appendix (see Appendix III.25). The university also has the option to veto the composition of the expert group. The expert group attends a preparatory training workshop at the AQAS Head Office before the first on-site visit takes place. All experts participating in a system accreditation procedure have to sign a written declaration of independence promising not to disclose any information from the documents (see chapter II.B.4). A list of all previous expert groups that participated in system accreditation procedures is enclosed as an Appendix (see Appendix III.40).

### **3.2.4 Self Evaluation Report (SER)**

During the first phase of the procedure universities must provide evidence that they comply with the current decision of GAC. The following aspects should be covered in the submitted documentation: internal steering and decision making structures, mission statement and university profile, course offerings, the defined quality aims and objectives, the internal quality assurance system for learning and teaching, the processes for quality assurance and quality development. Universities are not expected to produce a bespoke “classical” self evaluation report for the system accreditation procedure but rather to draw on already existing documents of their steering mechanisms and internal reporting system. These documents would normally be already in place as part of the internal quality assurance.

System accreditation therefore focusses on assessing universities’ internal documents and materials which describe the structures and mechanisms of the internal QA system. Based on AQAS’ experience universities are also asked to submit a short profile putting the documents into an overall context. This self portrayal helps the expert panel to scrutinise and assess the documentation.

AQAS attaches great importance to providing continuous support to universities throughout all phases of the system accreditation. AQAS hands out a guidance note to universities that is aligned with the GAC criteria for system accreditation but which also leaves enough space and flexibility allowing universities to follow the logic of their own internal QA system in their documentation (see Appendix III. 39).

Therefore, the checking criteria that AQAS provides for system accreditation can be applied to all phases of the procedure. These criteria offer an orientation for experts and ensure that all relevant aspects are assessed. They also guarantee a unified information basis for the AC<sup>Sys</sup>. The “checking criteria for system accreditation” are the key scrutiny method for the whole procedure and should not - unlike the checking criteria for the initial examination – be interpreted as a criteria catalogue corresponding with the guidance note for a specific procedural phase (see. Appendix III.37). As with programme accreditation experts in a system accreditation procedure are requested to submit a short written exploratory opinion. Samples are included as an Appendix (see Appendix III.29).

### **3.2.5 On-site visit**

The **first on-site visit** primarily aims to check - by applying the criteria outlined above - if the university's internal QA system complies with the criteria for system accreditation e.g. if all relevant structures are properly embedded in the system. In line with the GAC regulations, experts can request additional documentation at this stage. During this first on-site visit the experts also reach agreement on the compilation of samples and their documentation. This ensures that experts are involved in the selection of samples as required by the GAC rules; experts also have the opportunity to discuss with the university how samples should be best documented on the basis of the respective QA system. A sample for a first on-site visit is included as an Appendix (see Appendix III.30).

The main results of the first on-site visit are summarised in a short protocol which also contains the recommendation of the expert group for the sample selection (see Appendix III.31). Based on the protocol the AC<sup>Sys</sup> issues a draft resolution if further adjustments with regards to the documentation have to be made. This process complies with the specifications set by GAC whereby agencies should decide - based on the proposal of the expert group - which format the second on-site visit should take and if additional experts are required. The short protocol and the draft resolution by the AC<sup>Sys</sup> for the samples are sent to the university, together with a note on the timescale when the next set of documents has to be submitted.

The focus of the **second on-site visit** is to check, by using the selected samples, if the individual elements of the QA system have been implemented at the university, if aims and objectives have been met and if study programmes comply with the GAC criteria for programme accreditation. The latter is the condition for study programmes to be awarded the seal of GAC.

GAC defined criteria and the KMK developed regulations which are checked in the sample. As experts should take into account the whole range of study programmes within the context of the samples they can scrutinise a specific feature in several or all study programmes of the university. The subject of the samples can be all criteria within one or several study programmes.

In line with the prerequisites by GAC the expert group should be comprised thus: „*that they are able to carry out an appropriate assessment of all areas which are relevant for the evaluation [...] if requested the agency can appoint additional experts if this is necessary for the coordination of the samples*”.

Against this background the expert group can be widened up to include more subject specific experts.

As the documentation of the sample is always dependent upon a university's individual QA system AQAS is of the view that there can be no single set of rules for the documentation (nor can there be a single unified guidance note). Thus, the sequence of the second on-site visit is dependent upon the combination of elements in the sample and the type of requested documentation. The sequence is organised on a case by case basis, taking into account the demands of the experts in terms of the content and time. A sample for a potential sequence can be found in Appendix III.32.

### **3.2.6 Production of an expert report**

The final evaluation by the expert group forms the basis for the decision about the system accreditation which is produced by incorporating the results of the on-site visits (see Appendix III.33 and III.35). The experts assess if the internal QA system of the university can achieve the qualification aims and the quality of the study programmes taking the ESG into consideration, the requirements of the KMK and the criteria of GAC and if this evidence is corroborated by the samples. If any deficiencies are found in the samples, experts assess whether these deficiencies are of a systemic nature or whether these are outside the university's QA system. The expert group expresses a final recommendation for a decision regarding the system accreditation. It is foreseen that a system accreditation can be given with conditions; in other cases, the procedure can be suspended or the system accreditation can be denied. Before the final decision is taken, the university is sent the experts' report (without the experts' recommendation) so the university has the opportunity to formulate its own statement.

### **3.2.7 Finalisation of the procedure**

The basic principle on which the decision for a system accreditation rests is the expert report as well as the expert recommendations for the decision. The AC<sup>Sys</sup> makes the final decision on whether to award (or deny) a system accreditation based on the expert report and, in some cases, the statement by the university. In order to ensure that decisions taken by the AC<sup>Sys</sup> are consistent and secure a high level of comparability between individual system accreditation procedures, AQAS has developed a set of rules governing the decision-making process for system accreditations; these rules and regulations accommodate the complexity of procedures and decisions (see Appendix III.34). In some cases it is necessary to adjust the interpretation of the criteria, taking into account particular reasons or an institution's unique situation.

A system accreditation is awarded to study programmes that are set up following a system accreditation or which have already been accredited in compliance with the university's own internal QA system. If the system accreditation was only requested for a particular unit of the university, then all decisions by the AC<sup>Sys</sup> only refer to study programmes forming part of that unit.

