

**Report: Results of the Cross-Sectional Sample “Circulation”**

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## 1 Abstract

This study examines a total of 1,233 conditions imposed in 452 degree programs by eight agencies operating in Germany.

16% of the procedures result in accreditation without conditions. While in procedures without conditions

5 are predominantly reaccreditations, there is no discernible difference between initial and reaccreditations in procedures with conditions. The average number of conditions (for both) is 3.3 conditions per program.

Some requirements encompass multiple individual objections. By far the most common objection (14%) is the editorial revision of module descriptions and,

10 – in the terminology of the MRVO under the new accreditation law – a formal deficiency. More than half (56%) of the deficiencies relate to subject-matter and content aspects.

There are

significant differences between the individual agencies. Decision-making and requirements-

15 differ significantly in their wording practices.

Further insights could be provided by more comprehensive studies that take structural variables into account (type of institution, governing body, size, specific program format, academic discipline, agency's subject-specific specialization, federal state, etc.) as well as an examination of temporal trends (e.g., the 1st, 2nd, or nth reaccreditation), which are not the subject of the present

20 analysis.

A study conducted by INCHER as part of the research project "External and Internal Quality Assurance of Study and Teaching through Accreditation and Evaluation Procedures (EIQSL)" reaches similar conclusions in its final report presented in April 2018. According to the report, curricular content is less frequently addressed through requirements, but rather

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Key conclusions from the evaluation are that the Accreditation Council faces the task of developing a "decision-making practice" to ensure consistent decisions (and, where applicable, requirements). The legally redefined relationship between the Accreditation Council, universities, and agencies has yet to develop in practice.

## 2 Background

The *Foundation for the Accreditation of Degree Programs in Germany*, which was transferred to the *Accreditation Council Foundation* on January 1, 2018, had, pursuant to the Act Establishing the "Foundation for the Accreditation of Degree Programs in Germany" of February 15, 2005, the

5 The task of monitoring accreditations "carried out by the agencies"<sup>1</sup>. In September 2016, the Accreditation Council decided, as part of the so-called " monitoring portfolios," to conduct, among other things, a cross-sectional sample of "requirements and recommendations" related to the accreditation of degree programs based on documentation, which—unlike other monitoring instruments of the Accreditation Council—is not oriented toward individual  
10 program accreditation procedures but is designed to yield broad-based results. The evaluation of the requirements proved to be very time-consuming and consumed the entire estimated workload, so that the evaluation of recommendations was omitted.

The aim of the cross-sectional sample is to determine agency-wide and agency-comparative  
analysis results. Although requirements (and recommendations) are crucial steering instruments in (program) accreditation, the Accreditation Council has not yet published any analysis. An initial evaluation in 2009 was submitted to the Accreditation Council but not adopted. The results were not published. A further attempt failed due to the overly complex study design. In view of the  
practical  
20 significance of the conditions, a renewed effort was undertaken which—unlike what was foreseeable during the planning of the monitoring portfolio in the summer of 2016—is now also intended to provide important insights with regard to the Accreditation Council's new task under the legal framework effective since January 1, 2018, namely to make decisions itself in the future and, if necessary, impose conditions. This includes, among other things, how many conditions are imposed on average per  
25 degree program and what (formal or substantive) objective the conditions or objections serve.

Research on the impact and effectiveness of quality assurance at universities has been and continues to be conducted in many places, for example in the research projects funded by the BMBF: EIQSL – External Quality Assurance of Study Programs and Teaching through Accreditation and Evaluation  
30 ation<sup>2</sup>, WiQu – Impact Research in the Quality Assurance of Teaching and Studies – procedural, structural and personnel causes of the effects of

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<sup>1</sup>[http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/ASG\\_Stiftungsgesetz.pdf](http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/ASG_Stiftungsgesetz.pdf)

<sup>2</sup> <https://www.uni-kassel.de/einrichtungen/incher/forschung/innovation-und-transfer/qualitaetssicherung-von-studium-und-lehre-durch-akkreditierungs-und-evaluationsverfahren.html>

Quality assurance bodies<sup>3</sup> and WirQung – The Organization of Quality Management – Mechanisms and Effectiveness of Organizational Approaches in Academic Studies and Teaching<sup>4</sup>. EIQSL specifically addressed the issue of requirements; the final report on the project was submitted in April 2018<sup>5</sup>. Another relevant study on requirements

5 from 2012 includes the publication on the project “Bologna (Re)evaluated – An Empirical Analysis of the Study Structure Reform”<sup>6</sup> by Suchanek et al., which also gave rise to, among other things, the doctoral dissertation “Designing Degree Programs in the Spirit of Bologna – The Implementation of the Study Reform and the Effectiveness of Accreditation” submitted by Manuel Pietzonka at INCHER in 2013. These two publications were based on an analysis of the In-

10 struments “Conditions” in accreditation procedures at universities in Lower Saxony during the period 2004–2009. There is also a study published by the AQAS agency in early 2017 that subjected its own practice of imposing requirements to a thematic analysis in accordance with the (European) Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)<sup>7</sup>. Beyond the studies mentioned, the present investigation

15, this study provides cross-agency and comparative insights into program accreditation procedures of various agencies without a regional focus.

### 3 Initial Situation and Objective

As early as 2015, the Accreditation Council had decided to revise its rules—on the one hand, because of the revision of the ESG following the decision of the Ministerial Conference

20 from Yerevan in May 2015, and secondly, to place greater emphasis on the development of quality in study programs and teaching within the work of the Accreditation Council. Feedback from the accreditation system included criticism that the Accreditation Council’s criteria were often perceived solely as a monitoring tool and too rarely as a benchmark for the quality of study programs.

25 Following the decision of the Federal Constitutional Court in February 2016, which resulted in a change to the legal basis, it quickly became apparent that the Accreditation Council would no longer be responsible for translating the guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs (KMK) into its own accreditation requirements. In December 2016,

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<sup>3</sup><http://www.uni-potsdam.de/lv-verwaltung/projekte/projektwiqu.html>

<sup>4</sup><https://web.hsu-hh.de/fak/wiso/fach/icu/forschung/projekte/wirqung/wirqung>

<sup>5</sup> Steinhardt et al. (2018), “External and Internal Quality Assurance of Study Programs and Teaching through Accreditation and Evaluation Procedures – Results Report.” INCHER Working Paper No. 9. Kassel, 2018.

<sup>6</sup> Suchanek et al. (2012), “Bologna (Re)evaluated – An Empirical Analysis of the Study Structure Reform.” In: Society – Economy – Media, Vol. 3, 2012. Göttingen: V&R unipress.

<sup>7</sup>[http://www.aqas.de/downloads/analysen/Reflexion\\_Beauflagung\\_2017.pdf](http://www.aqas.de/downloads/analysen/Reflexion_Beauflagung_2017.pdf)

The ministers of education and cultural affairs have agreed on the State Treaty on Study Program Accreditation (StAkkStV). This treaty was ratified by the state parliaments in 2017<sup>8</sup>, entered into force on January 1, 2018, and reorganizes the German accreditation system. As a result, the Accreditation Council is now tasked, among other things, with making its own decisions regarding program and system accreditation in the future.

- 5 The transfer of decision-making authority regarding accreditation procedures to the Accreditation Council is accompanied by the transfer of regulatory authority, which will henceforth lie exclusively with the states. On December 7, 2017, the KMK agreed on the Model Statutory Ordinance (MRVO), which regulates the details of the accreditation system's structure in accordance with the StAkkStV and thus replaces the previous "collection of accreditation-related guidelines"<sup>9</sup>.
- 10 Consequently, the Accreditation Council was unable to complete the regulatory revision process as planned. However, the states utilized the interim results in drafting the MRVO. The Accreditation Council is now responsible for the practical implementation of the new system, which will incorporate the findings from the present sample of requirements.
- 15 Insights into (previous) conditions-imposition practices can be valuable to the Accreditation Council simply because the StAkkStV explicitly formulates the expectation of a "consistent decision-making practice based on the specified criteria," "by eliminating the agency standards that have frequently differed in the past."<sup>10</sup>

The explanatory memorandum to § 24 MRVO further states that conditions will in future be imposed "only in exceptional cases—  
"20 should be considered"<sup>(11)</sup>. This indicates the states' desire for a revised approach to the use of the publication requirement. Accordingly, this study will also address the question of how this requirement can be met in light of the experiences of recent years.

In addition, the study can provide an overview of current practices regarding conditions  
25 , learn from their experiences, and adopt best practices. Finally, the requirements should be examined in light of the distinction between formal and substantive criteria, as prescribed by the MRVO.

