



AGENTUR FÜR  
QUALITÄTSSICHERUNG DURCH  
AKKREDITIERUNG VON  
STUDIENGÄNGEN E.V.

# AWARDING SELF-ACCREDITING POWERS FOR DEGREE PROGRAMMES IN THE CONTEXT OF AN INSTITUTIONAL AUDIT

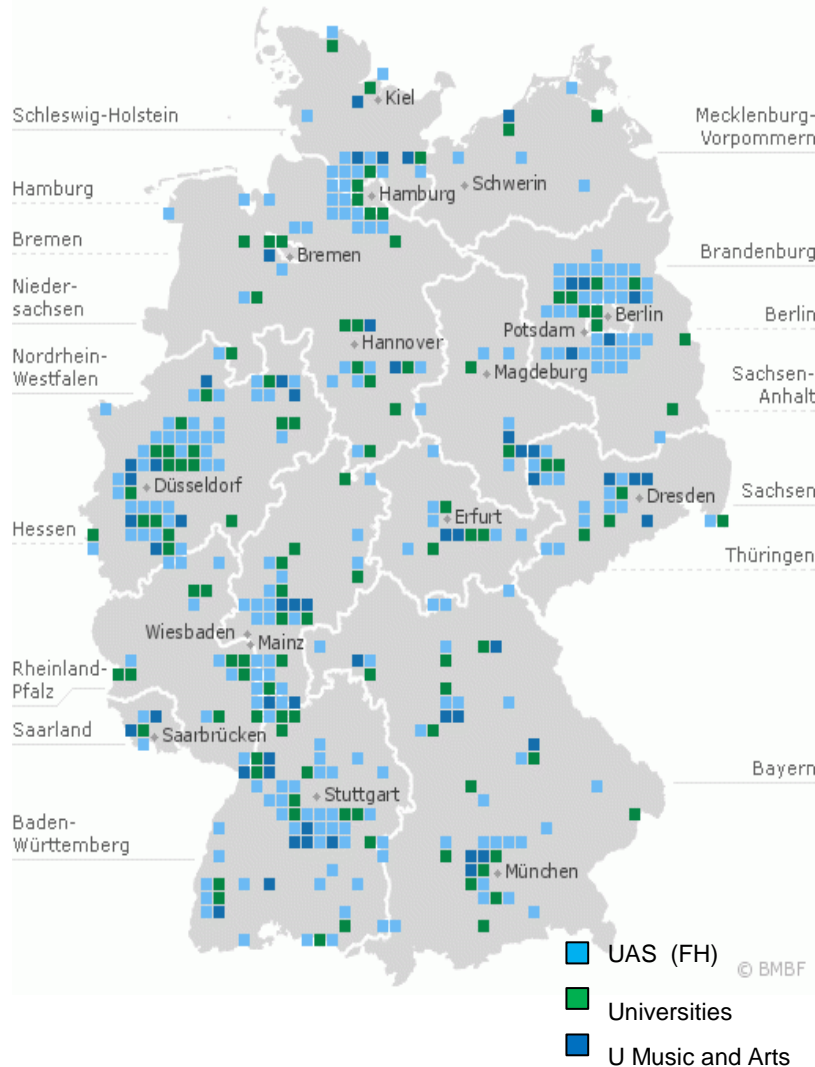
CRITERIA, PROCEDURES AND EXPERIENCES

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## AQAS - FACTS AND FIGURES

- Established in 2002 by HEI as a membership organisation – 93 national and international members (voluntary)
- Agencies operate on a non-profit basis; HEIs are charged for the costs of accreditation.
- One of the most experienced accreditation agencies in Germany/in Europe
- Over 8,000 accredited programmes, expertise across all disciplines
- Reaccredited by the German Accreditation Council; recognized by European authorities (ENQA & EQAR)
- Actor and facilitator of internationalization processes (e.g. Bologna)

# HIGHER EDUCATION IN GERMANY



Responsibility for Higher Education lies with the 16 federal states:

- 423 Higher Education Institutions, 21.430 programmes (BA/MA), 2,9 Mio students
- 1 federal framework for HE, but 16 state laws
- Education is funded by the Länder; federal ministry pays only for specific initiatives and projects
- different political viewpoints on education and research, depending on the 16 state governments
- Accreditation system was implemented in 2005; major revision in 2018
- 10 agencies are admitted to work in Germany and compete.