Once a successful system accreditation has been issued, the university is made aware of the requirement to submit an interim evaluation in preparation for a system reaccreditation. This information is described in the final documents sent to the institution (see below).

### **3.2.8 Follow-Up: (1) Publication and documentation of fulfilling the conditions**

Universities which have been accredited with conditions are given a legal deadline of usually nine months during which they must publish that they have fulfilled the conditions. In general, universities seek a follow-up briefing with the expert group that took part in the evaluation of the university's QA system. If deemed necessary, experts set up a conference call with the university or organise a meeting with university representatives. The vote by the expert group regarding the fulfillment of conditions is forwarded to the AC<sup>Sys</sup> which takes the decision. It is possible to allow for an extension of the deadline of three months max. during which the university can submit revised or additional documents.

The expert report takes note of the successful fulfillment of conditions. The report is published on the AQAS' homepage as well as in the GAC database.

### **3.2.9 Follow-Up: (2) Interim evaluation**

Following the rules of GAC universities must submit a self evaluation report (interim report) midway through the first accreditation period. AQAS deliberately streamlined this procedure as its purpose is to assist universities in their self-reassurance whilst preparing for their system reaccreditation. The university puts together an interim report which contains a summary of all QA procedures carried out at their institution since its received its first system accreditation. The report is also a means to reflect upon the experiences and adjustments made with regards to the university's QA system. The assessment is carried out in writing by the AC<sup>Sys</sup>. The results of this assessment are compiled in a short report which may contain recommendations to resolve any quality-related concerns. This report is then sent to the university and is published.

To date, AQAS carried out one interim evaluation (University of Applied Sciences in Münster) and received a positive feedback from GAC on our procedure.

### **3.2.10 Experiences**

AQAS successfully carried out ten system accreditations up to August 2016, three of which were accompanied by a member of staff of the GAC. We cannot offer as yet a robust statistical evaluation of the data because different procedural rules by GAC were applied and case numbers are still relatively small. Having said that, we can deduce certain key points and the resulting challenges associated with system accreditation procedures, impacting on universities, expert groups and the agency:

One of the strengths of system accreditation is that the theme of “quality development and enhancement” in teaching and learning is placed strategically at the centre of the procedure, which strengthens an institution’s internal governance. The GAC regulations allow universities to design their own bespoke internal QA systems (centralised versus decentralised). Universities therefore are in a position to not only apply the GAC criteria but also to use their own criteria and benchmarks when assessing their study programmes. On the one hand, this system encourages the development of a quality system at a particular HEI; on the other hand there is a danger that formal criteria are only implemented on a purely technical level without achieving a real change of culture within an institution. There is a danger that too much focus has been put on the self-accreditation rights that universities obtain once they have successfully undergone a system accreditation.<sup>9</sup> This is the result of the explicitly intended equivalence between programme and system accreditation (or internal accreditation) which allows a study programme to be awarded the seal of the GAC once it has undergone the relevant quality assurance assessment. The award of the seal (awarded internally by the university) is perceived to be an expression of quality. This indication of quality implies that the respective study programme meets the quality criteria formulated by the GAC. A system accreditation therefore pays particular attention to the fact that the university fulfills the criteria in its QA system and regularly checks and ensures it. The university, in addition, has to clearly define once a study programme has gone through the QA system and has been awarded (or, possibly, withdrawn the seal). A few universities therefore mirror internally the mechanisms of a programme accreditation procedure (including an internal accreditation commission), so that there is little added value im compared to a programme accreditation carried out by an agency. If an university is able to build up knowledge and experience through a system accreditation procedure, real added value is created (as the accreditation expertise of an agency is “transferred” to the university). On the other hand, we perceive a danger that self-referential systems are being set up where universities embed all relevant aspects into their QA management systems. In doing so, however, they fail to make provision for an objective scrutiny which a programme accreditation procedure would deliver (for instance, regular reviews of module descriptors by the responsible departmental representatives without a further scrutiny; or scrutiny by the internal QA unit without involving the subject- specific expertise of the departments).

In past procedures we also experienced that some universities do not use the option of internally accreditating all of their study programmes. Instead, these institutions wish to continue using the programme accreditation for some of their study programmes. This often happens if the internal QA system appears particularly onerous (e.g. with regards to cooperation programmes or Joint Programmes) or if there are other forms of recognition associated with a programme accreditation (recognition by professional bodies, for instance architects). We have also been told quite openly by university faculty representatives that they perceive the assessments by an external agency as more objective and more helpful for the further development of their study programmes. These universities have stated that they wish to continue having access to a programme accreditation procedure whilst also wanting to participate in their own institution’s internal QM system. Many universities also fed back to us that they appreciate the academic exchange within a programme accreditation procedure because the expert panel is able to discuss the specifics of a particular academic discipline on an equal footing.

Against this background AQAS does not expect from the university to have an internal accreditation decision within the internal QA procedure. We also accept QA systems which foresee an external programme accreditation in certain areas.

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<sup>9</sup> The terminology „self accreditation“ or „self accreditating rights“ in connection with a successful system accreditation has not yet been properly embedded in the regulations of GAC. This terminology is found for the first time in the GAC papers of Drs. AF 58/2013 (measures of improving the information and communication of universities in connection with a system accreditation).

We also wish to note that the comparability between programme and system accreditation can only be fully achieved if system-accredited universities are required to publish the results and conditions of their internal QA procedures („internal accreditations“). This transparency would undoubtedly contribute to a greater acceptance of this procedure by the public. From our point of view the international acceptance of system accreditations and, linked to this, the international recognition of system-accredited study programmes, still remain unclear. We take the view that GAC should step up its networking activities (for instance through ENQA) in order to build up trust and confidence among the international Higher Education community in the robustness and validity of system accreditation procedures.

