

Stiftung zur Akkreditierung von Studiengängen in Deutschland

Evaluators' report on the application of the Akkreditierungs-, Zertifizierungs- und Qualitätssicherungsinstituts e. V. Bayreuth (ACQUIN) of 27 January 2006

1. Basic procedural requirements

1.1 Legal task

The Foundation, in accordance with Section 2 Para. 1 No. 1 of the German Statute on the Establishment of a Foundation "Foundation for the Accreditation of Study Programmes in Germany", was assigned the task to accredit and re-accredit Accreditation Agencies and hence grant them temporary authorisation to accredit study programmes with the seal of the Foundation.

At its meeting of 15 December 2005, the Accreditation Council passed "Criteria for the Accreditation of Accreditation Agencies" and thus laid the basis for accreditation decisions. By defining these criteria, the Accreditation Council went beyond the direct task of accrediting agencies and furthermore considered the requirement for international compatibility of the German accreditation system.

At the same meeting, the Accreditation Council with the decision "Implementating re-accreditation of Agencies ACQUIN, ASIIN and ZEvA" also determined the course of the procedure in three steps:

- Substantiation of the application in writing by ACQUIN.
- Evaluation including on-site visit by a group of experts (a member of the Accreditation Council, a national expert, an international expert, a student member) and review of two sets of procedure documentation by the head office of the Foundation.
- Decision of the Accreditation Council following the hearing.

1.2 International recognition

To promote international recognition of decisions taken by the Accreditation Council and the Accreditation Agencies, the Accreditation Council particularly included the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* as adopted by the ministers responsible for the higher education system at the successive Bologna Conference in Bergen in May 2005 when passing the accreditation criteria. By considering the ESG, the Accreditation Council on one hand emphasised the central role of accreditation for realising the targets of the Bologna process, on the other hand, it made clear that quality assurance in the field of higher education and especially accreditation can no longer be exclusively geared to national standards or particularities. Further essential sources for wording the criteria were the *Code of Good Practice of the European Consortium for Accreditation* of 3 December 2004 and the

Guidelines of Good Practice of the International Network for Quality Assurance Agencies in Higher Education of April 2005.

2. Course of the procedure

With letter of 27 January 2006, the Akkreditierungs-, Zertifizierungs- und Qualitätssicherungsinstitut (ACQUIN) applied for re-accreditation as an Accreditation Agency by the Accreditation Council.

With letter of 28 February 2006, ACQUIN substantiated its application and presented additional documentation. In the course of the procedure, ACQUIN presented additional documents on 19 March 2006 in response to corresponding requests by the evaluators or specified already available documents. The Accreditation Council appointed the following evaluators with decision of 2-10 January 2006 (circular resolution):

- Prof. Dr. Johann Schneider, member of the Accreditation Council (chairman).
- Prof. Dr. Konstantin Meskouris, RWTH Aachen (national expert).
- Dr. Stephan Bieri, president of the "Eidgenössische Fachhochschulkommission" (Swiss higher education commission) (international expert).
- Stefanie Geyer, University of Marburg (student member).

The evaluators were supported by Mr Franz Börsch M.A. on the part of the Foundation's head office. Mr Börsch attended the general ACQUIN meeting in Bonn on 20 March 2006, since the members of the group of evaluators were tied up due to other appointments.

Following a preparatory meeting of the group of evaluators on 22 March 2006, a meeting took place the next morning between the group of evaluators and the chairman of the board, the vice chairman of the accreditation commission, the managing director of ACQUIN and subsequently with ACQUIN's employees. On the afternoon of 23 and 24 March 2006, the members of the group of evaluators attended the meeting of the *accreditation commission* of the Agency. The evaluators had received the agenda papers in due time prior to the meeting. Subsequent to the meeting of the *accreditation commission* on 24 March 2006, the evaluators discussed the impressions and experiences gained during an internal meeting.

