Review report of the Austrian Accreditation Council

(Ergebnisbericht über die Evaluierung des Österreichischen Akkreditierungsrates)

September 2007

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1. Introduction

This report documents the review of the Austrian Accreditation Council (Österreichischer Akkreditierungsrat – ÖAR) as conducted in 2007 by an international panel. The aim of this review is twofold:
o   assessing the way the ÖAR performs the statutory functions assigned to it by Austrian law;
o   establishing the degree to which the ÖAR meets the European standards and guidelines for external quality assurance agencies (ESG) and conforms to the ECA Code of Good Practice.

In Chapter 2, the working method of this review is presented: responsibility, preparatory steps, panel composition and procedure.

The report is structured with a view to covering the national and the international dimensions in a way that allows readers to focus on one at a time and even skip the part on the dimension they may not be interested in. As quite a number of basic facts and issues underlie both the national and the international evaluations, these have been collected in a separate Chapter 4 entitled "The ÖAR in brief", in order to avoid an undesirable measure of redundancy between the national Chapter 5 and the international Chapter 6. By way of context, Chapter 3 provides a succinct description of relevant parts of Austria's higher education system.

From the perspective of ENQA, the report's structure complies with its "Type B" requirement of a full chapter - Chapter 6 - which deals specifically with the ENQA membership criteria.

Chapter 6 also contains the assessment of the ÖAR in terms of the ECA Code of Good Practice.

In the final Chapter 7, the review panel presents its general conclusions and a number of recommendations.

This report has 4 Annexes.

2. Method

Responsibility
Responsibility for the review resides at the national level. Consequently, the Austrian Federal Ministry for Science and Research (Bundesministerium für Wissenschaft und Forschung: BMWF – formerly BMBWK) holds overall responsibility for a review of the ÖAR (see Annex A).

Preparatory steps
The Federal Ministry has established the terms of reference and the protocol for the review, and nominated the members of the review panel. The Federal Ministry has organised and coordinated the process, in concert with the Austrian Rector's Conference (ÖRK). The ÖAR has carried out a self-evaluation and produced a Self-Evaluation Report (SER).

The review panel: composition
The members of the panel have been appointed by the BMWF, according to the following specifications:
- chairperson, representative of a quality assurance agency: directly appointed by BMWF
- representative of a quality assurance agency: appointed by BMWF on recommendation by the chairperson
- representative of higher education institutions (national): appointed by BMWF on recommendation by the ÖRK
- representative of higher education institutions (European): appointed by BMWF on recommendation by the EUA
- representative of students: appointed by BMWF on recommendation by ESIB
- secretary: appointed by BMWF on recommendation by the chairperson

Conforming to the above, the actual composition of the review panel has been as follows:
- Chairman: **dr. K.L.L.M. (Karl) Dittrich** - Chairman of NVAO, the Accreditation Organisation for The Netherlands and Flanders
- Member: **dr. A. (Achim) Hopbach** – Managing Director of the German Accreditation Council
- Member: **prof. dr. L. (Lothar) Zechlin** – Founding Rector of the University of Duisburg-Essen (Germany); former Rector of Karl-Franzens University of Graz (Austria);
- Member: **prof. B. (Bente) Kristensen** – formerly Vice-Rector of the Copenhagen Business School
- Member: **B. (Bastian) Baumann** – Student of Law at Freie Universität Berlin; representative of students in Bologna-related gremia; member of EUA expert panels
- Secretary: **drs. A.J. (Fred) Mulder** – Policy Advisor with NVAO, the Accreditation Organisation for The Netherlands and Flanders

The review panel: procedure
On 27 february 2007, the panel's chairman paid the ÖAR a preparatory visit. In May and June 2007, the members of the review panel made a preliminary assessment and formulated questions and topics for discussion through individual desk research of the SER and other documents. On 1 June 2007, the panel – with the exception of prof. dr. L. Zechlin - convened in Vienna to be briefed by representatives of the BMWF and the ÖAR on the Austrian higher education system from an accreditation perspective. On 25 and 26 June 2007, the review panel carried out a site visit, engaging in talks with representatives of four Private Universities, students, the Austrian Rectors' Conference, the Rectors' Conference of Private Universities, the ÖAR and the Federal Ministry (for the full programme, the reader is referred to Annex B). Before and during the site visit, additional documents were consulted (see Annex C for a complete list). In July and August 2007, consecutive draft versions of the review report were commented upon by all members of the panel. The report was finalised by the panel's chairman and secretary.

3. Context: Austria's higher education system

Catering for over 200,000 students, higher education in Austria comprises some 200 institutions of many different types. From the perspective of this review, three categories of institutions are especially relevant: Private Universities, State Universities, and Universities of Applied Science.

Private Universities
As per 1 June 2007, ten institutions have been accredited as Private Universities. Figure 1 features their names, the number of study programmes, and student numbers.

Private University	Number of study programmes	Number of students
Kath.-Theol Privatuniversität Linz	7	448
Webster University Vienna	22	504
Private Universität für Gesundheitswissenschaften, Medizinische Informatik und Technik	12	522
PEF Privatuniversität für Management	4	126
Paracelsus Medizinische Privatuniversität Salzburg	7	334
Anton Bruckner Privatuniversität	26	923
Traditionelle Chinesische Medizin Privatuniversität LI SHI ZEN	11	24
Privatuniversität für Kreativwirtschaft	5	153
Konservatorium Wien Privatuniversität	32	762
Sigmund Freud Privatuniversität	6	229
TOTAL	132	4025

Fig. 1. Private Universities in Austria (adapted from the presentation "Privatuniversitäten in Österreich" by the ÖAR on 1 June 2007).

Almost half of the study programmes are in the domain of Art (64 programmes). The remainder of programmes are distributed among five other domains: Medicine and Health Sciences (31), Social and Economic Sciences (17), Humanities and Cultural Sciences (7), Information Science (6), and Theology (5).

Private Universities have launched study programmes not available elsewhere in Austrian higher education, in the fields of Public Health, Nursing Science, Palliative Care, Psychotherapy Science, Traditional Chinese Medicine, and Interior Design.

External quality assurance has been an integral part of the Private Universities sector right from the start. Private Universities are subject to accreditation by the ÖAR, both at the institutional and the programme level.

State Universities
There are 22 State Universities in Austria. They are not subject to (national) accreditation, neither at the institutional nor at the programme level.

Universities of Applied Science
Universities of Applied Science (Fachhochschulen - FH) provide degree programmes qualifying graduates for a profession through vocational training and practice oriented courses at higher education level. These institutions – now numbering 19 - and their programmes are relative newcomers to the Austrian higher education scene. After the Fachhochschule Studies Act came into effect on 1 October 1993, the academic year

1994/95 saw the start of the first ten FH degree programmes. The FH sector is organised under private law but is primarily publicly funded.

External quality assurance has been an integral part of the FH sector right from the start as well. FH degree programmes need to be accredited by the FH Council. There is no accreditation at the institutional level.

Comparison from an accreditation perspective
There are some striking resemblances between Universities of Applied Science and Private Universities if one looks at recent developments. First, both are relatively new to the field of higher education. Second, both are "private", although not exactly in the same sense: whereas both are organised under private law, Universities of Applied Science are primarily publicly financed, whereas Private Universities are primarily privately financed. Third, both feature their own specific system of external quality assurance through national accreditation which from the start has been integrated into the legal foundation of the institutions themselves: Universities of Applied Science saw their legal base established in 1993 and the FH Council was founded in the same year. For Private Universities, corresponding steps were taken in 1999, when the University Accreditation Act (UniAkkG) took effect and the ÖAR came into being. The two systems differ in what constitutes the "unit" of accreditation: whereas in the FH sector only programmes are accredited, in the Private University sector both programmes and institutions are accredited.

4. The ÖAR in brief

In this section, basic information on the ÖAR is presented: its legal foundation, its statutory tasks, the aims that the ÖAR has set itself, the organisation, its activities and method, and some statistics. The principal source of information for this section is the ÖAR's Self-Evaluation Report (SER). It has been supplemented with evidence obtained form additional documents, ÖAR's web site, and in meetings during the site visit.

4.1. Legal foundation

The Federal Act on the Accreditation of Educational Institutions as Private Universities (University Accreditation Act - UniAkkG) establishes the responsibilities of the Accreditation Council. It defines the Accreditation Council as an independent state authority with autonomous power of decision that is not bound by any directives. Decisions by the ÖAR have legal consequences, as soon as they have been endorsed by the Federal Minister (section 19 of this chapter). The accreditation process is further legally determined by the General Administrative Procedure Act (AVG).

4.2. Statutory tasks

The UniAkkG states that accreditation, at both the institutional and the programme level, is compulsory for private universities in Austria. This applies to existing non-university educational institutions aspiring to obtaining university status, and to newly founded institutions. The ÖAR is assigned the statutory task of carrying out the corresponding accreditation processes. In addition, the ÖAR has the task of supervising accredited private universities.

4.3. Aims

The ÖAR has set itself the following aims:
- to open the university sector to private providers from Austria and abroad;
- to provide quality assurance for the private university sector;
- to promote and improve the quality of the private university sector;
- to create transparency and comparability in the interest of providers, students and the labour market;
- to encourage innovative forms of university-level training and further education;
- to ensure the comparability of degrees from Austrian private universities with those awarded by international programs;
- to implement the objectives for the development of a European Higher Education Area for the private university sector.

4.4. Composition of the Council

The Accreditation Council comprises eight members, who are experts in the field of higher education in Europe. They are appointed by the federal government. Currently, four of the members are Austrians, the other four are foreigners, from other European countries. The default period of office for members of the ÖAR is five years. The Federal Minister appoints the president as well as the vice-president of the Council from among its eight members. They are appointed for three years. At the end of this period, these offices can be extended once by the Federal Minister for a period of three more years. ÖAR membership is a part time occupation. The Council convenes eight times a year, for meetings lasting one or two days.

4.5. The ÖAR office

The ÖAR office is located within the premises of the Education Ministry. It makes use of the Ministry's resources (rooms, postal, computer, fax, telephone, and copying facilities). The office is run by a managing director and four other staff (totalling 3,75 fte). Among their tasks

are the preparation of Council meetings, coordinating and organising the accreditation process, providing advice and guidance to institutions preparing an application, performing a check on the completeness of applications, providing support to Council members, taking part in site visits, answering questions by interested parties and the media, and internal quality assurance. In addition, the office team are responsible for publications, the staging of events, international cooperation activities, public relations, and the ÖAR web site. Staff are on the payroll of the Ministry of Education. However, they are exclusively answerable to the Council, except for personnel regulations.

