



Agency for
Quality Assurance
and Accreditation
Austria

Follow-up report on the recommendations in the panel report of the external review of AQ Austria by ENQA 2014

June 2016



Introduction

At its meeting of 18 June 2014 the Board of ENQA agreed to reconfirm AQ Austria's Full membership of ENQA, based on an external review conducted between Autumn 2013 and Spring 2014.

While the ENQA Board concluded that AQ Austria was in substantial compliance with the European Standards and Guidelines, it also requested a follow-up report on the recommendations in the panel report within two years of its decision, i.e. by June 2016.

AQ Austria analysed the panel report thoroughly and, the Board, at its meeting of 15 June 2014 adopted a follow-up plan which contained an examination of the findings of the panel and actions to be taken as a consequence of the review outcomes.

With this report AQ Austria now provides an update on its developments in general since the accomplishment of the external review in 2014, provides information on its follow-up activities on the recommendations by the expert panel, and finally gives its responses to some of the general reflections expressed by the expert panel.

The Board would like to take this opportunity once again to express its appreciation to the panel for the thorough review and for the many helpful and inspiring recommendations resulting from it.



I. AQ Austria's development since 2014 in general

The external evaluation of AQ Austria took place at a point of time when the agency was still in the middle of reorganisation after the merger of the three predecessor agencies. Some areas of activities had not yet been developed, and nor had all staff been recruited. When the self-evaluation process started the agency had not even completed the final approval of the new regulations for its various quality assurance procedures. This might provide an explanation as to why some of areas, in particular as regards internal structures, procedures and internal quality management, were not at that time as developed as one would expect from a well-established quality assurance agency. Although such circumstances make it difficult to use the full potential of an external review the agency benefited greatly from external feedback at an early stage of its development.

Generally speaking, the period since early summer 2014 has been characterized by the completion of the founding phase as regards design and implementation of the new quality assurance procedures. On the one side this has involved setting up the internal structures and implementing internal procedures; on the other side AQ Austria has been assigned additional responsibilities, notably the task of accrediting PhD-Programmes at the Austrian University of Continuing Education and also, with much greater impact, the task of notifying degree programmes offered in Austria by foreign higher education institutions. The latter function has resulted in the design of a particular evaluation procedure which is to be applied to Austrian educational institutions that collaborate with a foreign degree-awarding HEI. As a result the year 2015 was characterized by the first round of that type of evaluation, which constitutes a particular new approach to quality assurance of collaborative provision across borders.

In addition to these new tasks the agency strengthened three areas of activity: Firstly, conducting voluntary enhancement-led evaluations, mainly at Austrian HEIs. Recently more HEI have commissioned the agency to carry out such projects, after having shown some reluctance to do so during the first two years of the new agency's existence. In this regard it is noteworthy that, due to a new bylaw, the public university colleges of teacher education now have to undergo institutional evaluations 'in accordance with international standards' and that nearly all such institutions have chosen AQ Austria to conduct these evaluations. Even the private institutions which are not covered by that bylaw are doing so. This can be considered as a major achievement on the agency's forward path to be considered as the preferred partner for quality assurance in higher education in Austria. Secondly, in the field of thematic analysis AQ Austria has become more active by drafting and publishing the first triennial report on the stage of development of quality assurance in Austrian HEIs and by carrying out other smaller analyses. AQ Austria has also strengthened its international level activities by conducting reviews outside Austria, mainly in Southeast Europe and Kazakhstan, and by conducting a TWINNING-project in Bosnia Herzegovina in addition to contributing to various other international projects.

Currently the agency is focussing on another new field of activity notably quality assurance in continuing education which is high on the agenda in Austria. In a pilot project AQ Austria has just developed a procedure for voluntary accreditation of continuing education programmes offered by HEIs and is about to add this to its portfolio.

In general, the agency is progressing well, and this in turn is resulting in a growing demand from Austrian HEIs for voluntary evaluations and/or consultancy projects. The agency takes this as an indicator for a growing acceptance in the Austrian higher education system beyond compulsory quality assurance procedures. Notwithstanding these positive developments, the agency is fully aware of the fact that it is not an overnight process to reach its goal of being considered by all stakeholders as the foremost national centre of competence on all questions related to quality and quality assurance in higher education.