The head office of the Foundation for the Accreditation of Study Programmes in Germany subjected the documentation of two accreditation procedures filed on 1 March 2006 and supplemented by additional documents on 20 March 2006 to a critical review.

At its 47th meeting on 5 May 2006, the Accreditation Council heard the chairman of the board and the managing director of ACQUIN. The Accreditation Council had received ACQUIN's application rationale and a preliminary comment of the chairman of the group of evaluators prior to the meeting.

The evaluation report was based on ACQUIN's application for re-accreditation, the application rationale together with appendices and documents handed in later.

3. The Akkreditierungs-, Zertifizierungs- und Qualitätssicherungsinstitut (ACQUIN)

3.1 Development

The Akkreditierungs-, Zertifizierungs- und Qualitätssicherungsinstitut (ACQUIN) was established on 26 January 2001 and has been entered in the register of associations of the Bayreuth Local Court as a non-profit association since 5 March 2001. The establishment initiative, which had been taken by Bavarian universities at that time, was supported by representatives of the universities of applied sciences and universities from Baden-Württemberg, Bavaria, Saxony, Thuringia as well as Austria and Switzerland. The Accreditation Council accredited ACQUIN on 22 March 2001 for a period of five years.

3.2 Organisation

The Akkreditierungs-, Zertifizierungs- und Qualitätssicherungsinstitut (ACQUIN) is a registered non-profit association whose members – in addition to about 100 higher education establishments in Germany, Austria, Switzerland, Hungary and the USA – also include research-oriented vocational and professional associations. In principle, membership is open to domestic and foreign higher education establishments as well as commercial enterprises, professional associations, chambers and public institutions.

Bodies of the association are the general meeting, the board, the accreditation commission, the technical committees and the groups of evaluators. For the organisational implementation of all operations ACQUIN has a head office in Bayreuth.

The *general meeting* convenes for a regular meeting at least once per year. In particular, the general meeting is responsible for electing the members of the board, for electing the members of the accreditation commission, for formal approval of the actions of the board, for confirming the evaluation criteria and procedural basic requirements resolved by the accreditation commission as well as for taking decisions regarding amendment of the constitution and dissolution of the association.

The *board* of the Accreditation Agency comprises a first and second chairman, a treasurer and two more members. Two members each are members of the group of universities or universities of applied sciences respectively and one member is a member of the group of practitioners from the profession. Members of the board are elected for a term of three years by the general meeting. In particular, the board is responsible for preparing economic plans, acquiring associations and institutions relevant for accreditation as members of the association, taking decisions regarding the admittance of members and entering into agreements with other accreditation institutions.

The ACQUIN *accreditation commission* consists of a first chairman of the board, four representatives of universities and universities of applied sciences each and two representatives each from practitioners from the profession and students. The general meeting elects a substitute member for each member of the accreditation commission. All substitute members are invited to all meetings and receive all agenda papers. The accreditation commission ensures that the basic procedural principles for accreditation are in agreement with the law and rules. In addition, it has the following functions:

- a) Taking decisions regarding evaluation criteria and basic procedural principles taking into account suggestions made by the general meeting.
- b) Establishing guidelines for higher education establishments' self-documentation.
- c) Preparing an assignment overview of study programmes to technical committees.
- d) Consulting and determining evaluation results.
- e) Taking accreditation decisions on the basis of reports prepared by the group of evaluators and comments made by the technical committees.
- f) Appointing technical committees.

The accreditation commission has the duty to supervise the appointment of groups of evaluators by the technical committees.

The *technical committees*, which are made up of at least five representatives of higher education establishments and practitioners from the profession (as a general rule, at least one member each from the universities, universities of applied sciences and practitioners from the profession), are appointed by the accreditation commission for individual specific fields. Currently six or eight technical committees respectively, when considering also those in the process of being established, are assigned to the following specific fields:

1. Economic, legal and social sciences.
2. Engineering.
3. Humanities, linguistics and cultural sciences.
4. Information technology.
5. Mathematics and Sciences.
6. Architecture and planning.
7. Art, music and design (in the process of being established).
8. Medicine (in the process of being established).