4.6. The accreditation process
Every accreditation procedure comprises the twelve stages shown in Fig. 1.

1	Consultations with the ÖAR office	Preparatory steps (1 year approx.)
2	Presentation before the Council	
3	Preparation of the application file	
4	Submission of the application	
5	Formal check on completeness; revision	The accreditation process proper (6 months max.)
6	External assessment with site visit	
7	Experts' reports	
8	Comment by applicant institution	
9	Decision by the ÖAR	
10	Endorsement by the Federal Minister	
11	Notification and publication	
12	Supervision by the ÖAR	Status: accredited (duration: see text)

Fig. 1. Stages of the accreditation process (adapted from the Self-Evaluation Report).

In sections 4.7-4.17 and 4.19, each one of these steps will be succinctly discussed.

4.7. Step 1: Consultations with the ÖAR office
ÖAR office staff offer assistance and service to potential applicants. An important and useful stage in the run-up to applying is a series of detailed consultations. Within the framework of preliminary discussions with the applicant, the office attempts to clarify which conditions apply as regards both content and form of the application file. In addition, the office is able to provide expertise in matters relating to the actual elaboration and formulation of the application.

4.8. Step 2: Presentation before the Council
The ÖAR offers institutions the opportunity to present the intended application at a Council meeting. The ensuing discussions with members of the Council have proven to be an extremely useful and informative experience for applicants. The presentation is planned and co-ordinated by office staff.

4.9. Step 3: Preparation of the application file
The application should contain detailed documentation demonstrating that the legal criteria have been fulfilled. A Self-Evaluation Report (SER) by the applicant is a standard component of the documentation for all three types of accreditation procedure carried out by the ÖAR: initial accreditation and reaccreditation of institutions, and accreditation of

programmes provided by accredited institutions. A checklist compiled by the Council may be referred to for assistance, together with the results of preparatory steps 1 and 2.

4.10. Step 4: Submission of the application
The information file should come attached to a formal letter of application, signed by the institution's legal representative. The six months period within which the Council must complete the procedure begins on the date the application arrives at the office.

4.11. Step 5: Formal check on completeness; revision
If a check on the documents received shows that the application is incomplete or has formal shortcomings, the applicant institution will be requested to submit additional and/or revised documents by a certain date. Should one not comply with this request, the ÖAR will reject the application. Following this rejection, the same educational institution may still submit another (improved) application any time.

4.12. Step 6: External assessment with site visit
The AVG states that the responsibility for establishing the evidence and judgments constituting the basis for its decisions lies with the governing body concerned. This responsibility is reflected in the composition of the ÖAR (see section 4 of this chapter). Thus, the ÖAR does not delegate the entire assessment of an application for accreditation to a team of experts external to the Council, but only those domains - discipline-specific in nature, mostly – for which unsufficient expertise is available among its members.

The criteria for the selection of experts have been established by the ÖAR in accordance with those of ECA. Two criteria stand out: experts should possess relevant knowledge, skills, and experience, and they should be independent. A large majority – 91% - of experts deployed so far have been foreigners. This is the result of a deliberate policy geared towards satisfying the independence criterion.

The following categories of expertise should be present in the assessment team:
a) a high standard of discipline-specific scientific qualifications;
b) a thorough knowledge of university teaching and research;
c) experience in quality assurance and quality management in a university context;
d) executive experience in the (scientific) management of larger academic units;
e) educational skills; experience in the development, implementation, and evaluation of curricula;
f) knowledge of the Austrian higher education system and Austrian higher education law.

External experts appointed by the ÖAR are selected for their knowledge, skills, and experience as expressed in the above criteria **a** through **e**. Criterion **f** is provided for by assigning to the team one of the eight Council members and one of the ÖAR office staff. The Council member has the additional task of making sure that issues of a non discipline-specific nature which the ÖAR does have to assess are covered in the process. In actual practice, the panel has learnt, the Council member's share in the assessment includes issues coming under criteria **a** through **e**. As yet, teams do not include student members.

A site visit is carried out in almost all cases; it usually lasts one day or a day and a half. During the site visit, the Council member acts as moderator of the team of experts.

4.13. Step 7: External experts' reports
The external experts are requested to author individual and independent assessment reports, limiting themselves to an evaluation of those issues that they have focussed on during the desk research and site visit stages of the process and which should correspond to the expertise for which they were called in by the ÖAR. The external experts do not try and reach consensus, nor do they make an explicit recommendation regarding the

accreditation decision. Guidelines for the authors of these reports have been set out by the Council, in order to guarantee uniformity of method and comparability. The Council member assigned to the team does not author an individual report.

4.14. Step 8: Comment by applicant institution
The external experts' individual reports are communicated to the applicant institution by the ÖAR office. The institution has the right to present their comment on the experts' reports, either in writing or through a hearing before the Council.

4.15. Step 9: Decision by the ÖAR
The Council member assigned to the team authors a comprehensive accreditation proposal on the basis of the entire body of available relevant evidence and expert judgment, including the applicant institution's reaction to the external experts' individual reports. The accreditation proposal itself is not open for comment by the institution.
In a plenary Council meeting, the proposal is presented and discussed, and a positive or negative accreditation decision is taken. Conditional accreditation is not possible. However, the ÖAR can limit the length of the accreditation period. Decisions require a simple majority of five out of eight, irrespective of presence.

4.16. Step 10: Endorsement by the Federal Minister
The accreditation decision has to be endorsed by the Federal Minister. Endorsement may be withheld if the decision is considered to be against the interests of national educational policy. However, a negative decision cannot be changed into a positive one. In case endorsement is withheld, an appeal against the decision can be filed at the Higher Administrative Court.

4.17. Step 11: Notification and publication
The decision is communicated to the applicant institution by means of a written notification containing:
- a description of the private university;
- a description of the type of legal relationship which must exist between the private university and its students;
- a description of the type, number of hours, and duration of courses to be offered at the private university;
- the wording of academic degrees and/or titles that can be awarded by the private university;
- the time limit set on the private university's accreditation.

Accreditation decisions are published on the ÖAR web site, the supporting grounds, however, are not.

4.18. Costs
In accordance with the AVG, the applicant institution needs only reimburse the expenses of the external experts involved in the application procedure. This covers travel and accommodation, as well as a remuneration for the desk research, the site visit and the authoring of their report. On average, the total costs to be reimbursed amount to approximately € 6000.-

4.19. Step 12: Status: accredited
A positive institutional accreditation decision has implications for an institution's name. In German, an institution is allowed *and required* to call itself "Privatuniversität". In English, an institution is allowed to call itself "Private University", but may omit "Private" and thus designate itself as "University". The Council is unanimous in its view – backed by the law - that an institution's German name which omits "Privat" is not permissible, as state universities exclusively reserve the right to be designated as "Universität".
A Private University is permitted to award academic degrees to students on completion of

their studies. However, only those academic degrees are recognised which are awarded after accreditation and which are listed in the official notification of accreditation. Teaching staff and students of a Private University have the same legal status as teaching staff and students of state-funded Austrian universities as far as laws relating to foreigners and the Foreigners' Employment Act are concerned. Students at Private Universities enjoy the same privileges as students at state-funded Austrian universities as far as social legislation and tax laws are concerned.

4.20. Duration, reaccreditation
An institution's initial accreditation has a duration of five years. Reaccreditation is for another five years at first. Further periods of reaccreditation have durations of ten years each. The extension of accreditation must be granted in an official notification before the period stipulated in the initial accreditation has expired. An application must therefore be made in good time. As in the initial application, when applying for reaccreditation, the institution must document its compliance with all the necessary legal requirements, with special emphasis on developments since the previous accreditation decision.

4.21. Supervision
The ÖAR has to ensure a continuous quality assurance of accredited private universities. The latter are required to automatically submit an annual report in accordance with the University Accreditation Act. The report is to enable the ÖAR to examine the continued compliance with the accreditation requirements. In evaluating these reports, it may become necessary for the ÖAR to conduct reviews. At the same time, these annual reports are used by the Council as a basis for the decision on reaccreditation.
The ÖAR has the right to inspect private universities at any time when there is cause for concern, and may also demand specific information. As part of the Council's inspection rights, the private university is obliged to provide the following:
- access to its premises for inspection by the ÖAR;
- information on all of the private university's matters;
- access to all its documents and business records.

4.22. Statistical data
From the start in 2000 until May 2007 the following numbers of applications were submitted:
- 38 applications for initial or reaccreditation of institutions as private universities;
- 25 applications for the accreditation of 56 study programmes (the difference in numbers results from applications for more than one programme).

As per May 2007, a total of 10 institutions have been accredited as private universities. Of these, six are in their first accreditation period, whereas the other four have been reaccredited once. Between them, they provide 129 accredited study programmes.
Of the applications for initial institutional accreditation, 44% have resulted in a positive decision. For programme accreditation, this is 66%.

4.23. Cooperation with national and international stakeholders and partners
The ÖAR maintains structural contacts with representatives of private universities through yearly round table meetings. The recent foundation of a Private Universities Rectors' Conference has opened the way for furthering these contacts. Students in the private university sector are organised in ways that vastly differ between institutions. A round table meeting, in December 2006, is considered a first step towards better networking contacts with Private University students.

The ÖAR values its contacts and exchanges with the public university sector and regularly engages in meetings with rectors of individual universities and with the president of the Austrian Rectors' Conference.

Cooperation with the FH Council, the Austrian Quality Assurance Agency (AQA), and the Austrian NARIC office is constructive and is aimed at coordinating each partner's contribution to international bodies.

Through intensive cooperation with European and other international network organisations (INQAAHE, ENQA, ECA, DACH, CEE), the ÖAR is strongly involved in the development of a European understanding of quality assurance. The president and other members of the Council, the managing director, and some of the office staff frequently participate in accreditation related activities in other countries. This involvement has the added advantage of promoting that the work of the ÖAR meets international standards.

4.24. Developing standards and guidelines
The ÖAR has developed its own standards and guidelines, has adapted and refined these over the years, and is committed to continuing to do so. Primarily based on the ÖAR's interpretation of the UniAkkG, standards and guidelines have also been inspired by international standards contained in the Universitätsgesetz 2002 on public universities, and - in an overarching fashion – by "Bologna".

4.25. Quality assurance
Measures geared towards the development of its own quality assurance are considered by the ÖAR as component parts of a wider quality culture, based on two European documents: the ECA Code of Good Practice, of which the ÖAR is one of the signatories, and the European Standards and Guidelines for Quality Assurance in Higher Education.

Internal
Central elements of the ÖAR's internal quality culture are the following:
- a description of basic quality principles;
- a Quality Handbook;
- a set of rules for office procedures;
- a description of good site visit practice;
- feedback questionnaires for applicant institutions, external experts, and students.

External
The ÖAR's external quality assurance operates at three levels:
- annually reporting to the Austrian Parliament;
- supervision by the Federal Minister, in accordance with the UniAkkG;
- periodic external evaluations: these are not prescribed by the UniAkkG, but are considered mandatory – by the ÖAR itself – from a European perspective.

4.26. Public relations
Activities in the realm of public relations have the twofold aim of hightening the public perception of the work done by the ÖAR, and of strengthening its societal acceptance. The Council's most prominent information platform is its web site (www.akkreditierungsrat.at), which is available in both German and English.