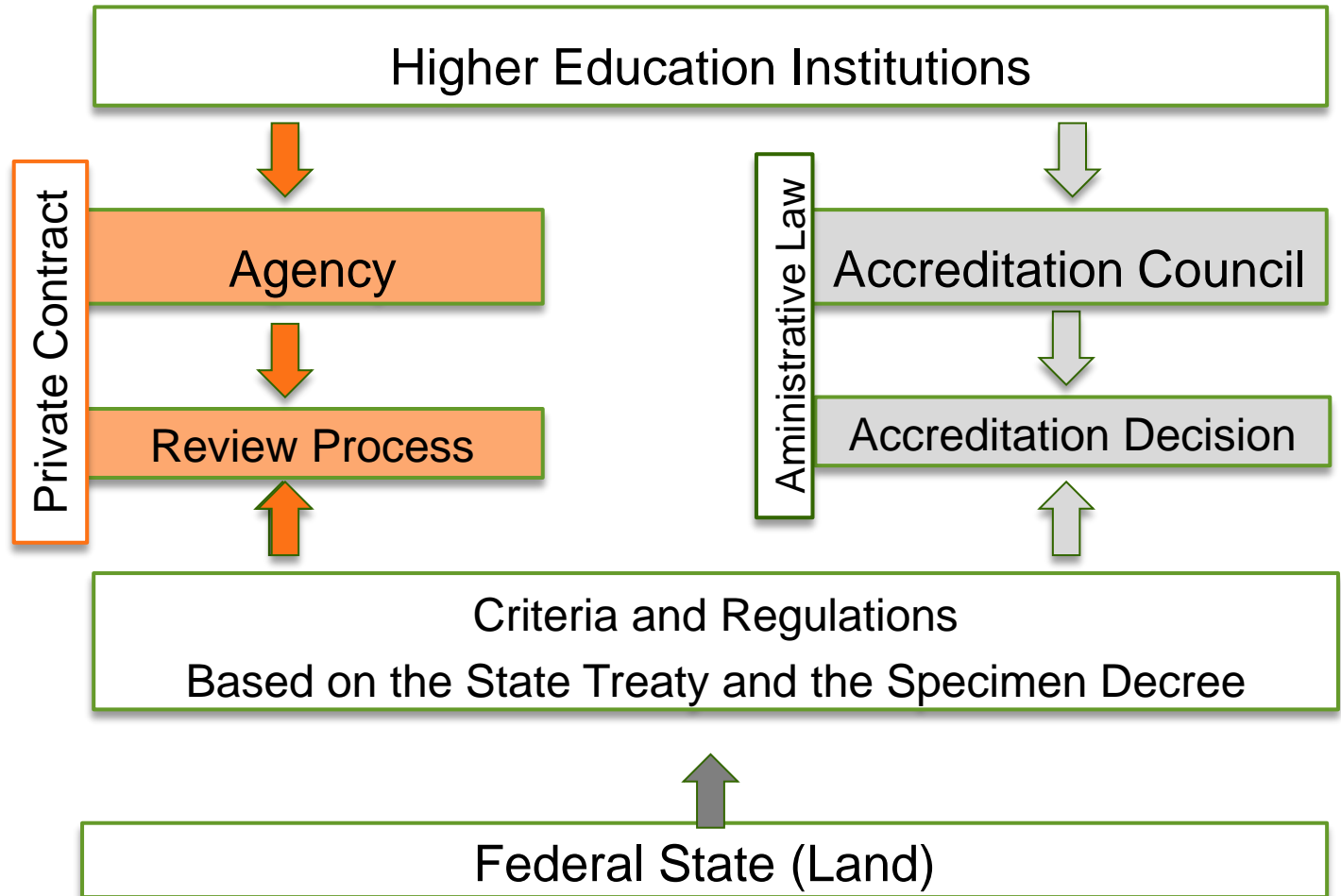
# FEDERAL CONSTITUTIONAL COURT (FCC) DECIDED IN 2018

- External quality assurance is legitimate but the regulators (= ministries of the 16 Länder) are responsible for the final decision taking.
- Therefore, external bodies can carry out the accreditation procedures but the state has to stay responsible for result.
- The set of rules and regulations has to be created in a way that provides for the consistent application of the administrative law.
- Specimen Decree (MRVO) was drafted and implemented in the 16 Länder
- Agencies lost right to accredit but are in charge of the coordination of the accreditation procedure and of providing a final report to the HEIs.