Primary task of the technical committees is to ensure uniform implementation of the procedure and uniform application of the evaluation criteria for their specific field. In addition, the technical committees have the following tasks:

- Appointing groups of evaluators and preparing documentations.
- Commenting on reports and suggestions for decisions made by the groups of evaluators, and
- developing specific criterion catalogues for particular study programmes and presenting them to the accreditation commission for decision taking.

The *groups of evaluators* are each appointed by the technical committee in charge and, as a rule, comprise three representatives of higher education establishments and one representative of the practitioners from the profession and one student representative each. The group of experts reviews the self-documentation of the applying higher education establishment, conducts the peer review and prepares an evaluation report for the technical committee and the accreditation commission. The members of the group of evaluators have a reporting duty towards the technical committee in charge.

3.3 Resources

The *head office* has its seat in office rooms rented by the Notarkasse (notary account) in Bayreuth. Each of the nine work places is equipped with a computer as well as telephone and internet connections. ACQUIN's personnel currently comprises one managing director, one project manager, six programme managers, one assistant for servicing its bodies and one assistant doing secretarial work. The head office's personnel is busy #####.

ACQUIN is financed by membership fees and revenues from accreditation procedures carried out. In 2005 the monthly operating income ranged from € ##### and € ##### according to information provided by the Agency. 2005 saw costs in the amount of € ##### and revenues in the total amount of € #####. Accordingly, the operating income of € ##### together with € ##### adds up to an amount of € ##### which corresponds to € #####.

According to its own proclamation, ACQUIN does not receive any financial subsidies from the government or any other institutions.

3.4 Activities

The Akkreditierungs-, Zertifizierungs- und Qualitätssicherungsinstitut (ACQUIN) grants the seal of the Accreditation Council to bachelor and master study programmes accredited by ACQUIN at state and state certified higher education establishments. In addition to reviewing procedures completed with formal accreditation, ACQUIN has also carried out evaluation procedures in the past few years. ACQUIN's activities, in addition to cross-subject and cross-institution type accreditation of bachelor and master study programmes, also includes realising projects and events with German and foreign partner institutions as well as participating in various types of higher education policy events. The Agency sees its mission in enabling a variety of study

programmes, securing the quality of education and guaranteeing transparency by means of independent, objective and quality-oriented evaluation procedures.

ACQUIN aspires to enter into agreements with other accreditation institutions and cooperates with higher education establishments, professional organisations, commercial enterprises as well as national and international institutions serving the same purposes as ACQUIN. ACQUIN is a member of the following European and international networks and associations:

- European Association for Quality Assurance in Higher Education (ENQA).
- European Consortium for Accreditation (ECA).
- International Network for Quality Assurance Agencies in Higher Education (INQAAHE).
- Central and Eastern European Network for Quality Assurance in Higher Education (CEEN).
- European University Association (EUA) [associate member].

Since December 2004 ACQUIN participates in a two-year pilot project for optimising process quality in the fields of study programmes and teaching as well as conceiving and implementing a procedure for process accreditation. The project is conducted by the German Rectors' Conference (HRK) and sponsored by the Federal Ministry of Education and Research (BMBF). Furthermore, the Universities of Bayreuth and Bremen as well as the Universities of Applied Sciences of Erfurt and Münster participate in the project.

From the point of its establishment to late 2005, ACQUIN conducted a total of 261 procedures. The seal of the Accreditation Council was awarded to 241 study programmes, 162 of which subject to conditions. 14 study programmes were not accredited, in six instances the higher education establishment withdraw its application for accreditation and in further 103 cases ACQUIN's accreditation commission decided to postpone the accreditation decision. In late 2005 ACQUIN recorded a total of 159 ongoing procedures.

