

Foundation for Accreditation of Study Programmes in Germany

Expert report with proposed resolution
in respect to the application of the Agency for Quality Assurance through
Accreditation of Study Programmes in Germany
(AQAS) (registered association) for Reaccreditation from April 26, 2006

(15.02.2007)

1. Principles of the procedure

1.1 Official order and factual criteria

According to § 2 Sect. 1 No. 1 of the Act for the Establishment of a "Foundation for Accreditation of Study Programmes in Germany" the Foundation has the order to accredit and reaccredit accreditation agencies and thus to grant time-limited accreditations to study programmes by affixing the seal of the Foundation.

On December 15, 2005 the Accreditation Council passed the "Criteria for the Accreditation of Accreditation Agencies" and therewith the basis for the accreditation decision.

To promote the international acceptance of decisions of the Accreditation Council and the Accreditation Agencies the Accreditation Council adapted in particular the Standards and Guidelines for Quality Assurance in the European Higher Education Area, as they have been passed by the ministers responsible for the higher education in the Bologna follow-up conference in Bergen in May 2005. Other important sources for the formulations of the criteria were the Code of Good Practice issued by the European Consortium for Accreditation on 03.12.2004 and the Guidelines of Good Practice of the International Network for Quality Assurance Agencies in Higher Education from April 2005.

1.2. Principles of the procedure

According to the resolution of the Accreditation Council "General Regulations For The Implementation Of The Process For Accreditation And Reaccreditation Of Accreditation Agencies" from June 22, 2006 the review is based on the following procedural elements:

- analysis of the reasons for the application,
- a local inspection in form of a meeting leads to the final accreditation decision of the relevant panels of the Agency,
- separate conversations with the Management of the Agency, the employees, experts and if necessary with the representatives of those higher education institutions, which have already accomplished a accreditation process at the Agency
- Participation in a local inspection of the Agency during an accreditation process
- If necessary, consideration of evaluations by the Accreditation Council since the last accreditation.

2. Implementation of the process

On April 16, 2006 the Agency for Quality Assurance through Accreditation of Study Programmes in Germany (AQAS) (registered association) has submitted a written application for reaccreditation as a accreditation agency to the Accreditation Council.

On October 19, 2006 the AQAS submitted a letter stating the reasons for its application along with other documents.

Upon corresponding requests of the expert group on November 22, 2006 and on December 8, 2006 AQAS submitted further detailed documents or explained existing documents.

In a resolution from July 17, 2006 (circular resolution) the Accreditation Council nominated the following experts:

- Professor Dr. Ing. Peter Pirsch, University of Hannover, member of the Accreditation Council (President).
- Dr. Peter Findlay, Assistant Director, Quality Assurance Agency for Higher Education, Great Britain
- Mrs. Janine Hofmann, Student at the University of Jena
- Gerd Köhler, formerly Board of Directors of the GEW, member of the Accreditation Council
- Professor Dr. Jürgen Kohler, University of Greifswald, Chairman of the Accreditation Council,
- Dr. Kurt Sohm, Manager, Higher Education Council (Austria)
Agnes Leinweber supported the expert group on behalf of the Office of the Foundation.

On November 27 and 28, 2006 a local inspection of the expert group took place in Bonn. After preliminary interviews of the expert group have taken place on November 16, 2006 the members participated in an all-day meeting of the Accreditation Committee (AK) at the "Uniclub" of the University of Bonn on November 17, 2006.

The hand-outs were previously delivered to the experts.

Before the meeting of the Accreditation Committee confidential conversations were held with the experts, who had participated in accreditation processes of the Agency.

Furthermore the group of experts talked to five representatives of higher education institutions, which have completed the process for the accreditation of study programmes at AQAS.

Subsequently the expert group visited the premises of the Foundation.

On the second day of the meeting of the Accreditation Committee simultaneously talks with scientific and administrative staff members took place in the morning of November 28, 2006. After the meeting of the Accreditation Committee the experts talked to the (leaving) chairman of the Board of the Agency, Prof. Dr. em. Dietmar Petzina and the manager Mrs. Edna Habel. In a final internal discussion the expert group talked about their impressions.