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<sup>8</sup> See [http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/Ratifizierung\\_des\\_Studienakkreditierungsstaatsvertrags\\_in\\_den\\_16\\_Bundeslaendern\\_Vorgangsdokumentation\\_.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/Ratifizierung_des_Studienakkreditierungsstaatsvertrags_in_den_16_Bundeslaendern_Vorgangsdokumentation_.pdf)

<sup>9</sup> Pietzonka, Manuel. "The Patient: Accreditation Between Hospital and Hospice. An Evaluation of the German Accreditation System Through Analysis of Accreditation Requirements and Surveys." In: Winfried Benz (ed.): Handbook on Quality in Studies and Teaching. HQL F 1.13 2 40 12 12. p. 11.

<sup>10</sup> Explanatory Memorandum to the StAkkStV, p. 7. <http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/Studienakkreditierungsstaatsvertrag.pdf>

<sup>11</sup> Explanatory Memorandum to the MRVO, p. 35. <http://akkreditierungsrat.de/fileadmin/Seiteninhalte/KMK/Vorgaben/Musterrechtsverordnung.pdf>

#### 4 Data, Sample, and Analysis Factors

Taking into account the market shares of the agencies, program accreditation procedures were selected from all agencies involved in program accreditation (8 out of 10) that were conducted in accordance with the *Rules for the Accreditation of Study Programs and for System Accreditation*

5 in the version dated February 20, 2013 (hereinafter: Rules). Bundled accreditations were broken down into individual degree programs, and sub-programs were considered as separate degree programs.

The number of degree programs examined per agency depended on its market share: ten were examined by a small agency, 50 each by three medium-sized agencies, and

10 75 degree programs from each of the four large agencies. The procedures were selected chronologically: Since compliance with the requirements was supposed to have been completed by the time of data collection (spring 2017), procedures from 2015 were initially selected, and from there, the selection proceeded backward in time until the new rules took effect in 2013. If the target number could not be reached even then, more recent procedures from 2016

15 (taking into account the requirement that compliance with the requirements had been completed). At one of the agencies, which has since grown to medium size, only 42 degree programs accredited under the 2013 rules could be identified—instead of the announced 50—due to the small number of procedures conducted during the study period; consequently, a total of 452 degree programs (instead of the announced 460) were examined.

20 .  
The degree programs were identified using the accreditation reports from the individual agencies and their expert opinions, most of which were found in the database of accredited degree programs. In some cases, however, the expert opinions in the database were incorrect or not linked at all. In these cases, the expert opinions could be identified via the agencies' own databases

25 ; in these cases, the agencies were asked to correct or add the links in the database of accredited degree programs.

One challenge in data collection was locating the conditions in the reports, as the reports from the various agencies are sometimes structured very differently. Some agencies place the decision, including conditions, at the beginning  
30 of the report; in other cases, the report concludes with the decision; and in yet other cases, the conditions are mentioned in several places throughout the report. In some instances, in addition to the conditions imposed by the commissions, the reviewers' (wording) recommendations regarding conditions are also mentioned.

No further restrictions were imposed on the composition of the sample:

35 Thus, programs from various universities across Germany and from the three

main types of institutions (universities, universities of applied sciences, and colleges of art and music), as well as vocational academies, were included, along with institutions of varying sizes and different forms of sponsorship. There were also no restrictions regarding the range of disciplines. Unlike in

Suchanek et al., these "structural variables"<sup>12</sup> (type and size of the institution, governance structure, federal state, information on selected degree programs, special forms of study, etc.) were not analyzed in this study due to capacity constraints et<sup>13</sup>. With one exception: initial and reaccreditations were recorded and analyzed as structural variables in order to determine, if applicable, whether a decrease in the number of conditions or other aspects of the conditions can be observed as the duration of a study program's accreditation increases

The scope of the analysis did not extend to the agencies' internal processes. Nor was the process of meeting circulation targets of interest in this study. Consequently, no cases were examined in which the circulation fulfillment process had not yet been completed. The analyzed data thus provide a suitable basis for addressing the

## 5 Method: Document Analysis

The following chapter highlights the method used and should be read in conjunction with the [tables](#) in the appendix. Qualitatively derived categories were quantified; mean values are presented in bar charts.

### 5.1 Coding Concept

This study is methodologically based on the document analysis procedure commonly used in the social sciences. In any document analysis, the development of a coding concept is one of the central tasks<sup>14</sup>. The main objective of the coding in this study is to identify the complaints mentioned in the text of the publication (here, "complaint" refers to the (the part of the requirement that identifies a deficiency) must be aligned as clearly as possible with the criteria of the Accreditation Council.

First, the eight agencies were surveyed about their experiences with internal categorizations of requirements and recommendations. All agencies except one have

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<sup>12</sup> Suchanek et al. (2012), p. 29.

<sup>13</sup> Suchanek et al. (2012) concluded that the structural variables "type of institution," "institutional sponsorship," and "degree type" played no role as influencing variables. The situation was different for the variable "institution size." See p. 38ff.

<sup>14</sup> See Suchanek (2012), p. 29ff.

commented on the planned study; as mentioned, AQAS had addressed the topic in a thematic analysis published in early January 2017. The others provided information about their experiences in dealing with requirements and pointed out, among other things, the challenge of finding a good formulation that identifies the deficiency without suggesting a solution

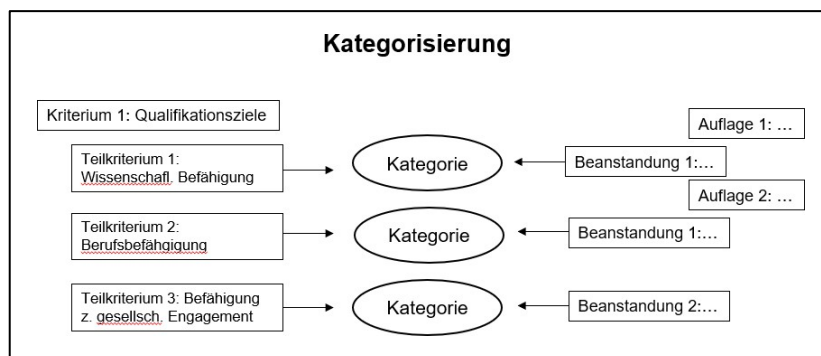
5. On the other hand, it is important to formulate conditions in a way that is action-oriented to facilitate implementation, although this significantly impairs comparability. For example, standard formulations have become established for deficiencies that frequently result in conditions, which contributes to consistency within the agency. Nevertheless, the need to formulate conditions individually and site-specifically was mentioned. One of the agencies had
- 10 rightly pointed out (see, however, footnote 133) the importance of structural variables for the validity of this study, which, however, were evaluated only in part due to the aforementioned capacity constraints.

In a second step, a preliminary analysis was first conducted on a subset of the requirements (n=50, requirements from various agencies), and initial categories were

15. The analysis is based on the criteria for the accreditation of degree programs (Chapter 2 of the Accreditation Council's Rules in the 2013 version (hereinafter: *criteria*)). Each criterion encompasses a different number of requirements; these are referred to as *sub-criteria* in the present study. The consideration of sub-criteria allows for a nuanced assessment of the men

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These sub-criteria, together with the actual wording of the requirements, served as the starting point for developing the categories. The KMK's state-wide structural guidelines (referenced in Section 2.2 of *the rules*) also served as a source of additional differentiating factors. The following diagram illustrates the approach:



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Diagram: Categorization

When the analysis was expanded to include the total number of requirements, additional categories Editions included in some cases several complaints; all

Complaints were used to identify categories. This resulted in a framework comprising 42 categories (see Tables 6–9 [in the Appendix](#)). In a second step, the categories were mapped as accurately as possible to the criteria of the Accreditation Council. Like Suchanek et al., Pietzonka, and AQAS, this study also concludes that absolute precision cannot be achieved in this process. Chapter 6.2.4 also discusses how the categories can be examined from formal (e.g., transparency, degree titles) and subject-matter (e.g., academic rigor, feasibility of study) perspectives in accordance with the MRVO.

Several challenges arose during coding, which are briefly described below

## 5.2 Challenges in Coding

### Challenge 1: The Accreditation Council's criteria contain cross-references to third-party documents

The Accreditation Council's criteria contain cross-references to accreditation-relevant

third-party documents: Criterion 2.2 refers both to the *requirements of the Qualifications Framework for German Higher Education Degrees* (hereinafter: HQR) [...] and to the joint state and state-specific guidelines of the KMK. It became apparent that while a single "HQR" category was sufficient to subsume objections in this regard, the KMK's guidelines—particularly the joint state guidelines—required several separate categories seemed more sensible.