II. On the recommendations by the panel¹

1) "Modify properly the intensity of the evaluation process depending on the effectiveness of the IQA system applied, independently from the type of HEI"

The panel states on p 16 of the report:

„Although the different evaluation processes that are applied to different HEIs rely on the IQA management of the institution and the weight of its contribution varied from audit (based mainly in the assessment of the IQA system) to accreditation processes (where it is one of the issues to be assessed), it is not clear whether the effectiveness of the IQA system is reflected on the intensity or differences in the different evaluation processes. It seems that the criteria for the application of different evaluation processes are more related to the type of HEI than to the degree of development of the IQA system achieved (audits to public universities, accreditations to private and universities of applied sciences).“

When discussing this recommendation and the actions taken by AQ Austria it is worth taking into account also the panel's statement on p 39 regarding issues "that restrict the development of QA in the Austrian Higher Education System":

"... The possibility to have common quality assurance assessment regulations for all the HEIs, independently of their types (public, private or applied sciences universities)"

Comment:

The panel concluded correctly that the type of external quality assurance procedure, be it quality audit, institutional accreditation or programme accreditation, to be applied at a higher education institution is defined by the law which, in this respect makes clear distinctions between the three sub-sectors public universities, private universities and universities of applied science. The law, however, not only differentiates between types of higher education institutions as such but also between different purposes of external quality assurance which necessarily has an impact on the design of the procedures.

Hence, when criticising the "intensity of the evaluation process" the legally defined purpose including the legally defined areas of assessment have to be taken into account. It should not surprise that in Austria, as elsewhere, that there is a legal requirement that programme accreditation is a precondition for state approval and funding of the given programme (the latter does not apply at private universities). These requirements stipulate a number of assessment areas and related criteria that go beyond considering the effectiveness of internal quality assurance and which are designed to provide comprehensive additional information about a programme to support the yes/no accreditation decision.

¹ The 10 recommendations are quoted in the boxes below.

Unfortunately the 'maturity' of an HEI's internal quality assurance system and its effectiveness will still be overruled by the main purpose and legal requirements of the external quality assurance procedure when it comes to the design of the procedure, notwithstanding the contrary recommendations of the ESG (already in ESG 2005!)

AQ Austria supports the position that also more enhancement-oriented or 'quality audit-like' external quality assurance procedures can and do support the accountability function of external quality assurance and it has consequently sought to trigger discussion on this topic. Another opportunity to give more credit to effective internal quality assurance systems will be the revision of the regulations in the course of 2017, when this question will be particularly relevant for re-accreditation of the private universities.

However, it is to be taken into account that the political will and consequently the law makes a distinction between public institutions, semi-public institutions and private institutions and how these institutions are to be treated in terms of the approval of programmes and quality assurance. This situation is not specific to Austria but common to many countries in the EHEA.

Follow-up measures:

As part of its follow-up plan the Board decided on 15th September 2014 that in 2015 AQ Austria will submit a proposal to the Ministry to evaluate the Austrian quality assurance system. (This also refers to the observation by the panel "that a detailed analysis of the impact of the merger process on the development of quality assurance in Austria has not yet been made." It should not surprise, though, that such an evaluation had not been conducted only one year after a new law came into effect and a new agency became operational respectively.) The proposal was submitted in January 2016, however the Ministry did not take up the initiative. Consequently AQ Austria has itself initiated a slightly less comprehensive evaluation which focuses mainly on its position in the Austrian quality assurance system and on the appropriateness and usefulness of the legal regulations for its work.

Without pre-empting the outcomes of that evaluation which are due in early 2017 one can already assume that the alignment of legal provisions for certain quality assurance procedures with their purposes, and in particular the ways in which the various quality assurance procedures articulate with each other will be at the core of the report.

