Foundation for the Accreditation of Study Programmes in Germany

Accreditation Council ▮▪

**Activity Report
2010**

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Activity Report 2010

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Preface

The German accreditation system is dependent on both reliability and continuous further development as well as on resolute changes. For this reason, in addition to its regular tasks (the certification of accreditation agencies and verification and monitoring of accreditation procedures), last year the Accreditation Council once again promoted important initiatives for the further development of the accreditation system in Germany. The fact that these initiatives are already reflected in the revised version of the regulations for system accreditation procedures is a result of the Accreditation Council's work which is aimed at enhancing quality.

Furthermore, the statement concerning the further development of accreditation presented by the Accreditation Council goes beyond a mere proposal of recommendations on how to improve accreditation procedures. By virtue of the guiding principle determining the work of the Accreditation Council that aims at verifying continuously whether legally laid down objectives have been achieved as well as at revealing weaknesses and potential for development and developing realistic approaches to solutions, the recommendations proposed by the Accreditation Council also contain basic reflections on how to further develop the entire system and its legal structure.

The further development of the accreditation system and the related debate between education policy stakeholders have gathered positive momentum, which will also result in the medium term in fundamental modifications of the accreditation system in Germany. It is thus even more important to guarantee the legal and political framework for higher education institutions, ensuring the reliability of the different accreditation paths.

Being able to rely on a close co-operation with the key stakeholders within the accreditation system, when performing its tasks, is not only very valuable for the daily routine work of the Accreditation Council, but also for the quality of the entire system. Thus, the expert meetings initiated by the Accreditation Council as well as the discussions held with the accreditation agencies on a regular basis represent a substantial contribution for providing an analysis of the potential for development of the system and for exploiting expert knowledge for enhancing procedures and criteria also in the future.

On this note and on behalf of the members of the Accreditation Council, I wish to thank our partners within the accreditation system and look forward to continuing our successful co-operation also in the future.

Bonn, March 2011 Prof. Dr. Reinhold R. Grimm

1. Further Development of the Accreditation System

At least since the Administrative Court of Arnsberg decided that the constitutionality of the state legislation in North-Rhine Westphalia should be reviewed by the Federal Constitutional Court, the debate concerning the future developments in accreditation has considerably gathered momentum. Different strands of discussion continue to culminate in this debate, ranging from general criticism on accreditation and on how it has been implemented with changing focuses since the system was introduced, to the question of its effectiveness and finally the demands to refocus the methods applied towards a more development-oriented approach with regard to quality assurance and to create new legal grounds for accreditation. In its endeavour to structure external quality assurance in higher education in Germany in an effective and efficient manner, the Accreditation Council welcomes this discussion.

As an instrument for quality assurance, accreditation aims at making the nature and the quality of a study programme - and thus also the comparability of programmes and quality assurance in teaching and learning - more transparent and reliable. The primary responsibility for quality in teaching and learning and for developing new study programmes lies with the higher education institutions. Accreditation assesses whether study programmes or internal quality assurance systems of higher education institutions comply with existing quality standards.

In Germany, the introduction of the accreditation system dates back to 1998 with the sug-gestions proposed by KMK and HRK concerning the potential design for this system. The conclusions that may be drawn after the first decade affirm the consistency of the decision taken at that time. They also confirm that programme accreditation is evidently an adequate means that contributes to the achievement of the objectives that have been set. On one hand, this is proven by the differentiation in academic programmes which is promoted by accreditation, but also by the fact that more than 75 % of the accreditation decisions were issued under certain conditions thus leading to the initiation of a quality enhancement process. Finally, the impact of accreditation on enhancing transparency in teaching and learning is twofold, offering on the one hand additional information by publishing accreditation results and, in the future, also the actual reports; on the other hand, assessing the provision of comprehensive information for students is defined as a separate criterion that has to be verified in accreditation procedures. Even if there is a lack of reliable data - research on the impacts of accreditation remains a desideratum for German quality assurance - the success of accreditation in Germany was also visibly reflected in the results of the two external evaluations of the Accreditation Council. Already in the year 2001 and again in 2008, independent expert groups confirmed the forward-looking approach of the German accreditation system.

Accreditation is not a static system, however, but evolves continuously also as a consequence of the changing legal and political framework. The momentum of the Bologna process, the on-going changeover to the tiered study structure in Germany and the debate on quality responsibility and quality assurance in higher education are giving continuously new impetus to the process of further development.

The consolidation of the accreditation system in 2005, the successful implementation of cluster accreditation and last but not least the introduction of system accreditation in 2007 are tangible results of evolutionary steps which have already been accomplished.

The Accreditation Council has grasped the opportunity offered by the first experience gained with system accreditation procedures and the questions recently brought up concerning the general and legal structure of accreditation, to discuss, on various occasions during the current reporting period, how to further develop the accreditation system and the already established instruments. The Council thus organised its fourth expert discussion, which was attended by over 40 participants - from Accreditation Council members to representatives of the federal states and external experts. As a result of this debate and following its 65th meeting on 10 December 2010, the Accreditation Council issued a statement containing recommendations for the further development of the accreditation system, which refer mainly to the fundamental legal structure of accreditation and to the aspects of system and programme accreditation that are in need of reform.

Ensuring legal grounds: As a non-governmental and flexible instrument for quality assurance carried out on a regular basis, accreditation has replaced the quality assurance originally carried out as part of the state approval procedure for study programmes and their examination regulations based on general guidelines. The process of restructuring the quality assurance system may therefore not be understood without considering the link between the reform of the approval procedure and quality assurance.

The constitutional debate on accreditation, however, shows clearly that ensuring its political and legal framework is of upmost importance. This calls for a clear definition of the task of accreditation and its position within the legal system and the harmonisation of existing rules for the accreditation system. In order to be able to ensure a higher degree of legal certainty, these fundamental modifications of the system require the federal states and the Standing Conference of the Ministers of Education and Cultural Affairs (KMK) to adopt respective decisions, possibly leading to legislative measures. This nationwide debate will focus, amongst other things, on the non-governmental orientation that may be ensured, for instance, by separating more clearly governmental approval decisions from quality assessments. The separation is indispensable since accreditation is not part of state supervision of higher education but provides instead a quality report elaborated on the basis of a private contract on behalf of the higher education institutions and irrespective of the approval of the study programme.

It has to be ensured that the procedures carried out in Germany are compatible with the *European Standards and Guidelines* in order to preserve international recognition. This includes particularly the principle according to which primary responsibility for quality in teaching and learning lies with the higher education institutions as well as the appropriateness and definiteness of the procedures and criteria and the independence of the accreditation agencies.

The Standing Conference of the Ministers of Education and Cultural Affairs and the Science Council have already appointed corresponding working groups this year. The Accreditation Council participates in these discussions and contributes its expertise.

Further development of system accreditation: Irrespective of the substantial debates regarding the legal questions of the accreditation system, the Accreditation Council is responsible for carrying out corrections inherent to the system that concern procedural rules and criteria. The Accreditation Council adopted initial steps for the further development of system accreditation during its 65th meeting on 10 December 2010.

The Accreditation Council set itself the objective of reporting its conclusions drawn from the first procedures for system accreditation also to the Standing Conference of the Ministers of Education and Cultural Affairs in order to be able to identify and correct evident errors at an early stage, if necessary. At the beginning of 2011, two procedures are at the programme random sampling stage and the relative decisions are thus expected for the second quarter of 2011. Other procedures are still at the initial stage. According to the higher education institutions, the rather slow implementation of system accreditation is due to the fact that the procedure requires the higher education institutions to meet high standards expecting them to provide evidence for an already implemented and operative internal management and quality assurance system for teaching and learning and that the prerequisites for admittance and the scope of the programme and half-time random samples compromise the attractiveness of system accreditation. This first experience gained with system accreditation has induced the Accreditation Council to revise the prerequisites for admittance as well as some other elements of the procedure that had a strong prohibitive effect in order to facilitate access to system accreditation for the higher education institutions.

► **Prerequisites for admittance:** Higher education institutions are no longer required to provide evidence that a certain number of study programmes have obtained accreditation in order to be admitted to procedures for system accreditation.

► **Programme random sample:** The intensive assessment of single study programmes by the programme random sample has been reduced from 15% to three study programmes as a rule. In this respect, the first reports on the experience made by accreditation agencies and the higher education institutions involved suggested that the value of the insights gained from programme random sample procedures does not depend on the number of samples assessed.

► **Decision rules:** By allowing issuing system accreditations also under certain conditions, the Accreditation Council aims at supporting higher education institutions in the continuous process of quality development and in implementing internal management and quality assurance system for teaching and learning.

In addition to abolishing procedural rules that have a prohibitive effect, the Accreditation Council has decided for the time being not to modify any further procedural rules or criteria for system accreditation, since the procedure needs to be evaluated in order to ensure a sustainable further development. Therefore, the Accreditation Council has decided to monitor the first two procedures for system accreditation carried out by an agency. From a present-day perspective, the Accreditation Council will focus its attention on the effectiveness of the feature random sample and the half-time random sample, the concrete form of the procedures adopted by the accreditation agencies and the quality and preparation of the experts.

Further development of programme accreditation: The introduction of system accreditation has made it necessary to re-discuss the future structure of programme accreditation. The initial experience gained in re-accreditation procedures illustrate that only such procedures make it possible to investigate comprehensively central quality-related aspects such as the academic feasibility of the study programmes, the professional relevance of qualification objectives and the professional success effectively achieved by graduates. Procedures for first-time accreditations, on the other hand, have proved to have an unfavourable ratio between the effort required and the actual benefits. By summer 2011, the Accreditation Council - in co-operation with the accreditation agencies - will thus substantially revise the rules of procedure for first-time programme accreditation in order to minimise the documentation required and to streamline the process of assessment.

Annex 1 *Statement on Further Development of the Accreditation System (10 December 2010)*

2. Activities of the Accreditation Council in 2010: Tasks and Results

2.1 Accreditation of Agencies

Certifying accreditation agencies is part of the Accreditation Council's core business. The certification (accreditation or re-accreditation) is based upon set criteria and rules of procedure which are also aligned with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Successful accreditation entitles the accreditation agencies to accredit Bachelor's and Master's study programmes and internal quality assurance systems within higher education institutions and to award them the quality seal of the Accreditation Council. This kind of quality control ensures that the procedures carried out by accredited agencies are highly comparable, transparent and reliable, which is an essential prerequisite for accreditation decisions being recognised at an international level. If an agency is accredited subject to certain conditions, the Accreditation Council verifies the compliance with the conditions, for which the agencies are obliged to provide evidence.

In the previous year already, the Accreditation Council had admitted the "Austrian Quality Assurance Agency" (AQA) for system accreditation procedures. In its 62nd meeting on 11 February 2010, the Accreditation Council had also decided to admit the AQA for programme accreditation.

At its 63rd meeting in June 2010, the Accreditation Council also initiated the re-accreditation procedures of ACQUIN, ASIIN and ZEvA.
    For the first time, the Accreditation Council also included a progress report in the procedures concerning the activities of the agency during the accreditation term under review. The evaluation should also include discussions with experts and, if necessary, representatives of higher education institutions, who have already gone through the accreditation procedures of the agency. The resolutions of the initiated re-accreditation procedures are expected to be adopted in spring 2011.

In the reporting period, compliance with the conditions was examined with regard to a total of four accreditation procedures. The Accreditation Council recognised that conditions had been met in a timely manner by the agencies OAQ, evalag and AQA. The condition concerning self-financing of AKAST was withdrawn by the Accreditation Council due to the particularities of the special framework conditions, which were also determined by the state legal regulations regarding religious associations.

Thus there are currently ten certified accreditation agencies, which are entitled to award the Council's quality seal.

The exact wording of the decisions concerning procedures which have either been concluded or initiated, the content of the single conditions and their compliance status are reported in the resolutions published on the Council's website. (**www.akkreditierungsrat.de**)

2.2 Monitoring of Accreditation Procedures

The accreditation system in Germany provides that the accreditation procedures for study programmes and internal quality assurance systems are performed by accreditation agencies, which must abide by procedures and criteria set down by the Accreditation Council during this process. Constant quality control completes the certification of the agencies which takes place every five years. In its as-

sessment of accreditation procedures performed by the agencies, the Accreditation Council must adhere to the provisions in § 2 para. 1 no. 4 of the Accreditation Foundation Law. The Accreditation Council fulfils this task on the basis of a procedure which is transparent and comprehensible to the agencies, providing both random sample and specific-purpose assessments as well as observation audits, during which the procedure is followed by a representative of the Accreditation Council - from the submission of application or on-site visit to the final decision of the agency's accreditation commission. The main objective of monitoring such procedures is to gain direct insight into the agencies' accreditation practice and in turn to communicate observations and perceptions from an external perspective to the agencies. During the reporting period it was not possible to carry out an observation audit to take place due to a lack of resources. In general, there are four random sample assessments per agency each year. Specific-purpose assessments are performed if there is any evidence that procedures have been carried out deficiently and/or that an accreditation agency has taken irregular decisions.

The quality control performed in connection with the procedure assessment basically consists of two objectives: Firstly, any accreditation decisions that turn out to be significantly incorrect will be revised, thus protecting the students affected; the second objective is to avoid mistakes in future procedures while pointing at an overall improvement of quality.

The procedure is assessed on the basis of files. The head office receives for this purpose the documentation of the procedure, which also contains the self-evaluation report of the higher education institution, information about the selection and appointment of experts, information about the on-site visit, the agency's

evaluation report and the response of the higher education institution as well as the agency's accreditation decision. Should the head office ascertain flaws in accreditation procedures, the board of the Accreditation Council will decide on how to proceed. The possible steps to be taken range from requesting an agency to modify its accreditation practice to making it obligatory to amend a specific accreditation decision as well as imposing an administrative fine or, in case of permanent and serious infringements of the Council's criteria and rules of procedure, the withdrawal of accreditation. In the course of the assessment procedure, the agency is given the opportunity to lay down a detailed statement in order to ensure that the decision is taken on a reliable factual basis.

In the reporting period, the Accreditation Council made a file-based assessment of a total random sample of 25 selected accreditation procedures. As the procedural assessment carried out by the Accreditation Council involves examining single accreditation decisions, the qualitative results stated herein do not allow any conclusions to be drawn from the general work performed by the agencies. The result of this assessment was as follows: From the 25 assessments, a total of 4 (in other words around one sixth of the procedures) were concluded without any objections. In nine procedures, the objections led to subsequent issuing of conditions. In three procedures single criteria of the accreditation had to be re-assessed. Flaws were detected in a further 18 procedures, although these generally concerned the transparency of procedural documents and did not directly affect the quality of the accredited study programme or the assessment. Three out of five specific-purpose assessments led to objections, and in one case led to a change in the accreditation deci-

sion. With view to protecting the legitimate expectations of students, in two cases the Accreditation Council abstained from changing the accreditation decision. In the other procedures the defects reported proved to be unjustified.

One agency appealed against one of the Council's decisions during the reporting period. The appeal was discussed in detail by the Accreditation Council's complaints committee and rejected by the Accreditation Council upon recommendation of the former.