System accreditation procedures are highly complex procedures. The regulations of GAC are so abstract that it is sometimes difficult to do justice to the different types of universities and the varied mechanisms of designing QA systems. Expert groups must map these regulations onto the reality of a given university, so that it may take a while for benchmarks and standards to develop which can then function as a future point of reference. Based on our previous experience expert groups have generally been faced with QA systems which are still being developed at the time a system accreditation takes place, thus making QA systems more like a „work in progress“. Many documents and a lot of information have to be added throughout different stages of the accreditation procedure which, in turn, impact on the work of expert groups. The samples methodology (Stichproben) has proven to be very useful in this rather fluid context. Samples gathered in specific study programmes make the QA system more real, tangible and easier to deal with on an operational level. Also, tracing individual process steps in a study programme („Programmstichprobe“) has proven to be very useful.

The role of agencies, too, is evolving: due to the complexity of the procedure, the high abstraction levels and the overall lack of a broad-based knowledge among the expert panels, AQAS is fully committed to bring its experience and expertise to these procedures. High levels of professionalism will ultimately ensure that regulations are adhered to and complied with during procedures.

The binding documentation of procedures is a basic condition for a successful system accreditation. Universities are therefore faced with the challenge to formalise internal practices which they may have been using for years by putting them down in writing and to document individual process steps in a format that allows third parties to understand them.

A special focus of system accreditations is to embed external expertise into the internal QA system with which universities substitute the key element of a programme accreditation i.e. the peer review. Conditions are often issued in this area: for instance, the participation of all stakeholders; the impartiality of external reviewers aligned with the ESG; or ensuring systematically (in external reports for the award of the GAC seal) that all relevant themes that require an academic expertise have been fully dealt with and can be documented in reference to the appropriate criteria. A problem however is that procedures are fairly open as to which extent external feedback is binding. Universities themselves have to ensure that they are able to achieve objective decisions for potential measures in follow-up processes. Only then can a university's internal system accreditation replace a programme accreditation. Unfortunately, student experts are often not involved in external evaluations carried out by universities. The participation of students is restricted to their own students. We also observe with concern that universities especially tend to limit the participation and involvement of professional experts to a minimum. Even if universities have signed up to the stakeholder principle there is a danger of „displacing“ the above named expert groups.

It is almost impossible to ascertain - within the context of a system accreditation procedure - as to which extend a university's QM system influences individual study programmes throughout the whole institution. This measure lies within the responsibility of the respective system-accredited university. The litmus test to gauge whether a university's QM system really works in practice only kicks in if the

university applies for a system reaccreditation procedure. It can be assessed only at that point whether QM is lived within the university, if the expectations of the university have been met and if the QM has evolved into a pro-active steering element whose results on the study programme level are broadly comparable with the results of a programme accreditation. However, we see a danger that universities, by circumventing their own internal regulations and taking shortcuts for their internal accreditation, will prevent that all relevant criteria are properly and fully scrutinised.

Against this background we follow with great interest the further development of the procedural rules by GAC. From our point of view it would be helpful to introduce a “traffic light” system (red, yellow, green) to flag the different levels of maturity of QA systems when a university applies for the first time for a system accreditation procedure. Concerning the system reaccreditation procedures we firmly believe that procedures should focus more on the results of the internal quality assurance (i.e. the study programmes). This would also improve the comparability between the results of programme and system accreditation.

The growing number of system accreditations has led to changes in the market conditions for agencies. A shift from agencies to universities has taken place as universities are now in charge of organising and carrying out their own system accreditation procedures. This, in turn, will reduce the number of programme and system accreditation procedures that agencies co-ordinate. Competition for individual contracts with universities has also intensified. We regret that the growing competition for contracts has been undercutting quality in terms of cost and content. Competition is not expressed by professionally and carefully co-ordinated accreditation procedures and we are faced with a situation where some of our competitors make special allowances to universities which are incompatible with the regulations set by the GAC.

### **Appendices:**

#### **System Accreditation**

- AQAS sample contract for System Accreditation (III.20)
- Sequence of a procedure for System Accreditation (III.21)
- Sample of a budget for the procedure costs and invoice for a procedure (III.22)
- Sample initial report for preliminary assessment (III.23)
- Sample initialisation letter (III.24)
- Samples for proposals for experts profiles (III.25)
- Declaration of willingness to work as an expert (III.28)
- Samples initial reports (III.29)
- Sample for an on-site visit: first on-site visit (III.30)
- Sample for a short protocol for the first on-site visit (III.31)
- Sample for an on-site visit: second on-site visit (III.32)
- Template for the expert report (III.33)
- Decision rules for the System Accreditation (III.34)
- Sample of expert reports (III.35)
- Checking criteria for admitting universities to a System Accreditation procedure (III.36)
- Checking criteria for System Accreditation (III.37)
- Guidance note for the production of an application for admission to the System Accreditation procedure (initial checking) (III.38)
- Guidance note for System Accreditation (III.39)
- Composition of all expert groups in System Accreditation (III.40)

## **4 Peer-Review Experts (ESG 2.4)**

*External quality assurance should be carried out by groups of external experts that include (a) student member(s).*

Expert groups at AQAS are composed, as a rule, by representatives of institutions, the labour market and students. The number of experts and their profiles vary in programme accreditation procedures, depending on the subjects or subject groups which are going to be assessed. Programme accreditation procedures can also be more or less complex, taking all these factors into account.

AQAS takes great care to ensure that the broad range of subject areas covered in cluster procedures are well represented in the composition of the expert group. During accreditation procedures abroad there is at least one expert in the panel group who is well acquainted with the respective Higher Education system or has the appropriate language skills. The Accreditation Commission discusses the profile of the expert group when an international programme accreditation is initialised and takes an appropriate decision.

The GAC provides the general framework regarding the composition of the expert group in system accreditation procedures. The processes and criteria for the nomination and appointment of experts in programme and system accreditations are described in the relevant decisions of the Accreditation Commissions (see Appendices III.7 and III.27). Representatives from universities and/or academic institutes and organisations form the majority in these commissions.

### **4.1 Selection of experts**

Experts are selected in close coordination with the Accreditation Commissions who nominate the experts. The expert panels for system accreditation always have one international member in their groups in order to adequately take the international perspective into account. International experts occasionally take part in programme accreditation procedures. By involving international experts in both Accreditation Commissions the participation of international experts is encouraged. AQAS ensures that expert panels represent a suitable mix of already known and new experts as this facilitates a good transfer of knowledge and experience.