In addition AQ Austria has modified its procedures for the approval of relevant changes in accredited programmes. (see also report on recommendation no. 2)

2) Design a transparent criteria for amendments of accreditation procedures, depending on the type of amendment requested, since it is not perfectly understood by the HEIs;
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On p 22 of the report the panel states

"Deviations from standard assessment procedures in requests for amendments of accreditation decisions were mentioned in the SER and were also discussed by the Panel



during the site visit. ... In any case, the criteria for “non-standard” assessment procedure in requests for amendments of accreditation decisions were not very clearly stated and this question should be developed more transparent in the upcoming future.”

Comment:

This statement is mostly correct. However already on 28th January 2014 the Board decided upon regulations regarding how to process requests of universities of applied sciences for amendments of accreditation decisions which refer solely to the number of study places (which is a subject matter of the accreditation decision). The defined procedure foresees a written request (not a self-evaluation) by the institution and then directly a decision by the President of the Board without involvement of peers and/or a site visit. None of the regular procedural steps would be appropriate for a relatively formal decision of this kind. However, other cases of deviation from the standard assessment procedures are not as straightforward because they cannot be standardized.

Follow-up measures:

As part of its follow-up plan the Board decided on 15th September 2014 that the agency would analyse all cases up to the end of 2015 and, based on that analysis develop regulations on how to conduct these types of non-standard assessments.

However, in the course of 2015 it had already become clear that the variety of cases is too big to make a typology feasible, because such a typology would simply turn into a long list of potential cases which would only pretend to be exact and comprehensive and which would lead to many discussions whether a case falls under type ‘A’ or type ‘B’ etc. and thus to unnecessary bureaucracy. Hence the Board decided to deal with every request on a case by case basis. Nevertheless in practice so called ‘most likely approaches to be applied’ evolve which are communicated to the institutions:

- Slight revision of the qualification targets and the profile of the programme: Expert(s) review the curriculum and other relevant aspects such as the qualifications of staff, without undertaking a site visit.
- The additional offer of a programme at a different site (i.e. different city within Austria) in collaborative provision together with a partner: Including a site visit, expert(s), primarily assess the arrangements, practice, resources and regulations of the collaboration, while not focusing on the curriculum providing it has not changed.
- etc

3) “The implication of negative results in the audit process for public universities should be made more transparent”

On p. 22 the panel states



„... in contrast to audits of public universities for which a negative result has an undefined consequence...“.

Comment:

This statement is not strictly correct. If a public university receives a negative certification decision in an audit it is clearly defined in the law that it has to undergo a re-audit after two years. In the case of second negative decision in the re-audit it is also clear that there are no legal or financial or other formally defined consequences. Hence the consequences are defined: none. It can be assumed however, that since the results are published a negative result might well have implications for the reputation of the university.

Follow-up measures:

None.

4) “Increase the availability of the assessment reports for all stakeholders.”

The panel states on p. 24

“Although in future AQ Austria will publish the reports and they will be available, right now there only reports published on an incidental basis. If any progress report or follow-up of the Agency would be taken, in the next review this point should be clearly checked.”

In June 2013 the Board of AQ Austria approved new regulations for accreditation and audit procedures which also stipulated that, in addition to the decision both the panel report and the statement of the institution (the latter being subject to non-objection by the institution) on the panel report are to be published on the agency’s website. Consequently full documentation of those reviews that started after July 2013 is published. At the time of the site visit on 4/5th March 2014 only a very small sample of documentation was available on the website since at that time only few procedures had been completed. For full documentation of all reviews the ENQA board is referred to the website <https://www.aq.ac.at/de/akkreditierte-hochschulen-studien/>

5) “Establish an adequate follow-up procedure for audit in public universities.”