Within the meaning of the internal quality assurance system adopted by the Accreditation Council, in the reporting period the head office analysed the assessment procedures and submitted the results of the assessment of the agencies to the Accreditation Council for discussion, at its 62nd meeting on 12 December 2010. The evaluation of all the assessment procedures carried out until then confirmed the consistency of the assessment decisions taken by the Accreditation Council as well as the effectiveness of the assessments themselve: the objective to ensure that the criteria and procedural rules set by the Accreditation Council were considered, thus guaranteeing the comparability of the procedures, was taken into account by the assessment procedures. Since the introduction of random sample assessment in 2007, most agencies have improved their own processes, abolishing to a large extent some typical procedural patterns and improving the quality of the procedures on the whole. The complaints, however, still too often concern the quality of the expert reports. In some cases, the evaluation reports gave only a few or no indications at all concerning the actual consideration of all criteria during the evaluation procedure. The new obligation for the publication of expert reports in accreditation pro-

cedures with probably result greater attention being paid to this type of defects.

The Accreditation Council has currently commissioned the "Internal Quality Assurance" work group to familiarise itself with the way in which the selected instruments work and to devise possible suggestions on how to further develop the assessment procedures (see **Chapter 2.4**).

2.3 Resolutions Adopted by the Accreditation Council

By making further developments in system accreditation, the Accreditation Council underlined its objective to encourage higher education institutions to be directly responsible for the quality of teaching and learning, to prevent avoidable, additional burdens for higher education institutions and to contribute towards their ability of self-management (see **Chapter 1**). The Accreditation Council also adopted a series of further decisions, in addition to revising existing decisions.

► Special rules for joint programmes

The accreditation of cross-border study programmes is gaining increasing importance, in particular with view to the pan-European area of Higher Education which is currently developing. In order to reduce the efforts required for the accreditation of such joint programmes to a minimum, without having to accept negative effects on procedural quality and thus on the quality of the accredited study programmes, the Accreditation Council already adopted far-reaching changes to its regulations last year.

As part of a pilot project, in 2010 the Accreditation Council took part in the accreditation of joint programmes and as a result recognised

the accreditation decision of a foreign accreditation institution (see **Chapter 3**). The Accreditation Council also used this experience to re-evaluate and further develop its decisions: whilst the Accreditation Council had so far been exclusively responsible for acknowledging the decisions of foreign accreditation institutions, it now transferred this responsibility to the accreditation agencies certified by the Council. Although the Accreditation Council is still responsible for setting the conditions for recognition, the agencies are hence in charge of actually carrying out the procedures. This means that the agencies may recognise accreditation decisions adopted by foreign agencies themselves, if they are full members of the *European Association for Quality Assurance in Higher Education* (ENQA) or if they are listed in the *European Quality Assurance Register* (EQAR).

Furthermore, the Accreditation Council considerably reduced the number of on-site visits necessary for the accreditation of joint programmes; this is now only necessary at one location. It must be ensured that facilities and the organisational structure of studies at all locations meet the requirements set by the Accreditation Council.

The fact that recognition of foreign accreditation decisions and the appropriate evaluation of cross-border study programmes are now easier to carry out has allowed the Accreditation Council to take a further important step towards removing the obstacles connected with the accreditation of joint programmes.

At present, there are three possible procedural scenarios for awarding accreditation to joint programmes: the procedure may be carried out either by an agency which has been certified by the Accreditation Council or in co-operation with foreign agencies. Last but not least, ac-

creditation decisions of a foreign agency may be recognised by an agency which has been admitted by the Accreditation Council. In the case of system accreditation, the higher education institution must state which measures are adopted to ensure the quality of its joint programmes.

► Study programmes with a special profile demand

In its *Rules for the Accreditation of Study Programmes and System Accreditation*, the Accreditation Council refers to the requirements which must be met by study programmes with a special profile demand. It also underlines the fact that all criteria and procedural rules must be applied in observance of these requirements.

With regard to the diversity of special profiles, in the case of study programmes with a special profile demand, the Accreditation Council has been guided by the principle of waiving any rules which have a high degree of detail. In order to ensure the comparability of accreditation procedures and thus also the homogeneity of the procedure results, however, the procedural rules and criteria were mainly completed with quality requirements which pertain to all profiles and can always be applied also to regular study programmes. These can be summarised as follows:

- In particular dual and Master's study courses providing further education, but also distance learning and part-time courses, as well as e-earning study programmes are targeted at new, heterogeneous student groups, while the individual federal states regulate access of students qualified due to their professional experience very differently. At the same time,

however, it may be clearly observed that profile-specific study programmes are attractive at supra-regional level. With the documentation and publication of the prerequisites for admittance required in the future, the Accreditation Council takes account of the information demands of those interested in the study programmes.

- In all state and state recognised study programmes, the main responsibility for the quality of the study programmes can only lie with the higher education institution awarding the degree. Even if study programmes with special profile demands are characterised by differentiated allocation of competences and forms of organisation, this principle of final academic responsibility still applies to them. In order to give appropriate consideration to the quality of cooperative forms of courses offered such as dual study programmes, but also Master's study programmes providing further education, distance and e-earning study programmes in the accreditation process, the Accreditation Council has broadened its criteria to include course-related co-operation with companies, other higher education institutions and similar establishments. The subject of accreditation is the scope and type of existing co-operation and the underlying agreements thereof.

The Accreditation Council has already adopted further recommendations for the accreditation of study programmes with a special profile demand in a hand-out. This is available to higher education institutions, agencies and also experts and aims to provide a better understanding of the criteria and procedural rules in reference to study programmes with a special profile demand. (Annex 2.5)

► **Special rules for the accreditation of intensive study programmes**

In 2010, the Accreditation Council took the student protests in 2009, which criticised the academic feasibility and examination load of the study programmes, as an occasion to rediscuss in a substantial way its specific rules for the accreditation of intensive study programmes.

Coherent concepts presented by the higher education institutions have prompted the Accreditation Council to preserve the possibility of offering intensive study programmes, whilst avoiding the conflicting relationship between plausible study programme concepts and the misuse of this profile.

On the basis of the increased student work load in terms of time, up to 75 ECTS points per academic year can be awarded in intensive study programmes. Due to the fact that students invest more time in such study programmes compared to regular, full-time study programmes, the work load involved to obtain one ECTS point in intensive study programmes corresponds to 30 hours. The framework conditions for time-intensive studying must be clearly different from conventional study programmes. In its resolution, the Accreditation Council listed study-related organisational measures which had been tested in practice and certified by accreditation.

The resolution adopted by the Accreditation Council should above all ensure that short standard periods of study with an increased work load for students in terms of time do not jeopardise the academic feasibility of the study

programme, and do not reduce the qualification level of the graduates.

► Special rules for procedures of cluster accreditation in teacher training

Already before the introduction of system accreditation, the Accreditation Council contributed to significantly increase the efficiency of procedures also in programme accreditation by implementing cluster accreditation, which allows to accredit several academically and disciplinary affine study programmes in a single procedure, ensuring that all partial study programmes are sufficiently evaluated.

In teacher training programmes, the elements related to the academic disciplines shift into the background in favour of a stronger focus on the pedagogic education (subject-related teaching methodology and educational sciences). In order to ensure that the assessment of the entire study programme remains as consistent as possible, in such cases the cluster should be compiled according to principles other than "disciplinary affinity". With view to their profile-specific multi-discipline structure, accreditation of teacher training programmes must not be unreasonably complex and excessively expensive. In the future, the cluster of teacher training programmes may, therefore, also be compiled in line with the orientation of the study concepts depending on the type of school. This greater flexibility in compiling the clusters affects the composition of the expert group, which has to ensure that the overall concept is evaluated in a suitable way with regard to both subject and school type, but not necessarily to the single components of the study programme.

► Norms for the interpretation of the Common Structural Guidelines of the Länder

With resolution of 4 February 2010, the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* presented an extensive change to the Common Structural Guidelines of the *Länder*.

The Accreditation Council took advantage of these modified provisions concerning flexibilisation of the student work load, the prerequisites for admittance for Master's study programmes and modularisation as well as the reduction of the examination load, to completely revise its set of rules for the interpretation of the Common Structural Guidelines of the *Länder*. This revision chiefly concerned the structure but also the contents of such guidelines. This review aimed at improving the readability and usability of the guidelines by restructuring and grouping already existing resolutions, deleting redundant provisions and by rewording the text of the resolutions in a comprehensible style.

In order to provide agencies and higher education institutions with a clear and complete overview of all guidelines regarding accreditation, the Accreditation Council conflated the previously relatively rather large number of single texts into one basic resolution:

All resolutions of the Accreditation Council are published on: **www.akkreditierungsrat.de**

Annex 2.3.1 *Rules of the Accreditation Council for System Accreditation (8 December 2009)*

Annex 2.3.2 *Special Rules for Joint Programmes (10 December 2010)*

Annex 2.3.3 Special Rules for Procedures of Cluster Accreditation and the Accreditation of Intensive Study Programmes (10 December 2010)

Annex 2.3.4 General Criteria for the Accreditation of Study Programmes (10 December 2010)

Annex 2.3.5 Norms for the Interpretation of the Common Structural Guidelines of the Länder (10 February 2010)

2.4 Internal Quality Assurance

Assessing and enhancing internal work flows and processes are one of the basic tasks of the Accreditation Council. The quality assurance system implemented for this purpose defines, within the tasks of the Accreditation Council, its demand for quality as well as appropriate quality assurance measures for both performance generating processes (accreditation of agencies, definition of criteria and rules for accreditation procedures and monitoring of the work of the agencies) and for support processes (strategic planning, financial planning, personnel recruitment and training as well as attending to boards). The measures for internal quality assurance comply with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and thus ensure recognition of the Foundation's work at international level.

To ensure a sustainable and consistent implementation of these measures, the Accreditation Council has set up a standing project group. The project group "Quality Assurance" is an integral part of the quality assurance system. It works independently, reports to the Accreditation Council on an annual basis and formulates suggestions on how to further develop the internal quality assurance system.

Already in 2009, the first quality report made by the QA project group contained extensive

recommendations concerning the efficient and transparent arrangement of accreditation procedures, as well as the further development and revision of agencies by the Accreditation Council.

This report was based, amongst other things, on the results of a comprehensive survey of the experts involved in accreditation procedures and of certified agencies. The Accreditation Council took up the suggestions received by the work group and published a guideline for accreditation procedures at the beginning of 2010. This guideline is published on the web-site of the Accreditation Council and provides comprehensive information to agencies and expert groups on how certification works and which requirements were set in terms of content.

In the reporting period, the QA project group discussed intensively the prospects of the further development of the assessment procedure.

In order to make sure that agencies carry out their evaluations correctly and to ensure the quality of the study programmes by a complete and transparent verification of the criteria, since 2007 the Accreditation Council has carried out random sample assessments and specific-purpose assessments of single accreditation decisions on a regular basis. The project group had the task of assessing the way in which the selected instruments work and to devise possible suggestions on how these can be further developed. The group discussed both established and possible future assessment instruments, based on the methodical experience gained and the assessment results reached in recent years. In this process, the evaluation of all assessment procedures carried out so far confirmed the con-

sistency of the assessment decisions taken by the Accreditation Council.

In order to include the experience gained by the agencies in the consultancy process, the QA project group will submit its second quality report at the beginning of 2011.

2.5 Working Groups of the Accreditation Council

Study programmes with a special profile demand such as dual programmes and study programmes providing further education as well as e-learning, distance and part-time study programmes or teacher training and intensive study programmes represent a particular challenge in accreditation for agencies and higher education institutions.

At its 62nd meeting, the Accreditation Council set up a work group for study programmes with a special profile demand in order to prepare the resolutions of the Accreditation Council and fully involve the expertise of external experts.

The members of the work group, the representative of the Accreditation Council, representatives of the agencies, representatives of the federal states and external experts gathered for a total of four meetings. Their task was to discuss and analyse the experiences gained in the accreditation of study programmes with a special profile demand. They also had to discuss, with regard to existing rules and resolutions of the Accreditation Council, whether or not any supplements or amendments are necessary.

The resulting resolution-related suggestions submitted by the work group were accepted by the Accreditation Council at its 65th meeting concerning, amongst other things, programme-related co-operations, the procedural form for

the accreditation of teacher training programmes and intensive study programmes as well as the requirements for transparency and documentation of study programmes (see **Chapter 2.3**).

In addition, the work group devised recommendations for the accreditation of study programmes with a special profile demand, which the Accreditation Council also resolved at its 65th meeting.

Annex 2.5 *Guidelines presented by the project group "Study Programmes with a Special Profile Demand" (10 December 2010)*

2.6 Events held by the Accreditation Council

► **Preparation of experts**

As with the procedure of programme and system accreditation, the certification of agencies is based on an evaluation of independent, external experts. This year, the three procedures for the re-accreditation of agencies have been initiated simultaneously by the Accreditation Council. With the procedures initiated at its 63rd meeting on 21 June 2010, the Accreditation Council set up groups of five experts, which respectively ensure the comprehensive assessment of the three agencies. In order to prepare the experts involved in the procedure, they were invited by the Council to the Federal Administration of the Unified Service Sector Union (ver.di) in Berlin on 5 October 2010. The all-day seminar offered the opportunity to deal intensively with the contents and flow of the procedure, and to gain an overall understanding of the criteria and assessment rules of the Accreditation Council, as well as the role of the experts themselves. The introduction to the German accreditation system was of particular value for the international representatives attending the seminar who were appointed by the Accreditation Council for each expert group. Special attention was paid to the *European Standards and Guidelines* (ESG). As one of the determining principles of accreditation in Germany, these are inherent to the procedural rules and criteria set by the Accreditation Council. In addition, all agencies certified by the Accreditation Council have applied for membership of the *European Association for Quality Assurance in Higher Education* (ENQA) and inscription in the *European Quality Assurance Register for Higher Education* (EQAR). In close co-operation with both the above European organisations, the Accreditation Council carries out the admission procedure at the same time as awarding its own certifications.

► **Discussion amongst experts: "Further Development in Accreditation"**

The Accreditation Council organised its fourth expert discussion with the title "Further development in Accreditation", which was held in November at the Secretariat of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* in Berlin. This was attended by about 40 experts - members of the Accreditation Council, representatives of both the German rectors' conference and the Standing Conference of the Ministers of Education and Cultural Affairs, agency representatives and external experts.

The discussion amongst experts was opened by statements made by all interest groups concerning the accreditation system and its organisational structure. The main discussion regarded the political framework conditions and the legal principles of the system, the relationship between the Accreditation Council and the agencies and also the role and task assumed by experts in the procedures.

In the second part of the discussion, experts basically exchanged ideas about the further development of system and programme accreditation. The reports by Prof. Dr.-Ing. Jürgen Petzoldt, Prorector for Education at the Technical University of Ilmenau and Dr. Uwe Schmidt, Head of the Quality Assurance and Development Centre at the Johannes Gutenberg University of Mainz, led to a discussion of initial experiences in system accreditation.

Both experts expressed their positive impression on the increased self-organisation opportunities for higher education institutions. They

agreed that the procedure of system accreditation has made an important contribution towards the dispute within higher education institutions regarding the quality of teaching and learning. In order to further develop this procedure, they agreed that it would be wise to continue discussions on the actual organisation of the procedure, in particular the feature random sample and expertise, as well as the preparation of experts in system accreditation procedures.