# THE GERMAN ACCREDITATION COUNCIL (GAC)

- GAC takes the final decision about an accreditation on the basis of the report of the agency and the statement of the university
- Members of the GAC are appointed by the KMK (Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany) and German Rectors' Conference (HRK) jointly:
  - academics (8)
  - HRK (1)
  - ministries as state representatives (4)
  - students (2)
  - professional practice (5)
  - international experts (2)

# RESPONSIBILITIES IN THE SYSTEM SINCE 2018



# GERMAN REGULATIONS FOR EXTERNAL QA

- „Interstate Treaty“ (MRVO) is a common regulatory framework of the Länder that is implemented consistently in all of the German federal states and linked to their Higher Education legislation. It contains:
  - academic and formal criteria (aligned with the ESG)
  - rules and procedures (aligned with the ESG)
  - connections to the administrative law.
- There are 3 types of accreditation in practice and universities may select which is appropriate for them:
  1. programme accreditation,
  2. Institutional accreditation of the management system including QA (“**system accreditation**”)
  3. “alternative procedures” = door opener for experiments/new forms of EQA

# INFORMATION ON SYSTEM ACCREDITATION

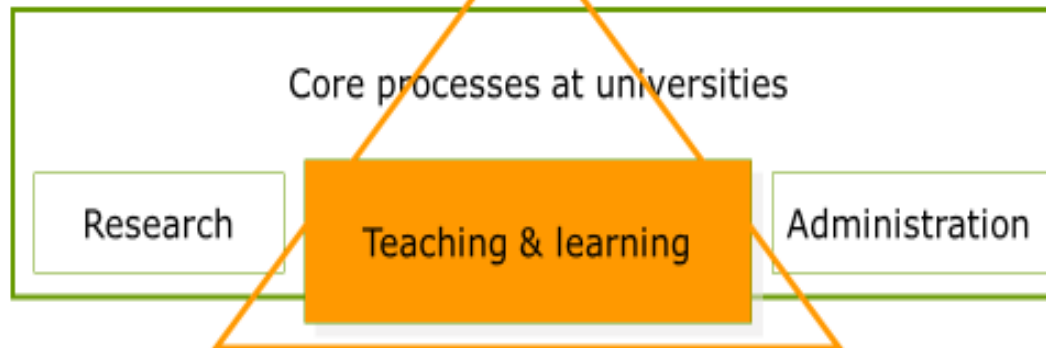
- After 3 cycles of programme accreditation in Germany „system accreditation was implemented as an alternative to programm accreditation.
- The ownership and responsibility of the Higher Education Institutions in the area of study and teaching should be strengthened.
- HEI should get more freedom to develop their own IQA procedures which are appropriate for them.
- Enable the integration of IQA in the management of the HEI
- Overall target is STILL to guarantee the quality of BA/MA programmes.
- After successful system accreditation HEIs have rights to accredit their own programmes and to award the seal of the GAC to their programmes.
- Data: since 2018 108 system accredited HEIs (69 first accreditations, 39 re-accreditations). In 2022 30 applications.



# GEGENSTAND DER SYSTEMAKKREDITIERUNG

## Object of an Institutional Review

Object of an institutional review is the internal QA system of an university  
(alternative: of a specific faculty in an university)  
**focussing on the area of teaching and learning**



# AGENCIES IN THE SYSTEM

- HEI are free to select one of the 10 agencies for their procedures
- Agencies conduct the accreditation procedures in line with the Specimen Decree and give recommendations for the accreditation to GAC:
- agencies check the formal criteria
- their peer experts evaluate the academic / content related criteria
- for the reports a template was drafted by GAC that
  - covers all the criteria but
  - leaves room for individual evaluations and recommendations by the experts
- all agencies listed in EQAR can take up activities in Germany, but they need to undergo a certification procedure to prove that they comply with the German regulations

# PROCEDURE SYSTEM ACCREDITATION



# WHY 2 VISITS?

**FORMALE REQUIREMENT:** 1 study programme has to be evaluated by the internal QA system of the university.

- Agency writes short report on assessment of formal criteria („Prüfbericht“).