Student experts are recruited via the Student Accreditation Pool which is in charge of training students and qualifying them for an accreditation procedure. AQAS' experiences with the Student Accreditation Pool are varied. In general, student experts are well prepared and knowledgeable. It is striking though that the Student Accreditation Pool keeps proposing the same students, in particular for system accreditation procedures. We noticed here that some student experts are more interested in taking part in accreditation procedures rather than pursuing their studies (in some cases students who have already graduated enroll in other study programmes so they can continue to act as experts). As these students can no longer fully act from a student's perspective, AQAS refuses to appoint them. The Student Accreditation Pool proposes three student experts for each procedure and AQAS selects one of these.

Unfortunately, there are very few students from Universities of Applied Sciences who can be called upon to work as student experts. In addition, there are specific disciplines, such as theology, arts or medicine for which the Student Accreditation Pool cannot nominate any experts. In these cases, AQAS has to recruit its own student experts. Unfortunately, it sometimes takes a very long time to receive feedback from the Student Accreditation Pool which is due, according to the Pool, to their own internal decision processes. This can lead, at times, to delays in accreditation procedures carried out by AQAS.

## 4.2 Preparation of experts

Preparing experts for a concrete **programme accreditation procedure** follows two steps:

### *Step 1:*

All experts receive written information materials and specific guidance notes for the procedure explaining all aspects ranging from the role of experts to the AQAS travel policy (see Appendix III.6). Experts are also sent the AQAS programme accreditation brochure with information on the agency, an overview of all relevant decisions and requirements and a written summary of the application documents (see Appendix IV.1). For teacher training accreditation procedures experts are provided with an additional brochure containing all the key state-level (e.g. relating to the individual Länder) and teacher-training rules and decisions. These brochures exist for the following Länder: North Rhine-Westphalia, Lower Saxony, Rhineland Palatinate and Schleswig-Holstein (see Appendices IV.3-IV.6). All brochures are updated, if required.

### *Step 2:*

Each on-site visit is preceded by a half-day workshop preparing the expert group for the visit and in particular for any special features relating to the accreditation procedure. These workshops are very intensive and are chaired by the AQAS consultant in charge of the programme accreditation procedure. The workshops take place in conference rooms (mostly in hotels) and are separate from other agenda items (such as the evening meal). A sample of such a workshop and its contents can be found in Appendix III.10.

Preparing experts for a **system accreditation procedure** follows the same two-step model:

### *Step 1:*

After having been nominated and appointed as experts, the panel meets in the AQAS Head Office for a one-day preparatory workshop. The workshop aims to prepare the expert panel for the procedure and to familiarise them with the underlying criteria. A sample for a system accreditation procedure can be viewed in Appendix III.26. After the workshop the university's application documents and the brochure for system accreditation are sent to the experts, the latter containing all important decisions and requirements (see Appendix IV.2). We believe it is of key importance that experts first understand the basic concepts and criteria of system accreditation before assessing the application documents of a particular university. The on-site visit of a system accreditation procedure is also preceded by a preparatory meeting the day before in which the group goes over the details of the visit.

Based on AQAS' experience most experts have had previous knowledge of accreditation procedures (e.g. having acted as experts in committees or accreditation procedures). A general accreditation-related training, not focused on a particular university, would therefore not be necessary. As the German accreditation system relies on experts participating in a voluntary capacity it is important not to "push" experts too much. We received a lot of feedback by experts explaining that they would no longer be willing to act as experts for AQAS if they had to undergo a prior mandatory training. Furthermore, initial results of the INCHER-study "Quality assurance of learning and teaching through accreditation and evaluation procedures" show that experts appreciate the exchange and knowledge transfer with their fellow colleagues in the workshop as a good way of preparing them for a procedure. Experts consider bespoke expert workshops of lesser value, such as general "expert workshops". These findings corroborate our own experiences.

AQAS receives regular and systematic feedback by experts through the ZEM surveys (Centre for Evaluation and Methods) which focus on the quality-related aspects of accreditation procedures (see Chapter II.A.6.4).

#### **4.3 Impartiality of experts**

With regard to the impartiality of experts we refer to the details given in Chapter II.B.3. Criteria regarding experts' impartiality and confidentiality are explained in the "declaration of impartiality and confidentiality" document that experts have to submit to AQAS as well as the general brochures and the handouts for programme accreditation (see Appendices III.8, III.28, IV.1, IV.2 and III.6).

#### **Appendices:**

- Handout for experts in Programme Accreditation procedures (III.6)
- Nomination and appointment of experts in Progamme Accreditation (III.7)
- Declaration of impartiality and confidentiality by an expert (Programme Accreditation) (III.8)
- Sample for a preparatory workshop of an expert group (Programme Accreditation) (III.10)
- Sample for an experts' workshop (System Accreditation) (III.26)
- Criteria and processes for the nomination and appointment of experts for System Accreditation (III.27)
- Declaration of impartiality and confidentiality by an expert (System Accreditation) (III.28)
- Brochure for Programme Accreditation (IV.1)
- Broschure for System Accreditation (IV.2)
- Broschures teacher training education (IV.3-IV.6)

## 5 Criteria for outcomes (ESG 2.5)

*Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.*

Accreditation agencies which are entitled to carry out procedures in Germany have to comply with all processes and criteria for programme and institutional accreditation as adopted by the KMK (Kultusministerkonferenz/Standing Council of Cultural Ministers in Germany) and the German Accreditation Council (GAC). These processes and criteria are publicly accessible (for instance on the internet).

One **particular unique feature** of AQAS is that we haven't developed any agency-specific criteria for programme and institutional accreditation procedures beyond those adopted by the KMK and GAC. Therefore, all our **process materials** are closely aligned with the GAC criteria. We ensure that the academic standards of the respective scientific community are well embedded by experts into all programme and institutional accreditation procedures. Universities which represent differing but robust quality assurance concepts can also be accredited if they are able to make a strong case and the expert group can follow their line of reasoning.

Experts groups follow in all programme and institutional accreditation procedures the GAC criteria. The **checking criteria (Prüfkriterien)** developed by AQAS mirror the GAC criteria and contain sample indicators assisting to check whether a criterium has been fulfilled. With its key leading questions AQAS ensures that expert reports take account of the GAC criteria.