The results of the discussion amongst experts were fully taken into account by the Accreditation Council in its statement on the further development of the accreditation system and the amendments to system accreditation (see **Chapters 1** and **2.3**)

***Annex 2.6** Programme of the Discussion Amongst Experts "Further Development in Accreditation"*

2.7 Future Tasks: An Outlook

Further Development in Accreditation

This year already, the Accreditation Council has dealt intensively with the further development of the German accreditation system and its instruments. It resolved first corrections to the procedural rules of system accreditation at its 65th meeting on 10 December 2010.

Before making any further changes to the criteria and procedural rules, the first system accreditations should be evaluated in order to guarantee the sustainable success of the entire system accreditation process. The focus of attention of said evaluation are, from the current standpoint, the effectiveness of the feature random sample, the way in which the procedure is organised by agencies and the quality and preparation of the experts.

In addition, the Accreditation Council will revise the half-time random sample in order to be able to assess the quality development within the higher education institutions with minimum effort.

Also in the case of programme accreditations, the Accreditation Council will reduce the amount of documents required from the higher education institutions. In order to streamline the assessment for the first accreditation of a study programme, in co-operation with the agencies the Accreditation Council will completely revise its procedural rules by summer 2011.

In addition, the Accreditation Council will provide the work groups of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* and of the Science Council, with its expert knowledge on further development, also of political and legal framework conditions of the accreditation system (see **Chapter 1**).

Preparation of Experts

The focus of the German accreditation system is the assessment of study programmes or internal quality assurance systems of higher education institutions by experts. Their opinion is the essential basis for the accreditation decisions. Due to this singled out role of the experts, it should be ensured that the expert group appointed fully meet their task and responsibility.

The Accreditation Council attaches great importance to the preparation of the experts for the accreditation procedure. In addition to preparing the experts for an actual accreditation procedure, by providing a thorough preparation, the agencies ensure that experts are ready to take on their work, that the experts

have a thorough knowledge of the assessment criteria and procedural rules and a clear understanding of their role in the evaluation procedure and are familiar with the particular circumstances of the decision to take of the pending case.

In 2008 already, the Accreditation Council laid down these standards in its resolution on the preparation of experts in accreditation procedures. Also in view of the increasing establishment of system accreditation, it is now important to deal with the status of its implementation. For this purpose, in close collaboration with the agencies, the Accreditation Council will evaluate the concepts and measures devised for the preparation of experts in accreditation, and discuss the way in which they work.

3. International Cooperation

Through its active involvement in the expansion and intensification of international cooperation in accreditation and quality assurance, the Accreditation Council contributes greatly to the development of comparable criteria, methods and standards of quality assurance and the improvement of transparency in study courses, and to the promotion and mutual understanding of the different quality assurance systems. The Accreditation Council thus helps to promote the creation of the European Higher Education Area and to strengthen the collaboration with non-European partners, not as an end in itself, but with the aim of supporting the mutual recognition of qualifications and thus student mobility in terms of transnational mobility. For over 10 years the Accreditation Council has gained extensive experience in the development of procedural rules and criteria for the quality assurance of study programme certification. It contributes this experience in the most important international networks and work groups. It is also actively involved as a consultant for the European further development of quality assurance in higher education.

In the reporting period, the Accreditation Council took part in a pilot procedure for the accreditation of the cross-border *Joint European Master Programme in Comparative Local Development* (CoDe) as part of the EU-funded ECA Project *TEAM 2*. The accreditation procedure was carried out under the responsibility of the *Hungarian Accreditation Committee* (HAC). The Council for *Higher Education of the Republic of Slovenia* took part in the project next to the Accreditation Council.

For the accreditation of the study programme which is jointly offered by the University of Trento (Italy), the Corvinus University Budapest (Hungary), the University of Ljubljana (Slovenia) and the University of Regensburg, the first step involved devising a mutual catalogue of criteria. Due to their low degree of detail, the rules of the Accreditation Council formed the basis for all parties involved. For a comprehensive evaluation of the international study programme, the expert group met in Trento together with the parties in charge of the programme of all European partner higher education institutions. As a result, the *Council for Higher Education of the Republic of Slovenia* (decision of 26 February 2010) and the HAC (decision of 4 June 2010) expressed their unconditional accreditation decisions. On 29 September 2010, the Accreditation Council acknowledged the decision of the Accreditation Council of the Hungarian partner institution and awarded its seal of quality for the study programme.

The experience gained in this cross-border, international pilot project was used by the Accreditation Council to evaluate and further develop its own rules for the accreditation of joint programmes (see **Chapter 2.3**).

This collaboration with international project partners is only one indication of the international orientation of the German accreditation system. Thanks to the standing representation of several international experts in the Accreditation Council itself and in the expert groups deployed by the Accreditation Council as well as the admission of also international agencies in Germany, the Accreditation Council also contributes to structure an international network of its counselling services and decisions.

Equally important in this context is the co-operation of the Accreditation Council in the relative European and international quality assurance networks, which is indispensable for the concordance of common standards in quality assurance. As an active member of the *European Association for Quality Assurance in Higher Education* (ENQA) and the *European Consortium for Accreditation* (ECA), the Accreditation Council is closely connected with the most important quality assurance networks. The following overview of the activities and of the Accreditation Council and of its members illustrates the efforts made by the Council in terms of international co-operation:

ENQA: At a members' assembly of the European Association for Quality Assurance in Higher Education on 24 September 2009 in Helsinki, the Managing Director of the Accreditation Council, Dr. Achim Hopbach, was elected president of ENQA for the second time. This role will allow him to make an important contribution to further intensify the relationships between the national and the European level.

As a full member of ENQA, the Accreditation Council also takes part in the work groups and projects of the Organisation. The fourth meeting of the *Internal Quality Assurance Forum* took place in London on 8 / 9 June 2010, with the participation of the head office of the Foundation. The annual discussion forum serves to provide a regular exchange of ideas about issues and methods of internal quality assurance in the different European agencies.

The head office took part in the third "Audit Spring Seminar", a networking meeting of international agencies aimed at the exchange of ideas about the methods of institutional

evaluation and accreditation, held in Helsinki on 7 / 8 June 2010.

ECA: As a pan-European project, the *European Consortium* for Accreditation (ECA) contributes to the mutual understanding of the accreditation systems and working methods of the agencies. The development of common standards for the mutual recognition of accreditation decisions, and thus also of qualifications, has been one of the key goals over the past years. Through its participation in the ECE project "TEAM 2" for the accreditation of several international study programmes, the Accreditation Council was able to actively contribute its expertise in this field. Other key objectives of the *European Consortium* are the mutual recognition of qualifications and accreditation decisions, the efficient accreditation of joint programmes as well as the creation of the European database *Qrossroads* (www.qrossroads.eu), which already contains comprehensive information on the accreditation systems, quality assurance institutions and accredited study programmes in many countries represented in ECA (see **Chapter 4.2**).

The programme managers represent the Accreditation Council in the three ECA work groups, which cover the topics of *Mutual Recognition and Joint Programmes, Qrossroads and Information Strategies* and *Mutual Learning and Best Practices*.

EDULink Project in East Africa: The Accreditation Council is a partner in the EDUlink project *Afriq'Units* ("Sustainable Quality Culture in East African Institutions through Centralised Units"), which supports the set-up of central quality assurances institutions in three higher education institutions in Uganda, Tanzania and

Kenya. The Accreditation Council basically contributes its expert knowledge from a European perspective.

Tempus Project in Tunisia: In the coming year, the Accreditation Council will be involved in the international Tempus project QualiCert, for the establishment of a quality assurance and certification system in the higher education scenario in Tunisia. Together with the Technical University of Dresden, several universities in France, Italy, the Czech Republic and Tunisia, as well as other project partners, the Accreditation Council will help to develop quality standards for teaching and learning, to follow through the set-up of an accreditation agency and to train experts for quality assurance in higher education. The consideration of the objectives and purposes of the Bologna Process in this modernisation process will consolidate the connection between the higher education systems in Tunisia and Europe in the longer term.

Since 1990, the Tempus programme has supported the further development and reform of higher education in its partner countries worldwide.

International Networking: Mutual understanding of quality assurance systems in the international context is not only promoted through the networks mentioned, but also through the co-operation of members of the Accreditation Council in commissions, expert groups or foreign quality assurance institutions as well as through informal contacts during meetings and workshops. These international contacts and co-operations represent an opportunity for the Accreditation Council to contribute expertise on an international level and

in return, to be able to take the experiences of its partners into account in its own activities. The Chairman of the Accreditation Council is, for instance, the Vice Chairman of the University Council of the University of Vienna. The Council's Managing Director is the President of the ENQA and still a member of the *Hong Kong Council for Accreditation of Academic and Vocational Qualifications* (HKCAAVQ). Both bring their international expertise as members of expert groups and international expert groups.

At European level, the managing director of the Accreditation Council is the German representative in the Bologna work group for qualification frameworks, and national correspondent for qualification frameworks.

Last year, the head office of the Accreditation Council received a foreign delegation from China (on 28 June 2010) and a representative of the *East African Inter-university Council* (5 July 2010).[1]

The members of the Accreditation Council are regularly informed at the Council's meetings about the latest international developments in accreditation and quality assurance.

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[1] Further dates included (amongst others): EDULink workshop on 20 - 22 January 2010 in Zanzibar, the National Bologna work group on 22 February 2010, 24 June 2010 and 29 October 2010 in Bonn, the ECA WG 1 on 10 March 2010 in Paris, the Bologna Conference of the Federal Ministry of Education and Research (BMBF) on 17 May 2010 in Berlin, the ENQA Workshop for Quality Assurance and Learning Outcomes on 9 September 2010 in Vienna and the EQAF on 18 / 19 November 2010 in Lyon.

4. Information and Communication

4.1 Presentation, Information and Consulting

The Accreditation Council considers it an integral part of its work to inform the public regularly and extensively about the Council's activities and decisions and about the further development of the accreditation system in Germany. The Accreditation Council presents its work mainly using electronic media, as well as contributions at meetings, events and by participating in various national and international work groups. Besides the publication of press releases on the *Informationsdienst Wissenschaft* (idw) (information service science) the Accreditation Council uses its regularly updated website to inform the interested public extensively on the accreditation system, the criteria and procedures for the accreditation of study programmes, accreditation agencies, system accreditation and on the Council's resolutions and the agencies accredited by the Council. All central documents are available in both German and English on the easily accessible website of the Accreditation Council. The most important results of the Accreditation Council's consultations are published directly following the meetings. With regard to the accreditation of accreditation agencies, the Accreditation Council follows in particular the basic principle of ensuring transparency. This is achieved by publishing not only the Council's resolution but also the agency's application, the expert group's report and, if available, the response of the agency on the Council's website as soon as a procedure is completed. The Council's activity report, which provides information each year about the activities the Ac-

creditation Council has undertaken within the reporting period, is also published in PDF format; this electronic version is publicly available as a PDF file on the Council's website, both in German and English.

Due to its high demand for transparency, the Accreditation Council already decided last year to change its method of publication with regard to the accreditation of study programmes. From now on, for all study programmes awarded the seal of quality of the Accreditation Council, not only the accreditation decision and the names of the experts will be published, but also the expert report. With this decision, not only does the Accreditation Council comply with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and thus with common practice in Europe, but also improves the sustainability of the procedures and thus the transparency of the accreditation system.

Besides providing information, the Accreditation Council is endeavouring to continuously improve the level of knowledge of the relevant interested groups as well as that of the national and international public about the accreditation system. The Council achieves this on the one hand by answering the large number of queries it receives by phone and letter from students, higher education institutions, ministries, special associations and agencies on general issues regarding accreditation and on the Council's resolutions. The head office of the Accreditation Council is generally open to the public from Monday to Friday from 8:00 AM to 6:00 PM. On the other hand, the presence of the Accreditation Council at a plurality of conferences, seminars and expert discussions is used by the members and employees of the head office to contribute with their speeches on issues concerning accreditation, quality as-

surance or the studies reform in a broader sense.

Additionally the Accreditation Council is consulted as an adviser on issues concerning the study reform and in particular on questions related to the Bologna process. These consultations far exceed the Council's direct sphere of tasks related to accreditation. Formal as well as informal communication structures play an important role in this context. The Council's managing director represents the Accreditation Council for instance at the National Bologna Work Group (Nationale Bologna AG), the programme advisory committee "Quality Management" of the Donors' Association for the Promotion of Sciences and Humanities in Germany (Stifterverband für die deutsche Wissenschaft), the work group for the elaboration of the "German Qualifications Framework for Lifelong Learning" and on the ERASMUS Mundus advisory board of the Federal Ministry of Education and Research (BMBF). An additional opportunity for exchanging information is provided by the participation of the employees of the head office at meetings, expert discussions, workshops or round table meetings organised by German academic and scientific organisations. Furthermore, the numerous discussions, which the board of the Foundation conducted along with higher education institution representatives, faculty associations, federations, professional associations and church representatives have also proved to be useful. Such informal meetings also represent an opportunity to discuss opportunities for collaboration and possible types of co-operation.

4.2 Publication of Accreditation Data

All study programmes which are awarded the seal of quality following accreditation, are published in the database of the Accreditation

Council. This database is linked with the Higher Education Compass of the German Rector's Conference and it is available on the Council's website (**www.akkreditierungsrat.de**), providing information on accreditation terms as well as on conditions that may be issued with accreditation. It provides also information on the profile of the study programme, the experts involved, and also the expert's evaluation of the study programme. Besides the accreditation data related to the study programme, the website of the Accreditation Council also provides statistics concerning accredited study programmes, information on the number of currently accredited study programmes itemised according to study duration, type of qualification, subject groups, higher education institution type, German states and standard periods of study. The accreditation data is maintained and updated in the database by the agencies accredited by the Accreditation Council. Data records may be released after they have been formally examined by the head office of the Accreditation Council.

In order to further develop the database for system accreditation, the Accreditation Council, in collaboration with the German Rectors' Conference, has developed a concept for modified data collection. The main aim of this concept involved minimising the effort for data input and data administration for the agencies without lowering data quality. In the first half of 2010, the extended database was already given a test run, to ensure a smooth start to the data acquisition within the framework of system accreditation. In the future, for example, all study programmes of a higher education institution which has successfully completed the system accreditation procedure, will automatically be published in the database of accredited study programmes.

In collaboration with the German Rector's Conference, the Accreditation Council participates in the European database project Qrossroads. With the participation of accreditation institutions from Belgium (Flemish part), Germany, France, Norway, Poland, Spain, Switzerland, the Netherlands and Austria, this database provides the user with extensive information on the accredited study programmes as well as on the higher education institution and accreditation systems of the participating countries under **www.qrossroads.eu**.

4.3 Communication with the Agencies

A constructive and close collaboration between the Accreditation Council and the agencies needs a sound communicative structure, which ensures reciprocal information between all parties involved. The involvement of agency representatives in the various work groups of the Accreditation Council and in round table discussions held with the agencies and organised by the Council as well the membership of an agency representative in the Accreditation Council have proven to be reliable communication instruments in the previous years. The member appointed by the agency participating in an advisory capacity at the Council's meeting, has the task of representing the agencies and of informing them about the outcomes of the Accreditation Council's meetings. At the request of the agencies, the member's participation at meetings held in 2010 was extended and now also covers issues concerning the activity of single agencies.

