

Requirements for the Publication Practices of System-Accredited Universities

Resolution of the Accreditation Council dated June 10, 2022

This resolution replaces the resolutions “Reporting Requirements for System-Accredited Higher Education Institutions” of September 24, 2018 (Drs. AR 108/2018) and “Guidelines for Quality Reports of System-Accredited Higher Education Institutions” of September 17, 2019 (Drs. AR 91/2020).

Preamble

5 This resolution consolidates the content of the resolutions “Reporting Requirements for System-Accredited institutions” dated September 24, 2018, and “Guidelines for Quality Reports of System-Accredited Institutions of Higher Education” dated September 17, 2019, as well as a series of explanations from the Accreditation Council’s information portal (*Frequently Asked Questions*) into a single, comprehensive resolution document that addresses all aspects of the publication requirements for system-accredited

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The content of this resolution does not go beyond the resolutions in effect to date. However, the guidelines for preparing quality reports under Section 3.2—formerly “Guidelines for Quality Reports of System-Accredited Institutions of Higher Education”—have been supplemented with explanatory notes intended primarily to serve as a source of information and guidance for the institutions.

15 The publication of accreditation decisions and reports serves to promote transparency both in program accreditation and in the internal procedures of system-accredited universities: prospective students, current students, potential employers, and the interested public can use the publicly available reports to gain an understanding of the underlying process, the evaluation results, and any measures taken

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In this way, quality is made visible to the outside world, thereby fostering trust in the study programs and the recognition of degrees both nationally and internationally.

The Accreditation Council attaches great importance to the provisions contained in the model regulation

25 and to inform the interested public about the results of the procedures through easily accessible data. System-accredited

and to inform the interested public by providing easily accessible data on the results of the procedures. System-accredited institutions of higher education also have the right to award the seal, so that—especially in view of the great diversity of accredited internal QM systems at higher education institutions—a comparable standard

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1. Legal Framework

Model Statute and European Standards

Section 29 of the Model Regulation (MRVO) stipulates that accreditation decisions

10 and accreditation reports must be published in both program accreditation and internal accreditation procedures conducted by system-accredited institutions of higher education. Section 18(4) specifies this requirement for system accreditation. These regulations are in line with the requirements at the European level, which are defined in Section 2.6 of the *European Standards and Guidelines*. Section 29, Sentence

15 3 MRVO notes that the requirements for publication practices in program accreditation apply *accordingly* to internal accreditation decisions by system-accredited higher education institutions.

Database

Pursuant to § 29 MRVO, the Accreditation Council is responsible for the task of publishing the accreditation decisions

20 and to publish the accreditation reports on its website. To this end, the Accreditation Council has established a database that lists all accredited degree programs and provides an up-to-date overview of all data relevant to accreditation (see section 2). While the Accreditation Council is responsible for data entry in program accreditation, in system accreditation, the entry of data for

25 all internally accredited degree programs falls under the responsibility of the system-accredited institutions of higher education. The entries submitted by the institutions are checked by the Accreditation Council's secretariat for formal correctness and subsequently released to the public. Random checks are also conducted to verify plausibility.

Consistent Publication Practices

30 In contrast to the comparatively standardized procedures of program accreditation, the internal procedures of system-accredited institutions are characterized by a highly individualized approach. In the past, this situation has repeatedly led to ambiguities in the application of legal requirements regarding the standards for

led to the publication of accreditation decisions. The State Treaty on Study Program Accreditation identifies the promotion of consistent decision-making practices based on established criteria as one of the central objectives associated with the new accreditation system (see the explanatory memorandum to Art. 3, para. 5). In the opinion of the Accreditation Council,

5 this consistency must also be reflected in the documentation of accreditation decisions. To ensure a consistent and transparent publication practice within the accreditation system in this sense, the Accreditation Council deemed it necessary to adopt an interpretation of § 29, sentence 3, MRVO. This concerns

- 10 • the requirements for data entry into the database of accredited degree programs (see section 2) and
- the requirements for the quality reports to be prepared by system-accredited institutions of higher education (see section 3).