4. Evaluation (evaluators' report)

I. Application and application documents:

The application documents were filed in due time. On request, the following documents were handed in later: documents on the Agency's economic development and situation, staff appointment scheme and a specimen agreement between Agency and higher education establishment. A series of initial questions posed at first in writing after perusal of the documents in order to facilitate the discussion process were also answered in writing mainly by making general references to the appendices to the application and prior to the on-site visit. For the evaluators' work it would have been more helpful to provide statements in the application with concrete references or incorporate them directly into the application.

In addition, the group of evaluators was provided with all agenda papers of the Accreditation Commission which were supplemented either directly prior to or during the meeting by handouts. The procedure of accrediting programmes became sufficiently clear from the consultancy documents (report/recommendations by the groups of evaluators as well as comments of higher education establishments and technical committees). All in all, the evaluators considered the documents as complete and sufficient for forming an opinion.

II. Course and evaluation of the on-site visit and of the commission's meeting

During the course of the on-site visit there was sufficient time for conversations with the chairman and managing director as well as the Agency's employees. The conversations were characterised by great openness, and all questions could be handled sufficiently. The group of evaluators could speak with the members of the commission as well.

The commission's meeting faced the pressure to having to deal with a large number of applications and handouts. This, however, seems to be quite the rule and in compliance with the ambition to complete procedures within the contractually agreed term of generally six months and nevertheless keep the number of meetings of the commission low. Nevertheless, the required attention was largely given to the applications and, if required, reference was made to self-reports prepared by the higher education establishments during consultations to clarify questions at issue. The discussions were marked by a high degree of expert knowledge and commitment. However, it is inevitable that the degree of attention for individual applications varies and the seizure of problematic issues is not only due to technical criteria. The group of evaluators, however, mostly had the overall impression that preparation, structure and especially conduct of the meeting guarantees that all applications receive the required care of consultation and the required taking of decisions (check field 16).

Also fundamental questions were discussed again and again, which indicates that the matter did not always follow the same procedure, but that the commission's self-perception is further developed based on the consultations.

At the end of the visit the group of evaluators informed ACQUIN's chairman of its preliminary evaluation and it was agreed to refrain from another hearing conducted by the chairman of the group of evaluators.

III. Evaluation

a.) Agency's profile

ACQUIN has a profiled self-conception (check field 1). *On one hand*, this is based on the fact that the Agency primarily understands itself as an organisation of member higher education establishments for quality assurance and therefore does not deem higher education establishments to be customers, but clients at best, but first and foremost to be members and partners. It remains open whether this self-perception is reflected in concrete relationships in the accreditation process at all times and also seen by applicants this way. Practical examples, however, show that ACQUIN maintains its opinion also towards members and attempts to get its way. *On the other hand*, a specific understanding of quality belongs to the profile which, based on the autonomy of higher education establishments, refrains from phrasing normative specifications and verifying their realisation. Quality is primarily understood as fitness **for** purpose. Although fitness **of** purpose is also phrased as a quality feature, it rather plays a minor role. Consistently, the guideline for programme accreditation is also not conceived as a mandatory list of criteria, but as non-binding assistance for higher education establishments. Save some exceptions (see below), the list itself meets the specifications of the Accreditation Council and international criteria (check fields 10-14), and the groups of evaluators largely prepare their reports in compliance with the same sample (higher education establishment and integration of study programmes, objectives, concepts, implementation, quality management and summary, partially with special comments by student representatives and representatives of practitioners from the profession) (check fields 7 and 8).

With this understanding of quality ACQUIN complies with the target of accreditation, i.e. to enable innovation and variety on the basis of the autonomy of higher education establishments and higher education establishments' responsibility for quality. On the other hand, however, the risk cannot be ignored that general higher education policy specifications are not sufficiently taken into account

(criterion 3.2 and check field 8). This ranges from requirements of the qualification framework and other minimum standards to criteria of employability, gender aspect as well as modularisation and certification of integrated internships (check field 9). ACQUIN makes their review dependent on the targets of the higher education establishments themselves without taking into account their general binding nature sufficiently. The discussions on the occasion of the Commission's meeting revealed existing uncertainties, which, however, also partially reflect factually logic and regulatory policy problems, e.g. regarding the higher education policy discussion on the tension between the autonomy of higher education establishments and national and European political stipulations. Examples thereof are the concept of modules, consideration of the workload, the necessity of options for students, quality assurance in study programmes, vocational parts, gender justice in study programmes and for professors at high school establishments and employability again.