Before adopting resolutions with fundamental significance for the accreditation system and the accreditation procedures, the Accreditation Council consults with the agencies. In this way it can be assured that the practical experiences gained by the agencies in accreditation

will be taken appropriately into account without questioning the Council's sovereignty concerning the definition of regulations.

In 2010, the members of the Accreditation Council and the agencies met for a round-table discussion on 21 May 2010, which was also attended by further representatives of the federal states. The topics dealt with in the discussion included the publication of the reports from accreditation procedures, the accreditation of joint programmes, requirements for higher education institutions with regard to application documents and challenges in re-accreditation. The constructive discussion made it possible to further consolidate the common understanding of the criteria set by the Accreditation Council and the changed Common Structural Guidelines of the *Länder*. Upon the invitation of the agencies, the managing directors of the Foundation and the programme managers of the head office also took part in a further meeting of all agencies on 2 February 2010, in which all parties involved came to an understanding regarding the organisation, demands and results of the assessment procedures.

Another important contribution was made by the agency representatives in the work group of the Accreditation Council on study programmes with a special profile demand. Thanks also to the trustful co-operation between the agencies, almost all agencies were involved in the discussions.

The Accreditation Council promptly informs the agencies about new or amended resolutions adopted by the Council, as well as any amendments to requirements which are common or specific to the federal states, in circulars or e-mails.

The monitoring of the accreditation procedures (see **Chapter 2.2**) carried out by the Accreditation Council has given further insight for both

the Council as well as the agencies, which has thus led to a better understanding of the different point of views of the various parties involved.

4.4 Statistical Data

A total of 6,701 Bachelor's and Master's study programmes, which were offered by state or state-recognised higher education institutions in Germany, bore the seal of the Accreditation Council by the end of December 2010.[2] The number of accredited study programmes increased by over 1,000 study programmes over a period of one year and has thus increased by a further 18%. Currently almost 60% of the offered Bachelor's and Master's study programmes, which by now constitute over 80% of the total number of study programmes on offer, have been accredited.[3] Since the statistics of the Accreditation Council refers to study programmes which were accredited at the time of query from the database, the number of 6,701 accredited study programmes does not say anything about the total number of accreditation procedures performed by the agencies.

Out of the total 6,701 Bachelor's and Master's study programmes accredited in December 2010, over 75% were accredited subject to conditions, whereas the accreditation was denied by the resolution of the competent accreditation commission in 51 cases. In com-

parison to the previous year's figures, the share of study programmes accredited subject to conditions has increased slightly.

If a study programme is accredited subject to conditions, the quality requirements of the Accreditation Council in single criteria are not fully met. In such cases, the higher education institute proves that the conditions have been fulfilled and has further developed its study programme with view to improving quality.

The website of the Accreditation Council provides current figures at: **www.akkreditierungsrat.de**

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[2] The mentioned numbers are based on the records on the Accreditation Council's database. All accredited study programmes or study possibilities are listed in this database, provided that the accreditation agencies entered them into the database.

[3] The number of all offered Bachelor's and Master's study programmes came to a total of 11,549 in winter semester 2009/2010. This and other statistical data on the implementation of Bachelor's and Master's study programmes is regularly published by the HRK in their statistics on higher education policy (**www.hrk.de**).

5. Resources

5.1 Finances

According to § 4 para. 1 of the accreditation foundation law, the Accreditation Council is jointly financed by the 16 federal states of Germany. Furthermore, pursuant to § 4 of the accreditation foundation law, the Council is allowed to impose fees for fulfilment of its tasks to cover its administrative expenses. The federal states only offer funding if the administrative expenses of the Accreditation Council are not covered by fees.

The Standing Conference of Finance Ministers has determined the annual allocation by the federal states to the Accreditation Council at 330,000 Euro. Fees exceeding this amount will remain with the Accreditation Council up to a maximum of 40,000 Euro; surpluses have to be paid to the federal states. This regulation was resolved for the budget years 2008 to 2011.

The annual financial statement of the Accreditation Council reports for 2010 revenues of 399,461.19 Euro and total expenses amounting to 399,228.07 Euro, and therefore a remainder of 233.12 Euro.

For the years 2012 and 2013, the Accreditation Council has submitted a new budget, which takes into account the greater demand in terms of personnel and materials due to the increased number of agencies and the introduction of system accreditation. The greater demand in terms of personnel corresponds to 1.4 jobs in academic service and 0.5 jobs in the processing department.

In order to put an end to the urgent deficits determined in the external evaluation made in 2008 in the PR sector, the Accreditation Council has applied for additional funds in this sector.

5.2 Personnel, Spatial and Material set up

The personnel at the head office of the Accreditation Council includes: one managing director, three programme managers (3.25 full-time equivalents) and one processing clerk (50%); as compensation for the ENQA presidency of the Managing Director, a temporary position has been set up with special funds; all employees hold higher education degrees. All employment contracts are, with one exception, permanent contracts. The remuneration is in line with the directives of the Collective Agreement for the Public Service of the Federal States (*TV-L - Tarifvertrag für den Öffentlichen Dienst der Länder*).

Including the head office in the Adenauerallee 73 in Bonn, the Accreditation Council disposes of four rented offices with a total space of 120 square meters.

The EDP infrastructure of the currently six work places comprises of one Pentium IV each or higher, one flat screen monitor, one telephone and internet connection.

Annexes

Members of the Boards

► Members of the Accreditation Council

Chairman

Professor Dr. Reinhold R. **Grimm**

Vice-chairman

State Secretary Professor Dr. Thomas **Deufel**

Representatives of the Higher Education Institutions

Professor Dr. Stefan **Bartels**, University of Applied Science Lübeck

Professor Dr. Reinhold R. **Grimm**, Friedrich Schiller University Jena

Professor Dr. Ute von **Lojewski**, University of Applied Science Münster

Professor Dr. Reinhard **Zintl**, Otto Friedrich University Bamberg

Representatives of the Federal States

State Secretary Professor Dr. Thomas **Deufel**, Ministry of Education, Science and Culture of Thuringia

State Secretary Dr. Michael **Ebling**, Ministry of Science, Further Education, Research and Culture of Rhineland-Palatinate

Ministerial Director Dr. Wilhelm **Rothenpieler,** Bavarian State Ministry for Science, Research and Arts

Ministerial Director Klaus **Tappeser**, Ministry for Science, Research and Arts of Baden-Württemberg

Representatives of Professional Practice

Ernst **Baumann**, former member of the Executive Board of the BMW AG

Petra **Gerstenkorn**, member of the Federal Board of ver.di

Dr. Regina **Görner,** Metalworkers' Union Board

Thomas **Sattelberger**, member of the Executive Board of the Deutschen Telekom AG

Ministerialdirigent Hans-Christian **Vollmer**, Ministry for Inner Affairs, Sports and Integration of Lower Saxony

Students

Moritz **Maikämper**, Brandenburg University of Technology Cottbus

Tobias **Proske**, Wismar University of Applied Science

International Representatives

Dr. Sijbolt **Noorda**, President of the Association of Universities in the Netherlands (vereniging van universiteiten- VSNU)

Professor Dr. Andrea **Schenker-Wicki**, University of Zurich

Representatives of the Accreditation Agencies (with advisory capacity)

Professor Dr. Lothar **Zechlin**, University of Duisburg-Essen

► Members of the Foundation Council

Chairman

State Secretary Gerd **Krämer** (until 10/2010)

name hitherto unknown

Vice-chairman

Professor Dr. Wilfried Müller

Representatives of the Federal States

State Secretary Cordelia **Andreßen**, Ministry for Science, Economic Affairs and Transportation of Schleswig-Holstein (successor for Mr Krämer as from 10/2010)

State Secretary Martin **Gorholt**, Ministry of Science, Research and Culture of the Federal State of Brandenburg

State Secretary Dr. Hans-Gerhard **Husung**, Administration of the Senate for Education, Science and Research Berlin (until 12/2009)

State Secretary Gerd **Krämer**, Hessian Ministry for Science and Arts (until 10/2010)

State Secretary Udo **Michallik**, Ministry for Education, Science and Colure of Mecklenburg-Vorpommern

State Secretary Dr. Knut **Nevermann**, Administration of the Senate for Education, Science and Research Berlin (successor for Mr Husung as from 12/2009)

Councillor of State Bernd **Reinert**, Free and Hanseatic City of Hamburg, Board for Science and Research

State Secretary Carl **Othmer**, Senate for Education and Science of Bremen

Representatives of the Higher Education Institutions

Professor Dr. Andreas **Geiger**, Rector of the Magdeburg-Stendal University of Applied Sciences (until 10/2010)

Dr. **Kathöfer**, Secretary General of the HRK

Professor Dr. Dieter **Lenzen**, President of the Freie Universität Berlin

Professor Dr. Wilfried **Müller**, Rector of the University of Bremen

Professor Dr. Micha **Teuscher**, Rector of the University of Applied Sciences of Neubrandenburg (successor for Mr Geiger as from 10/2010)

Professor Dr. Margret **Wintermantel**, President of the German Rectors' Conference

► Members of the Board

Chairman

Professor Dr. Reinhold R. **Grimm**

Members

State Secretary Professor Dr. Thomas **Deufel**, Ministry of Education, Science and Culture of Thuringia

Professor Dr. Reinhold R. **Grimm**, Friedrich Schiller University Jena

Dr. Achim **Hopbach**, Managing Director of the Foundation for the Accreditation of Study Programmes in Germany

Meeting Sessions

Meetings of the Accreditation Council in 2010

62nd meeting held on 12 February 2010 in Berlin

63rd meeting held on 21 June 2010 in Berlin

64th meeting held on 29 September 2010 in Frankfurt a.M.

65th meeting held on 10 December 2009 in Bonn

Meetings of the Foundation Council in 2010

9th meeting held on 16 July 2010 in Berlin

Statement on Further Development of the Accreditation System

(Resolution adopted by the Accreditation Council on 14 January 2011)

The Accreditation Council welcomes the current discussion on further development of accreditation as being of support to its endeavour to structure external quality assurance in higher education in Germany in an effective and efficient manner. Different strands of discussion continue to culminate in this debate, ranging from a general criticism on accreditation and on how it has been implemented with changing focuses since the system was introduced, to the question of its effectiveness in light of the criticism concerning the academic feasibility of Bachelor's and Master's study programmes, which was expressed by the students during their protests regarding the implementation of the Bologna reform, and finally the demands to refocus the methods applied towards a more development-oriented approach with regard to quality assurance and to create new legal grounds for accreditation.

The measures called for differ not only in their aims but also with regard to whom they are addressed as well as their time horizon. Whilst procedural rules and criteria may be corrected by the Accreditation Council at short notice, modifications concerning the entire system require the federal states and the Standing Conference of the Ministers of Education and Cultural Affairs (KMK) to adopt respective decisions and possibly also legislative measures.

The following two principles are of fundamental importance for considerations on the further development of accreditation in Germany:

In the further development of accreditation, it must be ensured that the objectives pursued with the procedures can be achieved.

The „Standards and Guidelines for Quality Assurance in the European Higher Education Area" (ESG) must be observed in order to ensure that German quality assurance is recognised at international level. This includes in particular the higher education institutions' key responsibility for quality in teaching and learning as well as the independence of the accreditation agencies.

The statement includes the following aspects

- suggestions concerning the legal structure of the accreditation system,
- immediate removal of prohibitive regulations in system accreditation,
- further steps of action required in order to substantially enhance the accreditation system.

2. Accreditation in Germany: Purpose and Results
2.1 Purpose

On the basis of decisions adopted by the KMK and HRK on 3 December and 6 July 1998[4], accreditation for study programmes was initially introduced with the primary aim of assuring quality, transparency and comparability with regard to the Bachelor's and Master's study programmes which had been newly introduced at that time. Last but not least, this should serve to improve student mobility and to promote the employability of graduates. To this end, the organisations involved shifted their paradigms, replacing the quality assurance carried out previously as part of the state approval procedure for study programmes and their examination regulations based on general guidelines[5] by non-governmental and more flexible accreditation carried out on a regular basis.

The objectives set thus range from assuring the quality of a study programme in the strict sense and particularly important elements of quality, such as professional relevance to higher education policy objectives such as promoting student mobility, which are a merely

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[4] *German Rectors' Conference*, Resolution adopted on 6 July 1998: Procedures for Accreditation; *Standing Conference of the Ministers of Education and Cultural Affairs of the Länder*, Resolution adopted on 3 December 1998: Introducing a Procedure for Accreditation of Bachelor's and Master's Study Programmes.
[5] Cf. regulations determined in § 9, para. 2 of the Framework Act for Higher Education (HRG), in its version applicable until 1998.

implicit expression of the quality of a study programme. The process of restructuring the quality assurance system may therefore not be understood without considering the link between the reform of the approval procedure and quality assurance.

2.2 Results

As in other countries, since its introduction external quality assurance in Germany has been subject to criticism concerning efforts and costs, efficiency and recently also its legal structure.

A closer look at three central objectives, however - wider scope for action for higher education institutions with regard to study programme design, quality assurance in teaching and learning, transparency regarding the type and quality of study programmes - reveals that programme accreditation is evidently an adequate means that contributes to the achievement of these objectives. On one hand, this is proven by the differentiation in academic programmes which is promoted by accreditation, but also by the fact that more than 60% of the accreditation decisions are issued under certain conditions thus causing the initiation of a process of quality enhancement. In addition, a pleasingly small number of about 80 study programmes did not obtain accreditation due to considerable deficiencies[6]. Finally, the impact of accreditation on enhancing transparency in teaching and learning is twofold, since it offers on the one hand additional information by publishing accreditation results and on the other hand due to the fact that one criterion to be verified in the accreditation procedures concerns the assessment of the provision of comprehensive information for students. Even if the above-mentioned aspects may be regarded as strong evidence for a certain effectiveness of accreditation, extensive reliable data that may answer this question is still lacking. Research on the impacts of accreditation remains a desideratum for German quality assurance. Both, critics and advocates of accreditation have thus often limited themselves to expressing their opinion in a rather anecdotic way.

3. Further development
3.1 Ensuring legal grounds

The political and legal framework for accreditation is constituted by

- agreements concluded at European level;
- KMK resolutions and nationwide agreements as well as establishments such as the "Foundation for the Accreditation of Study Programmes in Germany";
- the laws regulating Higher Education in the German federal states.

They provide the higher education institutions with a reliable framework for facing the challenges of the Bologna Process. Continuity should therefore be ensured in this respect. By doing so, the federal states also fulfil their responsibility for structural homogeneity and quality in their educational system, which are necessary for ensuring equivalence of degrees and the students' possibility to transfer between higher education institutions. This is a role that needs to be fulfilled by the federal states also in the future. In order to enable the accreditation system to accomplish this purpose, a reliable legal foundation needs to be provided, separating more clearly governmental approval decisions (according to the specific regulations of the respective federal states) from quality assessments (accreditation), in order to prevent the procedures from being affected by the restrictions imposed by administrative law. Only in this way can the non-governmental orientation of accreditation required by the European agreements be ensured.