5. National perspective: the UniAkkG

5.1. Introduction

Whereas standards are available for the assessment of the ÖAR from a European perspective (ESG and ECA), things are different at the national level. In its SER, the ÖAR has addressed the national dimension in a portfolio-like chapter covering the statutory tasks assigned to the agency by the UniAkkG. The review panel has opted for a corresponding structure for this report's assessment of the ÖAR from the Austrian national legal perspective. The seven sections in the sequel differ in the extent to which the panel has found the subject matter "assessable", as some parts are of a rather descriptive nature. The panel does formulate an assessment of the way the ÖAR performs each one of its statutory tasks. Accreditation, however, being the ÖAR's core business, receives a treatment far more extensive than the other six tasks.

The evidence presented below is based on the strengths-and-weaknesses analysis in the SER (Chapter 4), additional documents, and on exchanges with stakeholders during the site visit.

5.2. Accreditation

Evidence
For basic information on this subject, the reader is referred to sections 4.6-4.20.

Stakeholder feedback on processes and guidelines is generally positive. Private universities' assessment of the ÖAR features key words like: cooperative, unbureaucratic, and professional. The institutions are positive on the degree to which the accreditation process acts as a stimulus for internal reflection. They have more comments on the duration of the accreditation process proper. The ÖAR is very much aware of this issue, but has to cope with a number of factors beyond its influence:

- external experts' availability in terms of calendar options;
- the possibility for applicant institutions to submit additional contributions and modified documents while the process is running, even when it has reached its final stages;
- the legal six months maximum being inclusive of endorsement by the Federal Minister.

The ÖAR has pleaded for a maximum duration of nine months, conforming to the FH Council.

Private universities, in their feedback on the external experts, are positive on their contacts with them, on the international composition of teams and the competence of its members, but sometimes they are negative on the fact that most experts are from traditional universities. As yet, teams of experts do not include student members; the ÖAR is aware of the importance and urgency of this issue. As for the search for and nomination of experts, the ÖAR works on standardisation of the process. One consciously refrains from forming a pool of experts, in order to avoid that recruitment is always from the same reservoir. External experts are positive on having been able to perform their task in an independent manner. They are rather unhappy, however, on the fact that after fulfilling their task, they have received insufficiently comprehensive information on outcomes; in an attempt to improve on this point, the ÖAR now communicates to the experts the grounds for the accreditation decision.

Final responsibility for the assessment of all evidence relevant to the decision lies with the ÖAR; this is a very fundamental constitutional issue in Austria. This arrangement differs from "traditional" peer driven processes, in which the decision making body of the agency assigns the assessment as such to a group of external experts. Decisions should be quality

driven. Among the provisions the ÖAR has in place to guarantee that decisions be taken independently are the following:

- Council members abstain from involvement with an application in case of professional or private links with the institution concerned.
- Given the current composition of the Council (see section 4.4), together with the simple majority decision rule, no accreditation decision can come about with Austrian votes only. From the ÖAR's viewpoint, this safeguards the decision from attempts to exert national political influence.

Conditional accreditation is legally impossible in Austria, as yet; it exists elsewhere in Europe. The ÖAR holds the view that it would be good to have the option of conditional accreditation, especially in cases where a decision is based on ex-ante assessment. On the other hand, it *is* possible, in the present legal situation, to include among the grounds for a decision necessary steps to be taken by the applicant institution that have to be assessed by the ÖAR in its supervisory role.

A high proportion of applications for initial institutional accreditation has resulted in negative decisions; the ÖAR feels that this demonstrates that the agency is an important gatekeeper guarding the higher education market. The proportion of negative decisions is lower with applications for the accreditation of new study programmes; the ÖAR interprets this as showing that the majority of Private Universities have a solid foundation on which to build a portfolio of programmes meeting high quality standards. In addition, the ÖAR observes that every accreditation process contributes to the development of quality within the institution, which carries over into the next round of applications for new programmes.

The possibility for applicant institutions to submit additional contributions and modified documents while the process is running, even when it has reached its final stages, was mentioned above as one of three factors prolonging the length of the accreditation procedure and being beyond the influence of the ÖAR. In its site visit meeting with the Council, the panel learnt that this practice of addition and modification has expanded over the years, to the extent that one feels the need to define certain limits to it.

In quite a number of instances during the site visit, there have been discussions on what constitutes a university. Compared with public universities, (accredited) private universities tend to be smaller institutions with a smaller number of disciplines, where less research and PhD training are going on. In the site visit session with the Council, it was obvious that one was eager to discuss this issue and invited the panel's comment.
As for the aspect of (critical) mass, the UniAkkG does not stipulate any minimum requirement. It was proposed that institutions should at least provide two study programmes. This is a rather small number, but, the panel was told, staying small may be a deliberate policy. Council members related instances of small institutions managing to survive thanks to sponsoring. The panel wondered whether there is a relationship between the high proportion of negative initial institutional accreditation decisions and small scale. According to Council members, this is not so. It was also brought to the attention of the panel that some small Private Universities are simply very good, in terms of the ÖAR standards. One would not want to be forced to withhold accreditation from those institutions. A crucial and distinctive feature in these cases appears to be that institutions may be small in terms of the number of programmes they provide, but have seen to it that these programmes are adequately staffed, meaning that the overall number of faculty is sufficient to run a programme, that there is a healthy balance between temporary and permanent positions, and that a programme is not dependent on so-called "flying faculty".
As for the aspect of research and PhD training, doubts were expressed about the quality of research in some Private Universities by stating that part of their "research" does not deserve that label. In the meeting with representatives of the Private Universities' Rectors' Conference, the organisation's president subscribed to the importance of research for

Private Universities, "… because research is important for teaching." As opposed to this view, the representative of one of the Private Universities the panel met with declared that the "integration of research and teaching" paradigm has become obsolete by the ever increasing specialisation of research and the ensuing mismatch between the subject matter of research and what should be taught to students.

Discussions on what constitutes a university also addressed issues of governance: how to make sure that the academic freedom, or freedom of science, will be respected in Private Universities? There appears to be a measure of consensus among stakeholders outside Private Universities that one determining factor is the composition of an institution's Board of Governors.

Considerations

The panel has been able to validate what is presented in the SER regarding this part of the ÖAR's statutory tasks. This holds for both the relevant factual evidence and the accompanying strengths-and-weaknesses analysis.

Below, the panel formulates a number of considerations, both within and beyond the scope of the statutory accreditation task.

The practice of addition and modification of application documents during the accreditation process is not only very time-consuming, it might also bring the ÖAR into the awkward situation that after a certain number of addition and modification rounds it is almost impossible not to accredit. The ÖAR might be seen as too involved in the improvement of quality, to the detriment of its (perceived) independence. On these grounds, the panel is not in favour of it.[1]

As for the duration of the accreditation process, the panel can see that, under the present circumstances, the six months maximum is not a realistic proposition. However, abolishing the time-consuming addition and modification practice could make a substantial difference.

Regarding student participation in teams of external experts, the panel is of the opinion that students should definitely participate if the subject matter to be assessed pertains to existing educational quality. The panel is in favour of having students participate in teams of external experts at least in cases of reaccreditation.

The panel considers the issue of what constitutes a university a very serious one. The discussion on critical mass has convinced the panel that what counts is the number of faculty who are substantially involved with study programmes. The doubt expressed about the quality of research in (some) Private Universities is cause for concern. To put it bluntly: one should not let this happen. The panel disagrees with the alleged obsoleteness of the integration of research and teaching, as it was put forward by a discussant from a Private University, and is in favour of a high standard in this respect, as long as one uses the term "Universität", which in the Austrian context means that there should be an interwovenness between research and teaching. A third point in case is the academic freedom, which is not guaranteed to be respected without explicit standards for the way Private Universities are governed. The panel feels that Austria might take a risk in not defining "university" in a more precise way in the law, or in the regulations used by the ÖAR itself.

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[1] The ÖAR shares the panel's concern, but stresses the fact that a situation like that has not occurred so far, as one is very much aware of the risk involved. A positive accreditation decision has never been taken following a number of consecutive unsuccesful addition and modification rounds.

Assessment
In conclusion, the review panel's assessment is that the ÖAR adequately performs the statutory task assigned to it by the UniAkkG, as far as it pertains to the accreditation process.
Without detracting from this assessment, the panel has formulated a number of recommendations based on the above evidence and considerations. These recommendations are presented in Chapter 7.

5.3. Supervision

Evidence
For basic information on this subject, the reader is referred to section 4.21.

The default instrument for supervision of private universities is through mandatory annual reports. They also serve the purpose of assessing the implementation by the Private Universities of their development plans. In some cases, annual reports gave rise to a further review and even a site visit. In one case, these steps have led to withdrawal of accreditation. In one other case, the lack of quality of the annual report played an important role in the decision not to grant reaccreditation. The format for the annual reports has been developed in cooperation between the ÖAR and Private Universities.
Further review activities are carried out by means of written questions and answers, meetings with representatives or a site visit. They are intended to detect adverse developments as early as possible. The ÖAR has no sanctions, except the threat of withdrawing accreditation. The ÖAR tries to strike a balance between rigid intervention and laissez-faire.
In case an institution loses its accreditation, there is no legal provision guaranteeing students that they will be able to continue their studies, e.g. through some teaching-out model with another university. The panel calls for serious attention to this point as the position of students should be protected.

Considerations
The panel has been able to validate what is presented in the SER regarding this part of the ÖAR's statutory tasks. This holds for both the relevant factual evidence and the accompanying strengths-and-weaknesses analysis.

Assessment
In conclusion, the review panel's assessment is that the ÖAR adequately performs the statutory task assigned to it by the UniAkkG, as far as it pertains to supervision.

5.4. Development of standards and guidelines

Evidence
For basic information on this subject, the reader is referred to section 4.24.

The UniAkkG may be characterised as "lean and mean", laying down the essentials. Its application, therefore, requires interpretation and specification by the ÖAR to ensure legal security and equality of procedures and decisions. This legal framework allows the ÖAR to continuously adapt its quality standards to European developments and to do justice to the differing structures of private providers. On the other hand, this relatively large measure of freedom of interpretation brings with it the danger of legal unsecurity and unequality.
As opposed to the UniAkkG, the AVG is rather like a straightjacket, compelling the ÖAR to a design of the accreditation process that is partly not in line with European practice.

The ÖAR's standards and guidelines feature on the agenda of most Council meetings, with a view to regularly assessing their appropriateness. All major decisions taken by the Council are made public as guidelines, to promote transparancy and consistency. In formulating guidelines, the ÖAR has adopted as a leading principle to limit the number of rules, for the sake of institutional autonomy.

From a Bologna perspective, the ÖAR takes into consideration that the Private Universities are part of the Austrian higher education scene and have to coexist with other Austrian providers. Thus, the ÖAR must be aware of the state of affairs in Austria, Bologna-wise, and of particular legal possibilities that Austrian law opens up for public universities. A National Qualifications Framework has not yet been implemented in Austria, and therefore cannot play a role in assessment.