The AQAS Accreditation Commissions make their final decisions for programme or institutional accreditation based on the relevant and current decisions by GAC. Both Commissions have laid down their **decision principles** in an explicit resolution (see Appendices III.16 and III.34).

These decisions and materials are publicly assessible (in the form of brochures or by going to the AQAS homepage [www.aqas.de](http://www.aqas.de)).

From 2012 to 2015 GAC scrutinised 14 programme and two institutional accreditation procedures in line with its legal monitoring mandate. On average, two monita were picked up for each programme accreditation procedure (overall 28 monita); 53% of the GAC comments related to the documentation of a procedure. In only five instances, GAC commented on aspects relating to the accreditation processes. Only in a few individual cases GAC criticised that **conditions were missing** which had a direct impact upon the respective accreditation decision. In three cases AQAS was obliged to issue a retrospective condition in order to comply with the Lisbon Convention. We noted at the time that expert groups had great difficulty assessing whether the Lisbon Convention had been implemented at the respective university. Without experts having a legal background it seemed, at first, difficult to carry out a legal assessment as to which extent the Lisbon Convention had been incorporated in the relevant university documents as required by GAC. In the meantime, however, the situation has changed; it is now easy to assess if an institution complies with the Lisbon Convention because universities adopted appropriate parameters in their policy documents. Particular aspects such as the shifting of the burden of evidence (Beweislastumkehr) and the recognition of educational qualifications are being widely discussed on different levels of the Higher Education community.

In other individual cases the Accreditation Commission issued retrospective conditions which had often already been addressed, for instance in two cases the exam regulations were published directly after the accreditation decision.

With regards to the **procedural process** of AQAS GAC picked up on two basic areas:

- (1) According to GAC expert reports did not clearly separate between the recommendations proposed by the experts and the actual conditions.

In 2013 we introduced a new template for an expert report including a specific section for experts' recommendations (see Chapter II.B.6). There is now a clear separation between explicitly proposed conditions on the one hand and recommendations on the other ("potential for change" vs. "recommendations for further developing the study programme"). AQAS hopes that this practice will facilitate a better understanding of accreditation decisions.

- (2) In a few instances in the past, the Accreditation Commission for Programme Accreditations deliberately intervened in the wording of the experts report, introducing changes which were not fed back to the expert group. GAC banned this practice. This ban led to intensive discussions and irritation among members of the Accreditation Commission: the Commission made it very clear that it was not a committee that would simply „rubber stamp“ accreditations but that it would, where justified, remove polemical or irrelevant statements from an expert report, esp. in the view of the future publication. Based on the feedback by GAC AQAS amended its practice: the Accreditation Commission no longer intervenes with experts' assessments but requests that the expert group corrects any incorrect or misleading phrases. This procedure was adopted in the relevant decision of the AC<sup>Prog</sup> (see Appendix III.19).

Due to the low number of institutional accreditations and the resulting little experiential data we have to date, we cannot make any robust deductions. Feedback received for the previous monitoring procedures represent individual cases.

The GAC and KMK regulations do not apply to international accreditation procedures. In order to carry out international procedures the two Accreditation Commissions developed their own catalogue of criteria and specific indicators which are closely aligned with the ESG. Even in international accreditation procedures AQAS follows the principle that no subject-specific standards are a binding part of the criteria. Here too the expert group - as representatives of their respective *scientific community* – feeds their subject-specific standards into the accreditation procedure.

Criteria are published on the AQAS homepage.

#### **Appendices:**

- Rules about accreditation procedures (Programme Accreditation) (III.16)
- Resolution: Intervention into an experts report (Programme Accreditation) (III.19)
- Decision rules for Institutional Accreditation (III.34)

## **6 Reporting (ESG 2.6)**

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

### **6.1 Publication of reports**

All reports and formal decisions by the Accreditation Commissions are published on the AQAS homepage. They are also published in the GAC database (with a link to the report).

Over the course of the last accreditation period AQAS fully complied with the requirement to publish the reports by the experts. The internal process stipulates that reports are published on the AQAS homepage once the deadline to lodge an appeal has passed i.e. around four weeks after the final documents have been sent to the university. Within the context of a monitoring review GAC advised us that this procedure works well. In order to use staff and time resources efficiently, reports are uploaded in batches to the AQAS website.

Once reports have been published on the AQAS homepage, the accreditation decisions for individual study programmes are entered into the GAC database for accredited study programmes. This has proven, once again, to be a very cumbersome and time-intensive procedure over the course of the previous accreditation period. There are a number of reasons for this. The database often shuts down or there is a mismatch between the titles of study programmes as listed in the GAC database and the official titles of accredited study programmes. In other cases, the university failed to set up a record on the GAC database. These problems often lead to delays as we have to contact the university first, explaining why they have to change their record; we then have to follow up on our request, ensuring that the record is correct so we can enter our data. In addition, there are particular issues around teacher training programmes (due to the specific nature of “cluster” accreditations), leading to considerable problems when setting up records for these programmes on the GAC database.

GAC expects that records for all accredited study programmes have been entered on the database within six weeks of the accreditation decision. Taking into account the timeframe within which an appeal can be lodged, the timescale of six weeks is effectively reduced to two which is completely unrealistic. We therefore believe that a deadline of six weeks is acceptable once the deadline to make an appeal has passed.

Using the GAC database on the operational level has been a challenge for us for a number of reasons. We can either no longer find specific data sets or records have been changed (not by us) and without our knowledge. Other agencies confirmed us in these findings. Since 2008 we have been raising these problems with GAC on numerous occasions, however, these issues still remain unresolved today. In June 2016 GAC launched a beta version of their database informing us that this version would present “a more accurate picture of the self-accrediting rights and the information needs within system accreditation”. We were also advised that the beta version would be “more user-friendly”. We run internal tests on the beta version which showed that previously entered records were no longer there (for instance study programmes of the University of [...] which went through a system accreditation). We therefore set up a new record which, when running another check, had disappeared as well. Up to the end of June 2016, we had re-entered the record for [...] seven times (!) in total.