Comment:

It was not easy to understand why this recommendation has been given by the panel. On the one side a follow-up procedure is formalized for cases of conditional certification. Public universities (as well as universities of applied sciences) have to fulfil the conditions within two years. In addition to this AQ Austria offers a follow-up workshop at the institution approx. one



year after the certification decision, regardless of the outcome of the certification. During this workshop a member of the review panel together with a staff member discuss and evaluates the follow-up measures taken by the institution. This does not only refer to the follow-up on recommendations by the panel but to all actions taken by the institution as a consequence of the audit. It is noteworthy that, although this step is not legally stipulated and thus cannot be made compulsory, the institutions with limited exceptions ask for this workshop which indicates that AQ Austria is successful in implementing the audit not as a one-off event but as a component of a continuous process.

Follow-up measures:

None.

6) "System-wide analysis should be performed and results should be published."

The panel states on p. S. 27

"In any case, right now the Panel found that there was no report on thematic priorities or crosscutting issues, and therefore there was no evidence to support the compliance of such criteria. If any progress report or follow-up of the Agency would be taken, in the next review this point should be clearly checked."

Comment:

The panel rightly pointed out that no thematic analysis was published by the time of the site visit. This is due to the fact that only very shortly before the site visit the first accreditation procedures were accomplished hence it was not possible to conduct any thematic analysis by that time.

Follow-up measures:

As part of its follow-up plan the Board decided on 15th September 2014 that in 2015 two projects for thematic analysis should be conducted in addition to the "Report on the state of development of internal quality assurance at Austrian higher education institutions" which was scheduled to be drafted in 2014 and 2015.

However, AQ Austria has varied this decision and postponed the thematic analyses to early 2016 in order to associate them more closely with the revision of the regulations for quality assurance procedures which is due in 2017. Currently AQ Austria is conducting an analysis of the implementation of the "Bologna-Tools" and additional standards set by AQ Austria, based on the self-evaluation reports and on the panel reports. The results are to be published by the end of 2016 and will then feed into the revision of the regulations which will kick off in autumn 2016. Another reason for postponing this project was, that AQ Austria was heavily occupied with another thematic analysis notably the "Report on the state of development of internal quality assurance at Austrian higher education institutions" which has been published meanwhile. (<https://www.aq.ac.at/de/analysen-berichte/dokumente-analysen->



berichte/web_AQ-3Jahresbericht.pdf) In addition, AQ Austria has conducted another thematic analysis which also resulted in a publication, and which focuses on the practices of Austrian higher education institutions in recognition of prior learning. The report is due in autumn 2016 (All reports mentioned are only available in German language.)

7) "Medium-term goals have to be included in a strategic plan, as well as a risk management plan."

The panel states on p. 32

"The Panel affirms that the Agency's mission statement is implemented in its activities, although a strategic plan and a risk management plan have not been defined at this stage for medium-term development."

Follow-up measures:

As part of its follow-up plan the Board decided on 15th September 2014 that by May 2015 the Board shall approve a Strategic plan 2015/19.

In a variation of this decision, the Board then postponed the revision of its mission statement and the development of a strategic plan and started the process in winter 2015/16 with a SWOT-analysis. The reason was that the Board considered it too early to revise its strategy and that it would be wise to wait until the founding phase had been accomplished and the agency was fully established. However, in the meanwhile the Board revised its international strategy (adopted in June 2013) based on the first experience made with the emerging market of quality assurance agencies. At its meeting of 19th December 2014 the Board set new priorities based on the international strategy. (Attachment 1)

The adoption of the strategy 2016/20 is scheduled for the Board meeting of 20th September 2016. (Attachment 2: Draft tabled at Board meeting of 29th June 2016)

In addition to the strategic planning the Board considers at every meeting the regularly updated work plan for the coming 15 months. (Example as Attachment 3)

8) "Although an IOA system of AQ Austria is being developed right now, it is important to speed up the process of its implementation"

The panel states on p. 36

"The Panel was not able to corroborate the implementation of the IOA system and its inherent processes. If any progress report or follow-up of the Agency would be taken, in the next review this point should be clearly checked."

Comment:

The panel rightly stated that, by the time of the site visit no results from any internal quality management processes had been provided. This was partly due to the fact that the agency first developed the regulations for its external quality procedures and then focused on its internal quality policy. Another reason was that the results of the internal quality management procedures are analysed once a year, in autumn. Hence the first analysis took place only a couple of months after the site visit.