## Two site visits:

### 1. visit: „Information visit“ (system oriented)

- *Experts assess if all required elements of the MRVO are implemented in the QA-system*
- *Check: Who does what in the system?*
- *Are all criteria of MRVO addressing the study programmes respected?*

### 2. Visi: programme sample

- *Are all criteria of the MRVO for the study programmes addressed and are they applied?*
- *Is the application documented?*
- *Are the intended impacts on the study programmes realized „on the ground“?*



**Report by the experts**

***HEI can decide to take some time to revise shortcomings („Mängelbeseitigungsschleife“)***

**Finalization of the procedure:**



**Accreditation report to GAC**

# CRITERIA FOR SYSTEM ACCREDITATION (1)

## § 17 MRVO Concept of the QA system (targets, processes, instruments)

- Mission statement of teaching and learning
- Systematic implementation of the criteria for study programmes (part 2 & 3 MRVO)
- Transparent definition of the responsibilities and processes (for study and teaching)
- Internal procedures which lead to an accreditation of the study programmes
- Independence of quality assessment
- Internal complaints and appeals procedure
- Closed management cycles (PDCA)
- Appropriate and adequate (staff and material) resources
- Participation of internal and external stakeholders in the QA system
- Continuous development of the QA system

# CRITERIA FOR SYSTEM ACCREDITATION (2)

## § 18 MRVO measures to implement the QM concept

- Regular evaluation of programmes and related areas by internal and external students, external academics, representatives of the labour market, graduates
- Systematic and continuous data management in the area of QM
- Documentation of the evaluation results (including peer votings)
- Information – also external – about the measures and internal evaluation results
- Publication of the internal accreditation report and decision in the data base of GAC („Qualitätsberichte“, compareable to agency reports)

# EXPERIENCES AQAS: STRENGTHS

- The internal management of the Higher Education Institutions is strengthened. Within the management system QM becomes a central element and contributes to the further strategic development of the HEI.
- Quality culture is promoted in the universities
- Know-How about QM is expanded in the HEI
- The generic criteria and requirements for processes allow that HEIs implement or design individual QM-systems (central and decentral)
- Beside the criteria requested by the MRVO own criteria and KPIs can be added.

# EXPERIENCES AQAS: WEAKNESSES

- Focus on study and teaching is restrictive. Somehow research, services and administration are included but their role is not well defined.
- How are all stakeholders of the university addressed?
- Danger of technocratic implementation of the formal criteria without changing towards a quality culture.
- Internal QM focusses on formal criteria because they are easy to check („counting peas“).
- Some professors complain that internal QM managers are stricter than agencies and hinder development.
- Content-related critics by external experts is ignored. Programmes are not changed content wise.
- No negative decision taking by HEI. All programmes succeed.



# CHALLENGES

## ... FOR AGENCIES AND EXPERTS

- Complexity of the procedure (many documents and information on different levels)
- Assessments of changes ongoing in HEI („work in progress“) is difficult.
- Rules and regulations of HEI have to be compared to what happens in the programmes. Difficult to assess the reality and not the policy.
- Lack of benchmarks and standards (and at the beginning also lack of experiences of assessors).
- How deep do you have to dig to assess the QM-system (checking notes of meetings etc.)?
- How detailed have the results to be presented in the final report?
- How to keep the assessment of different institutions comparable?

# CHALLENGES

## ... FOR HIGHER EDUCATION INSTITUTIONS

- A robust QM-system has to be implemented – not only instruments.
- Reliability of repeatable processes on all levels of the HEI
- Meaningful internal documents have to be provided (for all levels of the institution, also on faculty level).
- QM has to be implemented on all levels of the institution (central, faculty, departments, administration).
- PDCA-cycle has to be closed (Follow-up, incentives etc.)
- Which body/unit decides about internal accreditation?
- „Now we have to deal with all conflicts ourselves.“How do deal with deficits, conflicts and problems)? Internal complaints and appeals management is needed.
- How to keep the internal QM-system running within the 8 years accreditation period?

## EXCURSION: EUROPEAN PERSPECTIVE

- ESG are a solid and reliable basis for all QM-activities on the international level.
- European Approach is a well established methodology on programme level.
- German universities which are part of European Alliances are in the process to discuss and align their internal QM-requirements.

Open questions:

- How is the international acceptance of programmes accredited by (German) HEIs internally? System accreditation is not known abroad.
- Is therefore external programme accreditation by European agencies necessary for programmes offered by European Universities?
- How can we organise continuous international exchange on this topic?

## THANK YOU!

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# AQAS

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eqar



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