Considerations

The panel has been able to validate what is presented in the SER regarding this part of the ÖAR's statutory tasks. This holds for both the relevant factual evidence and the accompanying strengths-and-weaknesses analysis.

With reference to the discussion in section 5.2 on the "university" concept, the panel is of the opinion that what is lacking in the ÖAR's legal position is the authority to define what constitutes a university.

Assessment

In conclusion, the review panel's assessment is that the ÖAR adequately performs the statutory task assigned to it by the UniAkkG, as far as it pertains to the development of standards and guidelines.

Without detracting from this assessment, the panel has formulated a recommendation regarding the definition of "university". This recommendation is presented in Chapter 7.

5.5. Cooperation with national and international stakeholders

Evidence

For basic information on this subject, the reader is referred to section 4.23.

The ÖAR welcomes the Private Universities' Rectors' Conference and supports the formation of a representative body of Private University students, as the presence of these new players on the stage of Austrian higher education enhances the visibiliy of the private sector and the assurance of its quality through accreditation.

The ÖAR maintains contacts with all relevant stakeholders. The international prestige of Council members and the competence of the ÖAR's office staff have been instrumental in establishing the ÖAR's position both nationally and internationally.

Considerations

The panel has been able to validate what is presented in the SER regarding this part of the ÖAR's statutory tasks. This holds for both the relevant factual evidence and the accompanying strengths-and-weaknesses analysis.

Assessment

In conclusion, the review panel's assessment is that the ÖAR adequately performs the statutory task assigned to it by the UniAkkG, as far as it pertains to cooperation with national and international stakeholders.

5.6. Annual reports to Parliament

Evidence
For basic information on this subject, the reader is referred to section 4.25.

A mandatory annual report to Parliament is the instrument laid down in the UniAkkG for the ÖAR's external accountability. So far, the President of the Council has annually been invited to a meeting of the parliamentary Scientific Committee to represent the ÖAR and discuss its annual report. In 2005, the parliamentary Scientific Committee has held an expert meeting to discuss the ÖAR's position paper on the future of the Austrian accreditation system.

Considerations
The panel has been able to validate what is presented in the SER regarding this part of the ÖAR's statutory tasks. This holds for both the relevant factual evidence and the accompanying strengths-and-weaknesses analysis.

Assessment
In conclusion, the review panel's assessment is that the ÖAR adequately performs the statutory task assigned to it by the UniAkkG, as far as it pertains to the annual reports to Parliament.

5.7. Public relations

Evidence
For basic information on this subject, the reader is referred to section 4.26.

The ÖAR's web site has turned out to be the best channel to reach target groups in a swift and comprehensive fashion. Relative to its modest share of the higher education market – catering for only 2% of students – the private university sector has received intense media coverage on occasions such as the start of new private universities and of pertaining ÖAR decisions. The ÖAR has established good relations with science journalists working for Austrian media. It is the wish of both the Private Universities and the ÖAR for accreditation to feature prominently in the public perception. Therefore, the ÖAR intends to launch, towards the end of 2007, some kind of quality logo for use by accredited Private Universities.

Considerations
The panel has been able to validate what is presented in the SER regarding this part of the ÖAR's statutory tasks. This holds for both the relevant factual evidence and the accompanying strengths-and-weaknesses analysis.

Assessment
In conclusion, the review panel's assessment is that the ÖAR adequately performs the statutory task assigned to it by the UniAkkG, as far as it pertains to public relations.

5.8. Quality assurance

Evidence
For basic information on this subject, the reader is referred to section 4.25.

In 2005, the ÖAR has started to intregate the available elements of its internal quality assurance. This process has served as a stimulus for reflection and, hence, the introduction of further quality instruments. These are being incorporated into a comprehensive quality

culture. As yet, the time span of these developments is too limited to warrant their assessment.

The high response rate of stakeholder questionnaires allows a continuous development of standards, processes and procedures. The same holds for the feedback obtained from round table meetings. Contacts with Parliament and with the Federal Ministry take place regularly and are businesslike in character.

The entire corpus of quality related documents is fully accessible electronically for all ÖAR office staff.

Considerations

The panel has been able to validate what is presented in the SER regarding this part of the ÖAR's statutory tasks. This holds for both the relevant factual evidence and the accompanying strengths-and-weaknesses analysis.

Assessment

In conclusion, the review panel's assessment is that the ÖAR adequately performs the statutory task assigned to it by the UniAkkG, as far as it pertains to the assurance of its quality.

6. The European perspective: ESG and ECA

6.1. Introduction
This chapter deals specifically with the ENQA membership criteria, complying with ENQA's requirement of a "Type B" report. The chapter's leading structuring element is the set of European standards and guidelines for external quality assurance agencies (ESG). Sections 6.2-6.9 are devoted to ESG 1 through 8. Each of these sections opens with the full text of the ESG, followed by subsections entitled *Evidence*, *Considerations*, and *Assessment*. Section 6.10 contains the overall assessment based on ESG 1-8.

The elements of the ECA Code of Good Practice have been allocated to the ESG, as indicated between parentheses at the end of each ESG section heading. There are two exceptions to this: sections 11 and 12 discuss ECA Code of Good Practice items 11 and 16, as these have no ESG counterpart.

Throughout this chapter, references are made to sections of Chapter 4, "The ÖAR in brief".

6.2. ESG 1: USE OF EXTERNAL QUALITY ASSURANCE PROCEDURES FOR HIGHER EDUCATION (ECA: 17)

Standard:
The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2[2] of the European Standards and Guidelines.

Guidelines:
The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions.
The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

Evidence
The integration of European best practices and experiences has been inspired by leading documents (European Standards and Guidelines for Quality Assurance in Higher Education, ECA Code of Good Practice), through the ÖAR's active involvement in European and international networking organisations (4.23), by the international orientation of the Council itself (4.4), and through experience gained in closely cooperating with the external experts called in by the ÖAR, most of whom come from abroad (4.12).

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[2] Part 2 is entitled "European standards and guidelines for the external quality assurance of higher education". It consists of the following eight standards with accompanying guidelines: (1) Use of internal quality assurance procedures; (2) Development of external quality assurance processes; (3) Criteria for decisions; (4) Processes fit for purpose; (5) Reporting; (6) Follow-up procedures; (7) Periodic reviews; (8) System-wide analyses. For the full text, the reader is referred to the Standards and Guidelines for Quality Assurance in the European Higher Education Area, to be downloaded from www.enqa.eu/pubs_esg.lasso

Considerations
In the opinion of the panel, the result of the above shows in the nature of the standards (4.24) and the processes applied by the ÖAR towards applicant institutions (4.6). The panel has observed that some features of the ÖAR accreditation process deviate from what has become common in Europe. The most salient of these features is the way a member of the Council is involved in each accreditation procedure, and the implications this has for the role and responsibility of the external experts. The Council member participates in the assessment – including the site visit - and authors the accreditation proposal that serves as a basis for the Council's decision. Thus, final responsibility for the proposal rests with the Council member. The external experts' written input consist of individual and independent assessment reports, in which they limit themselves to an evaluation of those issues that they have focussed on during the desk research and site visit stages of the process and which should correspond to the expertise for which they were called in by the ÖAR. The external experts do not try and reach consensus, nor do they make an explicit recommendation regarding the accreditation decision. Thus, final responsibility does not rest with them (4.12 -4.15).
The review panel has learnt that the above follows from the legal framework the ÖAR has to base its processes and procedures on: as the AVG states that the responsibility for establishing the evidence and judgments constituting the basis for its decisions lies with the governing body concerned, the ÖAR is not in a position to delegate the entire assessment of an application for accreditation to a team of experts external to the Council.
The review panel has come to the conclusion that the features discussed here are not in conflict with Part 2 of the ESG.

Assessment
<u>compliance</u>, partial compliance, non-compliance

6.3. ESG 2: OFFICIAL STATUS (ECA: 2)

Standard:
Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

Evidence
The Federal Act on the Accreditation of Educational Institutions as Private Universities (University Accreditation Act - UniAkkG) establishes the responsibilities of the Accreditation Council. It defines the Accreditation Council as an independent state authority with autonomous power of decision that is not bound by any directives. Decisions by the ÖAR have legal consequences, as soon as they have been endorsed by the Federal Minister (4.1, 4.19). The accreditation process is further legally determined by the General Administrative Procedure Act (AVG).

The UniAkkG states that accreditation, at both the institutional and the programme level, is compulsory for private universities in Austria. This applies to existing non-university educational institutions aspiring to obtaining university status, and to newly founded institutions. The ÖAR is assigned the statutory task of carrying out the corresponding accreditation processes. In addition, the ÖAR has the task of supervising accredited private universities.

Considerations
The panel has established that the ÖAR fully complies with the requirements of the legislative jurisdictions within which it operates. This is apparent from relevant sections of

the SER, primarily those presented in sections 4.4 through 4.24 of this report. It has been confirmed during the site visit in meetings with stakeholders, none of whom took the opportunity to make assertions towards the opposite.

Assessment
<u>compliance</u>, partial compliance, non-compliance

6.4. ESG 3: ACTIVITIES (ECA: 13)

Standard:
Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

Guidelines:
These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

Evidence
Over the seven year period 2000-2007 (May), numbers of applications submitted were as follows (4.22):
• 38 applications for initial or reaccreditation of institutions as private universities;
• 25 applications for the accreditation of 56 study programmes (the difference in numbers results from applications for more than one programme).

Considerations
For a correct understanding of the above statistical data, it is important to know that every application for and decision on institutional accreditation also pertains to the accreditation of all of the applicant institution's study programmes. In addition, applications for the accreditation of new study programmes may be submitted in the course of an institutional accreditation period.
The average yearly number of applications submitted to the ÖAR has been nine. Given this data, the review panel is of the opinion that the ÖAR undertakes accreditation activities – being the dominant part of its core functions - on a regular basis.

Assessment
<u>compliance</u>, partial compliance, non-compliance

6.5. ESG 4: RESOURCES (ECA: 5)

Standard:
Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

Evidence
The UniAkkG obliges the Federal Ministry to make the necessary material resources and personnel available to the ÖAR (4.5). Thus, these are not dependent on contributions by third parties, or on the number of applications submitted; in accordance with the AVG, the applicant institution needs only reimburse the expenses of the external experts involved in the application procedure (4.18).

Considerations
Judging from the SER, and from talks with Council members and staff, the review panel considers the resources available to the ÖAR adequate for the time being. However, it seems not unlikely that the present level of provision will no longer be adequate some time in the near future. This assessment is based on three inherently upward – at least, not downward - trends:

- At the institutional level: once accredited, a private university has to apply for reaccreditation.
- A study programme, once accredited, will enlarge the number of programmes that has to be taken care of as part of the next institutional reaccreditation.
- There will be a parallel increase in supervison activity.

