

**Automatic extension of accreditation periods for the duration of the administrative
5 procedure**

Decision of the Accreditation Council dated November 22, 2019

1 Preliminary Remarks

10 The Model Statute and the corresponding state statutes regulate (§ 26 MRVO) the procedures for
the seamless continuation of accreditations. Changes have occurred compared to the previous
situation under the old law, resulting in a current transition phase in which a difficulty described
below has arisen. To resolve this, to enable an orderly procedure during the transition phase, and
15 to protect the interests of graduates, the resolution listed below is adopted.

Regarding the situation: If an application for reaccreditation is submitted before the expiration of
the accreditation period, pursuant to Section 26(2), sentence 1 of the Model Statutory Ordinance
(MRVO) or the corresponding provision in the applicable state ordinance, accreditation is granted
retroactively upon a positive decision by the Accreditation Council, thereby enabling
20 re-accreditation. However, if a degree program is re-accredited only some time after the expiration
of the accreditation period, this results in the program being temporarily unaccredited until the
Accreditation Council's decision, which may lead to disadvantages for students or graduates.

The applicant can reasonably be expected to submit the application to the Accreditation Council in
a timely manner

25 It is to be assumed that the Accreditation Council will issue a decision before the accreditation
period expires. In accordance with the principles of administrative law (§ 75 VwGO), this is to be
assumed if the application is submitted up to three months before the expiration of the period. If
the administrative proceedings are delayed despite the application having been submitted in a
timely manner in this sense, this must not be to the detriment of the university.

30 One possible solution, provided the application is filed in a timely manner, is to extend the
accreditation periods for the duration of the administrative proceedings. This is based on a
combined interpretation of § 26(2) and (3) MRVO. Section 26(2) MRVO establishes
“uninterrupted follow-up accreditation” as the standard; from Section 26(3), sentence 3, MRVO, it
follows that

It is clear that delays at this stage should not be borne by the applicants.

Given that program accreditations are planned approximately two years in advance, a sufficiently long transition period is required before this regulation takes effect. To

5 enable universities to make the transition, provisional extensions will be granted until then without adhering to the three-month deadline.

“Application” continues to mean in program accreditation (§ 23 MRVO) the submission of the application in the ELIAS electronic system, including the submission of the accompanying documents (accreditation report, self-evaluation report), which must at least provide a summary

10 . Late submission of documents is not permitted.

2 Extension Options

1. The following rule applies to program accreditations that expire before September 30, 2022: If applications for reaccreditation are submitted by the end of the accreditation period

15 , the accreditation will be extended until the Accreditation Council makes a decision, provided that this decision is not made before the deadline expires.

2. For program accreditations expiring on or after September 30, 2022, the following rule applies: If applications for reaccreditation are submitted three months before the expiration of the accreditation period, the accreditation will be extended until the Accreditation Council’s decision

20 , provided that the decision is not made before the deadline expires.

The period of validity is not extended in either case.