### Challenge 2: Duplication/overlap of AR criteria with other documents

In addition, there are requirements that are mentioned in both the Accreditation Council's criteria and in third-party documents. For example, the recognition of credits earned at other institutions in accordance with the Lisbon Convention is established both in Section 2.3 of the Rules

of the Accreditation Council and in Section 1.2 of the appendix "Framework Regulation for the Introduction of Credit Point Systems and the Modularization of Degree Programs" of the KMK's joint state structural guidelines (p. 2).

In cases such as this, the category (e.g., here: "Credit Transfer/Recognition") was initially assigned; during the subsequent assignment of categories to the AR criteria, this category

### Challenge 3: Overlap of criteria within the rules of the Accreditation Council

The sub-criterion stating that "a module generally concludes with an examination covering the entire module" (category: "One examination per module") can be assigned both to criterion 2.5 "Examination system

5 system" (in the corresponding wording of the sub-criterion), as well as Criterion

2.4 "Feasibility of Study" in connection with an "adequate and workload-appropriate examination frequency." At this point, an overlap within the Accreditation Council's rules became apparent; AQAS also noted in its investigation that "the Accreditation Council's criteria cannot be clearly distinguished from one another, and certain

10 In some reports, the criterion to which the requirement was assigned was specified; in many cases, multiple criteria per requirement were also cited as "references." Both of these factors contributed to a better understanding of the requirement's intended purpose. However, not all agencies consistently specified the connection to the AR criterion<sup>16</sup> : Two of the eight agencies never

15 In this context, a connection to the AR criterion is established.

For example, all objections regarding the category "One exam per module" were assigned to criterion 2.5 in this study—while acknowledging that the reviewers' intentions may differ.

### Challenge 4: The purpose of the requirement is not understandable without context

20 It was not always apparent at first glance—without knowing the broader context—which deficiency the formulated requirement addressed. Two examples:

*"The examination regulations must be published with the changes described in the statement of May 29, 2015."*

25 *"Important aspects of the guideline-oriented approach must be incorporated into the program concept."  
approach. The revised curriculum must be submitted."*

In the first example, it was unclear to what extent the examination regulations were to be amended (prior to publication). In the case of unclear, undefined requirements in conditions, it was helpful for categorization—similar to what was described for Challenge 3—if the conditions were listed as a point under the corresponding criterion (or criteria) of the Accreditation Council

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<sup>15</sup> AQAS, p. 5.

<sup>16</sup> The text of the requirement was extracted from the report at the first available point; if the connection between the requirement and the criterion was established in the body text, through headings, or (in the case of a requirement mentioned twice) at a later point, this was not taken into account in the present study.

The text of the condition was included—provided that this was standard practice at the respective agency. In some cases, the expert opinion also had to be consulted for further contextual information in order to better understand the purpose of the condition.

Challenge 5: Assigning categories when there are multiple objections per condition

- 5 Conditions often contained multiple objections; in some cases, a single condition contained up to five objections. To record the frequency of the objections/deficiencies, these were categorized individually. To do this, conditions were broken down into individual points of objection. For example, one condition read:

*"The inspection system must be revised. In doing so, it must be ensured that in the*

10 *, only one examination is conducted per module, that the examinations relate to the module and not to individual courses, and that the examinations as a whole are geared toward the competencies to be achieved in the module. If, in exceptional cases, multiple examinations are planned for a module, this must be justified in a pedagogically sound manner."*

- 15 Although the entire requirement relates to AR Criterion 2.5 "Examination System" (which is why grouping the objections under a single requirement certainly makes sense), the two objections can be assigned to two different categories ("One examination per module" and "Competency-based examinations").

20 Logically, a similar approach was taken when a requirement contained multiple objections that belonged to different criteria. An example, here regarding the categories "Facilities" (AR Criterion 2.7) and "Academic Quality" (AR Criterion 2.1):

25 *"The university must ensure that the field of technical building equipment is covered from a technical perspective at a scientific level. The university must explain how this is achieved. The field of building engineering should also be more extensively integrated into the curriculum and linked to design modules."*

30 If a review contained a complaint that, while covering several aspects, all related to the same category, it was not counted twice. An example is provided below to illustrate this, using the category "Module Handbook (editorial)" (AR Criterion 2.2 in conjunction with KMK Framework Guidelines 1.1):

*"The module handbooks must be revised. In doing so, particular attention must be paid to the following aspects:*

*a. It must be made clearer in which modules quantitative methods are covered.*

*b. In the modules from the "Controlling" and "Intercultural Management" areas, it must be made clearer which fundamental competencies are covered in the bachelor's programs*

5 *and which competencies building upon them are taught in the respective master's program."*

These challenges and the respective solutions applied should be kept in mind when evaluating the results presented in the following chapter.

## 6 Results

The results are divided into findings regarding circulation figures (see Chapter 6.1) and categories (see Chapter 6.2).

It should be noted at the outset that the study aims to anonymize the agencies. Since

5 , the eight participating agencies are designated by the letters A through H<sup>17</sup>. In all comparisons, the analysis does not use the absolute number of editions/complaints, etc., examined, but rather exclusively the ratio to the number of degree programs examined for each agency.

### 6.1 Findings on requirements

10 First, the results regarding degree programs with conditions are presented: Based on the total number of degree programs, the analysis begins with the proportion of degree programs without conditions and the average number of conditions per program.

In each case, the variable "initial and reaccreditation" is examined and compared across agencies. The selected data contain roughly equal numbers of initial and reaccreditation

15 : across all procedures (n=452), the distribution is 47% initial accreditations and 52% reaccreditations<sup>18</sup>.

#### 6.1.1 Programs without conditions

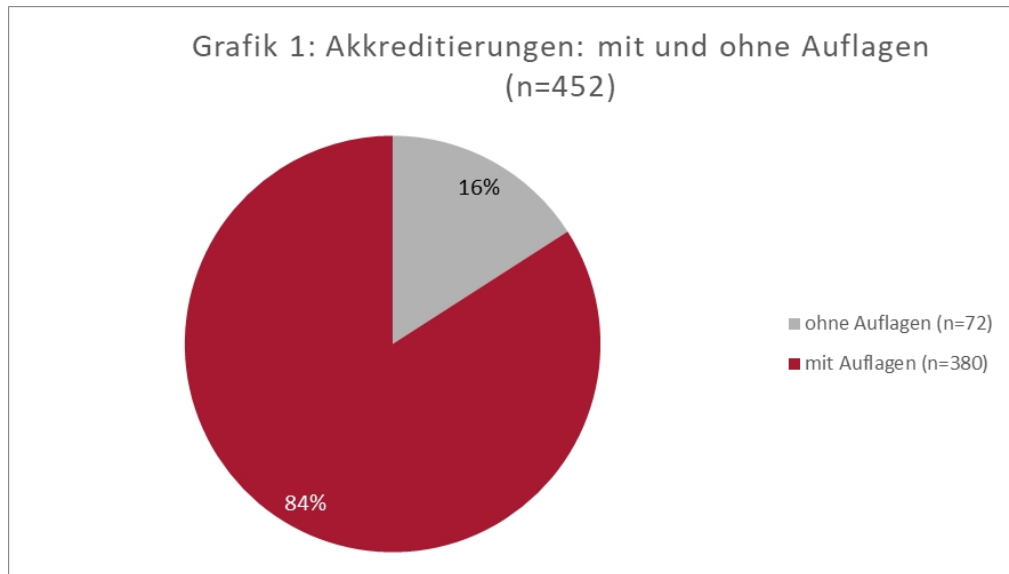
First, the study examined how many of the programs under review were accredited without conditions: Of the 452 (partial) programs examined, 72 were accredited without condi-

20 accredited. This corresponds to a share of 16% (see Figure 1).

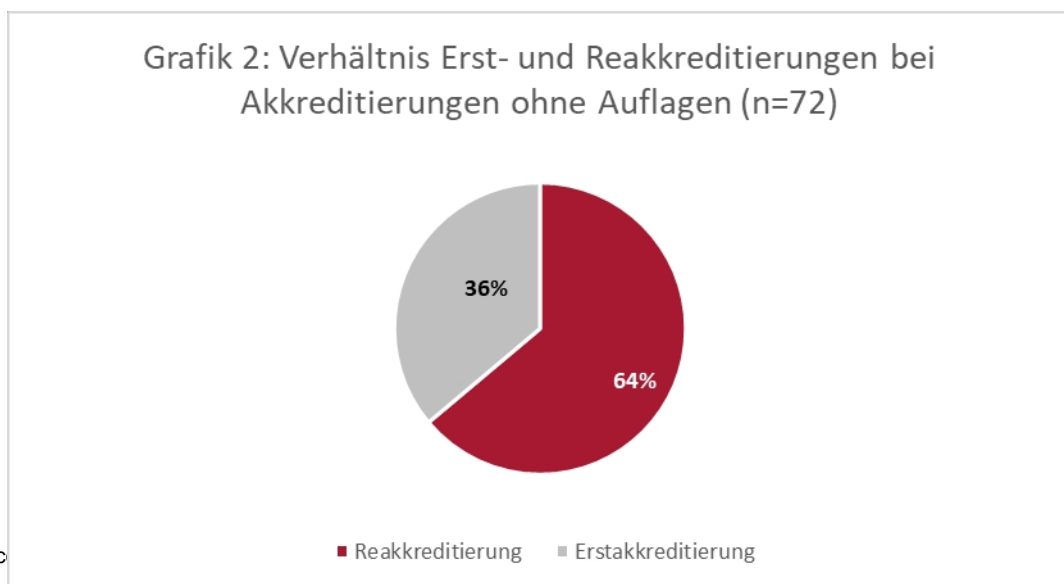
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<sup>17</sup> Each agency is informed of the key assigned to it.