It is obvious that growing numbers of applications for initial accredation will add to the pressure on resources.
The panel holds the view that, for the sake of financial security, it would be preferable to provide to the ÖAR an own budget, and their own personnel.

Assessment
<u>compliance</u>, partial compliance, non-compliance

6.6. ESG 5: MISSION STATEMENT (ECA: 1)

Standard:
Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

Guidelines:
These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

Evidence
The ÖAR has a mission statement. It is freely available through its web site. It comprises the ÖAR's position, tasks, assignments, aims (4.3), working principles, and profile. The mission statement is the subject of periodical evaluation and adaptation.

Considerations
In the opinion of the panel, the goals and objectives are definitely clear and explicit. The panel is positive about the way they have been embedded in a mission statement.

Assessment
<u>compliance</u>, partial compliance, non-compliance

6.7. ESG 6: INDEPENDENCE (ECA: 3, 9, 10, 15)

Standard:
Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

Guidelines:
An agency will need to demonstrate its independence through measures, such as:
• its operational independence from higher education institutions and governments
is guaranteed in official documentation (e.g. instruments of governance or
legislative acts);
• the definition and operation of its procedures and methods, the nomination and
appointment of external experts and the determination of the outcomes of its
quality assurance processes are undertaken autonomously and independently from
governments, higher education institutions, and organs of political influence;
• while relevant stakeholders in higher education, particularly students/learners,
are consulted in the course of quality assurance processes, the final outcomes of
the quality assurance processes remain the responsibility of the agency.

Evidence
The ÖAR's independence is guaranteed in the following manner:

Independence from the government. Through its legal status of governing body, the ÖAR is bound to the "legality principle" embedded in the Federal Constitution. From this, it follows that the ÖAR is bound to respect the equality principle and refrain from arbitrariness. At the same time, this obligation provides a measure of protection against unlawful external influences. Whereas, in general, governing bodies are subordinate to higher government organs, the UniAkkG contains an article stating that the members of the ÖAR are independent in the exercise of their duties. The five year term of office is a further guarantee for their independence.

Independence from business, industry, and professional bodies. The ÖAR is publicly funded; contributions from private sources are not possible. There are no representatives of business, industry, and professional bodies among the members of the Council.

Independence from applicant institutions. Applicant institutions have no influence on the appointment of Council members, nor on any other interest of the ÖAR.

Independence from national conflicts of interest. The composition of the Council (4.4), together with the simple majority decision rule, is a guarantee that no accreditation can come about with Austrian votes only.

Two points related to the nomination of external experts are relevant under this standard. First, the applicant institution may object to an expert's nomination on grounds of prejudice. Second, the experts themselves declare in writing that they are independent. The fact that 91% of experts deployed so far have been foreigners adds to the guarantees for independence (4.12).

Considerations
The panel has validated the above and found it to be relevant and correct. It might be argued, however, that the requirement of endorsement of the accreditation decision by the Federal Minister (4.16) detracts from the ÖAR's independence. The panel discussed this issue and has reached the conclusion that this is not so, because the object of endorsement is the accreditation decision, not the conclusions nor the recommendations in the ÖAR's reports. As for the Federal Minister appointing the ÖAR's president and vice-president (4.4), the panel recommends the nomination of candidates by the Council.

Assessment
<u>compliance</u>, partial compliance, non-compliance

6.8. ESG 7: EXTERNAL QUALITY ASSURANCE CRITERIA AND PROCESSES USED BY THE AGENCIES (ECA: 4, 9, 12, 14, 17)

Standard:
The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:
• a self-assessment or equivalent procedure by the subject of the quality assurance process;
• an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
• publication of a report, including any decisions, recommendations or other formal outcomes;
• a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

Guidelines:
Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.
Agencies that make formal quality assurance decisions, or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

Evidence
The ÖAR has developed its own standards and guidelines (4.24). All major documents on processes, criteria and procedures are made accessible through the ÖAR web site. A Self-Evaluation Report (SER) by the applicant is a standard component of the documentation for all three types of accreditation procedure carried out by the ÖAR (4.9). The same holds for an external assessment by a group of experts, with site visits as decided by the ÖAR. As yet, teams do not include student members (4.12). The ÖAR publishes core data on every application that has been accepted as such, including the accreditation decision. However, the present legal situation prohibits the publication of the external experts' individual reports, and of the grounds for the decision (4.17). It is the task of the ÖAR to ensure a continuous quality assurance of accredited private universities by supervising them in between accreditation decisions. The default instrument of supervision is the evaluation of mandatory annual reports by the institutions. This may be supplemented with reviews and physical inspection (4.21). The annual reports are also used by the ÖAR as a basis for the decision on reaccreditation (4.20).

The AVG carries four principles that apply to the professional management of requirements and processes as they feature in this standard's guidelines. These are: suitability, speed, straighforwardness, and cost-reduction. Consistency in decision making is guaranteed by:
• the transparency of the process in all its stages, required by the AVG, towards the applicant, who has the right to inspect relevant documents at all times;
• the fact that a Council member looks after the process from beginning to end;
• professional process management based on standardised procedures;
• the documentation of every individual application procedure;
• publication of all principal ÖAR decisions as guidelines;
• comprehensive written grounds for decisions.

In meetings during the site visit, stakeholders consistently reported that in their experience the ÖAR manages its processes professionally. The only aspect that many are dissatisfied with is speed, or the lack thereof. Council members and ÖAR office staff informed the panel

that the six months legal maximum for the accreditation process proper (4.11-4.17) is not a realistic proposition. As is shown in the SER (Annex A11), over the seven year period 2000-2007, the average amounted to nine months.

Applicants have the right to lodge an appeal with a court of justice against an ÖAR decision.[3] In addition, in case of delay in the completion of a procedure, applicants may request for the Council's authority to be transferred to the Federal Ministry. The ÖAR does not have in place an internal appeals procedure.

Considerations
The above evidence convinces the review panel that the ÖAR does a professional job, measured against the component parts that jointly make up this standard and its accompanying guidelines. There are two exceptions to this:

• As yet, teams of external experts do not include student members. The panel is of the opinion that students should definitely participate if the subject matter to be assessed pertains to existing educational quality. The panel is in favour of having students participate in teams of external experts at least in cases of reaccreditation.
• The ÖAR does not have in place an internal appeals procedure.

Consequently, the panel's assessment is that the ÖAR does not fully, but partially, comply.

Assessment
compliance, <u>partial compliance</u>, non-compliance

6.9. ESG 8: ACCOUNTABILITY PROCEDURES (ECA: 6, 7, 8, 15)

Standard:
Agencies should have in place procedures for their own accountability.

Guidelines:
These procedures are expected to include the following:
1. A published policy for the assurance of the quality of the agency itself, made available on its website;
2. Documentation which demonstrates that:
   • the agency's processes and results reflect its mission and goals of quality assurance;
   • the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;
   • the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties;
   • the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
3. A mandatory cyclical external review of the agency's activities at least once every five years.

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[3] Thus far this has happened twice. However, in these instances the issues at stake were related to the accreditation *process*, not to the accreditation *decision*.

Evidence
On its web site, the ÖAR has published a document entitled "Quality Principles and Quality Mission Statement of the Austrian Accreditation Council (AAC)".
The document most explicitly demonstrating that the ÖAR's processes and results reflect its mission and goals of quality assurance is the SER of May 2007.
A large majority – 91% - of experts deployed so far have been foreigners. This is the result of a deliberate policy aiming at satisfying the independence criterion. In the words of the SER: "… in order to avoid conflict of interest within the relatively small Austrian scientific community" (4.12).
As the ÖAR does not deploy subcontractors, mechanisms ensuring the quality of their activities are not applicable.
Measures geared towards the development of the ÖAR's own quality assurance have been described in the SER (4.25).
A mandatory annual report to Parliament is the instrument laid down in the UniAkkG for the ÖAR's external accountability (4.25).
Periodic external evaluations are not prescribed by the UniAkkG, but are considered mandatory – by the ÖAR itself – from a European perspective (4.25).

Considerations
In meetings during the site visit, the review panel has validated the above information. As a result, the panel rests assured that the ÖAR has in place procedures for its own accountability. Council members and office staff sport a positive attitude towards the ÖAR's accountabiliy. As for a cyclical external review, the panel recommends to not only *consider* this mandatory, but lay down a five year external review cycle in an appropriate document, to be published on the ÖAR web site.

Assessment
<u>compliance</u>, partial compliance, non-compliance

6.10. Integral assessment
In the light of the documentary and oral evidence considered by it, the Review Panel is satisfied that, in the performance of its functions, the Austrian Accreditation Agency (Österreichischer Akkreditierungsrat) is in compliance with the *ENQA Membership Regulations* and in substantial compliance with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area*. The Panel therefore recommends to the Board of ENQA that the Austrian Accreditation Agency (Österreichischer Akkreditierungsrat) should have its Full Membership of ENQA confirmed for a [further] period of five years.

The critical considerations in some sections of this chapter - corresponding recommendations are presented in section 7.3 - do not detract from the above integral assessment.

6.11. ECA 11: International cooperation

Standard:
The accreditation organisation collaborates with other national, international and/or professional accreditation organisations.

Question:
With which European networks or agencies in the field of quality assurance and accreditation does the accreditation organisation collaborate on a regular basis?

Reference points:
- **The accreditation organisation collaborates actively with other national/professional accreditation organisations.**
- **The accreditation organisation acts conformly with overarching European frameworks in the field of quality assurance/accreditation.**

Evidence
The ÖAR maintains contacts with the following national stakeholders: representatives of private universities, the Private Universities Rectors' Conference, students in the private university sector; the public university sector: rectors of individual universities and the president of the Austrian Rectors' Conference; the FH Council, the Austrian Quality Assurance Agency (AQA), and the Austrian NARIC office (4.23).

Through intensive cooperation with European and other international network organisations (INQAAHE, ENQA, ECA, DACH, CEE), the ÖAR is strongly involved in the development of a European quality assurance system (4.23).

Primarily based on the ÖAR's interpretation of the UniAkkG, its standards and guidelines have also been inspired by international standards contained in the Universitätsgesetz 2002 on public universities, and - in an overarching fashion – by "Bologna" (4.24).

Considerations
In meetings during the site visit, the review panel has validated the above information. Without exception, stakeholders were positive on this issue. The panel is of the opinion that, especially if one takes into account the short history of the ÖAR and its small scale, its national and international presence is quite impressive.

Assessment
<u>compliance</u>, partial compliance, non-compliance

6.12. ECA 16: Enhancement of quality
Standard:
The accreditation procedures must be geared at enhancement of quality.

Question:
Which elements and mechanisms within the accreditation process are used to enhance quality at the higher education institution?