15 **2. Entry of internally accredited degree programs into the accreditation database of the Accreditation Council**

The Accreditation Council's accreditation database generally lists all degree programs that have ever been accredited. New degree programs submitted for initial accreditation, however, must be entered into the accreditation database with the relevant program information and created as new entries.

20 The following program information must be entered:

- Program name;
- Degree level (Bachelor's, Master's, Magister, etc.);
- Degree title (B.A., B.Sc., M.A., M.Sc., etc.)¹
- Program type (undergraduate, graduate);
- 25 • If applicable, type of teaching degree;
- Study format(s) (full-time, part-time, dual, etc.);
- Standard duration of study;
- Location(s) of study;
- ECTS credits.

¹ If a different designation or the entry of multiple designations is desired, the information can be entered as "other" with a free-text option.

If a degree program is accredited internally, the respective system-accredited institution is responsible for entering the results of the internal accreditation into the Accreditation Council's database. To ensure that a summary view of accreditation information comparable to that of program accreditation is available in the public view of the database,

5 For every accreditation granted internally at a system-accredited institution of higher education, the following information must be entered into the database and subsequently published: ²

- Deadlines for the accreditation of the degree program;
- Accreditation type (initial accreditation, reaccreditation);
- Brief profile of the degree program (also part of the quality report);
- 10 • Accreditation status (Accredited without conditions, Accredited with conditions, Accredited—conditions met, Negative decision);
- Summary evaluation (also part of the quality report);
- Description of the process for awarding the seal, including information on the frequency of internal program accreditation at the institution (also part of the quality report)
- 15 report);
- Information on the involvement of external reviewers³ (also part of the quality report);
- Additionally, if provided for in the institution's quality management system, information on the conditions imposed (including details on deadlines for fulfilling the conditions).

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3. Requirements for Quality Reports

3.1 On the concept of the quality report

Unlike the *accreditation reports* prepared by the agencies or the evaluators in program accreditation pursuant to § 24 (3) and (4) MRVO

25 based on the template provided by the Accreditation Council, the reports to be published by system-accredited institutions are so-called *quality reports*. This conceptual distinction is intended to convey that the reports in program accreditation and the reports in

² Brief process descriptions for entering degree programs or internal accreditations into the accreditation database can be found on the Accreditation Council's website at the following link: <https://akkreditierungsrat.de/de/faq/thema/fragen-zu-elias>.

(³) The data protection provisions under Section 29, sentence 2, apply mutatis mutandis.

Different requirements apply to the internal procedures of system-accredited universities. In particular, system-accredited universities are expressly not bound to use the report template specified by the Accreditation Council for program accreditation.

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3.2 Guidelines for the Preparation of Quality Reports

The internal accreditation procedures implemented by system-accredited institutions of higher education are characterized by great diversity. Therefore, system-accredited institutions must be provided with a form of reporting that takes into account the individual

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With reference to § 18(4) in conjunction with § 29 MRVO, the following guidelines must be observed when preparing quality reports:

- 15 1) Quality reports must document the evaluation of the degree programs and consequently contain statements regarding the evaluation and fulfillment of the formal and subject-specific criteria.

Explanation:

- A quality report should, on the one hand, provide statements regarding *the fulfillment (or non-fulfillment)*
20 on the one hand, list the criteria, and on the other hand, document an *evaluation* of the relevant degree program based on the criteria of the applicable statutory regulation. The evaluation may also take the form of a meaningful summary, if appropriate.
- In particular, if a criterion is not met or is only partially met, the
25 report should contain an assessment in the form of a comprehensible justification. Merely stating a requirement is not sufficient at this point, as the nature and extent of the underlying deficiency cannot necessarily be inferred from the text of the requirement.
- The report must explicitly state the legal regulation on which
30 (and, if applicable, other requirements) the degree program was evaluated and accredited. A mere reference to the institution's own criteria or other, unspecified evaluation standards is insufficient, as the institution's quality management system must, pursuant to § 17(1) sentence 3 MRVO, ensure the systematic implementation of the formal and subject-specific criteria set forth in Parts 2 and 3 of the MRVO.