Similar is true for its own ethic understanding or the specified education target of citizen-oriented commitment for which there hardly is tangible operationalisation.

It may be for that profile that natural and technical science study programmes are underrepresented at ACQUIN. However, in view of growing interdisciplinarity and its appropriate consideration it would be desirable to strengthen this field, also in commission-internal discussions.

ACQUIN attaches great importance to its own quality assurance and enhancement, however, does without an internal quality assurance system (check field 6). The Agency has confidence in the quality-oriented motivation and communication of all parties involved as well as in the prompt and consistent consideration of feedbacks and suggestions at and from the various levels. The group of evaluators have gained the impression that this currently is sufficiently guaranteed, especially given the personnel available. This concept indeed fits into ACQUIN's quality culture which places more emphasis on communication than on formalities; whether the concept is sustainable for the future in view of continued growth of the Agency and alternating persons must remain open.

b.) Structures and processes

The Agency's structures essentially correspond to those at the time of initial accreditation and have largely proven themselves. The same applies to processes that are well-tuned to each other. They comply with international standards and requirements set by the Accreditation Council (check fields 2 and 3). The same applies for reporting to higher education establishments and the Accreditation Council (check field 4).

In compliance with its profile and its understanding of quality, the Agency is structured quite openly, implying very high requirements for all parties involved. The group of evaluators have gained the impression that specific structuring and formalising (especially of the application procedure) could be helpful. This begins with the appointment of members of technical committees by the accreditation commission where it may be reasonable to introduce a regulated system of term in office and changes in composition. Moreover, it appears appropriate to observe compliance with certain minimum requirements for the qualification of technical committee members (e.g. with regard to the number of the publications) in individual cases. Since the technical committees also appoint representatives of practitioners from the profession and students for delegation to the groups of evaluators, these should be represented in these bodies mandatorily as well. At the level of groups of evaluators it might be favourable, if the technical committees appoint one person mainly in charge and particularly prepare that person for the tasks of the procedure. This would facilitate cooperation between the groups of evaluators, the head office and the Commission, increase transparency and relieve consultations of the Accreditation Commission of many queries and uncertainties.

Changes in this respect would be the more urgent, when the Agency continues to grow, and multifaceted and direct communication among all participants as a compensation mechanism for structural frankness would not be sufficient anymore.

It is also noticeable that a large number of student peers come from departments of scientific members of the group of evaluators ("brought along students") and the variety and independence of perspectives required is endangered. With the student pool the Agency has available a sufficient reservoir of evaluators well prepared for that task. This pool has to be used to a greater extent.

c.) Agency's financial, human and material resources

The Agency's financial situation is good (check field 5), there are no third-party subsidies after expiry of start-up financing, and first, even if modest reserves could be generated which are also required as a responsibility towards the personnel, but are also limited within the scope of a charitable nature.

The accreditation procedure fees are lump sums to prevent disadvantages for possibly travel expense intensive locations of individual higher education establishments and generally prevent cost deliberations to the detriment of quality. On average, the fees cover the expenses. Therefore,

we also can speak of a fair competitive behaviour as far as finances are concerned (check field 15). As previously mentioned, there are no indications for the assumption that the Agency as a member agency is obliged to its members in a specific manner. The commission's consultations produced no indications for unequal treatment. Member higher education establishments have a price advantage of EUR 1000 which has already been allowed for in the calculation; applications by non-member higher education establishments, however, are only very few, so that generally a lower lump sum can be assumed. On the other hand, it shows that many member higher education establishments are also involved in other Agencies either directly or indirectly (e.g. via faculty days) and have programmes accredited by other Agencies. This may also be attributable to the fact that ACQUIN does not address natural and technical science study programmes equally as a result of its vision of itself. Besides, a more severe evaluation up to clear rejection of accreditation seems appropriate in individual cases located at the bottom of the quality range, especially with view to the applicant only having very low human resources. Such "downward delimitation" has a significance not to be underestimated particularly against the background of the ongoing discussion regarding the Bologna process (avoiding devaluation of new degrees).