<sup>18</sup> In two procedures (involving a total of 5 requirements), it was not clear whether they were initial or reaccreditations, which is why the total does not add up to 100%. These are degree programs at vocational academies; this was not evident from the reports. Furthermore, degree programs at vocational academies are not part of the Hochschul-Kompass and are therefore not included in the database of accredited degree programs, which—in addition to the reports—could provide such information.



Among the 16% of degree programs accredited without conditions, the majority are reaccreditations: 64% of the degree programs without conditions (with n=72) are reaccreditations, while 36% are initial accreditations (see Figure 2).



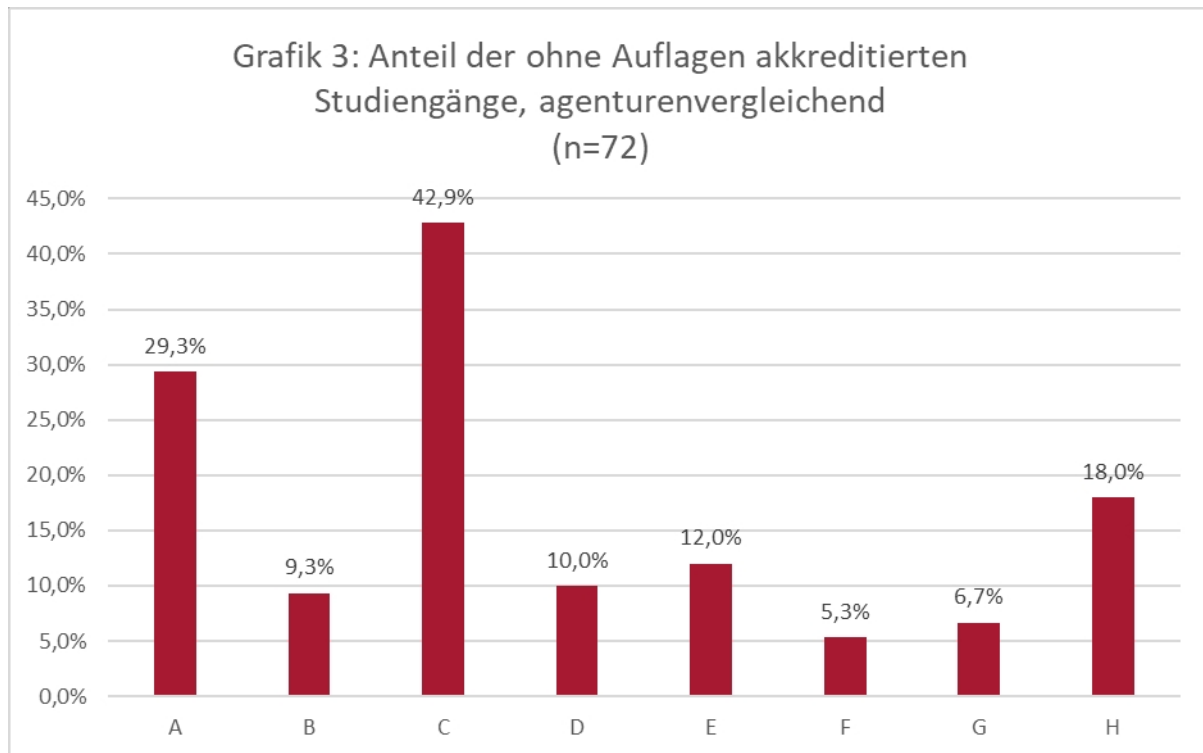
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If we compare the number of degree programs that are reaccredited with the number of degree programs that are initially accredited, we find that 64% of the degree programs are reaccredited, and 36% are initial accreditations.

In a comparison of agencies, the number of cases handled under non-publication procedures (as mentioned: relative to the number of the respective procedures examined), significant differences are apparent: From the average

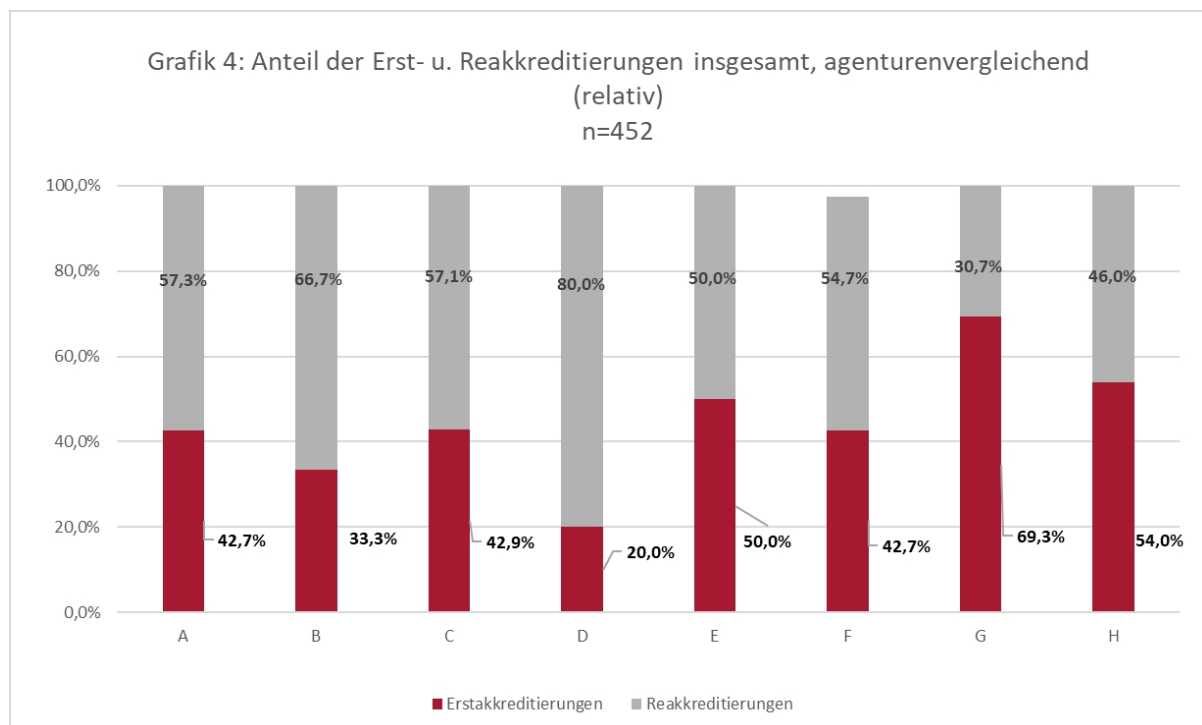
<sup>19</sup> For the deviation from 100%, see footnote 18.

(16%, see Figure 1), both Agency C, with just under 43% of procedures without a tender, and Agency F, with 5.3%, are far off (see Figure 3).



As Figure 4 shows, this—when comparing agencies—is not related to the proportion of initial and

- 5 reaccreditation procedures *within an agency*: There is no indication that above- or below-average values for procedures without conditions are also related to initial and reaccreditation.