2) Quality reports must include the evaluation by external stakeholders, taking into account any dissenting opinions. Pursuant to § 18(1) MRVO, external stakeholders include students, academic experts, representatives of professional practice, and graduates.

5 In accordance with Section 2.6 of the European Standards and Guidelines, the names of the participating reviewers must also be appropriately documented.

Explanation:

- The State Treaty on Study Accreditation (StAkkStV) describes accreditation in one of the “guiding principles” of its preamble as an *external* form of quality assurance
10 to ensure academic content standards and the professional relevance of higher education degrees (Explanatory Memorandum, Section I General). The Explanatory Memorandum to Article 2 of the StAkkStV further states that a *peer review* procedure is provided for the evaluation of academic content criteria.

Accordingly, the model regulation also attaches great importance to the participation of external experts

15 a central role within the internal procedures of system-accredited universities. Thus, pursuant to § 18(1) MRVO, the quality management system must, in addition to the explanatory memorandum, provide for regular evaluations of degree programs by students from outside the university, academic experts from outside the university, representatives of professional practice, and graduates. It

20 According to the explanatory memorandum to Section 18(1) of the MRVO, this ensures that evaluations conducted as part of the internal quality management system are implemented in such a way as to provide a continuous impetus for quality improvement.

The quality reports are intended to adequately reflect the results of this external review. In doing so, care must be taken to ensure that the evaluations, decisions, and
25 conclusions, statements, objections, etc., which may be documented in the quality report, can be clearly attributed to the respective responsible bodies, individuals, or groups of individuals.

- Since the involvement of external stakeholders occurs in different ways and at different points within the system depending on the nature of the QM system, it is crucial
30 the institutions of higher education themselves determine the form of representation. This applies in particular to evaluations by graduates, who are designated as external stakeholders in the Model Statutes but who are generally likely to be involved at other points in the QM system—for example, through graduate surveys.

- The explanatory notes to Section 29 of the MRVO explicitly refer to the requirements of *the European Standards and Guidelines*, which, under Standard 2.6, require information on the participating experts. Therefore, the participating experts must be named in the quality reports. The

5 Accreditation Council assumes that only those experts who have consented to the publication of their names prior to the start of the procedure will participate in the evaluation.

- 3) Quality reports must provide an overview of the measures that the institution has implemented in accordance with § 18(1) MRVO if, during the evaluation of the study
- 10 programs revealed a corresponding need for action.”

Explanation:

- The quality report is intended to provide information on the (quality-driven) development the degree program has undergone in recent years. An important point of reference in this context is § 14 MRVO and thus the question of what basis

15 which data (course evaluations, workload surveys, graduate surveys, statistical analyses of academic progress and examination results, student/graduate statistics) have been used to derive and implement quality improvement measures. In accordance with program accreditation, program-specific data—particularly regarding duration of study and graduation rates.

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- Since § 18(3) MRVO requires regular collection of data on the status of implementation and the effects of the measures introduced, the institution should be able to draw on existing data when preparing quality reports. In the explanatory memorandum to the aforementioned provision of the

25 MRVO, several examples are listed of information that may be of interest in this context: “Performance indicators, student body profile, study progress, success and dropout rates, student satisfaction with the degree programs, available facilities and support, career paths of graduates.”

- Particularly in the case of reaccreditation or—in the case of accompanying procedural models—the evaluation of well-established and frequently reviewed programs, the developmental aspect should be given special emphasis in the quality report (as opposed to merely confirming compliance with criteria).

- In the case of concept accreditations, no information regarding implementation can, of course, be provided

35 and, in the case of initial accreditations, only to a limited extent, if at all.