In the course of the process for the accreditation of the Agency the speaker of the expert group, Prof. Peter Pirsch and the official of the office of the Accreditation Council joined a local inspection implemented by AQAS in respect to the BA - and MA-study programmes „Economic Science“ at the Bergisch University of Wuppertal on November 23 and 24, 2006.

The impressions, which have been received herefrom, were reported to the experts.

In connection with the 51st meeting on February 14th - 15th, 2007 the Accreditation Council heard the new chairman of the Board Prof. Dr. Dieter Timmermann and the assistant directors Mrs. Hermann and Mrs. Kloeters. The reasons for the application of the Agency and a preliminary evaluation of the expert group were available to the Accreditation Council at the time of the meeting.

The evaluation report is based on the application for accreditation of the Agency for reaccreditation, the reasons for the application including all attachments and documents handed in later, as well as on the knowledge achieved by the expert group in observations and talks etc. while attending expert assessments of study programmes and which will be submitted by the chairman of the expert group.

3. The Agency for Quality Assurance through Accreditation of Study Programmes

3.1 Development

The Agency for Quality Assurance through Accreditation of Study Programmes was founded in January 2002. In a decision from March 14, 2002 AQAS was accredited as a accreditation agency by the Accreditation Council. AQAS accredits study programmes of higher education institutions and a variety of academic subjects.

3.2 Organization

The Agency exists in the legal form of a non-profit registered association. Among its members are currently next to 54 higher education institutions also the German Association For Specialists In German Studies - Society For German Language And Literature Studies At Higher Education Institutions, The German Association For Psychology And The Federal Association Of Graduated Engineers For Road Construction And Traffic.

The bodies of the association are: General membership meeting, management board and accreditation committee.

The management board is elected by the members of the general membership meeting, passes the statement of accounts, the annual budget, the articles of the association and decides about essential matters in respect to the association.

The chairman - since January 1st 2007 this position is held Prof. Dieter Timmermann - is head of the board which consists of five persons. The board elects the managing director, presently this position is filled by Mrs. Edna Habel.

The Accreditation Committee, which is responsible for the decisions about accreditations on basis of individual reports consists of the first chairman and 12 other persons from universities, universities of applied sciences and persons with professional experience.

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Among them are two students and experts from foreign countries.

For each member a substitute member will be nominated. According to the articles of the association the members of the Accreditation Committee will be elected by the board of the association, proposals can be submitted by the members of the general membership meeting.

The Accreditation Committee decides about the accreditation of individual study programmes on basis of recommendations given by experts. According to the articles it also determines the basic proceedings and standards for the accreditation.

On May 26, 2003 the board decided to establish the following five expert committees:

1. Mathematics, Natural Science and Computer Science
2. Engineering Science
3. Economic Science and Social Science and Law
4. Arts and Cultural Science
5. Medicine, Nursing Science

The establishment of expert committees for Fine Arts, Music, Architecture, Design and Lectureship are in preparation.

The present members of the experts committees were selected from proposals made by the associated higher education institutions and the regional headmaster conferences from North-Rhine Westphalia and Rhineland-Plantinate.

So-called "mentors", who are members of the accreditation committee and assigned to the upcoming respective study programmes for accreditation, act as reporters in the decision-making of the accreditation committee.

3.3 Equipment

Today the Agency employs a managing director, seven project managers (three of them with indefinite work contracts), one organization assistant (temporary), one clerk, two secretaries (one of them works part-time and temporary) and five student assistants.

On December 1, 2006 another official started to work with a work contract limited to 2 years. In the beginning of 2007 two more project managers and a secretary (with a temporary work contract) shall be employed. At the beginning of the summer term along with the managing director ten officers (two of them with an expanded field of occupation as assistant managing directors), a clerk, an organization assistant, three secretaries and five student assistants shall work in the Agency.

All project managers have gathered specific professional experience in Bachelor and Master Study Programmes and experience in the due course of accreditation and evaluation processes - this is also a hiring requirement.

The Agency can provide office rooms with a size of approx. 300 square meters in down-town Bonn.