Reference points:
- **The accreditation process contains elements that promote quality development and improvement of the higher education institution.**
- **The accreditation process should respect autonomy, identity and integrity of the higher education institutions.**

Evidence
The enhancement of quality features among the ÖAR's goals: "to promote and improve the quality of the private university sector" (4.3). When applying for reaccreditation, the institution must document its compliance with all the necessary legal requirements, with special emphasis on developments since the previous accreditation decision (4.20). The institutions are positive on the degree to which the accreditation process acts as a stimulus for internal reflection. The ÖAR observes that every accreditation process contributes to the development of quality within the institution.
A prominent characteristic of the Private University sector is its diversity. The ten Private Universities that have been accredited so far differ considerably on dimensions such as the

innovative character of content, and modes of teaching and research. The ÖAR's quality standards have been formulated to be open to the extent that they may accommodate this diversity and stimulate its quality.

Considerations
In meetings during the site visit, the review panel has validated the above information. As a result, the panel has become convinced that, although accountability is its first responsibility, quality improvement and enhancement are high on the agenda of the ÖAR. This shows in both attitude and practical dealings.

Assessment
<u>compliance</u>, partial compliance, non-compliance

7. Conclusions and recommendations

7.1. General impression

The study of the Self-Evaluation Report and additional documents, together with two interesting days with quite a lot of frank meetings (four private universities, students, the Austrian Rectors' Conference, the Rectors' Conference of Private Universities, Council members, ÖAR office staff, and the Federal Ministry) have enabled the review panel to develop a consistent view on the ÖAR, its work and how this is perceived by relevant others.

The panel has become impressed by what the ÖAR is doing. The Council and its members have manifested themselves as professional, independent, competent, and resistant to intervention. The ÖAR office staff are well-organized and very competent. The Self-Evaluation Report proved to be honest and solid: during the site visit, the panel hardly came across anything not already contained in it. Finally: chapeau for the ÖAR's international activities and position!

Representatives of private universities have told the panel: the ÖAR is fair and we hope that they will stay like this. According to others, the ÖAR does a good job within its possibilities.

Many of those the review panel engaged in talks with took the opportunity to express the need they feel to discuss the future of external quality assurance in higher education in Austria. Invariably, their contributions were inspired by concern for the present situation, characterised by three different systems for Public Universities, Private Universities, and Universities of Applied Science, respectively.

Considering a future accreditation system, the review panel can imagine that this could lead to an amended UniAkkG, even to the extent of providing (more) exceptions to the AVG (5.4).

7.2. National and international assessments

As it was formulated in the introductory chapter of this report, the aim of this review is twofold:
o   assessing the way the ÖAR performs the statutory functions assigned to it by Austrian law;
o   establishing the degree to which the ÖAR meets the European standards and guidelines for external quality assurance agencies (ESG) and conforms to the ECA Code of Good Practice.

The respective integral assessments made by the review panel are as follows:

The panel assesses the way the ÖAR performs the statutory functions assigned to it by Austrian law as adequate (Chapter 5).

The panel has established that the ÖAR complies with the European standards and guidelines for external quality assurance agencies (ESG) and conforms to the ECA Code of Good Practice (Chapter 6, with an integral assessment in section 6.10).

In various sections of this report, the panel has formulated critical considerations. Corresponding recommendations are presented in section 7.3.

7.3. Recommendations

1. **The definition of "university"; the status of accredited "Private University"** (ref. 5.2, 5.4)

   The panel considers the issue of what constitutes a university a very serious one. The discussion on critical mass has convinced the panel that what is of the utmost importance is the number and the quality of faculty who are substantially involved with study programmes. The doubt expressed about the quality of research in (some) Private Universities is cause for concern. To put it bluntly: one should not let this happen. The panel disagrees with the alleged obsoleteness, as it was put forward by a discussant from a Private University, of the integration of research and teaching, and is in favour of a high standard in this respect, as long as one uses the term "Universität", which in the Austrian context means that there should be an interwovenness between research and teaching. A third point in case is the academic freedom, which is not guaranteed to be respected without explicit standards for the way Private Universities are governed. The panel feels that Austria might take a risk in not defining "university" in a more precise way in the law, or in the regulations used by the ÖAR itself. An alternative option would be to introduce a distinction between universities and other institutions of higher education.

   The panel fully supports the Council in its view that an institution, upon being accredited by the ÖAR, should include "Privatuniversität" in its German name (4.19).

   The review panel recommends that the ÖAR be given a (legal) position enabling it to define what does and what does not constitute a university, to integrate this definition in its standards and guidelines, and to act accordingly. Also, the panel recommends for the ÖAR to uncompromisingly adhere to the mandatory use of "Privatuniversität" as component parts of an accredited institution's German name.

2. **The role of students** (ref. 5.2, 6.8)

   Regarding student participation in teams of external experts, the panel is of the opinion that students should definitely participate if the subject matter to be assessed pertains to existing educational quality. The panel is in favour of having students participate in teams of external experts at least in cases of reaccreditation.

   From its talks with student representatives, the panel has learnt that Private University students are different from students at public universities in that they tend to be less interested in quality assurance. In the ÖAR's early years, the relative lack of student involvement was, apparently, not considered a problem in Austria. But now that the Private University sector is growing to maturity, time has come to try and find ways to enhance the "visibility" of Private University students in both external and internal quality assurance. In the panel's view, the ÖAR should make it mandatory – through inclusion in its standards and guidelines - for Private Universities to arrange for students to participate in their internal quality assurance.

   Recommendations:
   - Have students participate in teams of external experts at least in cases of reaccreditation.
   - Make it mandatory – through inclusion in the ÖAR's standards and guidelines - for Private Universities to arrange for students to participate in their internal quality assurance.

   The review panel has extensively discussed the issue of student membership of the Council, but has not reached consensus. A majority holds the view that student membership is not desirable, as the Council should consist of persons who, in the course of a substantial number of years, have accumulated experience and expertise in the realm of university teaching, research, and management. Other members of the panel are of the opinion that student membership is desirable, both on principle grounds and in order to be in line with requirements of the Bologna Process.

3. **Composition of the Council: representatives of private universities** (ref. 5.2)
Private universities, in their feedback on the external experts who visited and assessed them, are sometimes negative on the fact that most are from traditional universities. Now it could be argued that it should be made mandatory to have a representative of a private university on every team of external experts. However, the review panel realises that a recommendation to that effect would not be feasible, given the modest number of private universities in Europe to recruit experts from, the more so as the panel is of the opinion that these experts should be from private *research* universities, whose numbers are even very much smaller. Instead, the panel would consider it a wise move to make this type of expertise available within the Council.
Recommendation: have one or more representatives of non-Austrian private research universities join the Council.

4. **Submission of improved applications; addition and modification of documents during the accreditation procedure** (ref. 5.2)
Following rejection or withdrawal of an application, the institution may submit another (improved) application any time. Also, the applicant institution may submit new and/or modified documents while the process is running, even when it this has reached its final stages. In its site visit meeting with the Council, the panel learnt that the addition and modification practice has expanded over the years, to the extent that one feels the need to define certain limits to it. It is obvious that both these practices are very time-consuming. However, they might also bring the ÖAR into the awkward situation that after a certain number of rounds it is almost impossible not to accredit. The ÖAR might be seen as too involved in the improvement of quality, to the detriment of its (perceived) independence. On these grounds, the panel is not in favour of the existing practice.
Recommendations:
- Discourage (too) frequent reapplications by charging a considerable fee for each application.
- Make an end to the practice of addition and modification of application documents during the accreditation process (ref. 5.2).

5. **Appeals procedure** (ref. 6.8)
Applicants have the right to lodge an appeal with a court of justice against an ÖAR decision. In addition, in case of delay in the completion of a procedure, applicants may request for the Council's authority to be transferred to the Federal Ministry. The ÖAR does not have in place an internal appeals procedure. The panel has discussed the desirability of such a procedure and has come to the conclusion that it is more important for reaccreditation than it is for initial accreditation. This is because in cases of reaccreditation the implications and repercussions of a negative decision are very serious for students and staff. Therefore, the panel recommends to introduce an internal appeals procedure for at least decisions on applications for reaccreditation.

6. **Preparation of external experts** (ref. 5.2)
The panel has observed that some features of the ÖAR accreditation process deviate from what has become common in Europe. One such feature is the role of external experts. As these are, almost without exception, foreigners, this means that even those who have been active in external quality assurance elsewhere, may not be familiar with some of the specifics of their role when working for the ÖAR. This calls for a way to prepare experts for what is expected and what is not expected of them. From the experts' feedback the panel has consulted it appears that in some cases this preparation has not been sufficiently substantial.
Recommendation: intensify the way of preparing external experts for their role.

7. **Publishing grounds for decisions** (ref. 6.8)
Accreditation decisions are published on the ÖAR web site, the supporting grounds, however, are not. For principal reasons, the panel is not in favour of this restriction.
<u>Recommendation</u>: publish the grounds for both positive and negative accreditation decisions.

8. **Role of Council member in accreditation process** (ref. 6.2)
The ÖAR does not delegate the entire assessment of an application for accreditation to a team of experts external to the Council, but only those domains - discipline-specific in nature, mostly – for which insufficient expertise is available among its members. One of the tasks of the Council member assigned to the team is to make sure that issues of a non discipline-specific nature which the ÖAR does have to assess are covered in the process (4.12). Whereas the individual reports by the external experts are communicated to the applicant institution, and are open for comment, the institution has no way of knowing what the Council member's individual assessment is like. The review panel finds this unsatisfactory and <u>recommends</u> the authoring by the Council member of an individual assessment report to be communicated – open for comment - to the applicant institution.

9. **Resources** (ref. 6.5)
Judging from the SER, and from talks with Council members and staff, the review panel considers the resources available to the ÖAR adequate for the time being. However, it seems not unlikely that the present level of provision will no longer be adequate some time in the near future. This assessment is based on three inherently upward – at least, not downward - trends:
- At the institutional level: once accredited, a private university has to apply for reaccreditation.
- A study programme, once accredited, will enlarge the number of programmes that has to be taken care of as part of the next institutional reaccreditation.
- There will be a parallel increase in supervison activity.
It is obvious that growing numbers of applications for initial accredation will add to the pressure on resources.
The panel holds the view that, for the sake of financial security, it would be preferable to provide to the ÖAR an own budget, and their own personnel. This would enable the organisation to engage in long term planning.
<u>Recommendations</u>:
- arrange for additional resources to become available in good time;
- provide to the ÖAR an own budget, and their own personnel.

10. **External review: 5 year cycle** (ref. 6.9)
Periodic external evaluations are not prescribed by the UniAkkG, but are considered mandatory – by the ÖAR itself – from a European perspective. The panel <u>recommends</u> to not only *consider* this mandatory, but lay down a five year external review cycle in an appropriate document, to be published on the ÖAR web site.

Annex A. Terms of Reference and Protocol

Austrian Accreditation Council

External Review 2007
Terms of Reference and Protocol for the Review

Table of Contents

1. Executive Summary

This document explains the terms of references, objectives and timescale for an external review of the Austrian Accreditation Council (AAC). In accordance with the principle of subsidiarity which underlies the *European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, responsibility for the reviews resides at the national level. Consequently, the Federal Ministry for Education, Science and Culture (BMBWK) holds overall responsibility for a review of the AAC, which is performed in concert with the Austrian Rector's Conference (ÖRK). The Federal Ministry organises and coordinates the process.

