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**Accreditation Council Strategic Planning for the Period of Office 2013-2017**

Resolution of the Accreditation Council adopted on 13<sup>th</sup> December 2013

**Summary**

As a result of its 77<sup>th</sup> meeting, which took place on 13<sup>th</sup> December 2013, the Accreditation Council adopted the strategic focus of its work for the period of office for 2013-2017 and acted on the recommendations made by the German Council of Science and Humanities, the higher education institutions and the Länder, as well as many other additional partners. It aims to change its focus within the context of the existing structures.

- After a phase of formal and structural reforms in teaching and learning, the discernible academic quality, quality development and quality assurance shall now become the focus of its work.
- The academic feasibility of study programmes, national and international mobility for the students, the specific research basis for Master's study programmes and academic and professional concerns are all important aspects of this academic quality.
- The aim is to improve the ratio of cost and benefits with regard to programme accreditation and with regard to system accreditation, to collaborate with the higher education institutions closely. This may also involve other forms of external quality assurance as part of a "trial clause".
- Particular attention will be paid to internationalisation of quality assurance at German higher education institutions and the development of a professional community of experts.

**I. Introduction**

In terms of its legal remit to organise the system for quality assurance in teaching and learning by means of accreditation, the Accreditation Council makes an important contribution to the assurance and the (continued) development of the academic quality in the European and German higher education area.[1]

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[1] Cf. the duties of the Accreditation Council www.akkreditierungsrat.de/...aufgaben.

By addressing questions about the quality of teaching and learning, and bringing these into the public discourse, it plays an important role as an active partner to the relevant stakeholders - higher education institutions and students, government and professional practice and it is a recognised decision-maker within the national and international system of higher education.

During the period of office for 2009-2013, the Accreditation Council gathered suggestions arising from its own work and also on the part of third parties in terms of how it can further improve its work and procedures and can adapt to the changing framework conditions. This information was addressed in the present planning for the strategic focus of its work during the period in office for 2013-2017 and will be incorporated as part of continuing quality development in its future work. Above all, the numerous incentives and comments on its work provided by the German Council of Science and Humanities, the German Rectors' Conference, the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder, the student bodies and the social partners, as well as the international group of experts as part of the European Association for Quality Assurance evaluation, have provided a particularly valuable and essential basis for the strategic development process.[2]

The Accreditation Council will regularly report to the interested members of the public on the implementation of strategic planning, as well as its realisation within the existing capacities and financial circumstances.

## II.  Stocktaking and Guidelines

### Stocktaking

Quality assurance has been established as an instrument to assess, ensure and improve the performance of the higher education systems in its present form.

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[2] Cf German Council of Science and Humanities recommendations on accreditation as an instrument for quality assurance at www.wissenschaftsrat.de; the German Rectors' Conference recommendations on the further development of the accreditation system at www.hrk.de; the policy document from the association of student bodies, the fzs, on the further development of quality assurance and quality development at www.fzs.de; the findings of QUEST, the ESU project for quality for students at www.esu-online.org; the higher education policy papers on business at www.arbeitgeber.de/.../Hochschule_der_Zukunft and www.arbeitgeber.de/../Bologna@Germany2012; the Confederation of German Trade Unions (DGB) higher education policy programme at www.dgb.de, as well as the union for the network of experts' benchmark paper on the continuation of the Bologna Process and the further development of accreditation at www.gutachternetzwerk.de.

In addition to this, quality assurance was defined as one of the central objectives for the Bologna Process[3]. The accreditation of study programmes had already been introduced in Germany prior to this.

Accreditation and the structural reform of study programmes (levels, modularisation, the introduction of testing to accompany the studies, etc.) occurred at the same time in Germany. Therefore, to date, the development of the accreditation system has been characterised by the implementation of this reform. This implementation phase has largely been completed so that the remit of the accreditation has been changed. The Accreditation Council will actively design this process.

**Guidelines**

The Accreditation Council associates with the opinion of the German Council of Science and Humanities and will place greater emphasis on the academic quality . This shall also include a restructuring of the relationship between higher education institutions, agencies and the Accreditation Council. The Accreditation Council correspondingly aims to complement its previously regulatory and supervisory role, by adding the role of a dialogical working committee in terms of the German Rectors' Conference considerations. With regard to corresponding international experiences, the Accreditation Council also maintains that both the monitoring and the quality development areas can be combined under the umbrella of the same institutions and procedures. For its current period of office, the Accreditation Council acts on the assumption of an institutional stability within the accreditation system[4] and, in this area, it also complies with the German Council of Science and Humanities which considers a substantive restructuring in terms of the existing structures as possible.