In their report initialising our self-accreditation procedure GAC claimed that AQAS had failed to properly maintain the database. GAC expressed the expectation that we would improve our data entry procedures, ensuring that records were entered in full and on time. We strongly reject this criticism but expect in turn that GAC runs a fully functional, robust and reliable database. Agencies cannot be expected to regularly check if a record that was set up before is still in the database.

## **6.2. Structure of AQAS reports**

The **guidance note** that AQAS developed for experts participating in programme accreditation procedures describes the basic points of an experts report. The format and structure of these reports are discussed in the preparatory workshop which precedes the on-site visit. For institutional accreditations these workshops last a whole day.

The reports produced by the expert groups follow a specific structure that was developed by AQAS and agreed by the appropriate Accreditation Commission. We put great emphasis on the fact that experts write up the evaluating parts of the report on their own. AQAS designed a template for this purpose. This template presents a snapshot and short descriptions of the university's current situation based on the institution's self-evaluation report (**description**). Based on the key questions of AQAS the expert group analyses and assesses the individual chapters (**assessment**). This process ensures that all key criteria are assessed in the evaluation and that the Accreditation Commission has a consistent base on which to make its decision. There aren't yet any key questions for institutional accreditations as procedures vary from case to case. Experts are encouraged to highlight QA aspects that work well within an institution or study programme (best practice samples) and to raise and query issues that have a potential for change. The relevant templates can be found in the Appendix (see Appendices III.14 and III.33).

In 2013 agencies agreed on a common set of standards to ensure the comparability of expert reports. The standards describe the basics, the content and the recipients of a report. The preparatory workshops cover what is expected of experts in the accreditation procedures.

### **6.2.1 Programme accreditation**

Within the context of monitoring AQAS by GAC, GAC requested that the decision of the Accreditation Commission for Programme Accreditation (AC<sup>Prog</sup>) would be separated more visually from the actual report. The AC<sup>Prog</sup> adopted a template for the final report, taking into account the recommendations made by GAC:

The report's cover page lists the **members of the expert group**, with their names and institutions. Next follows a clause which refers to the underlying criteria of the procedure. The following section covers the **steps of the procedure**. The section "general information" is used to describe how **the study programme is embedded into the overall university context**. This is followed by the actual assessment of the study programme divided into chapters as outlined below (see Appendix III.13):

- Profile & aims,
- Quality of the curriculum,
- Study feasibility,
- Professional orientation,
- Staff and material resources
- Quality assurance.

The alignment of the GAC criteria with these chapters can be viewed in Appendix III.13. The follow-up measures and improvements proposed by the expert group are summarised in a specific section (**summary of the monita**). The expert group's decision is then put down in a written document where all those aspects that do not comply with the GAC criteria are aligned with the respective criteria. The expert group recommends the accreditation to the Accreditation Commission (with or without conditions) or recommends that the accreditation is refused. Alternatively, a suspension of the procedure can be recommended. The **final decision of the Accreditation Commission** precedes the expert report, thus being separated visually from the text written by the experts. The decision includes explicitly all conditions and recommendations which are based on the monita of the expert group. The Accreditation Commission explains its decision if it contrasts with the vote by the expert group. Samples of complete expert reports can be viewed in the Appendix (see Appendix III.15).

The structure of the expert report developed by AQAS differs from that proposed by the criteria of GAC because the GAC criteria are not consistent and transparent, overlapping in parts (e.g. requirement of subject-specific and cross-disciplinary competences in criterium 2.4 and 2.5; taking account of student needs in criterium 2.3, 2.4 and 2.8). According to our experiences experts cannot follow this line of reasoning. This is also borne out by the survey which has been conducted internally by AQAS, looking at how well conditions were aligned with the GAC criteria (see Chapter B.3.1.10). In the context of reworking their rules and regulations GAC already announced that they would be improving their criteria. Once these changes are adopted, AQAS would welcome if the structure of expert reports would mirror these changes.

As expert reports in international procedures do not follow the requirements set up by GAC AQAS developed its own template for expert reports which, to a large extent, closely follows the GAC format. The AQAS report template ensures that a high degree of transparency and comparability is maintained between individual international programme accreditation procedures. AQAS extensive experience in national accreditation procedures served in good stead. Each chapter maintains the separation between description and evaluation. The report ends by summarising the “findings” by experts and includes a recommendation for a decision for the Accreditation Commission. A sample for such an expert report can be found in the Appendix VI.6.<sup>10</sup>

### **6.2.2 System accreditation**

All experts' names are listed on the cover sheet of reports for institutional accreditation procedures, thus mirroring the practice for programme accreditation procedures. Names are followed by a description of the procedural processes as well as by a short profile of the university in question. This is followed by an overview of the procedures highlighting key aspects in chronological order. The focus here is on the evaluation of the QA system within the context of a “system analysis”. Next, the results of the samples are described. A detailed evaluation of the QA system in line with the GAC criteria for system accreditation as well as a recommendation for decision for the Accreditation Commission complete the report.

The structure is as follows (for details please refer to the Appendices):

**I. Basic concepts of the procedure**

**II. Short profile of the university**

**III. Sequence of the procedure**

- A. Initial examination
- B. Institutional accreditation
  - 1. The first on-site visit
  - 2. The second on-site visit (incl. taking samples)
  - 3. Results of the institutional accreditation
    - 3.1 Aims of the internal QA system of the university
    - 3.2 Structure, responsibilities and resources
    - 3.3 Achievements of the internal QA system
    - 3.4 Internal and external transparencies
- C. Summary of the results of the samples

**IV. Scrutiny of the GAC criteria for institutional accreditation**

**V. Recommendations for accreditation by the expert group**

The final **decision by the Accreditation Commission** precedes the evaluation and is visually separated from the assessment of the expert group. The decision comprises all conditions and

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<sup>10</sup> For Oman a new structure for the expert report was introduced which is ESG oriented.

recommendations relevant for the accreditation which are based on the merits of the expert group. The Accreditation Commission explains its decision where it differs from the vote of the expert group. A sample for a complete evaluation can be viewed in the Appendix (compare Appendix III.35).