In the current debate on the legal nature of accreditation it is widely considered that accreditation constitutes an administrative act and that accreditation agencies thus act as agents

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[6] About 10 study programmes of those mentioned above obtained accreditation after extensive revisions carried out in a subsequent procedure.

performing a public function.[7] In contrast, the Accreditation Council has always assumed that accreditation agencies act as private-law bodies and that the agencies have never actually been legally entrusted with public functions.

The legal nature of accreditation may only be identified by analysing the normative structures of the accreditation system: At least before 2005 the private-law nature of the activities prevailed due to the fact that at that time it was not possible to assign the accreditation agencies and their decisions to a public authority with legal capacity.[8] Even the entry into force of the German Law on the Establishment of a Foundation "Foundation for the Accreditation of Study Programmes in Germany" adopted on 15 February 2005 and amended on 1 April 2008 (ASG) has left the situation unchanged. From a general point of view, this law has indeed contributed to the legal consolidation of the whole system, but in this specific case no change has been brought about. The wording of § 2, para. 1, no. 1 ASG may not be unambiguous, but does not state that the Foundation entrusts the accreditation agencies with any "powers of a public authority". Instead, the explanatory memorandum for the law explicitly describes accreditation agencies as being bodies organised "and acting" under private law.[9] From the above illustrated elements it cannot be presumed that the entrustment of the accreditation agency with public functions has ever been intended. In particular in view of the indisputably private-law nature of the agencies' activities before 2005, the change towards a henceforth presumably intended entrustment with public functions should have found a much clearer expression in the wording of the ASG itself.

Hence - and as a consequence of the fact that entrustment is given neither formally nor substantively - accreditation agencies do not need to be empowered to perform their tasks in a clearer and more detailed way than previously. The legal foundations currently determined in the ASG are in fact exhaustively sufficient for the given purpose.

The Accreditation Council asks the Federal States to provide uniform legal foundations for accreditation. Rules that differ from state to state result in different formal designs for accreditation procedures, depending on whether accreditation is regulated by administrative or private law.

3.2 Further Development of System Accreditation

The Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* (KMK) has charged the Accreditation Council with the task of carrying out an evaluation of the system accreditation procedure after a five-year period. When system accreditation was introduced, the Accreditation Council furthermore decided to monitor the first two procedures carried out by each agency, performing additionally an assessment of the first six procedures in order to be able to identify and correct possible errors at an early stage.

At present, two procedures are at the programme random sampling stage and the relative decisions are thus expected for the first quarter of 2011. Other procedures are still at their initial stage. Therefore, no adequate information is at present available to serve as a basis for recommendations regarding the further development of system accreditation towards more effectiveness and efficiency.

3.2.1 Abolishment of Prohibitive Regulations

Nevertheless, immediate action is required, since - according to the higher education institutions - the slow implementation of system accreditation is substantially due to two reasons related to the way in which system accreditation is regulated.

In response to the current state of development of internal quality assurance systems, a certain number of higher education institutions have decided to postpone their applications. System accreditation requires the higher education institutions to meet high standards expecting

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[7] Administrative Court of Arnsberg, Resolution of 16 April 2010, 12 K 2689/08, para. 119 ff
[8] See also *Heitsch* (Annotation 22), p. 138, *Pautsch*, Rechtsfragen der Akkreditierung, in: WissR 2005, p. 200 (209).
[9] LT-Drucks. 13/6182, p. 12.

them to provide evidence for an already implemented and operative internal management and quality assurance system for teaching and learning. This effect is amplified by the fact that awarding system accreditation under certain conditions is at present not admitted.
The Accreditation Council has hence decided to introduce the instrument of accreditation under certain conditions also for system accreditation.

The scope of the programme random sample and of the half-time random sample has proved to have a prohibitive effect. With regard to the significant effort required by system accreditation, many higher education institutions comment that the high number of study programmes to be assessed has a strong adverse effect on the attractiveness of system accreditation, which is in addition amplified by the substantial costs involved for carrying out the random samples. As a result, higher education institutions who are meanwhile experienced in carrying out procedures for programme accreditation prefer to adopt these due to the fact that less additional effort and expenses are required. The first reports on the experiences made by accreditation agencies and the higher education institutions involved also suggest that the value of the insights gained from programme random sample procedures does not depend on the number of samples assessed.
The Accreditation Council has hence decided to limit the scope of the programme random sample to three study programmes as a rule.

With regard to the conditions for access, accreditation agencies report unanimously that only those higher education institutions having many years of experience acquired in programme accreditation initiate procedures for system accreditation, regardless how many study programmes have obtained accreditation. Furthermore, due to the detailed regulations the impression may arise that the higher education institutions are not themselves responsible for assessing their own prospects for a successful system accreditation.
In this respect, the quantitative conditions for access to system accreditation set by Clause 5.2 of the resolution "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" of 8 December 2009 do not take any effect.
The Accreditation Council has hence decided to cancel evidence for accredited study programmes as a condition for access to system accreditation.

3.2.2 Evaluation of system accreditation

The Accreditation Council expects an increase in system accreditation procedures after the abolition of the above-mentioned prohibitive regulations, which will allow an initial evaluation of the experience acquired in these procedures to be made as quickly as possible and to adjust the rules, if necessary. The objective is to ensure the comprehensibility and applicability of procedural rules and criteria for decisions and, where required, to enhance their suitability for the purpose of achieving stronger self-responsibility of higher education institutions for quality development and ensuring compliance with the given standards. As a first step, the Accreditation Council monitors the first procedures carried out in system accreditation in order to be able to gain first insights from an evaluation performed concomitantly.
From a present-day perspective, this evaluation will focus on:

- the effectiveness of the feature random sample
- the concrete structure of the procedures adopted by the accreditation agencies and
- the quality / preparation of the experts.

Furthermore, the Accreditation Council plans to revise the half-time random sample so that an assessment of internal quality development in higher education institutions can be performed with less effort.

3.3. Further Development of Programme Accreditation

The initial experience gained in re-accreditation procedures shows that only such procedures make it possible to investigate quality-related aspects such as the academic feasibility, the actual work load for students, the professional relevance of qualification objectives and the professional success effectively achieved by graduates. In comparison, first-time accreditation procedures are too laborious.

By summer 2011, the Accreditation Council - in co-operation with the accreditation agencies - will thus substantially revise the rules of procedure for first-time accreditation of a study programme in order to minimise the documentation required and to streamline the process of assessment.

Rules of the Accreditation Council for System Accreditation

(Resolution of the Accreditation Council of 8 December 2009 as amended on 10 December 2010)

4. General Rules for System Accreditation

4.1 The Accreditation Agency conducts a p r e p a r a t o r y   c o n v e r s a t i o n with the applying Higher Education Institution and informs it about essential contents, steps and criteria of the procedure. The Agency provides the Higher Education Institution with a complete description of services and determines the fees.

4.2 The Higher Education Institution submits an application, including brief descriptions of the institution and its internal management and quality assurance systems in the field of teaching and learning. In case of a system re-accreditation the Higher Education Institution presents a report that provides information on the results of the h a l f   t i m e   r a n d o m   s a m p l e . In case of a respective special state regulation, the application has to be submitted via the responsible ministry.

4.3 The Agency conducts a p r e l i m i n a r y   e v a l u a t i o n whether the prerequisites for Higher Education Institutions for the admittance to system accreditation are met. If there are obviously no chances for successful system accreditation, the Agency shall inform the Higher Education Institution and the Accreditation Council within four weeks about the result of the preliminary evaluation.

4.4 The Higher Education Institution submits documentation to the Agency which particularly specifies internal management and decision making structures, the Higher Education Institution's overall mission and profile, its offer of study programmes, defined quality objectives and the system of internal quality assurance in the field of teaching and learning. The documentation explains the way procedures for quality assurance and quality enhancement work. In case of a system re-accreditation the documentation additionally comprises a report on the follow-up activities undertaken by the Higher Education Institution in order to remedy the deficiencies detected within the half-time random sample. A statement by the students' council of the Higher Education Institution shall be attached to the documentation.

4.5 For the evaluation procedure, the Accreditation Agency appoints an e x p e r t   g r o u p , consisting of at least the following persons:

- three members having experience in the fields of managing Higher Education Institutions,

- and of internal quality assurance of Higher Education Institutions,

- a student member having experience in the fields of self-administration of Higher Education Institutions and of accreditation.

one practitioner from the profession.

One member of the expert group each should have experience in the management of Higher Education Institutions, in curriculum design of study programmes and in quality assurance in the field of teaching and learning.

One member of the expert group shall be from abroad. If decisions on supplementary determinations in terms of professional law must be taken during the procedure and as far as it is required due to state regulations an adequate expert must be involved as well.

The Agency appoints a chairman or chairwoman.

The Agency takes appropriate steps to ensure experts' impartiality and maintains fairness toward the Higher Education Institution. The Agency informs the Higher Education Institution about the nomination of the experts and comes to an agreement. The Agency shall not grant a right of proposal or veto.

The Agency prepares the experts for the procedure.

4.6 The evaluation procedure includes

- two on-site visits,

- an in-depth comparative examination of relevant features of the structure of study programmes, the conduct of study programmes and quality assurance extending to all bachelor and master study programmes (feature random sample). In particular, the feature random sample serves for verifying compliance of all study programmes of the Higher Education Institution with the guidelines specified by the Standing Conference of the Ministers of Education and Cultural Affairs ("KMK") as well as state-specific guidelines and the criteria set up by the Accreditation Council for the accreditation of study programmes. Subject matter of any feature random sample may particularly be: the modularisation concept of the Higher Education Institution, the system of allocating ECTS points, the examination system, the organisation of studies and the qualification objectives. If the Higher Education Institution offers state regulated study programmes a relevant feature of at least one of these programmes has to be added. The experts decide on the composition of the feature random sample in accordance with standard rules that are agreed between the agencies and the Accreditation Council.

- in-depth examination of three study programmes (programme random sample). In case of Higher Education Institutions with less than nine study programmes, the programme random sample has to be carried out only for two programmes. When selecting the programme random samples, the Agency considers the whole range of subjects taught by the Higher Education Institution. If the Higher Education Institution offers state regulated study programmes one of these must be part of the programme random sample. If the Higher Education Institution offers teacher training programmes one programme each per type of teaching post is to be included in addition.

- if a study programme of the programme random sample is already accredited, the Agency may refrain from an on-site visit if the accreditation dates back no longer than three years.

The first on-site visit primarily serves for collecting information on the Higher Education Institution and its management systems. The experts examine the documents submitted with regard to their significance and completeness and decide which documents the Higher Education Institution must additionally present for the second on-site visit. The experts are involved in the selection of any feature random sample; the Agency determines a procedure for such selection.

The second on-site visit serves for the critical analysis of the documents submitted and for conducting the feature random samples. It should be scheduled so that the Higher Education Institution has sufficient time to compile the documentations required.

The experts conduct conversations especially with the presidency of the Higher Education Institution, the administrative staff, the equal opportunity commissioners, the persons in charge of quality assurance as well as professor and student representatives.

They shall prepare a preliminary report taking into account the critical analysis of the documents submitted, the results of the feature random samples and the conversations held. The Agency makes this report available to the experts of the programme random samples.

4.7 If the Accreditation Agency is also licensed for the accreditation of study programmes, it conducts in-depth evaluations of study programmes (programme random samples) as part of system accreditation. The Agency may commission another Agency licensed for programme accreditation by the Accreditation Council to take programme random samples.

If the Agency is not licensed for programme accreditation, those programme random samples must be taken by an Agency licensed for programme accreditation.

For taking the programme random samples the conducting Accreditation Agency appoints expert groups that ensure a proper evaluation of the study programmes in all areas relevant for the evaluation procedures. The common and state-specific structural guidelines and the "Criteria for the Accreditation of Study Programmes" specified by the Accreditation Council apply correspondingly pursuant to section 2. Student experts and practitioners from the profession shall be involved. In the case of teacher training or combined study programmes which contain elements in Theological Studies, an expert from either the Evangelical or Catholic Church must be involved. The examination is carried out in accordance to section 1 of the resolution of the Accreditation Council "General Rules for Carrying

out Programme Accreditation and Reaccreditation Procedures" without leading to independent accreditation decisions.

4.8 The expert group for system accreditation prepares a final report with their d e c i s i o n r e c o m - m e n d a t i o n s for system accreditation, taking into account the evaluation reports on the programme random samples and involving the chairmen of the expert groups for the programme random samples. In particular, the experts assess whether the deficiencies in quality identified in the feature and programme random samples have a systemic reason.

4.9 The Accreditation Agency forwards the experts' report to the Higher Education Institution without their decision recommendation for comment.

4.10 The Accreditation Agency's decision is based on the experts' report and the decision recommendation, taking into account the Higher Education Institution's comment. The Agency either grants accreditation with or without conditions or denies accreditation. A one-time suspension of the procedure by the Agency for normally 12 months, but no longer than 24 months is possible.

4.11 If the procedure results in denial of accreditation, the Agency must provide reasons therefore. (For the possibility to use the results from the programme random samples see Cl. 1.1.5).

4.12 The Accreditation Agency publishes the decision, a summary of the experts' report and the names of the experts involved. In addition, without prejudice to its reporting obligations to the Accreditation Council, the Agency ensures confidentiality in all of the procedures.

4.13 After expiry of half of the accreditation term the Higher Education Institution mandates an Agency that is licensed by the Accreditation Council for programme accreditation to carry out an in-depth examination of study programmes (half-time random sample). One study programme for each 2500 students enrolled in the last winter term is assessed, including at least one Bachelor's and one Master's study programme. The assessment also comprises one state regulated study programme and one Bachelor's or Master's study programme for teacher training, if such programmes are offered by the Higher Education Institution. The Accreditation Agency submits a report that provides information on the results of the halftime random sample and that, where appropriate, gives recommendations regarding the remedy of deficiencies. Afterwards the Agency publishes the report and makes it available to the Higher Education Institution. The examination is carried out in accordance to section 1.1 of the resolution of the Accreditation Council "General Rules for Carrying out Programme Accreditation and Reaccreditation Procedures" without leading to independent accreditation decisions.

5. Criteria for System Accreditation

5.1 Definition of the Subject Matter of Accreditation

Subject matter of the system accreditation is the internal quality assurance system of a Higher Education Institution in the field of teaching and learning. The structures and processes relevant for teaching and learning are assessed with regard to their appropriateness for achieving the qualification objectives and for ensuring high quality of the study programmes, with the European Standards and Guidelines for Quality Assurance in Higher Education (ESG), the guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs ("KMK") and the criteria of the Accreditation Council being applied.

A positive system accreditation attests the Higher Education Institution that its quality assurance system in the field of teaching and learning is appropriate to achieve the qualification objectives and to ensure the quality standards of its study programmes. Accordingly, study programmes set up after system accreditation or that already have been the subject matter of internal quality assurance as specified by the accredited system are accredited. This does not apply to Evangelical and Catholic theological study programmes in full theological courses.

In particular exceptional cases a Higher Education Institution may apply for system accreditation for the internal quality assurance system of one or several of the study-related organisational units of the Institution, if it has management competency and operative responsibility for teaching and learning, i.e. for planning and implementing the offered study programmes, and for the quality assurance in the field of teaching and learning.

5.2 Prerequisites for Admitting Higher Education Institutions to System Accreditation

In case of a system re-accreditation the Higher Education Institution presents a report that provides information on the results of the half-time random sample.