The Accreditation Council stresses that academic quality can only be provided and experienced within higher education institutions. The external evaluation is to increasingly adopt the role of a helpfully critical partner. This is currently opposed by the fact, that in many places, but not everywhere, accreditation (primarily programme rather than system accreditation) is perceived as an instrument to be used exclusively for control. All stakeholders, especially the Accreditation Council, agencies, higher education institutions and the Länder contributed to this in terms of their practice. In order to successfully realign the accreditation, restructuring changes need to be made, both in the procedural practices and in the procedural culture:

- Compliance with the applicable regulations for study programmes should increasingly become a natural course of action. Nevertheless, the accreditation procedure should continue to be able to adequately monitor compliance with regulations.

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[3] Cf. www.bmbf.de/pubRD/bologna_deu.pdf, pgs. 3-5.
[4] Subject to the decisions of the German Constitutional Court in case 1 BvL 8/10.

- A change in mind-set is required for all parties involved, so that the formal and structural reform phase has largely been concluded and the focus is now on "academic quality". This includes the professional and social mobility.

There must always be an awareness of the constraints of quality assurance that cannot change the general higher education policy and financial framework conditions within which it operates.

The Accreditation Council supports both the fact that quality development and quality assurance are moving closer together and the active development of the cultures of quality in higher education institutions, as well as between higher education institutions and external assessors. In connection with this, the Accreditation Council has pledged to widen the meaning of the seal issued by the Accreditation Council as a mark of discernible academic quality.

## III. Academic Quality

Within the structure of the relationship of academia – profession – person – society, academic quality extends beyond compliance with structural guidelines for study programmes. The Accreditation Council intends to support the understanding of the different dimensions of academic quality and will address this with a focus on the following aspects.[5] The particular requirements in teacher training will be taken into account in the same manner as specifics of other fields of study, where the restructuring of the study programmes and their accreditation have been less advanced until now. This includes, for example, study programmes at higher education institutions for art and music.

### Academic feasibility

The student protests of 2009 were not least sparked by the lack of academic feasibility of many of the new tiered study programmes which had often also been accredited. As a reaction to this, the Accreditation Council has introduced academic feasibility as a separate criterion. Although the "Studienqualitätsmonitor" shows an improvement in the 2008 to 2012 evaluation, it cannot be satisfied with the fact that still only about half of all students provide a positive review of the organisation and structure of the study programmes.

The Accreditation Council aims to hold dialogues with, for example, higher education institutions, agencies, students, professional practice and stakeholders as part of the Quality Pact

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[5] This should also include the stakeholder-based approach of the German Council of Science and Humanities (WR 2008, pg. 19f.) and the "student experience" approach of the DZHW quality monitor. Issues regarding the ability to transfer between academic and professional education, as well as the social dimension, can be also taken into account within this context.

for Teaching, in order to discuss good practice when designing study programmes which are academically feasible, whilst also taking issues of social mobility into account.

**Mobility**

Mobility, understood here as geographical mobility, forms part of the core pledges, not only for the Bologna reform, but also for the German discussion on higher education policy reform in the 1990s. The Accreditation Council is aware that there is a conflict between the intended differentiation in both the content and structure of the study programmes and trouble-free mobility. Mobility, without the need to pay transaction costs, would most likely be guaranteed in Europe or globally for study programmes fully-standardised which can neither be realised, nor are desirable.

Within this context, the Accreditation Council wishes to discuss mobility, as well as academic feasibility, with the relevant stakeholders. It will particularly address the transition from a bachelor's degree to a master's degree and analyse how obstacles to mobility can be removed like, for instance, when transferring between different types of higher education institutions, or when there is lesser affinity between the bachelor's and master's degree programmes in terms of subject matter.

**Specialised research basis for Master's study programmes**

The German Council of Science and Humanities and the Standing Conference of the Länder have advised that the accreditation should pay greater attention to the specialised research basis for Master's study programmes. The Accreditation Council, agencies and higher education institutions should jointly discuss possible measures.

**Academic and professional concerns**

The two central quality criteria "scientific or artistic qualifications" and also "competence to take up a qualified employment" are at the heart of the working group on "academic and professional concerns", initiated by professional practice at the end of 2012. In 2014, the working group is expected to provide the Accreditation Council with a report on the role of these criteria in the accreditation procedure and on the possibility of placing greater emphasis on these areas.

## IV. Programme Accreditation

Regardless of the successful implementation of system accreditation (cf. V), many higher education institutions continue to use programme accreditation. For this reason, it is necessary to continue to develop the quality of this procedure in terms of the above mentioned guidelines.

The Accreditation Council will address the issues of not only how costs could be reduced, but also where there could be increased benefit. Among others, the following aspects could be highlighted:

- Potential for improvement: A survey conducted by the German Rectors' Conference in 2010 showed that faculties generally perceive (possible) benefits with regard to the academic quality. However, this has often not (sufficiently) been put into place due to a variety of factors[6]. Any impeding factors should be identified and restricted in collaboration especially with agencies and higher education institutions.