An external review of the AAC ought to demonstrate in a verifiable manner how effectively the AAC performs the principal statutory functions set out by the University Accreditation Act, as well as to what extent the AAC in its work adheres to *European Standards and Guidelines* (ESG) and thereby fulfils the membership criteria for ENQA as well as the standards of the ECA Code of Good Practice (ECA-GP).

The entire review process ought to be conducted in a spirit of full and frank objectivity, using analytical parameters such as description, strength/weakness analysis and potential for improvement. It ought also to follow a fixed schedule. The process is based on the *Guidelines for National Reviews of ENQA Member Agencies*.

The process consists of the following basic steps:
- Nomination and appointment of a panel of reviewers
- A self-evaluation and self-evaluation report by the AAC
- Review by an independent panel of reviewers, including a site-visit
- Report by an independent panel of reviewers
- Draft of a plan for implementation of the reviewers' recommendations by the AAC
- Submission of the review report to the respective boards of ENQA and ECA and to the ÖRK
- Publication of the review report and follow-up measures

2. Tasks, Aims and Legislative Context of the AAC

The AAC is the authority responsible for external quality assurance of Austrian private universities. Its tasks and activities are laid down by the Federal Act on Accreditation of Educational Institutions as Private Universities (University Accreditation Act or UniAkkG) which was passed in 1999 by the Austrian Parliament. The act assigns the following tasks to the AAC:

- Accreditation of private universities and their academic programmes;
- Accreditation of new academic programmes offered by private universities;
- Supervision of private universities;
- Re-accreditation of private universities and their academic programmes.

The AAC performs its mandate in the following manner:

- Interpreting the quality requirements prescribed by law by setting up guidelines and quality standards for accreditation;
- Developing instruments for a regular review of whether these requirements have been met by private universities;
- Active participation in international cooperation projects in the field of accreditation and quality assurance;
- Submitting an annual report on its activities to the Austrian Parliament.

The aims of the AAC consist in:

- Opening the university sector to private providers from Austria and abroad;
- Providing quality assurance to the private university sector;
- Ensuring, promoting and improving the quality of the private university sector;
- Creating transparency and comparability in the interest of providers, students and the labour market;
- Encouraging innovative forms of university-level training and higher education;
- Ensuring the comparability of degrees from Austrian private universities with those awarded internationally;
- Implementing the objectives for the development of a European Higher Education Area for the private university sector.

The AAC is a body comprising eight members who are all acknowledged experts in the field of European higher education. Its members are appointed by the ÖRK and the incumbent Federal Ministry. Appointments are made by the Federal government for a period of five years. The University Accreditation Act mandates that the members of the AAC be independent in their role and not bound by any directives.

The accreditation procedure is carried out in accordance with the General Administrative Procedure Act (AVG). Both work principles and decision-making procedures are set out in the Council's by-laws. Accreditation cannot be granted on a conditional basis. In order to have legal validity, accreditation decisions require the approval of the appropriate Federal Minister. This approval can only be withheld if a decision by the AAC is inconsistent with national educational policy interests.

The AAC shall be subject to supervision by the incumbent Federal Minister. In addition, the Council must present a report on its activities to Parliament every year.

3. Context of the Review

To determine whether the AAC fulfils national requirements, the University Accreditation Act has designated as instruments of external quality assurance both the annual report of the AAC to Parliament as well as the supervisory responsibility of the BMBWK. The AAC's obligation to undertake an external review also results from the European context, in particular from:

- The resolution of education ministers (Bergen Communiqué) to adopt the *European Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) as well as an obligatory cyclical peer-review process for quality assurance agencies to be undertaken at the national level;
- The planned establishment of a European Register for quality assurance agencies;
- The condition that all ENQA members, in order to retain their membership, undertake an external review with respect to ESG by 2010 at the latest;
- The agreement that members of the ECA project submit for external review their fulfilment of the *Code of Good Practice* by 2007.

4. Formulation and Aims of the Review

The following explanation is based on a process design for external reviews which was passed by the AAC at its meeting on 31 March 2006. The design was approved by the Federal Ministry for Education, Science and Culture (BMBWK) on 11 July 2006 and was subsequently reported to the boards of ENQA and ECA.

Among other things, an external review is meant to determine to what extent the AAC meets the tasks set it by law as well as to what extent it fulfils them using developed processes and/or the implementation of same. To determine this, both the national legal

context as well as the requirements of international standards are taken into consideration. National responsibility ought to be seen in relation to international requirements. For this reason, the external review ought to be placed within European as well as national terms of reference.

Accordingly, this formulation of the review corresponds to a Type B report as outlined in the *Guidelines for National Reviews of ENQA Member Agencies*. During the process, the following areas of the AAC's work ought to be examined:

- In what way and to what extent does the AAC fulfil the tasks set it by the University Accreditation Act using the process that the AAC developed, implemented and applied for the purpose of fulfilling these tasks?
- In what way and to what extent does the AAC meet the membership criteria for ESG/ENQA (*European Standards and Guidelines for External Quality Assurance Agencies*)?
- In what way and to what extent does the AAC fulfil the ECA *Code of Good Practice*?

The entire review process ought to be conducted in a spirit of full and frank objectivity, using analytical parameters such as description, strength/weakness analysis and potential for improvement. It ought also to follow a fixed schedule.

5. Process Responsibility

Overall responsibility for the process resides with the Federal Ministry for Education, Science and Culture (BMBWK) which also supervises the AAC as per the University Accreditation Act. The BMBWK coordinates and organises all processes necessary for the review and takes agreement from the ÖRK on its procedure.

6. The Review Process

An external review of the AAC consists of the following phases:

- Nomination and appointment of a review panel
- A self-evaluation and self-evaluation report by the AAC
- Review by the independent panel of reviewers, including a site-visit
- Report by the independent panel of reviewers
- Draft of a plan for implementation of the reviewers' recommendations by the AAC
- Sending the review report to the respective boards of ENQA and ECA

- Publication of the review report and follow-up measures

6.1. Nomination and Appointment of a Review Panel

Based on the procedure outlined by ENQA, the panel of reviewers has the following structure:

1 chairperson (quality assurance agency)	nominated by BMBWK
1 representative of a quality assurance agency	nominated by BMBWK on suggestion of the chairperson
1 representative of higher education institutions (national)	nominated by BMBWK on suggestion of the ÖRK
1 representative of higher education institutions (European)	nominated by BMBWK on suggestion of EUA
1 representative of students (European)	nominated by BMBWK on suggestion of ESIB
1 secretary	nominated by BMBWK on suggestion of the chairperson

The secretary performs support functions for the panel, in particular the organisation of communication and work processes as well as the drafting of the expert report.

The BMBWK appoints members of the panel of reviewers and prepares them in an appropriate way for carrying out the review. The boards of ENQA and ECA are notified of the composition of the review panel with the possibility for comment.

The review takes place in German. Though English may also be used as a working language, each member of the panel ought to have sufficient passive knowledge of German so as to allow them to read documents and understand the content of conversations.

6.2. Self-Evaluation and Self-Evaluation Report

Responsibility for organising and carrying out a self-evaluation lies with the AAC. The following principles are meant to guide the process of self-evaluation:
- The process follows a fixed schedule.
- All stakeholders are included in the process.
- The process is conducted in a spirit of full and frank objectivity.
- Individual steps in the self-evaluation process are coordinated by an open working group whose members are drawn from the AAC and employees of its offices. The working group gives regular reports in plenary sessions of the AAC.

The following principles are meant to guide the drafting of a self-evaluation report:

- A service portfolio is outlined, with reference to the fulfilment of a legal mandate (University Accreditation Act) as well as the criteria of ESG and ECA-CGP.
- The outline of the service portfolio includes the following analyses: Description, strength-weakness analysis, potential for improvement
- The self-evaluation report ought to be as future-oriented as possible and include appropriate development concepts alongside identified weaknesses and/or eventual points of criticism.
- The self-evaluation report is to be formulated both briefly and concisely, and is to be sent to the panel of reviewers and the BMBWK four weeks at the latest before the site-visit.
- The self-evaluation report is passed in a plenary session of the AAC.

The form and content of the self-evaluation report are to be agreed with the chair of the review panel. The self-evaluation report ought to demonstrate in a verifiable manner how well the AAC fulfils the duties set it by the University Accreditation Act, as well as to what extent the Council in its work adheres to *European Standards and Guidelines* (ESG) and thereby fulfils the membership criteria for the ENQA as well as the standards of the ECA *Code of Good Practice* (ECA-GP). The following points must be included in a self-evaluation report:

- An outline of the national context;
- Documentation of the activities of the AAC, in particular the methods, instruments and procedures of the external quality assurance it has undertaken and appeal methods;
- Details of the AAC's internal system of quality management;
- Opinions on the agency by key stakeholders.

6.3. Site-visit by the Review Panel

Using input from the AAC and/or the chair of the review panel, the BMBWK will create and publish a schedule for the panel's site-visit. The site-visit will last two to three days, providing opportunity for conversations with all key stakeholders to take place. It will conclude with a conversation between the review panel and the AAC to discuss the most important findings of the review.

6.4 Report by the Review Panel

Together with the members of the review panel, the panel's chairperson is responsible for drafting its report. The report should be drafted in agreement among all the reviewers involved. A list of the report contents will be agreed upon by the BMBWK and the review panel to ensure that the formulation and aims of the review have been given appropriate consideration. The BMBWK will provide an electronic document template of the report to

the review panel. The following points must be included in the report:

- Executive summary
- Contextual details of the review
- Outline of the report's supporting documentation
- Outline of the frame of reference, sequence and central elements of the review
- Evidence-based analysis referring to national issues, membership criteria of ESG/ENQA and the standards of ECA-CGP
- A summative conclusion regarding whether and/or to what extent ENQA membership criteria are considered to be substantially fulfilled, partially fulfilled or not fulfilled
- Recommendations for improvement

7. Publication of the Review Report and Follow-Up Measures

The AAC will discuss the review report at a plenary session and inform the BMBWK of follow-up measures which are based on the findings and, in particular, on the recommendations of the review panel. Following a discussion of the review findings and planned follow-up measures with the BMBWK, the reviewers' report and the agreed plan for implementing the reviewer's recommendations will be sent to ENQA, ECA and ÖRK and will be published.

