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ESG Evaluation of the German Accreditation Council in 2020/2021: Follow-up report

Dear President of ENQA, dear Douglas,

We would like to report on developments in the German Accreditation Council concerning the recommendations from the review panel and from the ENQA Board. We also would like to reflect on our key challenges.

Recommendations

Regarding recommendation to ESG 3.1/ESG 2.2:

In its spring meeting in 2022 GAC set up a working group consisting of members of Accreditation Council¹ to launch a strategy process. In September and November 2023, two externally moderated, full-day strategy workshops were held in which all stakeholder groups in the Accreditation Council including the agency representatives and together with the head office debated the following topics:

- Self-image of the German Accreditation Council,
- interaction between the players in the accreditation system,
- communication with interest groups and
- further development of the system.

¹ About terms: The „Accreditation Council“ is the main decision-making body of the German Accreditation Council. We speak of the Accreditation Council when referring to this body and of the German Accreditation Council when referring to the institution as a whole.

As a result of the two workshops and debates in the Accreditation Council in Winter 2023 and March this year (in March the strategy process was debated with all agencies in the joint accreditation council meeting) a mission statement was developed. It builds on the foundation's 2019 "Leitbild" and contains both the current and future goals of GAC as well as the tasks and activities that will contribute to achieving these goals. The mission statement is expected to be adopted in summer 2024. The next step will be the adoption of work packages based on the GAC's identified objectives.

We are aware that the panel has emphasized the need to extend collaboration "beyond the stakeholder representatives already involved in the agency". The Board told us to "further strengthen collaboration and involvement of stakeholders in the agency's governance and work".

Concerning these relationships, the following chapter deals with our work with the other agencies ("assessing agencies"). We also have taken several steps to better connect with other important stakeholders:

- Higher Education Institutions:
 - The chairman has started an initiative to visit the rectors' conferences of the German states. Until now, two meetings have taken place, several more are under consideration.
 - We regularly take part in the exchange forum of system-accredited HEIs.
 - After a vacancy, the German Rectors' Conference has appointed a new Vice President for Study and Teaching. A monthly briefing with him has been established.
- Students: GAC and the Students' Accreditation Pool in Germany have agreed upon an agreement about collaboration.
- Employers: At the time of the review, GAC only had a connection to the Employers' Association (BDA). Since then, we have reached out to the three other big business and trade associations, exploring opportunities of collaboration: German Chamber of Commerce and Industry (DIHK), The Federation of German Industries (BDI), German Confederation of Skilled Crafts (ZDH). Especially the connection to DIHK seems to be promising.
- Unions: We are regular guests and active participants in the meetings of the Trade Union QA Experts Network (Gewerkschaftliches Gutachter:innennetzwerk).

Regarding recommendation to ESG 3.3:

GAC appointed an agency liaison agent in July 2023. The goal with this position is to strengthen the dialogue between the assessing agencies and GAC. As such, the person representing the GAC can function as a sort of ombudsman for the agencies in case of a conflict. The position also aims to deepen the collaboration between the GAC and the agencies through joint short-term projects, such as in March 2024, when ACQUIN and GAC collaboratively offered workshops and lectures on system accreditation for HEIs.

For August 2024, the agent, with the help of a group of employees of the GAC, arranges a daylong meetup for project managers of the assessing agencies and GAC, under the theme of the history and future of accreditation. We are happy to report that this event is already fully booked with 30 colleagues from the other agencies taking part.

The agent also tries to promote work shadowing between the agencies and the GAC; up to this point, three employees of the GAC visited assessing agencies to gain first-hand experiences of the evaluation procedures of the agencies and the challenges the agencies face in conducting these procedures.

Case-related communication has also been intensified. In system accreditation, an exchange takes place with the agency in charge when there are particularities in the procedure and also in the case of negative decisions. However, agencies also receive feedback if the GAC considers a procedure to be particularly well managed or good practice. This is an effort from all sides; our colleagues from the agencies have intensified their case-related communication also.

In programme accreditation, the exchange takes place in particular by means of a regular meeting between the programme managers of the assessing agencies and of GAC, which takes place about three times per year. Past topics were joint programmes and the accreditation criterion of human resources, in July 2024 an exchange on health study programmes will take place. There are similar regular meetings in system accreditation.