In the two cases where GAC scrutinised institutional accreditation procedures carried out by AQAS, the main criticism referred to a **lack of robust documentation** in the expert report. GAC criticised that the expert report failed to mention that the university's mission statement/vocational profile had been published. AQAS was able to demonstrate that all points picked up by GAC had been assessed during the accreditation procedure. Hence, there were no consequences for AQAS in terms of its procedural processes.

Institutional accreditation procedures are notoriously complex. By having developed a bespoke template for expert reports AQAS met its aim to simplify and streamline procedural processes. The template is divided into several parts. In Chapter B AQAS seeks to address and appreciate the QA system of the respective institution; Chapter C provides an overview of the sequence of the procedure, detailing all intermediary results; Chapter IV takes account of the GAC criteria. The GAC criteria are listed verbatim in this Chapter. The expert group states for each criterium whether it has been fulfilled and justifies its decision based on its previous assessment. We are convinced that we have put all measures in place to ensure greater transparency and comparability of decisions taken by the Accreditation Commission, so that the interested public can follow the line of reasoning taken by experts in their reports. GAC stipulates that agencies must reach out to the public in institutional accreditation procedures.

#### **Appendices:**

- AQAS-Categorisation for the criteria for Programme Accreditation (III.13)
- Template expert report for Programme Accreditation (with guidance notes for experts) (III.14)
- Sample reports for Programme Accreditation (III.15)
- Template report for Institutional Accreditation (III.33)
- Sample report for Institutional Accreditation (III.35)
- Sample report for Programme Accreditation (VI.6)

## **7 Complaints and appeals (ESG 2.7)**

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

On 09.2011 the AQAS Management Board adopted a complaints and appeals procedure for programme and institutional accreditation procedures. This policy was updated on 15.06.2015 (compare Appendix I.17). AQAS informs universities about the complaints and appeals processes according to section 21 for programme accreditation procedures (see Appendix III.2) and section 29 for institutional accreditation procedures (see Appendix III.21). The underlying regulatory framework forms part of the contract between AQAS and the university. Hence, universities can lodge justified complaints and appeals within four weeks. Complaints and appeals may refer to the composition of the panel of experts, expert reports, the nature of the accreditation process or the actual accreditation decision. The accreditation procedure will then be tabled again at a meeting of the appropriate Accreditation Commission (AC Prog or AC Sys). If no decision can be reached, the AQAS Appeals and Complaints Commission will take the matter forward.

In line with § 9 of the AQAS statute the Complaints Commission is tasked to evaluate complaints and appeals by universities and to reach a final decision. The Commission is only called upon in cases where decisions taken by one of the Accreditation Commissions have been appealed against and where no resolution in a prior meeting of the appropriate Commission could be found.

The inaugural meeting of the Appeals and Complaints Commission took place on 15.05.2013. The Commission to date only met once in 2015. In addition, two decisions were taken by written circulation. One complaint resulted in legal action. During the previous accreditation period two complaints were brought to the administrative court of Cologne (independent of the complaint mentioned above). The Court decided in favour of AQAS resulting in the university withdrawing the other complaint. The case was closed. The AQAS complaints and appeals procedure has been published on our website.

Our experience shows that appeals by universities can normally be solved by the relevant Accreditation Commission. The Complaints Commission only intervenes in a very few individual cases. This raises the question (taking our experiences into account) if the Complaints Commission is not better placed on a central level within the German accreditation system (for instance at GAC).

### **Appendices**

- Complaints and appeal procedure (I.17)
- Sequence of a procedure (Programme Accreditation) (III.2)
- Sequence of a procedure (Institutional Accreditation) (III.21)

## **C. Additional criteria for recognition in Germany**

The reaccreditation of AQAS is formally based on the criteria of GAC adopted in the version of 10.12.2010. We included a matrix (see Appendix V.5) aligning the ESG criteria with the GAC criteria which we hope will facilitate the orientation.

The explanations which follow below refer to the fulfilment of the “Additional criteria for the recognition in Germany”, based on section 4 of the draft version for the new regulatory framework of GAC for the accreditation of agencies in Germany of 30.05.2016. The draft has not yet been adopted by GAC. In a letter dated 13.07.2016 GAC requested that AQAS would consider these criteria in their SER.

**4.1 In order to carry out programme and institutional accreditation procedures an agency has to provide evidence that it has binding internal structures and processes in place which ensure the correct and consistent application of the „GAC rules for the accreditation of study programmes and institutional accreditation procedures“ in its current version. The agency signs a contract with GAC according to § 3 ASG.**

AQAS has robust structures and processes in place which have been developed over many years of practice in programme and institutional accreditation procedures. These structures and processes are continually being refined. The relevant sequences within programme or institutional accreditation procedures have been adopted by the appropriate Accreditation Commission (AC Prog or AC Sys) and comply with the requirements of GAC. AQAS supports universities by providing guidance notes and a checklist for procedures which are aligned with the requirements set by GAC and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany (KMK). This ensures that the „GAC rules for the accreditation of study programmes and institutional accreditation procedures“ in their current version are consistently applied

➔ see Chapters II.A.6.5, II.B.2.4, II.B.3.

Every five years AQAS undergoes its reaccreditation by the GAC in order to obtain permission to carry out programme and institutional accreditation procedures and to award the seal of the GAC. A contract between AQAS and GAC forms the basis of our work. The most up to date version of the contract was signed by AQAS in June 2013.

➔ see Chapter II.A.7.

**4.2 The agency has its own legal personality.**

Since 24.01.2013 AQAS e.V. has been registered as an association under the number VR 17554 in the register of associations at Cologne district court. AQAS is recognised as a not-for-profit organisation.

➔ see Chapter II.A.2.

**4.3 The agency is a not-for-profit organisation and carries out accreditation procedures on a full cost basis.**

AQASe.V. is not allowed to make profits being a non-profit organisation. However, AQAS is a company under private law which has to finance itself and work on a full-cost, cost-recovery basis. Therefore AQAS basically works with lump sums to keep the administration costs low. These lump sums have been checked empirically in an exemplary project time recording and have proven to be realistic.

➔ see Chapters II.A.2, II.B.2.6.

**Procedures for a full-cost recovery basis:**

**Calculation Programme Accreditation**

[...]

**Calculation Institutional Accreditation**

[...]