Manager and employees are very good qualified for their tasks (check field 5a) and can participate in many events regarding accreditation and the development of quality (partly also abroad) so that they are integrated well in the general higher education policy discussion. They all also take part in meetings of the commission and hence can assume an integrating function between the groups of evaluators, the technical committees and the accreditation commission. There is no specific further training or development of human resources conducted beyond that extent.

As the group of evaluators could assess on site, the Agency's spatial and material resources are good as well and appropriate for the tasks. In addition, the possible connection to the University of Bayreuth has a positive effect (check field 5b).

d.) Business areas

ACQUIN primarily is an Accreditation Agency which is also active in some other fields. In addition to thematic events in the development of quality, these activities also include evaluations and certifications, also abroad, in some cases. These procedures proceed according to the same pattern as accreditations, however, break off earlier and accordingly only imply recommendations for further development. ACQUIN also perceives accreditation to be not only an indirect acting instrument of quality improvement and therefore easily blurs the borders of evaluation and accreditation with the already previously mentioned problems of the binding nature of external standards.

However, coaching or evaluation with the direct goal of accreditation resulting therefrom does not take place explicitly.

The pilot project "Process quality for study programmes and teaching – conceiving and implementing a procedure for process accreditation" sponsored by third parties holds an exceptional position. Since this project is conducted at member higher educational establishments at which also study programmes incl. their quality systems are accredited, there seems to be a highly problematic overlapping of business segments that must be monitored to a higher degree – even at the level of employees involved therewith.

e.) International dimension

ACQUIN is involved in various international activities and a member of international bodies. Irrespective of membership, the demand for accreditations outside of Germany is growing. Link-up to the European discussion is ensured. However, implementation of normative specifications or recommendations at that level bumps into the same difficulties as those of national specifications or recommendations. Participation in international bodies is not provided for by the constitution, except for membership in foreign higher education establishments (currently Austria, Switzerland).

f.) Synchronisation with criteria for the accreditation of Accreditation Agencies and overall impression

The Agency has developed well in terms of quantity and quality, and represents an important contribution to the accreditation system in Germany due to its profile in terms of regulatory policy. Given the aforementioned restrictions, ACQUIN essentially meets the criteria assigned to the check fields. These restrictions mainly refer to performance and less to structures and processes, even if some changes at that level (see recommendations) would support improvements in this regard.

IV. Conclusion

The group of evaluators recommends re-accreditation, but sees the following problems and makes corresponding suggestions:

1. Consideration of qualification standards taking into account research and development should be increased and compliance with (structural) specifications controlled more consistently. Particularly, in this connection, criteria for check fields 8 and 10 (criteria 10.2 and 10.4) shall be elaborated.
2. Thought should be given to a time limit of the mandates of the members of technical committees or removal procedures. Consideration of professionals' and students' interests shall also be mandatory at that level. Scientific/professional qualification of members of the technical committees must be ensured, and balance of the sexes should be aspired.
3. The technical committees should appoint one chairman each for the group of evaluators and that person should be qualified for this task separately or enabled to do so.
4. Stronger formalisation of the courses of action and uniform criteria for conditions and recommendations should reduce consultations of the accreditation commission and concentrate them on important issues.
5. A critical attitude to study programmes with conspicuously little personnel resources and a quality profile placed rather at the bottom of the spectrum appears appropriate.
6. Overlapping of business segments should absolutely be avoided.
7. More care must be taken for the selection of independent student representatives.