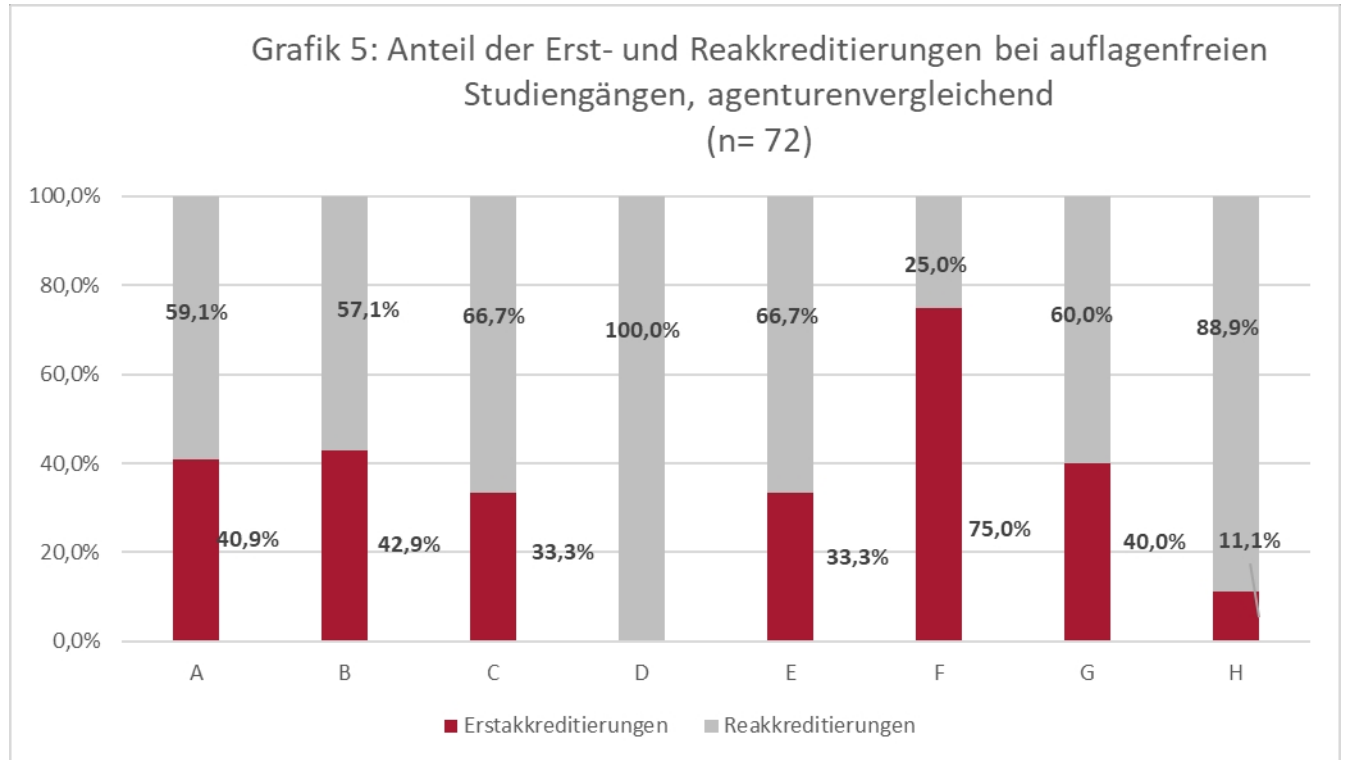


Accordingly, agencies with high proportions of reaccreditations (primarily Agency D, but also B, A, C, and F) should also have had high proportions of procedures without conditions. As the two figures show, there appears to be no explicit correlation.

**The decision between "required" and "not required" obviously depends heavily**

5 **on the agency's "decision-making practice"; this "decision-making practice" varies considerably among agencies.**

If we consider only those procedures without conditions, the following picture emerges (see Figure 5):



10 Seven of the eight agencies (all except F) have a majority of reaccreditation procedures among their cases without conditions, two of them (D and H) even to an above-average extent. Only for Agency F does this assumption not hold true; there, with 75%, there are significantly more initial accreditations.

The analysis of additional structural variables could offer potential explanations here (e.g., the agency's specific

1 5

### 6.1.2 Conditions per Program

A total of 1,233 conditions were imposed across the 452 degree programs examined; this corresponds to an average of 2.7 conditions per program. When considering only

those degree programs in which conditions were imposed (n=380), an average of 3.3 conditions per degree program were imposed.

In cases involving conditions, a maximum of 11 conditions were imposed (in a single case). Only in 6.6% of cases were 7 or more conditions imposed.

Conditions/Proceedings	Number of proceedings (n=380)	in percent
1	78	20.5%
2	75	19.7%
3	88	23.2%
4	49	12.9%
5	43	11.3%
6	22	5.8%
7	13	3.4%
8	5	1.3%
9	5	1.3%
10	1	0.3%
11	1	0.3%

5

Table 1: Distribution of conditions per procedure

Table 2 lists the maximum number of conditions in a procedure for each agency:

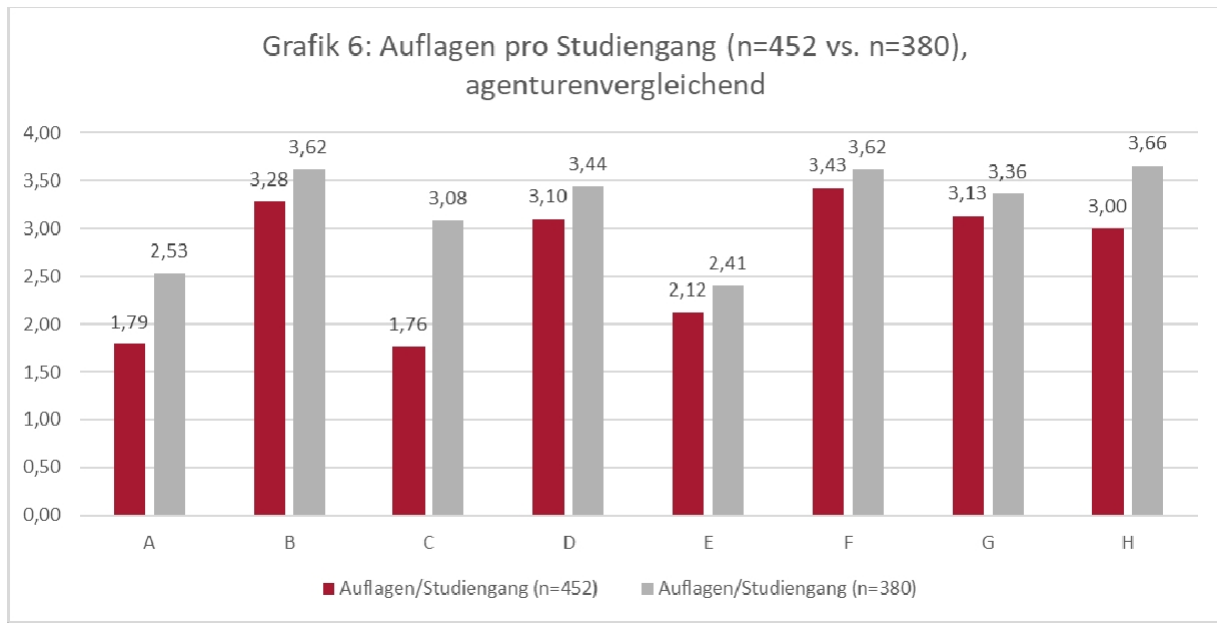
Agency	Maximum number of conditions
Agency A	7
Agency B	9
Agency C	11
Agency D	9
Agency E	8
Agency F	10
Agency G	7
Agency H	9

Table 2: Maximum number of print runs per agency

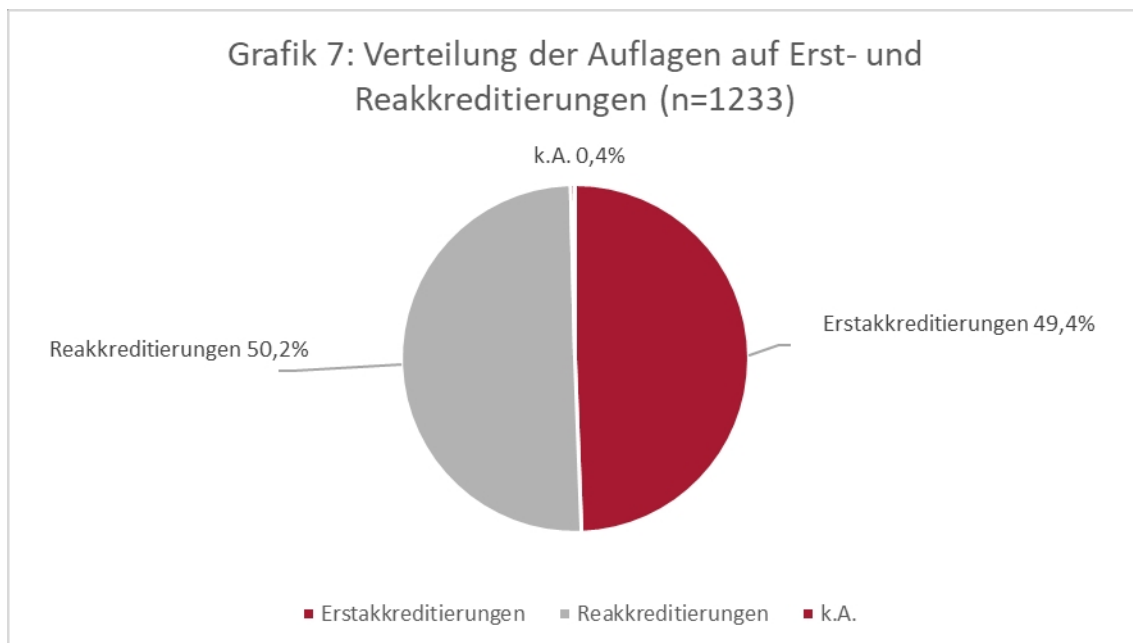
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As Figure 6 shows, there are significant differences between agencies. It is apparent that the difference at Agency C; the explanation is that Agency C had accredited nearly 43% of the degree programs without conditions (see Figure 4). Another notable finding is that

Agencies A and E are well below the average of 2.7 and 3.3 requirements per program, respectively, while the other five agencies are significantly above that average.