#### **4.4 The agency accredits all types of universities and all subjects and disciplines within programme accreditation procedures.**

Since 2002 AQAS has been carrying out programme accreditation procedures in all disciplines and since 2008 institutional accreditations at universities and universities of applied sciences. Since the agency was set up we accredited over 5.000 study programmes and 10 Higher Education Institutions (system accreditation).

➔ see Chapter II.A.1.5.

#### **4.5 An appropriate and binding regulatory framework is in place which governs the competencies and responsibilities of the agency's committees as well as their staff resources. Representatives of the academic community, students and professional practice participate in expert groups and committees. Academic representatives have the majority of votes.**

The AQAS statutes set the rules and regulations for the competencies and responsibilities of AQAS' committee structure. The committees are as follows:

- the Member Institutions,
- the Management Board,
- the Accreditation Commission for Programme Accreditation (AC<sup>Prog</sup>),
- the Accreditation Commission for Institutional Accreditation (AC<sup>Sys</sup>) and
- the Complaints Commission (BK).

All commissions and expert groups at AQAS are based on the stakeholder principle in order to fully represent the different perspectives of all relevant parties in an accreditation procedure (academic community, students, professional practice). Academic representatives have the majority of votes.

➔ see Chapter II.A.1, II.A.3.3, II.B.7.

#### **4.6 The agency publishes its internal procedures for appeals and complaints.**

On 26.09.2011 the AQAS Board adopted the Appeals and Complaints Procedure within the context for programme and institutional accreditation procedures. It has been published on the AQAS website.

➔ see Chapter II.B.7.

#### **4.7 If the agency sub-contracts other organisations to carry out parts of a procedure the agency has to ensure that binding mechanisms and written documentation are in place to safeguard a correct implementation.**

AQAS e.V. interprets this criterium to mean that an external organisation (for instance another agency) can be contracted out to carry out parts of a procedure in the name of AQAS. This could be within the context of a system accreditation where AQAS could ask another agency to carry out a sample (e.g. sample in teacher training programmes). AQAS has never contracted out parts of its work and does not intend to do so in the future.

AQAS ARCH GmbH is not considered to be an external organisation with which AQAS e.V. would have to agree on specific agreements as AQAS ARCH would normally use materials and staff resources provided by AQAS e.V.

#### **4.8 As a general rule the agency uses the German language in business field of GAC.**

Procedures in Germany are conducted on principle in the German language.

#### **Appendix:**

- Matrix fulfillment of criteria of GAC (V.5)

### **III. Outlook**

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After having finalised our SER in August 2016 there was still a considerable degree of uncertainty about the future of the accreditation system in Germany, following the decision by the Federal Constitutional Court earlier that year. The decision of the Federal Constitutional Court does not call into question the fundamental justification of having an accreditation system in Germany, but its legal basis; nonetheless, this decision has triggered off a substantial political debate around the shape and form a future accreditation system could take. As regards the Court's decision to give academics a decisive and much stronger voice in accreditation procedures, AQAS finds itself already well-positioned. Unlike GAC AQAS has ensured, right from its inception, that academics form the majority voice on all its internal committees. AQAS however is not in a position to influence changes in future legislation as these fall within the scope of the German legislature. It remains to be seen how AQAS will be operating in the future and in which legal structure.

Apart from the issues outlined above, the public debate brought two key questions to the fore.

How can accreditation procedures be shaped and re-aligned towards a much stronger QA development process on the institutional or programme level? We hope to be able to contribute to this discussion by participating in the experimental clause (Experimentierklausel).

Who should make the final accreditation decisions – would this task remain within the remit of the agencies or would GAC take on this role? We cannot see any real improvement by the suggestion that GAC should make all final decisions. In view of the high number of annual decisions through the ten agencies operating in Germany we doubt that GAC would be able to fully take on this role. GAC would have to concentrate on a few problematic cases. This would result in additional bureaucracy for all other accreditation procedures, leading to an increase of costs and time delays without offering any added value.

The competition between agencies would remain in this proposed model. We believe that competition remains important; on the one hand, to allow universities - in the spirit of cooperation and trust - to choose the agency that best fits them or to switch from one agency to the other. On the other hand, competition enables to continuously shape processes and develop materials in terms of quality enhancement.

Our task over the coming months will be to prepare AQAS for the changes outlined above. We have already started work in reviewing the statute regarding the composition of the Accreditation Commission for System Accreditation in order to react more flexibly to changes in the framework we are operating in. The work of our internal ESG working group matching the AQAS procedural materials with the new ESG will be continued. The aim is to align our instruments for procedures in Germany with the ESG and the new regulations of GAC as soon as they are decided on.

On the procedural level we would like to use our experiences gained in system accreditation procedures to develop key questions for experts assisting them in writing up their reports. In Germany institutional accreditation procedures are often viewed as an alternative to programme accreditation. Both procedures differ a lot from each other. Whereas programme accreditation is focused on a specific subject area, which can easily be dealt with by the expert panel during the two days on-site visit, institutional accreditation procedures focus on aspects of quality assurance processes, gauging if they are have been implemented at a university and if they are operating effectively. The main advantage of a programme accreditation procedure is that the expert panel, which includes all relevant stakeholders, represents the same discipline for which accreditation is sought. Thus the expert group is able to discuss all formal and informal aspects with faculty representatives. Programme accreditation procedures take place within the department/faculty or the institute and will affect changes on these levels. From AQAS' point of view programme accreditation will remain an important alternative to institutional accreditation and should therefore be adequately considered in the new regulatory framework of GAC.

The work of AQAS ARCH GmbH will be further developed and intensified. Although AQAS ARCH has been operating since 2015 we could only take on a limited number of projects due to capacity issues. We are currently training consultants and developing their expertise, so they can take on new projects for AQAS ARCH in the future, such as consultancy projects or workshops. AQAS aims to expand its portfolio of services over the next five years so that AQAS ARCH would be financially viable and operating independently of AQAS e.V. The focus will be on international consultancy projects as well as bespoke training workshops within the quality assurance area.

Overall, we perceive AQAS to be well placed to face future challenges in national as well as international educational contexts.

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<sup>i</sup> The plural or singular "expert/experts" includes both men and women.

<sup>ii</sup> Also referred to as AC Sys



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