3.4 Cooperation and memberships

AQAS is a founding member of the European Consortium for Accreditation (ECA), the consolidation of various European accreditation agencies. Together with the other members AQAS has signed the „Code of Good Practice“ in december 2004. Additionally AQAS works in the European Association for Quality Assurance (ENQA) as a "Candidate Member" and does its best efforts to obtain full membership.

4. Evaluation

At first we like to mention, that it would be desirable to have a part in the course of the reaccreditation process, when after a retrospective self-evaluation of the Agency a preview of the upcoming phase would follow. New criteria and essential matters have to be considered if outcome-orientation and other methods for quality management shall shape future accreditations. A strategical positioning for the further development of the accreditation of programmes was missed.

The documents which were first handed-out to the members of the expert group were evaluated as insufficient. It was difficult to check the criteria of the review fields determined by the Accreditation Council since those fields were assigned to different sections. All efforts to name reasons for the application concentrated on describing the organization and the procedure of the accreditation implemented by the agency. Sometimes the reasons for the application were contradictory to the information from the attachments or the information from personal interviews at the respective location. An example: On the one hand quality approach is determined under consideration of the fitness of purpose and the fitness for purpose (see page 16f of the application forms), on the other hand this is not really reflected in the description of the quality approach. Another example: The quality approach of the fitness of/for purpose and the corresponding confession are confronted with quality requirements of the respective "scientific community" (Page 16) and this leads to inconsistent quality aspects.

A very huge subsequent delivery established more clarity in respect to the organization, the criteria for the decisions and the principles of the procedures of AQAS. The entire procedure became more transparent because of the implementation of local inspections during an AQAS accreditation procedure and because of talks with groups which are involved in the accreditation procedure

like higher education institutions, experts, project managers and the Accreditation Committee.

During a local inspection in the due course of the AQAS accreditation procedure, the speaker of the expert group was positively impressed by the professional and well-trained attendance and support of the peers performed by the project manager of the AQAS-office, who sovereignly mastered the task of acting as a representative of the agency between the expert group and the higher education institution.

During the local inspection in Bonn the representatives of the higher education institutions - who had already completed a few accreditations - praised the intense communication initiatives of the agency before and during the accreditation procedure. Even in case of big procedures like accreditation packages the proposed deadlines by AQAS have been kept.

The representatives of the experts who were applied at AQAS emphasized in interviews the excellent support and advisory service of the office. Also the notes, which are written and submitted by the office after the talks in the due course of the local inspections, are a service which by far not many agencies do offer.

Because of these talks the expert group gained the impression that AQAS fulfills the tasks and requirements of a accreditation agency with limitations. The experts found that some specific review fields needed improvements. In discussions with members of the Accreditation Committee the experts came to the conclusion that the resolutions of the Accreditation Council from December 15, 2006 in respect to the procedure for accreditation decisions are known but have not been implemented consequently.

Basically the expert group especially misses a self-critical analysis and reflection of the own process in the respective documents of the Agency. The project managers are qualified and characterized by a high potential; this potential, however, should be used more efficiently through a concept of human resources and organizational development based on a strategical direction of the Agency.

Review field 1: Understanding of the accreditation task

The AQAS Agency accredits programmes across subjects and higher education institutions according to quality guidelines of its own, for which no binding resolutions have been submitted. The review of the quality standards in respect to the study programmes is implemented on base of specific rules and resolutions issued by superior institutions, which determine the accreditation regulations. AQAS points out that it is important that the accreditation guidelines do not adversely affect the guaranteed constitutional principle of free research and teaching. Additionally the importance of standards and frame curricula in the sense of a rule which were developed by scientific associations was stressed. A specific AQAS review approach can be developed from many different documents. Among these are evaluation reports about higher education study programmes and information in the "Hand-out For Experts".

Fulfilling their accreditation tasks AQAS does not only analyse the usual items but in particular the evaluation of the study possibilities and the intended careers.

The quality criteria, however, is not coherently defined and communicated in the AQAS-documents. The expert group observed a tendency of the Agency that in case of deficiencies stated in the reports and which are essential according to the regulations of the Accreditation Council it rather demands the fulfillment of certain requirements than simply to reject the accreditation.