- 5, 609 of the 1,233 requirements imposed relate to initial accreditation procedures (for n=213), while 619 of the requirements relate to reaccreditation (n=237). This means that the requirements are divided almost equally between initial and reaccreditation procedures (49.4% in initial accreditation procedures, 50.2%<sup>20</sup> in reaccreditation procedures).



<sup>20</sup> For the deviation from 100%, see footnote 18.

When viewed in relation to the total proportion of initial and reaccreditation processes, this corresponds to an average of 2.9 conditions per initially accredited program and an average of 2.6 conditions per program for reaccreditations. Looking exclusively at the processes in which conditions were imposed (n=380), the average is 3.3 conditions

(in initial and reaccreditation procedures)—the previously observed significant difference has thus completely leveled off.

The maximum number of conditions (11 conditions per program) was imposed in an initial accreditation; in reaccreditation procedures, the maximum number of conditions was 9 (4 procedures in total).

Conditions/Procedure	Number of initial accreditation procedures	in %	Number of RA proceedings	in %
1	33	17.6%	45	23.6%
2	39	20.9%	35	18.3%
3	46	24.6%	41	21.5%
4	28	15.0%	21	11.0%
5	20	10.7%	23	12.0%
6	10	5.3%	12	6.3%
7	6	3.2%	7	3.7%
8	2	1.1%	3	1.6%
9	1	0.5%	4	2.1%
10	1	0.5%	-	
11	1	0.5%	-	

Table 3: Distribution of requirements per procedure, broken down into initial and reaccreditations

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**It can be noted that—when conditions are imposed—initial accreditations result in an average of the same number of conditions per procedure as reaccreditations. However, reaccreditations remain “condition-free” more often overall.**

**The distribution in Tables 1 and 3 shows that procedures with a very high requirements are extremely rare; in each case, just under 90% of procedures have a maximum of 5 requirements, with a maximum of 11 for initial accreditations and 9 for reaccreditations.**

15

The comparison of agencies, in turn, reveals significant differences, as shown in Table 4: While Agency D imposes conditions in only just under 10% of its cases and Agency B in 26.4% of its initial accreditations—

has granted accreditations, while at Agency G the figure is just under 70%.

20

Circulation	EA	RA
<b>Total</b>	<b>49.4%</b>	<b>50.2%</b>
Agency A	44.0%	56.0%
Agency B	26.4%	73.6%
Agency C	50.0%	50.0%
Agency D	9.7%	90.3%
Agency E	58.5%	41.5%
Agency F	47.9%	50.2%
Agency G	68.9%	31.1%
Agency H	65.3%	34.7%

Table 4: Conditions in Initial and Reaccreditations: A Comparison of Agencies

### 6.1.3 Conditions vs. Objections

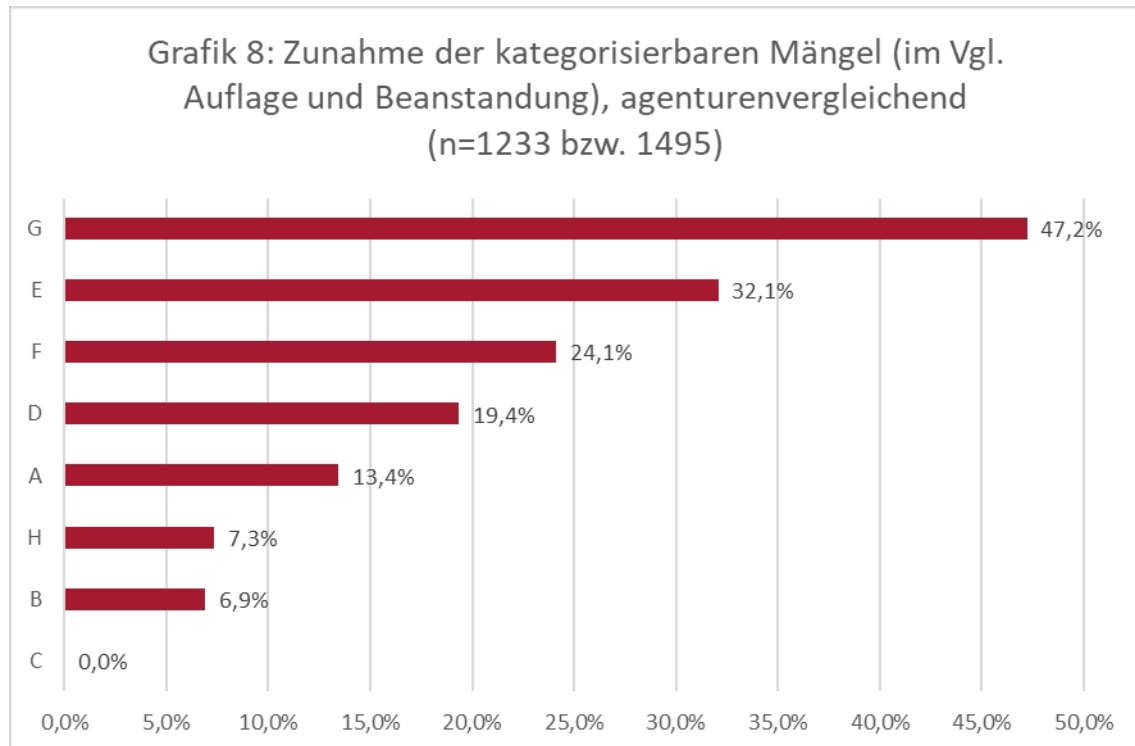
As already mentioned in Section 5.1, some requirements contain multiple objections that ultimately describe a categorizable deficiency. The 1,233 requirements in this

5 The study included a total of 1,495 complaints (262 additional complaints, 21%). A total of 166 conditions (13.5%) were identified that involved more than one reported deficiency; on average, a condition involving multiple complaints contained 1.6 deficiencies/complaints.

10 Looking at the total number of accreditation procedures examined with conditions (n=380), it appears that in slightly more than one-third (143; 37.6%) of the procedures, at least one of the conditions imposed contains more than one objection.

When examining the distribution across the agencies, a picture of significant differences emerges once again: While no program at Agency C contained more than one objection per condition, 47.2% more objections can be found at Agency G compared to the

15



The Accreditation Council's decision-making rules (see Section 3 of *the Rules*) do not establish a quantitative "upper limit" beyond which accreditation is denied; accordingly, there is neither a need nor any guidelines that provide an incentive to combine multiple objections into a single condition. Reviewers recommend accreditation, or accreditation commissions decide on it, based on the severity of the deficiencies: "Accreditation shall be granted subject to conditions if deficiencies exist that are expected to be remedied within nine months." (Section 3.1.2 of *the Rules*). Therefore, no statement regarding quality can be derived from this observation; it is possible that—

For example, it does not show that the agencies with the most complaints per requirement have a correspondingly low average number of requirements per degree program (see Figure 6).

Nevertheless, this points to significant divergences among the agencies regarding the "practice of formulating requirements."

All agency-comparative observations in this quantitative analysis regarding the number of accreditations without conditions and the ratio of reaccreditations to initial accreditations reveal significant differences. The fact that a "system with [...] competing accreditation agencies necessarily results in the agencies' decisions not always being consistent, even if all agencies work on the basis of the same procedures

procedures and criteria," the Accreditation Council has already noted (self-critically) in its 2007 evaluation report. Suchanek et al. also reached the

that "[a] uniform decision-making practice across Germany as a whole is therefore not to be expected."<sup>21</sup> Whether future accreditation decisions and, where applicable, the formulation of conditions issued by a single body (the Accreditation Council) will exhibit greater consistency remains to be seen in practice.

## 5 6.2 Analysis of the Categories

This subsection examines the nature and frequency of the deficiencies that led to conditions being imposed in the degree programs under review. To this end, initial explanations are provided based on existing experience and regulations in accreditation practice.