The Higher Education Institution demonstrates plausibly that it has set up a formalised quality assurance system covering the whole Higher Education Institution.

No negative decision has been filed against the Higher Education Institution in a system accreditation procedure during the last two years.

5.3 Prerequisites for the Admittance of Sub-divisions of Higher Education Institutions to System Accreditation in Particular Exceptional Cases

5.3.1 In system accreditation, the report on the results of the half-time random sample refers only to the study-related organisational units. The quality assurance system of the organisational unit is integrated into that of the whole Higher Education Institution.

5.3.2 The presidency of the Higher Education Institution applies for system accreditation for one or several study-related organisational units and provides comprehensible reasons why accreditation of the quality assurance system for the entire Higher Education Institution is not yet reasonable or practicable. In addition, it declares that it assumes the responsibility for the internal organisation of the procedure.

5.4. Criteria

5.4.1 Qualification objectives

The Higher Education Institution has defined and published an education profile for itself as an institution and for its study programmes as part of a strategic development concept. It has and is continuously using methods to check the qualification objectives of its study programmes.

5.4.2 Management system in the field of teaching and learning

The Higher Education Institution has and is continuously using a management system in the field of teaching and learning. This ensures determination of concrete and plausible qualification objectives of study programmes, taking into account the Criteria for the Accreditation of Study Programmes as amended in its latest version. The qualification objectives include disciplinary and interdisciplinary aspects, especially scientific competency, employability (competency to take up a qualified employment), qualification to commitment in the realm of civil society and personality development. The system warrants

- implementation of the qualification objectives and intended learning outcomes in study programme concepts that are academically feasible (practicable) and ensure achievement of the aspired level and profile of qualification. This includes a realistic evaluation and verification of students' work load, application of the ECTS, proper modularisation, adequate organisation of examinations, offers of consultancy and assistance, consideration of gender justice and the specific requirements of students having health impairments, students having children, foreign students, students with a migration background and/or from so-called educationally disadvantaged classes as well as the rules applied for recognising credits achieved at other higher education institutions or externally achieved credits, if necessary in accordance with the Lisbon Recognition Convention;

- adequate implementation of study programmes on the basis of qualitatively and quantitatively sufficient resources as well as measures for personnel development and qualification;

- agreement of the qualification objectives with the German Qualifications Framework for Higher Education and compliance with legal requirements, particularly common and state-specific structural guidelines and, where appropriate, existing special regulations for study programmes preparing students for state regulated professions;

- participation of professors and students, graduates and external experts as well as practitioners from the profession in the development and reformation of study programmes. In the case of study programmes preparing for state regulated professions, adequate experts shall be involved.

5.4.3 Procedure of internal quality assurance

The Higher Education Institution has in place quality assurance methods in the field of teaching and learning meeting the requirements of the European Standards and Guidelines for Quality Assurance in Higher Education and integrated into an overall concept.

The internal quality assurance system has staff and equipment resources that ensure sustainability. It is appropriate to assess the effectiveness of internal management processes in the field of teaching and learning and to warrant the ensuring and continuous improvement of the quality of teaching and learning.

In detail, the internal quality assurance system includes the following

- Regular internal and external evaluation of study programmes, taking into account the organisation of studies and examinations,
- Regular course evaluation of the quality of teaching units by students,
- Verification of the competency of professors in the fields of teaching and examination when they are hired and their regular training advancement,
- Regular verification of the compliance with guidelines for the accreditation of study programmes specified by KMK and the Accreditation Council,
- Binding procedures for implementing recommendations and a system of incentives.

It ensures participation of professors and students, of administrative personnel, of graduates and practitioners from the profession and makes sure that authorities (persons) that are independent in their decision perform the evaluation of quality within the scope of internal and external evaluations.

5.4.4 Reporting system and data collection

The Higher Education Institution has an internal reporting system that documents the structures and procedures in the development and implementation of study programmes as well as the structures, procedures and measures of quality assurance, its results and effects.

5.4.5 Responsibilities

The decision procedures, competencies and responsibilities within the management system for teaching and learning and within the internal quality assurance system are clearly defined and published throughout the Higher Education Institution.

5.4.6 Documentation

The Higher Education Institution informs the bodies in charge of teaching and learning at least once per year and in addition the general public and the responsible ministry in an appropriate manner about the procedures and results of the quality assurance measures in the field of teaching and learning.

5.4.7 Joint Programmes

The Higher Education Institution ensures that the partner Higher Education Institutions, with which it carries out joint programmes, implement appropriate measures to ensure - in accordance with the criteria set in the clauses 5.4.1 to 5.4.6 - the quality of the components of the joint programmes offered by the partner institution.

6. Decision Rules for System Accreditation

6.1 Contents of Decisions and their Prerequisites

6.1.1 System accreditation must be granted, if the quality requirements are met. Accordingly, study programmes set up after system accreditation or that already have been the subject matter of an internal quality assurance as specified by the accredited system are accredited. If system accreditation was applied for an organisational unit of the Higher Education Institution, any and all decisions of the Agency only refer to study programmes of that organisational unit.

6.1.2 The accreditation shall be granted with conditions if there are defects, which can most likely be remedied within nine months.

6.1.3 System accreditation shall be denied, if essential quality requirements are not met. Already existing accreditations shall not be affected thereby. If the applying Higher Education Institution can be expected to remedy the deficiencies, the accreditation procedure may be suspended once by a period of generally 12 months, but maximum 24 months to be set by the Accreditation Agency. If renewed system accreditation (re-accreditation) is denied, the study programmes shall be deemed accredited for another one and a half years.

6.1.4 Shortcomings are essential in the case that the internal quality assurance system does not ensure compliance with the criteria for accreditation of study programmes.

6.2 Time Limitation

6.2.1 System accreditation shall be limited to a period of six years. The period starts with the day when the accreditation notification becomes effective (Cl. 6.6). The period calculated after that is extended until the end of the last academic year within the period.

6.2.2 In the case of re-accreditation the accreditation time period is eight years. Clause 6.2.1, Sentence 3 applies in a similar manner to the determination of the period.

6.3 Provisional Accreditation

6.3.1 If an application for re-accreditation is submitted to an Accreditation Agency at the latest one year before the expiry date of the accreditation period, the system accreditation should be provisionally extended by the Agency for a maximum of two years, unless there is obviously no prospect of a successful conclusion of the procedure. If re-accredited, the length of time required for the preliminary extension of the accreditation shall be included in the relevant period of time determined in accordance with Clause 6.2. Provisional system accreditation lapses with immediate effect in case of a negative decision in the procedure. Clause 6.1.3, Sentence 4 applies to the study programmes of the Higher Education Institution.

6.3.2 If the Higher Education Institution has applied to an Accreditation Agency for system accreditation, then the Agency accredits the study programmes, the accreditation terms of which expire during the procedure, temporarily until the decision on the system accreditation is taken.

6.4 Conditions

6.4.1 Conditions and respites for providing evidence of their fulfilment have to be specified clearly.

6.4.2 Accreditations granted subject to conditions must include the indication that the lack of evidence of fulfilment of such conditions leads in general to the revocation of the accreditation.

6.4.3 The fulfilment of the conditions is declared by notification of the Accreditation Agency to the Higher Education Institution. In this case the accreditation decision is valid unconditionally for the duration specified in the accreditation notification.

6.4.4 If the Higher Education Institution does not provide evidence for the fulfilment of the conditions before the given respite and if accreditation was granted with a proviso of revocation, the Accreditation Agency shall immediately revoke the accreditation, after sending a reminder and expiry of an adequate additional respite, with effect from the end of the next semester. In well-founded cases the Accreditation Agency can grant a one-time extension of up to further three months.

6.5 Suspension of the Procedure

6.5.1 Accreditation procedures are suspended in writing by indicating the reasons and the period of time within which the Higher Education Institution may apply for the resumption of the procedure.

6.5.2 It is incumbent upon the Higher Education Institution to apply for the resumption of the procedure to the Accreditation Agency within the period fixed; in this case the suspended procedure is immediately resumed. On resumption of the procedure the Agency decides whether any procedural steps have to be repeated.

6.5.3 In case that the Higher Education Institution does not submit an application for resumption of the procedure within the period stipulated, the Accreditation Agency shall refuse system accreditation.

6.6 Revocation of the Accreditation Decision

6.6.1 The Agency shall revoke the accreditation decision with immediate effect, if it was reached without taking into consideration or applying an accreditation criterion appropriately or in violation of an essential procedural rule and if the Accreditation Council has thus obliged the Agency to revoke the decision. This obligation does not apply, if the same accreditation decision would have been taken even if the mistake had not been made; the Agency has the burden of explanation and proof in this respect.

6.6.2 If in case of Cl. 6.5.1, a favourable accreditation decision should have been granted, the Agency shall file the corresponding decision without delay. 6.6.3 In case of modifications to the internal quality assurance system, the Agency decides whether they are to be defined as significant changes which might lead to a decrease in the quality of the study programmes. In this case, the Agency immediately revokes the accreditation, provided that a renewed system accreditation has not been applied for. In case of revocation, Cl. 6.1.3, Sentence 4 applies for the study programmes of the Higher Education Institution. The Agency decides whether the procedure can be shortened in the individual case.

6.7 Coming into Effect of Decisions

Decisions from accreditation agencies in the named cases will become effective upon the receipt of a written decision.

7. Rules for the Compilation of the Criteria Random Sample

7.1 The criteria random sample in the context of system accreditation is "an intensive comparative study, covering all Bachelor's and Master's study programmes, of relevant features of the curriculum design of study programmes, the implementation of study programmes and the quality assurance (criteria random sample). In particular, the feature random sample serves for verifying compliance of all study programmes of the Higher Education Institution with the guidelines specified by the Standing Conference of the Ministers of Education and Cultural Affairs ("KMK") as well as state-specific guidelines and the criteria set up by the Accreditation Council for the accreditation of study programmes.

7.2 Object of the Criteria Random Sample

The following features of the curriculum design of study programmes can be the object of the criteria random sample:

- Definition of qualification objectives
- Compliance with the general guidelines for the introduction of credit point systems and the modularisation of study programmes
- Definition of admittance prerequisites, crediting of external achieved performances and selection procedures
- Workload of students
- Facilities with regard to personnel, material and space under consideration of interdependent structures
- Organisation and coordination of studies
- Examination system (examination effort and examination forms), which is module-related and competence-orientated and adequate information about it
- Technical and interdisciplinary course guidance

7.3 Selection of the Criteria Random Sample

The criteria random sample contains at least three criteria. Two criteria are selected by lot.

7.4 Special Provisions

If the Higher Education Institution offers regulated study programmes (e.g. teacher training programmes), then the corresponding specifics (e.g. regulations for the accreditation of teacher training programmes, common to the *Länder* and if necessary *Länder*-specific) are added as further criteria.

Special Rules for the Accreditation of Joint Programmes

(Resolution of the Accreditation Council of 8 December 2009 as amended on 10 December 2010)

1.5.1 The following rules are applicable to study programmes jointly carried out by at least one foreign and one German Higher Education Institution and leading to at least one degree recognised by German law (joint programmes).

These rules are also applicable for the accreditation of national study programmes which offer an option that corresponds to a joint programme.

1.5.2 The Agency verifies whether the entire study programme complies with the "Common Structural Guidelines of the *Länder*" and the guidelines set by the Accreditation Council for programme accreditation.

1.5.3 In case the application of one of the guidelines mentioned under 1.5.2 would most likely prevent the accreditation of the study programme, since it is contrary to a specification of another accreditation institution involved or a national specification of one of the partner countries involved, the Accreditation Council can permit the responsible Agency not to use the specification in question in the accreditation procedure. The Board of the Foundation takes the decision on application of the Agency.

1.5.4 It must be ensured that facilities and the organisational structure of studies at all locations adhere to the requirements set in Cl. 2.7. At least at one location of the programme an on-site visit has to take place. The on-site visit(s) must include interviews with the persons in charge of programme design and with students and teachers of all locations where the programme is carried out. Modern forms of communication may be implied for this purpose.

1.5.5 Experts with international experience must be involved. As far as possible, for each country involved an expert with appropriate knowledge of the country should participate.

1.5.6 Procedures may be carried out in co-operation with a foreign Agency. For this Agency the following applies in addition to 1.5.1 - 1.5.5:

    a) The agencies involved should prepare a joint catalogue of the assessment criteria to be used. Thereby it must be ensured that the "Common Structural Guidelines of the *Länder*" as well as the guidelines set by the Accreditation Council for programme accreditation are verified for the entire study programme.

    b) The agencies should cooperate in the nomination of the experts. Representatives of the relevant interest groups must be included in the expert group. This includes particularly the sciences, the students and the practitioners from the profession.

    c) A joint self-report should be presented, which considers the *Länder*-specific characteristics respectively national guidelines in the partner countries.

    d) An expert report should be written jointly for all locations.

1.5.7. An Accreditation Agency licensed by the Accreditation Council may recognise decisions for programme accreditation adopted by an Agency, which is not licensed by the Accreditation Council - hereinafter "foreign Agency" -, subject to the following prerequisites:

    a) The decisions for recognition concern joint programmes according Cl. 1.5.1.

    a) The foreign Agency/agencies are listed in the European Quality Assurance Register or is/are full member(s) of the European Association for Quality Assurance in Higher Education (ENQA).

    c) The Agency licensed by the Accreditation Council ensures that there are no substantial differences between its own criteria for accreditation and rules of procedure and those applied by the foreign Agency.

    d) The Agency also ensures that the "Common Structural Guidelines of the *Länder*" are substantially complied with.

1.5.8 The legal consequence is that the study programmes in question are accredited with the seal of the Accreditation Council. Accreditation terms and any possible conditions are determined by the rules of the foreign Agency. If the Accreditation Council subsequently revokes the accreditation decision, the Agency licensed by the Accreditation Council is obliged to revoke the decision for recognition.

1.5.9 The Agency licensed by the Accreditation Council is obliged to promptly report the single decision for recognition to the Accreditation Council.

Special Rules for Procedures of Cluster Accreditation

(Resolution of the Accreditation Council of 08/12/2010 as amended on 10 December 2010)

1.3.1 The cluster accreditation of study programmes requires a high technical affinity of the individual study programmes. This is given only if it goes beyond the bare affiliation to a subject area (humanities and cultural studies, social sciences or natural sciences) and there is a disciplinary affinity of the (individual) study programmes.

Common structural features of the (individual) study programmes alone do not justify a technical affinity.

1.3.2 An adequate assessment of all (individual) study programmes has to be ensured in the formation of the expert group. The restriction to only one expert for every special discipline represented in the cluster needs to be substantiated.

1.3.3 The scheduling of the on-site visit must ensure that every study programme in the cluster can be adequately reviewed for compliance with the criteria for the accreditation of study programmes. This has to be explained also in the report.

1.3.4 The programme clusters for teacher training programmes may, in justified cases, be compiled depending on the type of school. An adequate assessment with regard to the subject and to the type of school has to be ensured when forming the expert group.

Special Rules for the Accreditation of Intensive Study Programmes

(Resolution of the Accreditation Council of 08/12/2010 as amended on 10 December 2010)

1.4.1 In particularly justified cases, up to 75 ECTS points per academic year can be awarded for study programmes with special measures for the organisation of studies. The workload for one ECTS credit point corresponds to 30 hours (intensive study programmes).