- Subsequent revisions to quality reports that have already been published are generally not required. Rather, the aim is to provide an overview of which measures were taken and implemented during the previous accreditation period or even prior to the initial (internal) accreditation of a degree program. In the case of

5 accompanying procedural models, the institution must decide, with reference to the operational processes of the QM system, which time interval should reasonably be considered.

- 4) Quality reports must include a brief description of the process for awarding the seal and information on the frequency of internal evaluation/accreditation in order to meet the requirements in
- 10 the report.

Explanation:

- A brief overview of the procedures, processes, and responsibilities within a quality management system can significantly improve the transparency of a program evaluation. Therefore, the quality report should provide information on who (which bodies—

15 , individuals, or groups of individuals) decides on the awarding (or withdrawal) of the Accreditation Council's seal, on what basis (expert opinions, recommendations, statements, etc.), and with what consequences. Especially in the case of complex systems that differ significantly from the procedural logic of program accreditation, a brief description of the central system components and procedures is particularly

20 contribute significantly to the transparency of the quality report. In this context, the awarding of the seal should be understood in a broader sense. This also applies to accompanying systems in which, for example, there is no regular “re-awarding” of the seal, but rather continuous verification and demonstration that a degree program meets the requirements associated with the seal (until proven otherwise)

25 , a continuous awarding of the seal takes place, so to speak.

- The description of the certification process is typically a standard text block that can be used for all quality reports of a university (or an academic unit).

- 5) Quality reports must include a brief profile and a summary assessment of the respective
- 30 program in question, in order to accommodate the interest of various target groups in easily accessible brief information regarding content and evaluations. In the accreditation database, the brief profile and summary evaluation appear prominently when an accredited program is displayed.

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Explanation:

- In **the brief profile**, the institution can, for example, provide information on academic focuses, qualification objectives, distinctive features, duration of study, degree title, academic and non-academic collaborations, or specific
5 authorizations related to regulated professions, etc., so that the reader can quickly get an idea of the program.
- The **summary evaluation** should be contextually relevant and provide an overview of the key evaluation findings obtained through the institution's internal quality assurance procedures. For example, it may include
10 identified strengths and weaknesses of a degree program and, where applicable, explain any requirements or recommendations. A meaningful summary evaluation is particularly important when the presentation of the evaluation and fulfillment of the criteria is essentially schematic.
- A well-written, continuous text is fundamentally preferable to a tabular, bullet-point-style presentation
15 . Nevertheless, it is up to the institution to choose an appropriate format for these two overview chapters.
- In the case of accompanying QM systems that do not follow the procedural logic of program accreditation and for which, therefore, an expert's overall evaluation may not be available at a specific point in time, reference may be made, for example, to the various
20 locations and at different times.
- Since, in accordance with § 18(1) MRVO, every QM system requires regular external evaluation of degree programs, it can generally be assumed that evaluation results are available for each accredited degree program that can be used for a
25 can be used for a summary assessment.
- In principle, there is no reason not to include links to additional content in the quality report. However, experience has shown that links are not reliably updated and therefore often become invalid after a certain period of time (for example, following a website relaunch or other changes resulting from restructuring, mergers,
30 , renaming of universities/faculties/departments/institutes, etc.), the reports or information can no longer be accessed. Links that replace quality reports or parts thereof should therefore be avoided.

3.3 Implementation

Even universities that were system-accredited under the old law are, pursuant to Section Sections 6.3 and 6.6 of the Rules for the Accreditation of Degree Programs and for System Accreditation, as amended on February 20, 2013, require that the public be informed in an appropriate manner about

- 5 the procedures and results of quality assurance measures in the area of study and teaching, and to publish expert reports on the external evaluation as well as the follow-up measures.

Internally accredited degree programs are now only included in the Accreditation Council's database in conjunction with a quality report that incorporates the guidelines for preparing
10 quality reports in accordance with Section 3.2.

This does not apply to internal procedures under the old law that were completed before March 31, 2021.