In addition, a yearly exchange takes place between the management of assessing agencies and GAC. The last meeting was in January 2024 on the evaluation of the specimen decree. GAC's meeting with the assessing agencies is organised once a year in March; this is a joint operation.

At the ENQA members' forum this year in Hanover, the chairman of the German Accreditation Council and the managing director of ZEvA together presented the German system.

With regard to the ENQA panel's request for a clearer division of roles between the assessing agencies and GAC with regard to the tasks provided for in the German accreditation regulations and the ESG, it should be noted that the self-image of the German Accreditation Council is part of the strategy process (see section on ESG 3.1/ESG 2.2). There, however, the focus

is not so much on defining the roles of the actors, it is rather on the self-image with which the roles defined in this way are lived. The roles themselves from GAC's perspective are already largely clearly defined. With regard to each of the procedural steps and tasks provided for in the ESG, the applicable legal bases clearly define which actor is responsible for them. According to Article 5 (2) of the state treaty GAC has been commissioned by the states ("Länder") to ensure the equivalence of German bachelor's and master's degrees by means of accreditation. The assessing agencies take on a clearly defined part of the process. According to Art. 3 sentence 2 of the State Treaty the higher education institutions "enlist the assistance of QA agencies listed in the European Quality Assurance Register for Higher Education (EQAR) and authorized by the accreditation council for the assessment and the preparation of the review report." This is how the process has been implemented and lived since 2018. The details of the distribution of roles are also clear according to the legal basis and current practice: for example, the agencies appoint the expert groups and are therefore also responsible for recruiting the experts. The Accreditation Council is responsible for making the accreditation decision. It can only make this decision if the procedure has been carried out properly. This also includes ensuring that the expert group was composed in accordance with the regulations in the State Treaty and specimen decree. In the rare cases in which the expert group did not include all the required experts and this may have had an influence on the decision, the Accreditation Council cannot take a decision on this basis and the procedure must be repeated. The same applies if the report, which the agency is responsible for editing, does not provide a sufficient basis for the Accreditation Council's decision.

Regarding recommendation to ESG 3.4:

GAC fulfils its responsibility concerning thematic analyses as the central body in the German accreditation system through various tools:

Under the label AR Data Analysis (ARDA), the head office has developed a new evaluation tool for data of accredited study programmes in ELIAS. ARDA analyses are carried out with the help of the tool 'R'. The evaluation is based on data that is already freely accessible via the public view. It is semi-automatic, i.e. it can be extended to other study programmes or sufficiently definable groups of study programmes with little effort.

The analysis of conditions, which had already been carried out regularly, was professionalised by the help of "R". It should be noted that conditions are connected with major issues of quality development at the HEI's. The main aim and output of the analysis of conditions is to find out which problems HEIs have in implementing the formal and academic criteria and thus to identify the main enhancement needs at HEIs. The annually planned quantitative and qualitative

general analysis of conditions last took place at the end of 2023 with a significantly larger database (4049 study programmes compared to 349 study programmes in the previous analysis).

In addition, quantitative ARDA analyses of the various subject groups and the conditions imposed in each case are carried out as well as of certain subjects in more detail on an ad hoc basis. For example, the subject mechanical engineering has been analysed because student numbers are particularly low there. An evaluation of nursing sciences was carried out as a basis for the exchange with the Federal Institute for Vocational Education and Training (BIBB) on academisation in nursing. An analysis of system accreditations is planned for next year as far as capacity permits.

The results of the analyses are not only incorporated into exchange formats, but also help to increase the consistency of the application of criteria (see section on ESG 2.5) Above all, however, HEIs use the public analyses for their own quality development.

All ARDA analyses can be found at <https://www.akkreditierungsrat.de/en/node/253> (German only).

Agencies and GAC are equally faced with the challenge of carrying out thematic analyses of the findings from their activities. It was decided at the joint Accreditation Council meeting with the assessing agencies in March 2023 to set up a joint working group to develop an approach for such joint analyses. The working group developed the proposal to initially conduct surveys in the Accreditation Council and the assessing agencies to identify aspects of the accreditation system that represent a strength or weakness for the various status groups. In a subsequent step, the results will be used to develop proposals for joint thematic analyses by GAC and the agencies. Results of the survey are expected at the end of this year.