8. Preliminary Review Schedule

Key:

Responsibility of BMBWK	
Responsibility of AAC	

AAC decides process design	31 March 2006
BMBWK approves process design suggested by AAC	11 July 2006
Forward process design to ENQA and ECA	20 July 2006
Constitution of the internal working group for self-evaluation	August 2006
Self-evaluation begins	October 2006
Gather stakeholder views	October to December 2006
Notify ENQA and ECA of guidelines and planned timescale	January 2007
Nominate members of review panel	January/February 2007
Notify ENQA and ECA of composition of review panel	January/February 2007
Plan site-visit and briefing of reviewers	February 2007
Coordinate objectives and structure of self-evaluation report with chairperson of review panel	February 2007
Begin drafting self-evaluation report	February 2007
AAC completes and passes self-evaluation report	April 2007
Send self-evaluation report to BMBWK	May 2007
Send self-evaluation report to review panel	
Site-visit	June 2007
Send reviewer report to AAC	3 weeks after site-visit
Opportunity for AAC to respond to review report	2 weeks after report sent
Discussion of report and creation of a plan to implement reviewers' recommendations	2nd half of 2007
Forward to ENQA and ECA both review report and follow-up measures	2nd half of 2007
Publication of the review report and follow-up measures	2nd half of 2007

Annex B. Site Visit Programme 24-26 June 2007

	SONNTAG, 24.06.2007		
	Zeit:	*TeilnehmerInnen:*	*Ort:*
	19:00	**Abendessen** **Dr. Dittrich, Dr. Mulder, Prof. Dr. Kristensen, Herr Baumann, Rektor Prof. Dr. Zechlin, Dr. Hopbach, Dr. Brandstätter, Mag. Pölzl**	Hotel Regina Rooseveltplatz 15, 1090 Wien
	20:00 – 22:00	**Vorbereitung der ExpertInnen**	Hotel Regina Rooseveltplatz 15, 1090 Wien
	MONTAG, 25.06.2007		
Gespräch:	*Zeit:*	*GesprächsteilnehmerInnen:*	*Ort:*
1.	10:00 – 12:00	**Österreichischer Akkreditierungsrat** Akkreditierungsrat • *Univ.-Prof. Dr. Hannelore Weck-Hannemann, Präsidentin des ÖAR* • *Univ.-Prof. Dr. Hans-Uwe Erichsen* • *Univ.-Prof. Dr. Hans Robert Hansen* • *Dr. Guy Haug, MA MBA* • *Univ.-Prof. Dr. Erich Hödl* • *Univ.-Prof. Dr. Evelies Mayer, Staatsministerin a.D.* • *Univ. Prof. Dr.iur. Dr. phil J. Michael Rainer* • *Univ.-Prof. Dr. Luc Weber* Geschäftsstelle: • *Mag. Elisabeth Fiorioli* • *Mag. Elvira Mutschmann-Sanchez* • *Mag. Andrea Bernhard*	Ort der Sitzung des ÖAR/ TEINFALTSTR. Raum **E01**
2.	12:00 – 13:00	**Teilnahme an der Sitzung des ÖAR**	Ort der Sitzung des ÖAR/ TEINFALTSTR. Raum **E01**
	13:00 – 14:00	*Mittagessen*	*TEINFALTSTR Raum 132*
3.	14:00 – 15:00	**Rektorenkonferenz der Privatuniversitäten** • *Rektor Univ.-Prof. Dr. Bernhard Tilg* • *Rektor Univ.-Prof. Dr. Alfred Pritz*	TEINFALTSTR Raum **132**
	15:00-15:15	*Pause*	
4.	15:15 – 16:15	**Bundesministerium für Wissenschaft und Forschung -BMWF** • *Sektionschef Mag. Friedrich Faulhammer* • *Dr. Wilhelm Brandstätter*	TEINFALTSTR Raum **132**
	16:15 – 16:30	*Pause*	

MONTAG, 25.06.2007				
Gespräch:	*Zeit:*	*GesprächsteilnehmerInnen:*		*Ort:*
5.	16:30 – 17:15	**Privatuniversitäten (1. Teil)** • *Mag. Andrea Koblmüller, Geschäftsführerin der PEF Privatuniversität für Management* • *Dr. Gottfried Eisl, Kaufmännischer Universitätsleiter der Konservatorium Wien Privatuniversität*		TEINFALTSTR Raum **132**
	17:15 – 17:30	*Pause*		
6.	17:30 – 18:45	**StudierendenvertreterInnen von akkreditierten Privatuniversitäten und Österreichischer HochschülerInnenschaft** • *Susanne Haslinger, Österreichische HochschülerInnenschaft (ÖH)* • *Katharina Hofbauer, Konservatorium Wien* • *Anna Gruber, Privatuniversität für Kreativwirtschaft* • *Manuela Taschlmar, Sigmund Freud Privatuniversität* • *Matthias Wiedemann, UMIT*		TEINFALTSTR Raum **132**
	ab 20:00	**Abendessen**		
DIENSTAG, 26.06.2007				
Gespräch:	*Zeit:*	*GesprächsteilnehmerInnen:*		*Ort:*
7.	9:30 – 10:30	**Österreichische Rektorenkonferenz** • *Rektor Univ.-Prof. Dr. Christoph Badelt* • *Rektor Univ.Prof. Dr. Wolfhard Wegscheider*		TEINFALTSTR Raum **132**
	10:30 – 10:45	*Pause*		
8.	10:45 – 11:30	**Privatuniversitäten (2. Teil)** • *Dr. Michael Nake (Kanzler) und Dr. Monika Killer Paracelsus Private Medizinische Universität Salzburg* • *Dr. William Fulton, Akademischer Direktor der Webster University*		TEINFALTSTR Raum **132**
	11:30 – 11:45	*Pause*		
9.	11:45 – 12:30	**Geschäftsstelle des ÖAR** • *Mag. Elisabeth Fiorioli* • *Mag. Elvira Mutschmann-Sanchez* • *Mag. Andrea Bernhard* • *Ingrid Hinterleitner* • *Sandra Rischer*		TEINFALTSTR Raum **132**

Gespräch:	Zeit:	Teilnehmer:	Ort:
**DIENSTAG, 26.06.2007**		
	12:30 – 13:00	Mittagessen	
10.	13:00 – 16:00	**Vorbereitung für die Abschlussbesprechung**	TEINFALTSTR Raum **132**
11.	16:00	**Abschlussbesprechung mit dem ÖAR: erste Schlussfolgerungen ohne Diskussion** Akkreditierungsrat • *Univ.-Prof. Dr. Hannelore Weck-Hannemann, Präsidentin des ÖAR* • *Univ.-Prof. Dr. Hans-Uwe Erichsen* • *Univ.-Prof. Dr. Hans Robert Hansen* • *Dr. Guy Haug, MA MBA* • *Univ.-Prof. Dr. Erich Hödl* • *Univ.-Prof. Dr. Evelies Mayer, Staatsministerin a.D.* • *Univ. Prof. Dr.iur. Dr. phil J.Michael Rainer* • *Univ.-Prof. Dr. Luc Weber* Geschäftsstelle: • *Mag. Elisabeth Fiorioli* • *Mag. Elvira Mutschmann-Sanchez* • *Mag. Andrea Bernhard*	Ort der Sitzung ÖAR TEINFALTSTR.R aum **E01**

Annex C. Documents consulted

1. Austrian Accreditation Council – External Review 2007: Terms of Reference and Protocol for the Review
2. Guidelines for national reviews of ENQA member agencies
3. Standards and Guidelines for Quality Assurance in the European Higher Education Area – European Association for Quality Assurance in Higher Education (ESG)
4. Code of Good Practice for the Members of the European Consortium for Accreditation in Higher Education

5. Österreich: Postsekundäre Bildungseinrichtungen. BMBWK. Wien (2005).
6. Bericht über den Stand der Umsetzung der Bologna Ziele in Österreich. Berichtszeitraum 2000 – 2006. BMWF. Wien (2007).
7. Privatuniversitäten in Österreich, hand-out to a presentation by the ÖAR on 1 June 2007.
8. Fiorioli, Elisabeth & Weck-Hanneman, Hannelore: Privatuniversitäten zwischen Tradition und Innovation. Zur Qualitätssicherung in einem dynamischen neuen Sektor. In: Winfried Benz, Jürgen Kohler, Klaus Landfried (Hrsg.): Handbuch Qualität in Studium und Lehre. Raabe Verlag (2007).

9. Universitäts-Akkreditierungsgesetz: Bundesgesetz über die Akkreditierung von Bildungseinrichtungen als Privatuniversitäten (BGBl. I Nr. 168/1999, in der Fassung des Bundesgesetz BGBl. I Nr. 54/2000)
10. Externe Evaluierung des Österreichischen Akkreditierungsrat – Selbstevaluierungsbericht, 11. Mai 2007
11. Documents on institutional and programme accreditation processes: examples taken from applications by seven different institutions
12. Jahresbericht des ÖAR an den Nationalrat, 2004
13. Jahresbericht des ÖAR an den Nationalrat, 2005
14. Documentation on feedback by applicant institutions
15. Documentation on feedback by external experts
16. Questionnaires for students at Private Universities
17. Questionnaires for Private Universities
18. Stellungnahme des Vorsitzenden der ÖRK
19. Stellungnahme des Vorsitzenden des Wissenschaftsausschusses im Nationalrat
20. Standards, Richtlinien und Grundsatzentscheidungen des ÖAR ("Blaue Mappe")
21. Orientierungsrahmen für Sachverständige (Institutionen/Studiengänge)
22. Grundsätze guter Praxis für Begehungen
23. Format Jahresberichte
24. Auswahlverfahren und Selektionskriterien für Experten/innen in Review-Teams des ÖAR
25. Informationsblatt für Experten/innen in Akkreditierungsverfahren
26. Bestellungsbescheid
27. Beeidigungserklärung
28. Qualitätsgrundsätze und Qualitätsleitbild des ÖAR
29. Qualitätshandbuch des ÖAR
30. Regeln für interne Abläufe der Geschäftsstelle
31. Verfahrensanalyse
32. Sitzungsprotokolle des ÖAR 2005-2007
33. Budgetübersicht 2006 Österreichischer Akkreditierungsrat

Annex D. List of Abbreviations

AAC	Austrian Accreditation Council
AQA	Österreichische Qualitätssicherungsagentur
AVG	Allgemeine Verwaltungsgesetz
BMBWK	Bundesministerium für Bildung, Wissenschaft und Kunst
BMWF	Bundesministerium für Wissenschaft und Forschung
CEE-Network	Network of Central and Eastern European Quality Assurance Agencies in Higher Education
DACH	Deutsch-österreichisch-schweizerisches Akkreditierungsnetzwerk
ECA	European Consortium for Accreditation in Higher Education
ENQA	European Network on Quality Assurance in European Higher Education
ESG	European Standards and Guidelines for Qulity Assurance in the European Higher Education Area
ESIB	European Students' Union (formerly European Student Information Bureau)
EUA	European University Association
FH	Fachhochschul
FHR	Fachhochschulrat
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
NARIC	National Academic Recognition Information Centre
NVAO	Nederlands-Vlaamse Accreditatieorganisatie
ÖAR	Österreichischer Akkreditierungsrat
ÖRK	Österreichischer Rekrorenkonferenz
SER	Self-Evaluation Report
UniAkkG	Universitäts-Akkreditierungsgesetz