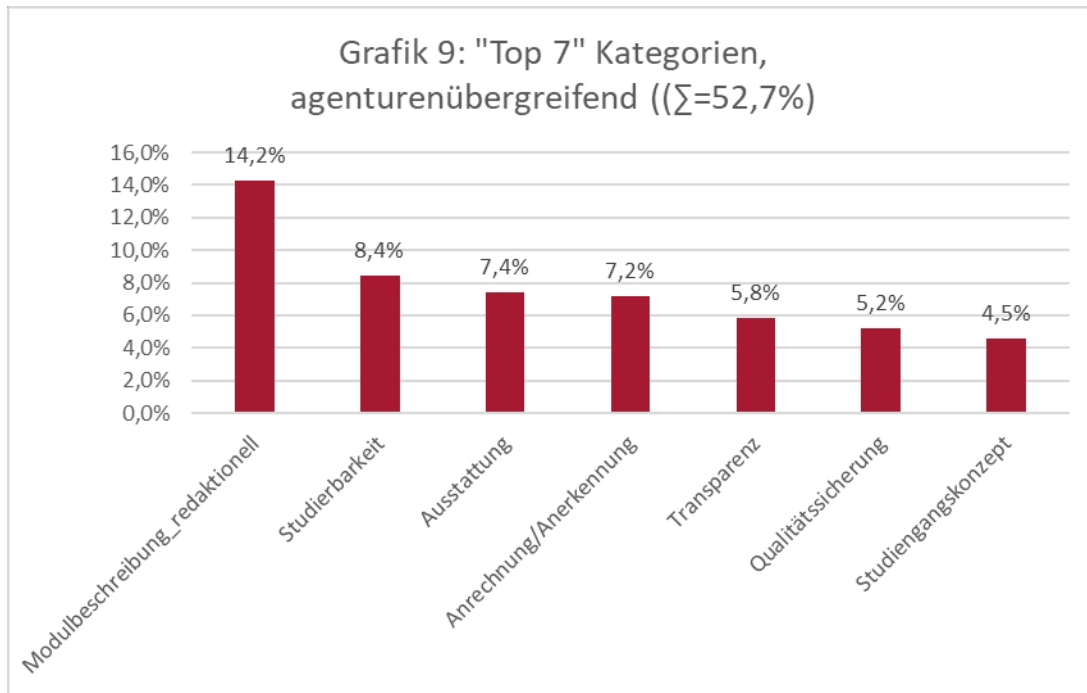
10 The coding scheme (see Chapter 5.1) comprises a total of 42 categories to which the 1,495 complaints were assigned. The results for all categories are listed below according to their frequency. Some of the categories are not self-explanatory; explanatory notes can be found in Table 9 [in the appendix](#).

### 6.2.1 Total Frequency of Categories

15 The most common complaint is that one (or more) module description(s) needs to be editorially revised (14.2%). This is followed by a wide margin by complaints—of relatively similar frequency—regarding the feasibility of the program (8.4%), facilities (7.4%), and credit transfer/recognition (7.2%). These are followed by complaints regarding transparency (5.8%), quality assurance (5.2%), and the program concept (4.5%) (see Figure 9; for the frequency of all cat-  
20 categories, see Table 6 in the appendix). These first seven categories ("Top 7") already account for more than half of all complaints.

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<sup>21</sup> Suchanek et al., p. 24ff.



The editorial revision of a module description is by far the most frequently identified deficiency, accounting for one-seventh of all complaints<sup>22</sup>. Complaints include, for example, the need to standardize the editorial style of the module description, to highlight something in particular, or to add missing information

5

This category is closely related to the "Transparency" category, which is the fourth most common. This is assigned when transparency/standardization of documents

10 (other than the module descriptions). Here, too, the issue is not that certain content or structures are missing, but rather that the description of reality contains gaps. One obvious explanation could be that the universities are initially waiting for further changes of a content-related or structural nature resulting from potential requirements before the relevant documents are finally adapted. The two categories

15 together account for one-fifth (20%) of the complaints.

The category "feasibility of study" includes shortcomings related to calls for improved exam organization (e.g., regarding the frequency of exams). Often, the structure of the degree program should be reviewed in terms of workload (e.g., regarding part-time options) or

<sup>22</sup> This is consistent with the results of the thematic analysis by AQAS.

a risk of exceeding the standard period of study. Not included here are shortcomings regarding one exam per module, which constitute a separate category.

The "Facilities" category addresses both the quantitative and qualitative aspects of personnel, material, and spatial resources. If a program has deficiencies regarding both

5. Since these criteria cover both material and personnel resources, they are not counted twice (see Challenge 5, Chapter 5.1, p. 11). Proposals that include measures for staff training are so rarely required that a breakdown of Criterion 2.7 does not appear necessary for the presentation. With regard to deficiencies in staffing, however, it is frequently required to demonstrate the filling (or adequate replacement) of vacant professorships

10 .

Objections in the "Credit Transfer / Recognition" category often involve requests to incorporate the relevant rules for recognition in accordance with the Lisbon Convention or for the transfer of credits earned outside of higher education in accordance with the KMK resolutions into the examination regulations. The frequency of requirements regarding credit transfer rules may

15 be related to the fact that the Accreditation Council, in consultation with the KMK, initially decided in February 2014 to suspend the imposition of such requirements until the end of 2014, "in order to give universities more time for implementation in view of the complexity of possible regulatory content"<sup>23</sup>. The procedures examined fall precisely within this period, during which there may have been an increase in the number of conditions imposed due to

20 the expiration of the suspension period (as of January 1, 2015). Although no definitive statement can be made on this, a connection is plausible, especially since the AR's interpretive guidance also specified in which cases conditions must be imposed.

With regard to the practice of formulating conditions, it should be noted here that some agencies

25 for credit recognition and requirements for program accreditation separately, even if these were issued within a single accreditation process regarding the same degree program<sup>24</sup>. Other agencies combine these regulatory requirements into a single condition, sometimes together with other aspects that are to be amended in the examination regulations.

30 In some cases, quality assurance requirements criticize the provision of statistical data, the regularity of surveys, and the lack of specificity regarding these (e.g., the

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<sup>23</sup> See AR circular on "Recognition of knowledge acquired outside higher education" dated December 19, 2014, [http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/AR\\_Rundschreiben\\_Anrechnung.pdf](http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/AR_Rundschreiben_Anrechnung.pdf)

<sup>24</sup> Agencies B, E, and H.

Graduate survey). Above all, it should be systematized or clarified that and how the results of the surveys serve the further development of the degree programs.

Criticisms of the program concept frequently involve aligning the program name, content, and learning objectives ("consistency"), and less frequently also the

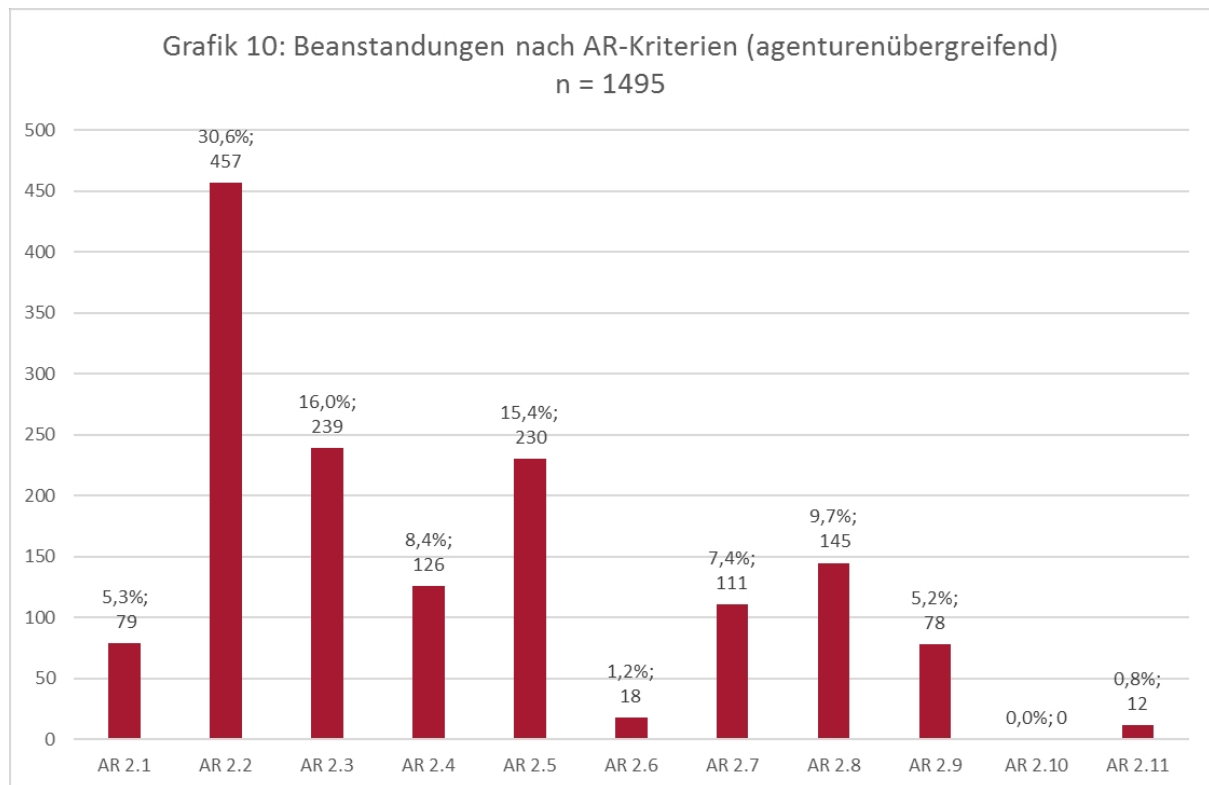
5. Revising the curriculum or clarifying the content of several modules, refining the profile of the (sub)program, and revising the content of all program-related documents.