The analysis on the topic of academic success² was prepared as part of the master's thesis of a programme manager of GAC. It will feed into the quality dialogue on the same topic, which will take place at the end of June 2024.

Regarding recommendation to ESG 3.5:

In September 2022 the Conference of Finance Ministers (FMK) approved an increase in posts of plus 9,25 full-time equivalents. All new posts are permanent. From 2026 onwards, they would be provided with so-called "kw-notices" (kw = to cease to exist in the future), however. That means that when the post holder leaves the position will not be filled.

²² <https://www.akkreditierungsrat.de/de/media/262>; the analysis is at the moment only available in German but a translation is planned.

The budget increased from 1,701,737 euros in 2021 to 2,500,054 euros in 2023.

As a result, in 2023 five people were hired and six positions were made permanent. There are currently 22,75 FTEs employed plus one student assistant, 2,75 of which are temporary.

A significant increase in the number of employees can be seen in the departments of programme and system accreditation, as well as for example in the field of thematic analyses and public relations (in particular, there are now more personnel resources for dialogue events with HEIs.)

In addition, our digital system called “ELIAS”, handling with applications for accreditations and providing the database, has been further improved and new functionalities have been programmed. In particular, functionalities relating to the submission of applications concerning the accreditation according to the European Approach and concerning substantial changes have been implemented.

This creates room for improving the core processes, i.e. the accreditation procedures, as well as for cross-divisional tasks. See for example the sections on ESG 2.5 and 3.4. In addition, for example, a very comprehensive project was launched to improve internal communication and internal knowledge management.

Regarding recommendation to ESG 3.6 by the ENQA board:

With regard to the deficits identified by ENQA, the GAC points out the following steps:

Dialogue with stakeholders: See the section on ESG 3.3 for dialogue with assessing agencies and the section on ESG 3.1/ESG 2.2 for institutional dialogue with other stakeholders.

In this chapter, we would highlight that another channel of dialogue has been intensified and professionalised with the event formats ‘Quality Dialogue’ and ‘Accreditation Council in Dialogue’. Here the GAC addresses more complex topics from the accreditation sector, i.e.:

- Cooperation with non-university institutions
- Diversity of QM systems - What freedom do HEIs have?
- Role and self-image of review panels
- System accreditation
- The importance of qualification objectives for accreditation
- Dual study programmes
- Diversity at HEIs
- Teacher training
- Continuing academic education and lifelong learning

The events are developed based on requirements from the members of the Accreditation Council, the head office and external stakeholders. The GAC designs those events with external stakeholders such as agencies, lecturers, students, HEI quality assurance staff and other stakeholders and addresses all stakeholders in the system.

Agency's self-reflection: The examination of the self-image was initiated at the beginning of the Council's new legislative period in 2022 with the strategy process. The focus of the strategy process was on defining the GAC's self-image, its members, and its tasks. See for details on the strategy process the section on ESG 3.1/2.2.

Weak 'act' phase of the PDCA cycle: GAC recognizes that the measures of the 'act' phase of the PDCA cycle have not yet been transparent enough. GAC defines numerous processes and measures as part of the 'act' phase:

- These include the FAQs provided on the website of the Accreditation Council and regularly developed further. They transfer the requirements of the state treaty and the state decrees to the operational level for applicants. The FAQs are regularly reviewed, supplemented, or expanded. In 2022 and 2023, 22 FAQs were amended or newly developed.
- The events 'Quality Dialogue' and 'Accreditation Council in Dialogue' are to be seen as part of the 'act' phase because they respond to the desiderata and questions of the stakeholders in the accreditation system and try to find answers together.
- ELIAS is continuously being improved, also in response to user feedback.
- Assessment practice is subject to continuous development. One example is the change of practice with regard to part-time degree programmes following a lawsuit by a HEI and several debates in the Accreditation Council in December 2023 and March of this year.
- The perception, also based on results of thematic analyses, that HEIs have problems with the application of a certain criterion (example are dual programmes and the recognition according the LRC and of prior learning) are incorporated into the assessment of accreditation applications, are used for discussions with HEIs (e.g. discussions with the Bavarian HEIs on dual study programmes) and were included in the proposals of the Accreditation Council for the revision of the specimen decree.