1.4.2 Special measures for the organisation of studies concern, for instance, the learning environment and student support, the structure and planning of studies as well as measures for ensuring a living.

Criteria for the Accreditation of Study Programmes

(Resolution of the Accreditation Council of 8 December 2009 as amended on 10 December 2010)

2.1 Qualification Objectives of the Study Programme Concept

The study programme concept is geared towards qualification objectives. These comprise of technical and interdisciplinary aspects, particularly

- scientific or artistic qualification,
- Competence to take up a qualified employment,
- Competence for involvement in civil society
- and personality development.

2.2 Conceptional Integration of the Study Programme in the System of Studies

The study programme complies with

(1) the requirements of the Framework of Qualification for German Degrees of 21 April 2005 in the respective valid version,

(2) the requirements of the Common Structural Guidelines of the *Länder* for the Accreditation for Bachelor and Master's Study Programmes of 10 October 2003 in the respective valid version,

(3) *Länder*-specific structural guidelines for the accreditation for Bachelor's and Master's study programmes,

(4) the binding interpretation and summary of (1) to (3) by the Accreditation Council.

2.3 Study Programme Concept

The study programme concept covers the imparting of specialised knowledge and inter-disciplinary knowledge as well as of technical procedural and generic competences.

It is built up coherently in the combination of the individual modules with regard to the formulated qualification objectives and provides adequate forms of teaching and learning. Possibly planned practical components are so organised that credit points (ECTS) can be acquired.

It lays down the admission requirements and if necessary an adequate selection procedure, in addition to, rules for the recognition of credits achieved at other higher education institutions or externally achieved credits, if necessary in accordance with the Lisbon Recognition Convention. Regulations are provided for compensating disadvantages of handicapped students. If necessary planned mobility windows are integrated in the curriculum.

The organisation of studies ensures the implementation of the study programme concept.

2.4 Academic Feasibility

The academic feasibility of the study programme is ensured through:

- consideration of the expected entry qualifications,
- an appropriate curriculum design
- the information on the student workload, which is checked for plausibility (or, in the case of the first accreditation, estimated according to empirical values),
- frequency and organisation of examination, which is adequate and has a reasonable workload,
- corresponding offers of support as well as

- technical and interdisciplinary course guidance.

The interests of handicapped students will be taken into consideration.

2.5 Examination System

The examinations serve the purpose of determining, whether the formulated qualification objectives have been accomplished. They are module-related as well as knowledge and competence oriented. Every module, as a rule, concludes with an examination covering the entire module. Compensating disadvantages of handicapped students with regard to time-related and formal guidelines in the studies as well as in the final performance tests and those during the studies is ensured. The examination regulations were subjected to scrutiny of rights.

2.6 Programme-related co-operations

The Higher Education Institution ensures the implementation and the quality of the study programme concept, if other organisations are involved or commissioned by the latter to carry out parts of the study programme.

A written record is kept of the extent and nature of existing co-operations with other higher education institutions, companies and other organisations as well as for any agreements upon which the co-operation is based.

2.7 Facilities

The adequate implementation of the study programme is ensured with regard to the qualitative and quantitative facilities with regard to personnel, material and space. In this interdependence with other study programmes is taken into account. Measures for a personnel development and qualification are available.

2.8 Transparency and Documentation

The study programme, course of study, examination requirements and the prerequisites for admittance including the regulations for compensating disadvantages of handicapped students are documented and published.

2.9 Quality Assurance and Further Development

Results of quality management internal to the Higher Education Institution are taken into consideration in the further developments of the study programme. Here the Higher Education Institution takes into consideration evaluation results, studies of the student's workload, academic accomplishment and the whereabouts of the graduates.

2.10 Study Programmes with a Special Profile Demand

Study programmes with a special profile demand have special requirements. The aforementioned criteria and rules of procedure have to be applied under consideration of these requirements.

2.10 Gender Justice and Equal Opportunities

The concepts of the Higher Education Institution for gender justice and for the promotion of equal opportunities of students in special situations such as students having health impairments, students having children, foreign students, students with migration background and/or from so-called educationally disadvantaged classes are implemented at the level of the study programme.

Norms for the Interpretation of the Common Structural Guidelines of the Lander

(Resolution adopted by the Accreditation Council on 10 February 2010)

1. Inner Curricular Practical Components

Practical components in the studies are ECTS-enabled, if they represent a training section in the professional practice, which is integrated in the studies and regulated by the Higher Education Institution, content-specific and (ideally, however not mandatorily) accompanied, that is, supported by courses.

2. Criteria for Distinguishing Names of Degrees

The Higher Education Institution has the right to specify the desired name of a degree. The agency has, however, to examine the details given by the Higher Education Institution regarding this in every case, whereby names, which are obviously misleading, i.e. not covered by the programme, have to be objected in the accreditation procedure.

3. Use of Bachelor's Modules in Master's Study Programmes

The use of modules from Bachelor's study programmes in Master's study programmes is permitted in exceptional cases, if the partial qualification objective, which is accomplished with the successful completion of the respective module, adequately serves accomplishing the overall qualification objective of the Master's study programme. This applies to consecutive and to non-consecutive and advanced Master's study programmes. However, the double usage of modules in the sections of the study programme, which are based on each other in content, has to be excluded.

In all other respects, the following applies: The qualification standard defined in the national qualification framework for the respective final degree must be maintained.

Moreover, the Higher Education Institutions must ensure that the individual student cannot take a module, which is the same or which is identical to a great extent in content, in the Bachelor's course and again in the Master's course.

4. Final Theses in BA/MA Study Programmes in Music, Dance, Fine Arts and Applied Design

The final thesis, specified in Clause 1.4 of the resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Lander (KMK) "Common Structural Guidelines of the Lander as per § 9 para. 2 HRG for the Accreditation of Bachelor's and Master's Study Programmes" in the version of 15.06.2007, is obligatory also in the Bachelor's and Master's study programmes in the areas of music, fine arts and applied design. Since Clause 2.5 of the resolution "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" in the current version requires the assessment in a system of examinations whether the defined education goals have been accomplished, the concept "final thesis" can be defined also in the sense of a "final project", particularly in the study programmes mentioned above. The final project should contain a written documentation, in order to take into account the principle of putting down the final achievements in writing as a characteristic of studies at Higher Education Institutions, as contained in the KMK structural guidelines.

5. Master's Study Programmes with Teacher Training Profile

In the accreditation of Master's study programmes, with which prerequisites for a teaching profession are imparted, the existence of a teacher training profile has to be certified.

For this, the technical requirements for the teacher training education common to the Lander (standards in the education sciences as well as common requirements of the Lander with regard to content

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of the subjects and their didactics) as well as possibly state-specific structural guidelines and those regarding content have to be applied as evaluation criteria.

Apart from that, common structural guidelines of the Lander as per § 9 para. 2 HRG have to be applied for the accreditation of Bachelor's and Master's study programmes in the current valid version.

6. Master's Study Programmes with an Artistic Profile

Master's study programmes in colleges of arts and music should have a particularly artistic profile, which has to be shown in the accreditation according to the guidelines of the Accreditation Council and should be shown in the Diploma Supplement.

The Higher Education Institution has the discretion to decide, whether a Master's study programme has an artistic profile as per A 3.2 of the common structural guidelines of the Lander. Only a profile assignment, which is obviously misleading, i.e. not covered by the study programme, has to be objected in the accreditation procedure.

Guidelines presented by the work group "Study Programmes with a Special Profile Demand"

(Resolution adopted by the Accreditation Council on 10/12/2010)

Preliminary remarks

Comprehensive and sustainable qualifications as well as continuous further education in terms of life-long learning are proving to be of increasing importance. Flexible concepts for study programmes allowing for permeability and targeted at students with differing educational and professional paths are offered by many higher education institutions. Study Programmes with a special profile demand such as dual study programmes, programmes providing further education, targeted distance learning, e-learning and part-time study programmes as well as teacher training programmes and intensive study programmes contribute towards supporting these transformation processes.

The accreditation of these study programmes with a special profile demand represents a particular challenge for both accreditation agencies and higher education institutions. In its 62th meeting, the Accreditation Council therefore set up a work group, which was commissioned with the task of analysing the experience acquired in accrediting such study programmes. Another task of the work group was to discuss whether and to what extent existing regulations and resolutions of the Accreditation Council need to be integrated or amended.

The work group discussed the single profiles in a total of four meetings calling in external experts who provided a problem-driven introduction, which served as a basis for the members to agree upon a common understanding about the single profiles and the respective aspects the discussion should focus on. The work group concentrated its attention exclusively on planning-related aspects offered by such those study programmes. The individual study behaviour of students - for instance with regard to the decision taken by the students themselves to reduce the work load during the semester - was not dealt with in the discussion.

In their results, the work group refers to the specific requirements, which have to be taken into account when applying the *"Rules for the Accreditation Study Programmes and System Accreditation"* for the accreditation of study programmes with a special profile demand-[10]

The following recommendations for higher education institution and experts shall serve for a better understanding of the criteria and rules of procedure regarding study programmes with a special profile demand

Recommendations for the Accreditation of Study Programmes with a Special Profile Demand

In its *"Rules for the Accreditation of Study Programmes and for System Accreditation"*[11] the Accreditation Council refers to specific requirements to which study programmes with a special profile demand are subject. The Council also emphasises the fact that all criteria and rules of procedure that are effective for programme accreditation must be applied under consideration of these requirements.

With regard to the variety of differentiated study programme concepts offered by the higher education institutions, it seems to be neither possible nor suitable to determine one single, clearly identified study programme with a special profile demand. In the course of the discussion within the work group it became obvious that these concepts should be first and foremost understood as attributes of available programmes that may be combined with each other and from which specific requirements for the plan-

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[10] Upon the recommendation of the work group, the Accreditation Council furthermore revised its resolutions concerning, amongst other things, programme-related co-operations (Cl. 2.6), the procedural structure for the accreditation of teacher training programmes (Cl. 1.3), intensive study programmes (Cl. 1.4) as well as the requirements for transparency and documentation of study programmes (Cl. 2.8). The recommendations for the resolution suggested by the work group have been included to the *"Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation"* adopted on 8 December 2009 as amended on 10 December 2010 (Printed Matter AR 85/2010).
[11] Cl. 2.10 of the "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation", Resolution adopted by the Accreditation Council on 8 December 2009 as amended on 10 December 2010, Printed Matter AR 85/2010.

ning, organisation and execution of a study programme derive. The respective requirements were determined by the work group by providing definitions for the single profiles.

Due to the fact that basic profile-specific requirements may be derived from the definition of the single profiles in themselves, they should precede the recommendations of the work group. These definitions are not intended to have an exclusive or binding nature but are meant to serve as orientation for higher education institution and experts.

- **Dual study programmes** are characterised by the involvement of companies and similar establishments as a second learning location in addition to the higher education institution and by the distribution of the curriculum between at least two learning locations. Their planful integration in terms of content, timeframe and organisation aims at a specific skill profile for students by combining theoretical and practical training. Dual study programmes can be divided into programmes integrated with training-related, practice-related and profession-related elements, according to the nature and intensity of said integration.

- A **Master's study programme providing further education** is a study course determined by a curriculum and an examination regulation aiming at an academic grade, which - considering also alternative methods of access - requires a first cycle degree qualifying for access to the profession and which is generally undertaken after at least one year of qualified professional activity. With regard to subject, didactics and methodology it is conceived for higher education and it aims at integrating the curriculum and tying in with the students' professional experience, taking also into account the specific needs of working students regarding time requirements, if needed.

- A **distance learning study programme** is a study course determined by a curriculum and an examination regulation aiming at an academic grade, within which learning takes place in an organised way and at distance in terms of time and space.

- An **e-learning study programme** is a distance learning study programme which makes it possible to achieve the qualification objectives mainly on-line, i.e. by employing electronic media for the computer- and/or web-based presentation and distribution of teaching material and/or for supporting learning-related interaction and communication.

- A **part-time study programme** is a study course determined by a curriculum and an examination regulation aiming at an academic grade, not carried out as a full-time course but characterised by a steady and continuous participation in supervised learning activities, private study and the verification of learning achievements. It has the same value as an equivalent full-time degree course in terms of level, nature and extent.

- An **intensive study programme** is a study course determined by a curriculum and an examination regulation aiming at an academic grade, within which students are awarded more than 60 ECTS credit points per academic year based upon a higher student work load in terms of time.

- A **teacher training programme** in a broader sense is a study course at a higher education institution determined by a curriculum and an examination regulation aiming at an academic grade qualifying for access to the profession providing the educational prerequisites for the teaching service.

Given the combinability of the single programme profiles, the following recommendations for the accreditation of study programmes with a special profile demand are not arranged according to the single programme profiles but follow the structure of the criteria set by the Accreditation Council (Part 1). On a superordinate level, reference is made to the specific requirements, to which particular attention should be paid when accrediting study programmes with a special profile demand. In this regard, an accentuated role is attributed to the concepts for study programmes, academic feasibility as well as specific requirements for transparency towards the public and in accreditation. Requirements specific to the single programme profiles are identified accordingly. Finally, a description is provided of the specific characteristics that result from procedures for accreditation of study programmes with a special profile demand (Part 2).

Part 1 Content-related Requirements

1. Qualification Objectives and Conceptual Integration of the Study Programme in the Study System

The higher education institution defines the qualification objectives in view of the specific programme profile, ensuring the equivalence of the study programme with the qualification levels and skill profiles defined by the Framework of Qualification for German Degrees; this is subject to verification in accreditation procedures. The degree-awarding higher education institution bears the final academic responsibility also for those cases in which other organisations are involved in or commissioned with the task of carrying out parts of the study programme.

In order to avoid jeopardising the mobility of students, the total number of ECTS credit points for the single levels is defined bindingly by the Framework of Qualification for German Degrees, according to which 180, 210 *or* 240 ECTS credit points may be awarded for a Bachelor's study programme and 60, 90 *or* 120 ECTS credit points for a Master's study programme. Furthermore, the minimum periods of study set by § 19 of the Framework Act for Higher Education - at least three years for a Bachelor's study programme and at least one year for a Master's study programme - must be ensured.

- *Dual study programmes:* Irrespective of the extended practical components contained in dual study programmes, the higher education institution ensures the academic qualification of the students. This has to be demonstrated in the procedure for accreditation.

- *On-the-job and intensive study programmes:* In spite of the particular work load of students in both on-the-job and intensive study programmes, it must be ensured that students are qualified for involvement in civil society and are able to grow personally.

- *Teacher training programmes:* According to section A.1 of the Common Structural Guidelines of the *Länder*, the Bachelor's degree has a distinct profile as a qualifying degree for professional practice. Accordingly, the qualification objectives must be defined in such a way that the degree awarded allows graduates to take on qualified employment. For Bachelor's degrees awarded in a consecutive course model for teacher training, which does not qualify for taking up preparatory teaching practice, the higher education institution must specify further qualification objectives that may also include professional fields of work outside the school sector. It is appropriate to implement polyvalent objectives also in Master's study programmes, in particular if not all graduates are accepted for teaching practice.