For the „basic ethical understanding“ of an agency it is important to provide an substantiate reflection in respect to its understanding of the constitutional principle of free research and teaching, in other words to make it clear: how this principle is reflected in the decision criteria and the guidelines for the experts.

But there is no such guideline, because the quality understanding is not clear and changes.

There are no references to the national qualification framework visible. The underlined aspects like, for example, that the complete implementation of the "learning outcomes", the internationalization and the quality increase in the sense of a dynamic quality understanding are still missed, should not be mentioned negatively considering the actual German status quo.

Review field 2: Structural organization

AQAS is a non-profit registered association. Its members are mainly higher education institutions and associations from North-Rhine Westphalia and Rhineland-Plantinate. Thanks to its legal form as a registered association, AQAS has the capacity to be subject to legal rights and duties. On basis of the regulations defined in the articles of association the outward responsibilities are clearly determined. Even in case of existing expert committees, they are not regularly involved in the decisions about accreditation. At the present time their essential task is helping to find experts. The tasks of the expert committees assigned in the articles of association are only partly implemented in practise.

Furthermore the formation of the expert committees does not fulfill the requirement to involve all relevant stakeholders. Many professionals and students are not represented in these panels so far. To improve the procedure the Accreditation Committee introduced a "mentor", being technically affine members of the Accreditation Committee in relation to the respective accreditation process. Due to the increasing numbers of accreditations the function of a "mentor" has become common. So far it has not been fixed in written resolutions. Also the nomination of experts does not take place in a clearly defined process.

At present, the Accreditation Committee, the expert committees and the mentors are authorized to nominate an expert. During the local inspections one has gained the impression that the final decision on the nomination of experts was made by the mentors of AQAS and not by the Accreditation Committee.

Review field 3: Procedural organization of the Agency

The collaboration of the bodies at AQAS is determined in the articles of association and supplementary resolutions about the procedure. The experts have gained the impression that the consistence of the decisions of the Accreditation Committee is essentially determined by the members, since written guidelines or exemplary decisions are not sufficiently available. A stronger involvement of the expert committees in the decision processes would be chance to relieve the Accreditation Committee. The experts participating in the accreditation procedure are only insufficiently involved in subsequent processes when changes in respect to their evaluation are made. The technical review of the requirements is only implemented by one member of the expert group and not by all persons who were involved in the creation of the evaluation reports. Hence personal points of view for the evaluation can not always be excluded. The efficiency of the procedures is given; however there is no reflection about the efficiency of the requirements.

In respect to the reasons for the accreditation decision the process until the formal beginning of the procedure within the Accreditation Committee was found to be positive and should be mentioned. The report about the initial situation published by the office, which was the basis for the beginning of the procedure and the transmission of the most important issues from the meeting of the Accreditation Committee provide the highest possible transparency at the beginning of the procedure. Since the higher education institution receives a composition of essential impressions and questions of the expert group on base of the written application forms, it is possible to implement a target-orientated preparation. All in all, the experts consider the initiatives of the Agency in respect to communication, reasons for their decision and transparency as positive.

Review field 4: Reporting

Until now AQAS published abstracts about accreditations in the Higher Education Compass with quite a big delay, but it does its best efforts to be up-to-date. For the completed procedures since 07/2006 the names of the experts are also published. Until now the Agency publishes only the name of the accredited study programme and the respective higher education institution. The experts recommend to publish also the abstract for the Higher Education Compass on the internet pages of the Agency.

Review field 5: Equipment and sustainability

Qualification, competency and the respective experience of the staff members of AQAS meet the requirements of the task. The expert group gained a positive impression from the project managers, who all acted in a dedicated way, highly motivated and self-confident. This potential should be improved by adequate measures in respect to the development of human resources and organization and participation in meetings about accreditation issues. In respect to the premises and the financial background of AQAS, the requirements in respect to an accreditation agency are fulfilled.

Review field 6: Internal quality management

The presentations in the written application and also the local inspections have proved that there is only a rudimentary internal quality management. Regular internal meetings in the office and an annual meeting shall enable an exchange of experience and lead to new strategical orientations. New project managers will be trained externally in conflict management and moderation for a start. It is also positively noticed that in the beginning there is an initial transition phase for the project managers allowing them to observe the procedures and to accompany the mentors. Apart from the initial transition phase for project managers there are only a few approaches in respect to human resources and organizational development.