Follow-up measures:

As stipulated in its internal quality policy AQ Austria analysed the reviews conducted between 2013 and September 2014 and drafted the feedback report 2014 (Attachment 4) which focused on the feedback from panels and institutions. The biennial quality report 2015 presented the results of the internal quality management procedures of all activities of the agency during 2014 and 2015. (Attachment 5) One result was that the internal quality policy should be revised which was done between December 2015 and June 2016. The Board adopted the new version at its meeting on 29th June 2016 (Attachment 6)

9) "It is desirable that AQ Austria develops its training opportunities for evaluators and continues to collaborate with ÖH in providing student evaluators and stakeholder consultancy. We recommend that joint trainings for all evaluators, including students, are considered."

10) "Due to the participation of international experts, careful preparation (training) is needed to understand properly the Austrian Higher Education system."

The panel mentions on p. 22

"Some concern was raised that the level of international experts' knowledge of the Austrian context is not always as good as can be desired."

Comment:

AQ Austria agrees that for foreign experts familiarity with the national framework of an institution or programme to be reviewed is essential. Hence from the beginning AQ Austria has put emphasis on this aspect in the briefings for its foreign panel members.

Follow-up measures:

AQ Austria has reviewed its briefing activities in order to place more emphasis on specificities of the Austrian higher education system. The first step was a collection of feedback from the institutions about what specific national features were not taken into account properly by foreign experts. It is noteworthy that the result of this survey showed a very short list of a few aspects but a longer list of aspects that referred to common practices of an institution which are not connected with the legal framework. Nevertheless AQ Austria revised its



briefings and in addition it now also conducts training seminars for panel members which focus on the national higher education system and on the general tasks of panel members as such without reference to specific reviews. The pilot briefing took place on 15th January 2015 and two more have been organized since then. (Attachment 7: Programme of one seminar as example.) In addition to its own training activities AQ Austria actively supports, by regularly contributing to the programme, the training seminars of the Austrian students' union (ÖH) that conducts training seminars for students twice per year. It similarly contributes to the training seminars of the Swiss students' union, because AQ Austria also uses Swiss students in its panels.



III) Comments on the panel's observations on framework conditions that restrict the development of QA in the Austrian Higher Education System.

"Although it is not in the authority of decision by AQ Austria, there are some other issues that restrict the development of QA in the Austrian Higher Education System."²

1) "Impossibility of conditional initial programme accreditation"

On p 22 the panel states:

"AQ Austria pointed out in the SER that a legal limitation to procedures lies in the impossibility to condition initial accreditations regardless of whether they are institutional or programme accreditations. The same view is shared by AQ Austria's stakeholders."

p 25:

"During the site visit, the Panel discussed extensively the importance of having the option of initial accreditation subject to conditions. The Panel supports the initiative of AQ Austria – in function of quality improvement - for changing legislation with the purpose of introducing initial accreditation subject to conditions."

Comment:

As already discussed during the site visit AQ Austria agrees with the panel. Furthermore it seems obvious that a consensus is developing among institutions, some stakeholders and AQ Austria that the option of giving conditional accreditation in initial accreditation procedures would be beneficial for the institutions.

Follow-up measures:

As part of its follow-up plan the Board decided on 15th September 2014 to recommend an amendment of HS-QSG in spring 2015. AQ Austria triggered this topic by discussing it at the regular meetings with senior representatives of the ministry, at the presentation of the annual report in the parliament and by discussing this frequently with stakeholders. It is very likely that a recommendation to change the law in this respect will be part of the outcomes of the evaluation of the law conducted by AQ Austria and due in early 2017. It is not likely that the Ministry will take action on this topic before that report has been submitted.

2) "The link between audit and accreditation for universities of applied sciences and its consequences."

On p 21 the panel states:

² Panel report p. 39. The four issues highlighted are quoted in the boxes below.