- Programme reaccreditations: In collaboration with higher education institutions and agencies, methods should be identified how to better align these procedures towards assessing and developing academic quality.

- Quality of reports: In 2013, the agencies worked on standards for review reports which have been approved by the Accreditation Council and which will be published in the foreseeable future. This could increase the benefits of reports for all the parties involved.

- Reduction of effort: It should be parsed in greater detail from where the efforts related to the accreditation arise. Which efforts arise from the actual accreditation procedure, which are more likely to arise from the general curriculum design (and could not seriously be attributed to the accreditation), and, in higher education institutions, what are the best practices for utilizing and organising accreditation in order to minimise additional efforts.

## V.  System Accreditation

Fortunately, the interest in system accreditation has continued to grow. Previous experience highlights that system accreditation can sustainably strengthen the autonomy of the higher education institutions and the self-responsibility for study programmes offered.

The Accreditation Council is of the opinion that the rules for system accreditation, which were last adapted in February 2013, form a suitable basis for the initial system accreditation. However, in preparation for the initial system reaccreditations, advice on possible modifications should be sought, particularly on the basis of the existing experiences of the agencies and the system-accredited higher education institutions. The certification of partial steps on the pathway to system accreditation will also have to be discussed.

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[6] Cf. articles on higher education policies 8/2010, pgs. 47-57.

The fact that higher education institutions with system accreditation handle their freedom to award the seal of the Accreditation Council for their study programmes in a responsible manner and, in particular, the fact that these study programmes continue to conform to the applicable quality criteria are deciding factors for the future success of system accreditation. Until now, there has been no direct relationship between the Accreditation Council and the higher education institutions accredited. It must be verified whether the relationship Accreditation Council/agencies/higher education institutions should be realigned in view of the facility for higher education institutions to award the seal. Among others the following points should be considered:

- The Accreditation Council performs ad-hoc monitoring for study programmes with programme accreditation. A similar instrument could be introduced for study programmes at system-accredited higher education institutions which hold the Council's seal.
- The Accreditation Council could consider accompanying and/or monitoring all system accreditation procedures.
- In terms of the German Rectors' Conference's concept for quality audits for institutions, and resembling the Dutch system, in the long-term and with different responsibilities, the Accreditation Council could either carry out the system accreditation procedures itself or make the decision on the awarding of the seal on the basis of an evaluation by an agency.

In many cases, it appears that the system-accredited higher education institutions deal constructively with the assurance and development of quality within teaching and learning. The Accreditation Council regards these higher education institutions as new and important partners when performing its dialogue and network functions (cf. II.). It will approach these higher education institutions in order to jointly develop suitable forms of co-operation. This should also include discussion on whether and how the higher education institutions include study programmes which are not part of the Bachelor and Master degree system (law, medicine, partially teacher training) in quality assurance.

At the same time, it will be necessary, and has also been called for within the framework of the international evaluation, to thoroughly scrutinise the system accreditation and its effects. The Accreditation Council will recommend the agencies and the system accredited higher education institutions to involve an external evaluation and to jointly develop an assessment order.

## VI. Experts

As with any evaluation which is dependent upon *peer review*, the quality of the result for the programme and system accreditation depends to a significant extent on the experts. The Accreditation Council plans to focus on the following areas:

- Until now, no noticeable community of qualified higher education lecturers with a particular interest in teaching and learning has been formed by the group of experts in programme accreditation. There needs to be discussions with agencies and higher education institutions, and particularly with the actual experts, to find options to achieve progress in this area.
- The German Council of Science and Humanities has suggested that the competition amongst the agencies to find suitable experts and their separation could be detrimental to the overall system. The Accreditation Council will consider holding a full list of experts and supporting the development of a professional community.[7]

## VII. Trial Clause

The German Council of Science and Humanities has suggested trying other forms of external quality assurance by using a trial clause under the supervision, and with the approval, of the Accreditation Council.[8] The Accreditation Council will act on this suggestion, promptly discuss on the precise framework conditions and call for proposals.

## VIII. Becoming More European and More International

The Accreditation Council endorses that the quality assurance at German higher education institutions becomes more international. In so doing, it takes account of the recommendations from the international evaluation, as well as the internationalisation strategy, proposed by the federal government and the Länder. On this basis, it will draft its own internationalisation strategy which could include, inter alia, the following issues:

- The accreditation of *joint programmes* is to become easier. There is already a pilot project for this in cooperation with the Netherlands. In addition to this, a general proposal will be developed as requested by the federal government and the Länder.[9]

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[7] Cf. www.wissenschaftsrat.de/download/archiv/2259-12.pdf, pg. 81.
[8] Cf. www.wissenschaftsrat.de/download/archiv/2259-12.pdf, pg. 83f.
[9] Cf. www.kmk.org/.../2013_Strategiepapier_Internationalisierung_Hochschulen.pdf, pg. 4.