Until now no specific qualification and sensitization of the experts for their tasks has taken place. There is no systematic quality management with a feedback among any of the involved persons visible.

Review field 7: System control of the higher education institution

An important key issue for the accreditation procedure is the review of the quality orientation of the higher education institution. In the guideline for higher education institutions AQAS determines various aspects of quality orientation. In many AQAS accreditation procedures, surveys of students in lectures and the respective conclusion are considered to be a sufficient quality element. A more profound quality orientation with all its different levels has to be requested by AQAS and also by the higher education institutions.

Review field 8: Educational targets of the study programme

In the "Hand-out For Experts" as well as in the evaluation structure of the applications the educational targets of the study programmes are specifically analysed. As a major target the professional qualification is underlined - not very much emphasis is put on the scientific abilities, social abilities and contributions to self-development.

Correspondingly the criteria in respect to this review field is not completely fulfilled.

Review field 9: Conceptual classification of the study programme

The requirements for the national quality frame are mentioned in the guidelines of the higher education institutions, but not in the documents for experts and are not explicitly reviewed by AQAS. According to the experts there is much more focus on the objective criteria in respect to "ECTS" and "Modularization". As a specific aspect it should be pointed out that the

regulation for the admission to Master Study Programmes are not controlled in respect to the actually acquired credit points at the time when the qualification as a master is obtained. The persons involved in an accreditation procedure have especially difficulties to review the outcome-criteria of the national quality frame under consideration of the statements of the higher education institutions or to require adequate statements in respect to the achievable competencies and abilities. In the "Hand-out For Experts" this requirement is not explicitly stated. Until present only a few reports about study programmes contain corresponding evaluations. Also in respect to the outcome orientation, which is hard to be reviewed, it is expected that AQAS acts a forerunner; submitting supporting information with exemplary descriptions and materials for the procedure the experts should be sensitized.

Review field 10: Review and evaluation of the concept of the study programme

In the AQAS guideline the higher education institutions are requested to describe the concept of the study programme with the intended professional targets and learning outcomes. The experts are requested to review the respective statements. As the evaluation reports show, this is not always done with the necessary profoundness. The reasons for this are the insufficient information of the higher education institutions and experts about the new requirements.

In order to check if and how a study programme can be studied especially students should be interviewed. It is found, that in many accreditation procedures there were no students represented in the expert group, which contradicts the resolution of the Accrediation Council in respect to the participation if all stakeholders in the due course of the accreditation process. AQAS explains that there is only an insufficient number of voluntary students of certain higher education institutions available for the accreditation procedure. As a rule AQAS does not take students for different types of higher education institutions.

Review field 11: Performance of the study programme

According to the guideline for higher education institutions AQAS requires detailed data in respect to the staff, equipment and the premises. This data is reviewed in the course of the process. Over an integration matrix of educational matters all burdens of the scientific staff members are considered.

Review field 12: Review sytem

The submission of a valid examination regulation is an inherent part of the accreditation procedure; experts do not implant a legal review of the examination regulations. An approved examination regulation is a condition precedent to the accreditation procedure. According to AQAS the experts are instructed to check if the stated examination form correspond to the learning outcome.

The issue, if the examination system is educational target-orientated, is seldom discussed in the evaluation reports and consequently is not examined adequately by the experts. Usually the possibility to perform an examination in time and the organization of the examination procedure are checked for plausibility, since the Agency has almost exclusively controlled study programmes, which have not started yet.

Review field 13: Transparency

For transparency purposes the higher education institutions keep records and publish the relevant requirements for the corresponding study programmes. In case of existing study programmes there is usually a demand for study advisory services; this matter is so far irrelevant in cases of new study programmes. The experts control the correctness of the statements of the higher education institutions in respect to the records and examination requirements. The

evaluation of the purpose of the statements of the higher education institutions in respect to their understandability and achievability belongs also to the tasks in the course of an accreditation, but this is often neglected – also by AQAS. Nevertheless the expert groups examine very explicitly the curricular structures of the study programmes and the module catalogues.