Regarding recommendation to ESG 3.7:

The continuous renewal of ENQA membership and EQAR listing is one of GAC's priorities. To contribute to this goal, we would very much like to take the opportunity to have a progress visit (see below).

Regarding recommendation to ESG 2.3:

The process of issuing and fulfilling conditions is an important instrument in the German accreditation system with which quality deficiencies at HEIs can be remedied and quality development can be promoted. Conditions are connected with major issues of quality development. Even conditions that at first glance seem to relate to formalities, such as those concerning the Lisbon Recognition Convention and the Diploma Supplement, point to aspects of quality that are extremely relevant for students.

Further tools to foster quality development at HEIs are

- the so-called quality improvement process which is a voluntary procedural step carried out by the agencies and
- the evaluation of the implementation of recommendations and the evaluation of the quality development of the university since the last accreditation.

There are several sections in the accreditation reports for this purpose:

- In the rubric "Summary assessment of the expert panel",
- in the rubric "2.1 Focus of the evaluation / focus of quality development",
- in the evaluation of each academic criterion, as evidenced by the "Strengths and Development Needs" heading included for the evaluation of each criterion.

Practice shows that these rubrics are amply used to evaluate developments of study programmes and QA systems.

In principle, there is agreement in the German system that this follow-up is fit for purpose. However, as part of the debate on the evaluation of the specimen decree, it was suggested that the quality improvement process should be incorporated into the decree.

Regarding recommendation to ESG 2.4:

At this year's March meeting, the Accreditation Council debated with the assessing agencies how all stakeholders could work together to promote the recruitment of experts. It was agreed that the quality of the experts was crucial for the acceptance of the system. The agencies emphasised that there were no fundamental problems in finding well-qualified experts. Nevertheless, the participants pondered whether to set up a working group with all stakeholders and to develop a concept on how to improve the appreciation and recruitment of experts.

Regarding recommendation to ESG 2.5:

GAC has continued to work on increasing consistency in both programme and system accreditation.

In programme accreditation, extensive workshops on all criteria were held among the programme managers. The main topics were the exchange on the intention and the assessment practice developed by the Accreditation Council for the respective criterion. These workshops resulted in the updating of the programme accreditation handbook in the form of handouts for each criterion. The programme managers are each responsible for one or two criteria and for ensuring that the handouts are regularly updated. In addition, separate information sheets were created for degree programmes leading to regulated professions.

In system accreditation, the main consistency tool is an overview on all decisions in the form of an Excel spreadsheet that is updated for every meeting of the Accreditation Council. It contains decisions with conditions and condition categories by keyword. In this way, comparable cases can be found, and decisions can be made consistently. This corresponds to a comparable tool that is available in ELIAS for programme accreditation.

Regarding recommendation to ESG 2.7:

In the meantime, five appeal procedures have been concluded. Four of the five appeals were submitted by higher education institutions that did not agree with the accreditation decisions of the Accreditation Council; one appeal was submitted by an expert involved in the procedure. Three appeals were rejected, two were successful in whole or in part.

In March this year, the Accreditation Council adopted supplementary regulations on the complaints and appeals procedure. This resolution defines in more detail the mandate of the Complaints and Appeals Commission and includes rules for appointing its members, as well as for the course of the complaints and appeals procedure.

Key challenges of the agency

The new mission statement focuses on the Accreditation Council's understanding of its role, in particular on the dualism of control and dialogue. The next steps are to work on the identified topics of interaction between the players in the accreditation system, communication with interest groups and further development of the system.

The further expansion of dialogue formats is one of the building blocks in this context. This also aims at further promoting acceptance of the accreditation system. It would be desirable for the seal of the Accreditation Council to be used even more confidently by the higher

education institutions as advertising and to be understood by all interest groups as a decisive proof of quality.

In the area of further development of the system, the focus is on the implementation of the new specimen decree. In the medium term, the new ESG will also have a decisive influence on the further development of the German accreditation system. Close dialogue with other European agencies will also continue to be crucial for the innovative capacity of the German system.

With writing about key challenges, we hereby indicate that we are interested in the progress visit as outlined in the "Guidelines for ENQA Agencies Reviews".

Best regards

A handwritten signature in blue ink, appearing to read "Olaf Bartz". The signature is written in a cursive style with a large initial "O".

Dr. Olaf Bartz