This should not only refer to the European higher education area, but also include the approval of decisions from agencies outside Europe.

- It should be checked whether the seal of the Accreditation Council can also be awarded by approved agencies for study programmes that have been established abroad and are not in accordance with German law, but which still fulfil the criteria of the Council and the common Structural Guidelines of the Länder.

- Since its foundation the Accreditation Council has had the role of issuing approvals for agencies active in Germany which has now found a European equivalent in terms of the EQAR register. For the agencies located in Germany, the Council acts as a "supplier" of the ESG assessment of compliance for the EQAR and therefore also evaluates their international work as part of the accreditation. This role should be retained and could be developed so that the Accreditation Council based on its experiences also performs ESG assessments of compliance for agencies outside of Germany. It is equally important to acquire well-respected, international agencies to work in Germany.

## IX. Communication and Dialogue

In spite of extensive opportunities to acquire information, inter alia online, all the stakeholders have, in some cases, large gaps in information and knowledge on the full range of topics. The Accreditation Council will take greater account of the increasing need for information and continue to intensify the supply of relevant information geared towards target groups.

The Accreditation Council therefore plans to extend its information activities and aims to seek more co-operation with those stakeholders who already work in the field of quality assurance. In addition to its members from higher education institutions, the Länder, the students, professional practice and the agencies, the following should also be mentioned: the German Rectors' Conference, evaluation groups, faculty and departmental conferences, the system-accredited higher education institutions, the federal government, the German Academic Exchange Service (DAAD), the German Central Office for Foreign Education (ZAB), the HIS-HE, the Centre for Higher Education Development (CHE) and networks of science and research managers.[10] The objective is to improve the level of information about accreditation, quality assurance and academic quality by means of existing organisations and communication channels and to expand the circle of interested parties.

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[10] e.g. the German university chancellors, as well as the consortium of higher education institution chancellors, the network of science and research managers or even the centre for science and research management (ZWM). Cf. section IX on higher education research.

The co-operation with the agencies is to be further developed through dialogue, irrespective of the Council's legal monitoring functions. Method and scope of the regular random sampling of accreditations conducted by the agencies are to be reappraised in terms of both programme and system accreditation.

## X. Accreditation and Research on the Impact

The Accreditation Council welcomes the fact that there has begun to be an increase in proposals in the field of accompanying and impact research on quality assurance and accreditation. In this context, it particularly appreciates the fact that the Federal Ministry of Education and Research (BMBF) approved the financing of a relevant research project by INCHER Kassel in 2013,[11] and is appealing to the higher education institutions and higher education research institutions, as well as the research funding organisations, to conduct and support further research in this area like it is carried out, for example, by the Johannes-Gutenberg-Universität Mainz Centre for Quality Assurance and Development (ZQ).[12]

## XI. Private Higher Education Institutions - Accreditation Council and German Council of Science and Humanities

Even if both do contribute to the quality assurance within the higher education sector, the institutional accreditation of private higher education institutions by the German Council of Science and Humanities and programme and system accreditation under the supervision of the Accreditation Council have been developed as two independent procedures having different objectives.

In 2012, the German Council of Science and Humanities broached the issue of the "double burden" for private higher education institutions due to the two accreditation systems, and reduced the efforts of accreditation for established ones.[13]

It is noticeable that the German Council of Science and Humanities had refused accreditation for an institution on several occasions, even though the study programmes at the institution had received programme accreditation. This indicates that programme accreditation is not

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[11] The key findings of the project "External quality assurance for teaching and learning through accreditation and evaluation. An analysis of the relationship between external and internal quality assurance at higher education institutions in Germany" can be expected from 2017.

[12] Cf. e.g. the project "Evidence-based action in higher education institutions. The influence of quality assurance measures on the organisation of control, research and teaching processes in higher education institutions" (www.zq.uni-mainz.de/1049.php)

[13] Cf. the Further Development of the Reaccreditation of Institution www.wissenschaftsrat.de/.../2264-12.pdf, pg. 136ff.

always in a position to identify and appropriately evaluate inadequate institutional framework conditions for teaching and learning.

The Accreditation Council aims to conduct conversations with the German Council of Science and Humanities on ensuring improved co-ordination of both accreditation systems and also on identifying the diagnostic weaknesses in programme and, where necessary, system accreditation. In addition to this, the Accreditation Council will exchange with the German Association of Private Higher Education Institutions (VPH).

## XII. Additional Consequences for the Foundation's Work

The implementation of the strategic planning is also to be reflected in the Foundation's mission statement and will involve changes in the rules for accreditation.[14] Particular attention must be paid to the comprehensibility and applicability of this rules (see IX).

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[14] This particularly applies to the "Rules for the accreditation of study programmes and for system accreditation" and the "Rules for the accreditation of agencies".