Review field 14: Internal quality assurance of the higher education institutions

In relation to this matter AQAS will ask the applying higher education institutions general questions.

If the measures are adequate for the purpose and the data is usually controlled for the first time or expected to be controlled in course of a reaccreditation procedure. Often AQAS accepts surveys in students classes as a sufficient quality element. Quality elements beyond this, especially those with reference to the review of target concepts and the overall structure of the study programme, are requested, but not required by the universities in short term. The agencies play an important role in answering these questions, and AQAS should do its best efforts to meet the expectations by giving examples of Best-Practice in their materials for higher education institutions.

Review field 15: Acquisition

After a great number of accreditation have been performed AQAS has developed a standardized procedure for initial interviews with the higher education institutions and the subsequent accreditation procedure.

The course of the initial interview has a specific structure according to the documents. Offers for an accreditation of study programmes, which were made available as examples, show a complete description of the services and the calculation of the corresponding fees. AQAS has enclosed a model accreditation contract to its other documents.

According to the expert group AQAS acts in compliance with the German law against unfair competition.

Review field 16: Implementation

AQAS provides the higher education institutions with a guideline for the application, containing the expected structure and the relevant questions. In respect to the criteria which is important for the decisions, AQAS has not passed a catalogue of its own, refers the "Criteria For The Accreditation Of Study Programmes" released by the Accreditation Council. The Agency performs measures to ensure the impartiality of the experts and grants a veto-right to the higher education institutions. The procedure has some special issues. The incoming application will be audited in the office and an initial report with all relevant data will be written. This initial report will be submitted to the higher education institutions, giving them the possibility to correct possible mistakes. Accreditation procedures will be opened formally by the Accreditation Committee on basis of this initial report. It is regarded as a positive fact that the statements of the experts before the local inspections are sent to the respective higher education institutions, because this grants them the possibility to react correspondingly before the local inspection takes places. AQAS does not provide the higher education institutions with the report of the experts in order to give another statement. In many audit-teams representatives of students are not involved. AQAS considers only students from the respective type of higher education institution, university or university of applied sciences. The experts recommend to consider also students from other types of higher education institutions in case of being prevented from performing the function.

In case of new study programmes, which do not have any matriculated students, AQAS does its best efforts to consider students from related study programmes or previous study programmes for the local inspections.

Review field 17: Decision and reason for the decision

The decision of the Accreditation Committee is based on the evaluation report of the expert group, which will be partly modified in respect to the consistency of the decisions made by the mentors or the Accreditation Committee. The final evaluation report also includes declarations to the requirements and recommendations or a suggestion for a justified denial of the procedure. The notification of the president of AQAS to the higher education institution summarizes the result. The main reasons are stated in the enclosed evaluation report. The expert group has gained the impression that the decisions of the Accreditation Committee are not always orientated on the relevant provisions of the Accreditation Council.

Review field 18: Compliance with the requirements

The auditing of the time is implemented by the office. The auditing of the facts will be performed according to the resolution of the Accreditation Committee by a member of the expert group (in respect of problems with the contents) or by the assigned project managers of AQAS (in formal issues). Since AQAS restricts the requirements to one year, a maximum extension of 6 months is possible in case of new criticism.

Review field 19: Complaints

AQAS explains that complaints of higher education institutions must be submitted in writing to the Accreditation Committee. However AQAS has no formularized procedure for complaints with definitions of the matter which has to be reviewed, its limitations and assessment of a person for the decision.

Review field 20: Programme accreditation packages

AQAS offers a so-called accreditation package for technically affine study programmes and has determined regulations for this purpose. Nevertheless there are no visible criteria for connecting study programmes in packages. It is determined, however, that at least one member of the expert team will have the required expertise for the respective study programme and that each study programme will be acknowledged in a discussion. These regulations limit the number of study programmes for each package. AQAS has fixed a corresponding fee for accreditation packages.

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5. Recommendations

The experts recommend a reaccreditation of AQAS under some conditions. The following requirements listed below have to be fulfilled until xxx.

A.