"A big challenge for AQ Austria in the near future will be the implementation of audit processes in the university of applied sciences sector, which enters into the audit scheme after a single successful institutional reaccreditation. The validity of the accreditation status is linked to the positive result of audits, in contrast to audits of public universities for which a negative result has an undefined consequence, implying that a greater level of compliance-oriented behaviour by universities of applied sciences is likely to occur in audits, which means that the original objective of audits has been changed and this issue deserves critical re-thinking."

Comment:

As already discussed during the site visit AQ Austria agrees with the panel. As part of its follow-up plan the Board decided on 15th September 2014 to conduct an analysis of the audit procedures finished during winter 2014/2015. The analysis gives evidence that the link between audit and accreditation status has a significant impact on the attitude of universities of applied sciences towards the audit procedure.

Obviously this topic will be touched upon in the evaluation of the law as mentioned in III 1). A very likely outcome of the evaluation would be a recommendation to reconsider this link. It is much too early to make an assumption as to whether the Ministry will take up this initiative.

3) "The incomplete integration of the higher education system under the same quality assurance policy performed by AQ Austria (university colleges of teacher education, philosophy and theology universities, IST Austria, cross-border studies under current legislation)."

The panel states on p 30:

"Similarly, the Panel did not understand the need of the existence of the Quality Assurance Council for Teacher Education, responsible for quality assurance at university colleges of teacher education and teacher education programmes, as an independent body/agency."

Comment:

AQ Austria agrees that, at first sight it is not easy to understand the decision to setup an extra quality assurance agency for teacher training. However the fact that university colleges of teacher education are not independent higher education institutions in the narrow sense and are currently 'on their way to move closer to the rest of the higher education system', and the fact that the responsibility for teacher training lies to a large extent with the education ministry and not with the ministry for science, research and economy, may give hints as to why this decision was taken. In addition one should mention that this body is not a quality assurance agency in the classical sense but has additional functions in the current reform of teacher training in Austria. It is noteworthy that the public university colleges of teacher education have to undergo institutional evaluations 'in accordance with international standards' and that

nearly all institutions have chosen AQ Austria to conduct these evaluations. Even the private institutions which are not covered by that bylaw do so. This can be considered as a step towards an integration of that sector into the national quality assurance system in higher education. It is too early to make an assumption whether this will lead to legal changes in the near future.

As regards cross-border studies a major legal change took place in 2014. AQ Austria was assigned the responsibility for the notification of degree programmes offered in Austria by foreign higher education institutions. (See introduction.)

The panel states on p. 18

“The Panel also observed that a detailed analysis of the impact of the merger process on the development of quality assurance in Austria has not yet been made.”

Comment:

In its follow-up of 15th September 2014 the Board considered it was too early to have such an analysis only one year after the agency had become operational. Meanwhile AQ Austria conducted the first triennial “Report on the state of development of internal quality assurance at Austrian higher education institutions” which already gives some indications regarding the impact of the merger process on the development of quality assurance in Austria. Its analysis together with the above mentioned evaluation of the law will put AQ Austria into the position of assessing the impact by early 2017.

The panel states on p. 30

“The Panel recognises the alignment of the national legislation to the recommendations of the Bucharest Communiqué allowing EQAR-registered agencies to perform their activities in Austria, although the limitation to audit processes is not very well understood.”

Comment:

At first sight this assessment might be understandable. However, a closer examination of the respective developments in other countries in the EHEA shows that Austria is not a deviant case but rather an example of a trend that seems to be emerging: It would appear that national quality assurance systems open up to the activity of foreign agencies when it comes to quality assurance procedures without any direct legal and/or financial consequences, whereas national ministries are much more reluctant to allow foreign agencies to carry out quality assurance procedures that do have such consequences. Austria might even be considered a good example of this trend because of the regulations that apply if a higher education institution receives a negative outcome in an audit conducted by a foreign agency. After such a negative result the institution has to undergo another audit within two years but then it can no longer choose a foreign agency and has to commission AQ Austria. Hence, as soon as the audit might have consequences (link to accreditation status in case of universities of applied



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sciences; threat to reputation in public in case of public universities) the 'national' agency becomes the only actor in the field.