2. Study Programme Concept

Study programmes with a special profile demand are characterised by a coherent concept, which reflects the special requirements for a determined profile (for instance in terms of self-organisation and private study, time management, integration of academic and vocational training) in its didactic and methodological concepts.

Practical Components of the Curriculum: The integration of practical training phases in study programmes with a special profile demand in terms of planning is regulated by the resolution "ECTS Compatibility of Inner Curricular Practical Components" adopted by the Accreditation Council.[12] According to the afore-mentioned resolution, practical components are ECTS-ready, if they "contain a supervised period of training in professional practice, (ideally, however not mandatorily) accompanied by a respective course, integrated into the study programme and in terms of content regulated by the higher education institution.

- *Dual study programmes:* The higher education institution describes the way in which theoretical and practical training phases are coordinated in terms of content within a coherent programme concept, from which the structure and crediting of the practical training phases is derived. During accreditation, the higher education institution provides evidence that student support is appropriately organised for the practical training phases.

- *Teacher training programmes:* The higher education institution describes the way in which teaching practice studies are integrated within a coherent programme concept, and illustrates in particular,

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[12] see *"Norms for the Interpretation of the Common Structural Guidelines of the Länder"*, Resolution of the Accreditation Council of 12 February 2010 (Printed Matter AR 20/2010).

during accreditation, any preparatory and follow-up measures for teaching practice studies as well as how the responsibility for student support is distributed.

Access: As a result of its flexible structures and due the integration of professional practice, *on-the-job study programmes* are directed to heterogeneous student groups, addressing in particular students who have not obtained the higher education entrance qualification by following the traditional educational path.

If the programme concept of the higher education institution provides access for students who qualify due to their professional experience, prerequisites for admission and, if necessary, an appropriate selection procedure must be defined. The competences required for admission have to be verified in an appropriate way. Assessment takes place during the accreditation process, taking account of the programme concept and the academic feasibility of the study programme in reference to the entry qualifications of the students.

- *Dual study programmes:* Involvement of companies in procedures for the admission and selection of students must be recorded in an appropriate manner and comprehensibly demonstrated in accreditation.

Recognition of Prior Learning: For study programmes with a special profile demand, recognition of equivalent, proven competences and skills achieved outside higher education proves to be of the same importance as the conditions for admission of students who are qualified due to their professional experience.

If the higher education institution provides recognition of prior learning, appropriate rules for recognition must be defined. The competences required for recognition have to be verified in an appropriate way. The rules for recognition set by the higher education institution must be comprehensibly demonstrated in accreditation, taking into account the KMK resolutions concerning the "Recognition of competences and skills achieved outside higher education" I and II[13] as respective quality standards.

Recognition of prior learning achievements for a total of up to half of the credit points provided for the study programme must be considered separately from the inner curricular practical components.

- *Teacher training programmes:* If a teacher training programme provides for the recognition of credits achieved during the preparatory teaching practice, the rules for recognition have to be documented and published. In addition, access to the Master's degree (300 ECTS credit points) must be also granted to students who do not intend to enter the preparatory teaching practice .

3. Academic Feasibility

Work Load: Student work load in on-the-job study programmes cannot be considered separately from their extra-curricular work load.

When verifying the student work load, the typical total work load specific to this target group has to be considered appropriately in terms of programme concept and further development of the programme. A plausibility check and an assessment takes place in accreditation, which focus in particular on whether the qualification objectives can be achieved in the time allotted for this purpose and on the academic feasibility of the programme. In re-accreditation, evidence has to be provided for the successful implementation of the concept also with regard to the work load.

The special study demands must be documented for the public and by the procedures for accreditation.

- On-the-job study programmes which involve the student work load defined for a full-time degree course (60 ECTS credit points per academic year) in addition to a full-time employment, are not academically feasible. The student work load is to be reduced accordingly and the standard period of study has thus to be extended.

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[13] Recognition of competences and skills achieved outside higher education (I). Resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* of 28 June 2002 and Recognition of competences and skills achieved outside higher education (II). Resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* of 18 September 2008.

4. Curriculum Design and Student Advisory and Support:

In general, study programmes with a special profile demand are characterised by a specific learning environment and a special course structure, which have to be considered when designing the curriculum. The resulting special needs in terms of advisory and supporting services for students have to be taken into account.

- *Dual study programmes:* A decisive aspect of dual study programmes is the involvement of companies and similar establishments as a second learning location in addition to the higher education institution and by the distribution of the curriculum between at least two learning locations. The *organisational* coordination of theoretical and practical training phases is described in a coherent programme concept provided by the higher education institution, which also illustrates the temporal organisation of the study programme. In accreditation, practical training phases for which no credits are awarded must also be illustrated in order to allow a comprehensive assessment of academic feasibility. The student support at both teaching and learning sites is ensured.

- *Distance and e-learning study programmes:* Students in distance and e-learning programmes can decide on their learning location, time frame and learning environment in a very flexible way. Within these flexible structures and over the complete course of the programme, it is of particular importance to provide an adequate learning organisation based upon an appropriately structured curriculum design in terms of didactics and supported by adequate measures that will be used particularly to guide and to support the students in their private study.

- *Part-time study programmes:* Due to the necessary adjustment of the standard period of study, part-time study programmes extend over a longer period of time. The programme concept, however, provides a steady and continuous participation in supervised learning and private study activities as well as the continuous verification of learning achievements. This applies also for study programmes offering a structured part-time version of a full-time study programme.

- *Teacher training programmes:* Due to their specific multi-discipline structure (two academic disciplines, subject-related teaching methodology and educational science), teacher training programmes are to be defined as combined study programmes. According to the specific rules set by the Accreditation Council for the accreditation of these programmes, the higher education institution provides a concept for its range of combinable programmes, which includes a soundly designed structure, ensuring at the same time the academic feasibility of the study programme with regard to the coordination of curricular contents and examinations as well as the absence of overlap for at least the most frequently selected combinations. With regard to rarer subject combinations, the higher education institution should aim at ensuring the absence of overlap. In these cases the higher education institution has a special obligation to inform the students.

- *Intensive study programmes:* Students enrolled in intensive study programmes systematically invest more time in their study activities than students in regular, full-time degree courses. The higher education institution illustrates in a conclusive concept the necessity for an intense work load as well as the basic conditions which make the intensive study programme possible. In particular, it addresses the elevated number of organisational measures concerning the learning environment and student support as well as the structure and planning of studies and, if necessary, measures for ensuring a living.

- Since the student work load of regular full-time degree courses also covers the entire calendar year, extending the time frames available for studying, for instance with periods outside of term-time, may not be defined a basic condition for the academic feasibility of an intensive study programme. Furthermore, the selection of particularly motivated and proficient students may not serve as the sole criterion for motivating the establishment of an intensive study programme.

5. Facilities

Specific forms of organisation and allocation of competences in study programmes with a special profile demand, require special measures to some extent in order to ensure quantitative and qualitative sustainability and continuity of personnel, material and space facilities for the offered programmes.

- *Dual study programmes:* The percentage of teaching activities carried out by teaching staff members fulfilling the employment prerequisites for professors shall not be less than 40%. Avocational

teaching staff offering theory-based teaching seminars leading to the award of ECTS credit points should also meet the employment prerequisites for professors.[14]

- The status of students in case of non-completion of the training or study course has to be regulated and comprehensibly demonstrated in accreditation procedures. In addition, it must be ensured that students can complete their study course also in case of unexpected modifications in the co-operation between the training company and the higher education institution.

- *Master's study courses providing further education, distance and e-learning study programmes:* Continuity and sustainability of the available programmes must be ensured by an appropriate full-time status of the teaching staff. In accreditation, the higher education institution illustrates the measures adopted to encourage the commitment of qualified teaching personal.

- Learning methods and study material used for the programmes comply with requirements related to subject-related teaching methodology. Barrier-free access to and operability of these technologies and materials is ensured.

- *Teacher training programmes:* In accreditation, the higher education institution illustrates the facilities for educational science and subject-related teaching methodology studies. If so-called "Teacher training centres" are involved in the study programmes, the higher education institution has to document their tasks describing their contribution to planning, implementation and execution of the study programme.

6. Transparency and Documentation, Information and Advisory Services

Study programmes with a special profile demand are characterised by a special need for information and advisory services. The study requirements must be documented for the public and by the procedures for accreditation.

7. Quality Assurance and Further Development

The quality assurance and further development of a study programme depend on the specific characteristics of its profile. Requirements and characteristics of its specific profile must be considered by the procedures and instruments used for the study programme.

- *Dual study programmes:* In accreditation, the higher education institution records systematic and suitable measures implemented at all learning locations, which aim at ensuring the continuity and quality of the offered teaching activities in a permanent and sustainable way.

- *Distance and e-learning study programmes:* Quality assurance measures and those aimed at the further development of distance and e-learning study programmes also take account of the learning technologies and the related technical infrastructures used to implement the programme.

- *Teacher training programmes:* With regard to the quality assurance and further development of a teacher training programme, the higher education institution also takes account of teaching practice studies.

- *On-the-job and intensive study programmes:* In the further development of a study programme, the higher education institution takes appropriate account of the student work load analysis, also in relation to the total work load for students.

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[14] The exemptions defined for universities of cooperative education by the KMK resolution "Classification of Bachelor's Training Courses at Universities of Cooperative Education within the Consecutive Structure in higher education" of 15 October 2004 as well as the respective regulations under state law must be taken into account.

Part 2 Particular Aspects of the Procedure

In its *"Rules for the Accreditation of Study Programmes and for System Accreditation"*[15] the Accreditation Council defines the procedural rules for the accreditation of study programmes and hence the formal structure of an accreditation procedure. The Council emphasises the fact that the assessment of a study programme includes *all* relevant fields, taking into account not only subject-related and study-related structural or formal elements but also social aspects of study programmes. This important principle of comprehensive assessment also applies to the accreditation of study programmes with a special profile demand. The specific requirements of the programme concept are reflected in particular by the composition of the expert group and by the way the on-site visit is organised.

1. Composition of the Expert Group

As an expert-centred procedure accreditation is based upon the assessment of all fields relevant to the study programme (e.g. subject-related aspects, study-related structural and formal aspects and social aspects). With regard to the composition of the expert group for study programmes with a special profile demand, attention must thus be paid to ensure that the peers are familiar with the concrete, profile-specific requirements, conditions and issues.

2. Assessment

According to the *"Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation"*, the assessment of a study programme is based on the analysis of the explanatory statement for the application and additionally on an on-site visit. The assessment must take account of conditions and forms of organisation and also the allocation of competences specific to study programmes with a special profile demand.

- *Dual study programmes:* The assessments take appropriate account of the company as a learning location (e.g. involvement of the cooperating companies during the on-site visit).

- Even though the programme concept has to be assessed also in view of the coordination in terms of organisation, content and time frame for all education and training elements, assessment and accreditation solely include theory- and practice-based programme elements defined by a curriculum. Any extra-curricular activities carried out by students related to a certain target group must be disclosed.

- *Distance and e-learning study programmes:* The structure of the on-site visit has to take account of the teaching and learning processes of the study programme that are supported by electronic media or the respective programme elements. The respective learning infrastructures as well as the teaching and learning materials must be considered appropriately by the assessment. This also includes the methods of notification and communication used by the study programme.

- *Part-time study programmes:* A part-time study programme that derives from a previously accredited full-time degree course with identical content requires a separate accreditation decision. The Agency decides whether the accreditation procedure may be shortened on a case-by-case basis.

- In accreditations of full-time degree courses which systematically allow part-time study, the part-time programme concept must be also be dealt with in the procedure.

- If the part-time version was established after accreditation of the study programme, section 3.6.3 of the resolution "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" applies, according to which the agency decides whether the change decreases the quality and therefore a renewed accreditation is required. Furthermore, the Agency decides whether, if a new procedure is necessary; this can be shortened on a case-by-case basis.

- *Teacher training programmes:* Considering the complex, institution-wide allocation of competences in teacher training programmes, a specific structure for accreditation procedures may be suitable to assess the single study programmes, contributing in this way to ensure consistency between the single decisions.

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[15] Cl. 1 of the *"Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation"*, Resolution adopted by the Accreditation Council on 8 December 2009 as amended on 10 December 2010, Printed Matter AR 85/2010.

- The subject-related assessment of the single study programmes may be preceded by a model assessment, which provides an evaluation of the institution-wide teacher training organisation and major issues (e.g. central support services, integration of practical components, assuring absence of overlap and the tasks of teacher training centres) carried out by a centrally organised expert group, if needed. The results of the overriding assessment may be taken into account in procedures for the accreditation of single study programmes. An accreditation decision must be taken for every single study programme.

In addition, the work group refers to the final reports elaborated by the past work groups concerning Master's study courses providing further education and distance and e-learning study programmes; these reports have been adopted as guidelines.

The work group was composed of the following members: Prof. Dr. Ute von Lojewski (Chairman), President of the University of Applied Science Münster and Member of the Accreditation Council; Prof. Dr. Reinhold R. Grimm, Friedrich Schiller University Jena and Chairman of the Accreditation Council; MR Hartmut Römpp, Ministry of Science and Culture (MWK) Baden-Württemberg | Head of Department Cooperative University; LMR Dr. Wolfgang Meier, Ministry of Education, Science and Culture of Thuringia | Head of Department Universities; Henning Dettleff, BDA | Department of Education, Vocational education; Dr.-Ing. Karl-Heinrich Steinheimer, ver.di | Department of Education, Science and Research; Tobias Proske, Wismar University of Applied Science | Student Member of the Accreditation Council; Dr. Immo Schmidt-Jortzig, FIBAA; Carola Brink, AQA; Michael Meyer, ASIIN; Henning Schäfer, ZEvA; Eva Pietsch, AHPGS; Doris Hermann, AQAS; Dorit Gerkens, ACQUIN, Melanie Gruner, ASIIN. The work group consulted the following experts: Dr. Helmut Vogt, Department for Scientific Further Education at the University of Hamburg and Vice-chairman of the German Association for University Continuing and Distance Education - Deutsche Gesellschaft für wissenschaftliche Weiterbildung und Fernstudium e.V. (DGWF); Prof. Dr. Ulrike Tippe, Vice-chairman of the Hochschulverbund Distance Learning (HDL) and Representative for Distance Learning of the Technical University of Applied Sciences Wildau; Prof. Dr. Gabriele Bellenberg, Ruhr University Bochum and former Head of the Centre for Teacher Training.

The work group was supported by Ms Friederike Leetz and Ms Agnes Leinweber on behalf of the Foundation for the Accreditation of Study Programmes in Germany.

Programme of the Expert Discussion on "Further Development of Accreditation"

3 November 2010

10:30 a.m.   **Welcome address**

Professor Dr. Reinhold R. Grimm,

Chairman of the Accreditation Council

10:45 a.m.   **Short introductory statements:**

Foundation Board, Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder*, German Rectors' Conference, Student Representative, Representative of Employers, Representative of Employees, Representative of the Accreditation Agencies

01:30 p.m.   **Discussion on the topics: Political framework, legal foundations, relation between the Accreditation Council and Agencies, the role of the students (experts in general)**

02:30 p.m.   **Discussion on the topics: System Accreditation, Programme Accreditation**

04:15 p.m.   **Conclusion**

Professor Dr. Reinhold R. Grimm,

Chairman of the Accreditation Council