Requirements:

A.1

AQAS provides a binding and documented adoption of resolutions over their understanding of the tasks of accreditation, procedural principles and rules about the choice between the possible accreditation decisions. (Review field 1).

A.2

AQAS defines and documents the task of the specialized committees exactly and includes them according to the assigned tasks into the accreditation procedures uniformly and consistently. The constitution of the expert committees must fulfill the requirements of the Accreditation Committee regarding the participation of stakeholders.

If the supplementing function of a mentor in the Accreditation Committee is to be kept, his task has to be documented clearly and to be clearly defined for the other persons involved in the procedure (review field 2).

A.3

The procedure for the nomination of the experts has to be organized clearly under assignment of proposal and order powers and has to be documented (review field 2).

A.4

AQAS introduces a formalized internal quality management, which includes feedback processes and environmental analyses and it guarantees the analysis and reflection of its own processes. A concept for HR and organizational development as well as the qualification of the experts has to be submitted.

For its conversion an associated flow diagram has to be compiled (review field 6).

A.5

The requirements of the national qualification framework have to be documented in the procedure materials, particularly in the hand-out for the experts and have to be discussed in the evaluation reports related to the respective course of studies (review field 9).

A.6

AQAS guarantees that all groups of interests in the committees and groups of consultants, mentioned in the "Criteria For The Accreditation Of Accreditation Agencies", are represented.

This concerns also the presence of at least one representative or a representative of the respective groups of interests at the panel meetings. (Review fields 10 and 16).

A.7

The presence and the fitness for purpose of the university's internal quality assurance are to be examined by AQAS. Experts have to be provided with an exemplary list of test criteria (review field 14).

A.8

The possibility of a statement for the evaluation report of the expert group, which is crucial for the decision of the Accreditation Committee, is to be granted to the higher education institutions (review field 16).

A.9

AQAS proves that the relevant rules of the Accreditation Council for the contents of accreditation decisions are made available within its organization and will be applied (review field 17).

A.10

AQAS arranges a formularized complaint procedure for higher education institutions (review field 19).

A.11

AQAS documents the criteria for the bundling of the accreditation of study programmes.

It guarantees an adequate composition of the group of experts. (Review field 20).

A.12

AQAS submits operationalized criteria and standards to the aspects "Studies and Career", "Internationalization" and "Metadisciplinary/social competences".

Deviating resolution recommendation by Professor Dr. Jürgen Kohler:

In case of substantial deficiencies the accreditation is to be denied according to the rules of the AC.

Some deficiencies can be seen at AQAS, whose relevance results from the fact that they directly affect the correctness of accreditation decisions: (1) The quality criteria are - also concerning normative Essentialia like e.g. the qualification frameworks - not clear, anyhow not clearly and also not consistently communicated to the higher education institutions, experts and the Accreditation Committee; (2) apart from the resulting deficits the accreditation decisions do not differentiate correctly between the consequences of insignificant and substantial deficiencies in the study programmes, so that the accreditation results do not comply with the relevant rules of the AC (with the consequence that study programmes with substantial deficiencies, although under requirements, are permitted).

According to decisions of AC substantial insufficiencies can lead to the suspension of the procedure instead of non-accreditation. It can not even be deviated (easily) if other accreditation procedures have been performed "moderately" (which is not the case, at least if it is not certain and furthermore the continuation of errors it is not legitimate or required). The present situation of AC in respect to their resolutions leads to the consequence that provisionally no continuation of the accreditation work of the Agency up to the repair of the substantial insufficiency can take place.

In case of an initial accreditation one would have to decide in this way according to my opinion.

One can only escape from the consequences of a suspension of the procedure; if the relevant rule is changed generally at the same time with the AQAS decision concerned (the other agencies would not suffer any disadvantages from it, as they are not connected with any impairment). The consequences of a suspension of the procedure, however, affect a reaccreditation more severely than a first accreditation. This could be solved if the relevant regulation could be supplemented as follows without reducing the quality demand substantially:

If the procedure is suspended the procedures of the Agency are suspended as well until the accreditation of the Agency takes place. In course of a accreditation procedure the Accreditation Council may give the order that the procedures implemented by the Agency shall not be suspended, provided that the Agency proves that the essential deficiencies are eliminated.