These seven most common categories already account for more than half of the complaints (52.7%). Since some of these categories refer to a (sub)criterion, while others refer to

- 10 the entire criterion (2.4 Feasibility of Study, 2.7 Facilities), it is useful to examine the distribution of all categories across the AR criteria.

## 6.2.2 Frequency of categories across the AR criteria

If the complaints are categorized according to the criteria of the Accreditation Council, the following overview emerges:



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It can be inferred that the objectives and profile of the degree programs are comprehensible in most accreditation procedures; deficiencies regarding structural requirements are cited most frequently. The implementation of the degree program concept and the curriculum is also still criticized in some

cases, though mostly not in relation to subject-specific content. These findings are also reflected in the INCHER study from April 2018<sup>25</sup>.

The AR criterion "studyability" is cited less frequently than other AR criteria, contrary to what might have appeared to be the case in section 6.2.1. The second most common category, "study-

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2.5—not subdivided into individual sub-criteria. This is because the formulated requirements or objections could only partially be assigned to the sub-criteria (as possible categories). Monitoring regarding "one exam per module" (which was also frequently assigned in connection with AR criterion 2.4) is not included here; this

10 constitute a separate category with a frequency of 3.3%, which is assigned to AR Criterion 2.5 in Figure 10. At this point, we would like to refer once again to the challenges described in Chapter 4. Thus, it appears that complaints regarding criterion 2.4 are overall less frequent than complaints regarding criteria 2.2, 2.3, 2.5, and 2.8.

Complaints identified in this study in connection with criterion 2.10 of the *Re-*

15 were counted; this is not surprising, since criterion 2.10 for degree programs with a special profile states that the "aforementioned criteria and procedural rules [...] must be applied"<sup>26</sup>. If the complaints are categorized without knowing that the program in question has a special profile, the complaints must necessarily be assigned to the other criteria. An evaluation in

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The fact that twice as many complaints are recorded under criterion 2.2 as under the next most frequent criterion is directly attributable to the fact that this criterion encompasses the entire set of structural requirements established jointly by the states and the KMK (see Challenge 1 in Chapter 5.2). These

25 contains a large number of individual provisions; accordingly, this can lead to a significant number of complaints. The categories developed from these are based on formal requirements that can be clearly identified as deficiencies. As Steinhardt et al. also highlighted in the INCHER study, formal criteria are "intersubjectively verifiable and [enable] consensus within the review panel"<sup>27</sup>.

### 30 Frequency by Initial and Reaccreditation

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<sup>25</sup> Steinhardt et al. (INCHER), p. 26ff.

<sup>26</sup> See *Rules*, p. 13. [http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR\\_Regeln\\_Stu-diengaenge\\_aktuell.pdf](http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Regeln_Stu-diengaenge_aktuell.pdf)

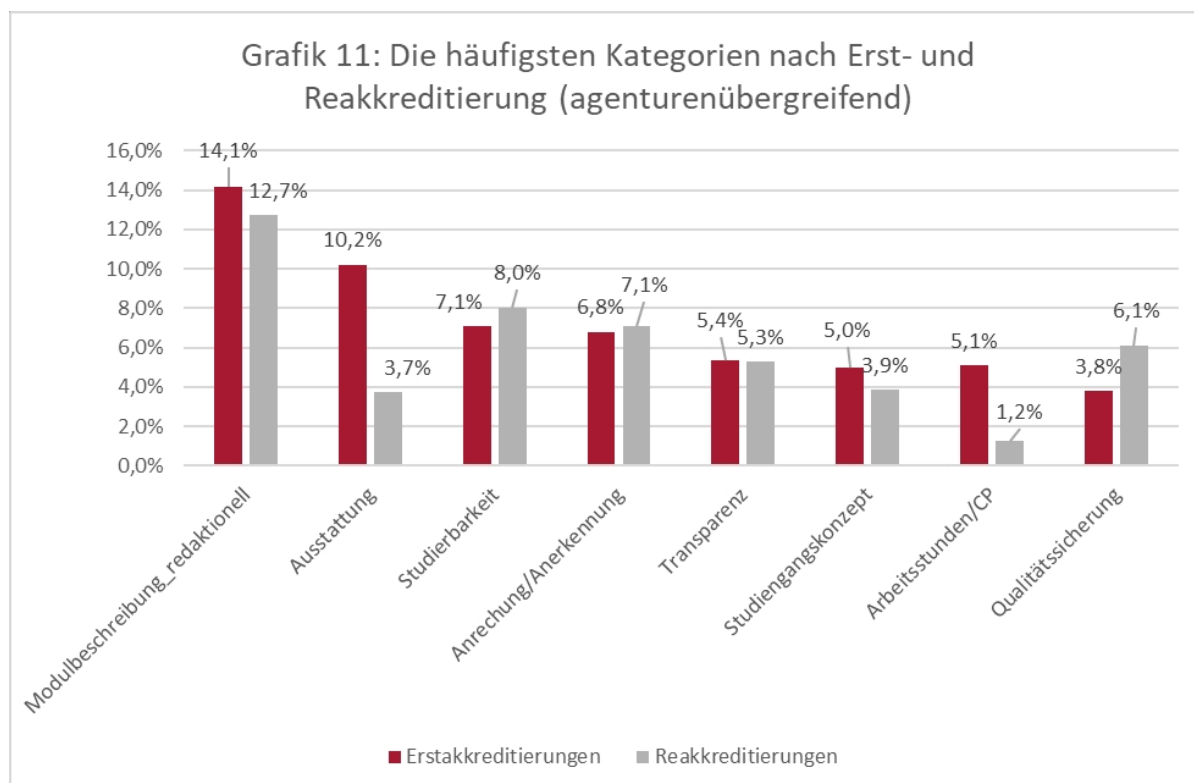
<sup>27</sup> Steinhardt et al. (INCHER), p. 27.

If we now examine the frequency of objections by initial and reaccreditation (see Figures 10 and 11), it becomes apparent that objections in the category "Module description\_editorial" are the most common, regardless of whether the accreditation is initial or reaccreditation. The remaining six categories are found in the breakdown by initial and reaccreditation

5 (see Figures 10 and 11). Additionally, in initial accreditations, the category "Working Hours/CP" (i.e., *workload*) appears in the list, while in reaccreditations the category "Quality Assurance."

In comparison, the categories "Facilities" and "Work Hours/CP" appear significantly more frequently in initial accreditation procedures than in reaccreditation procedures; for the category "Quality

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If we then examine the ratio of initial to reaccreditations within a category (see Table 5), we can see that this ratio differs significantly only in the categories

"Facilities" and "Quality Assurance":

<sup>26</sup> On this point as well, the results of the INCHER study and this investigation corroborate one another.

Category/Objection	EA	RA
<b>Total</b>	<b>51.1%</b>	<b>48.3<sup>29%</sup></b>
1) Module_Description_Reaction	50.7%	49.3%
2) Studyability	42.9%	56.3%
3) Facilities	70.3%	27.9%
4) Credit Transfer/Recognition	48.6%	51.4%
5) Transparency	47.1%	52.9%
6) Quality assurance	37.2%	62.8%
7) Program design	55.9%	44.1%

Table 5: Ratio of Initial and Reaccreditations

It stands to reason that deficiencies in facilities occur more frequently in initial accreditations than in reaccreditations.

The explanation for the higher incidence of shortcomings regarding quality assurance in reaccreditation

- 5 In initial accreditations, such results are usually not yet available. Nevertheless, the frequency of conditions is not zero: It should be noted here that not all initial accreditations are conducted before the program begins. Some such procedures  
10 take place after the program has been running for a certain period of time, so that conditions are conceivable in this scenario.

### 6.2.3 Frequency of categories in a comparison of agencies

15 A comparison of agencies shows that the five most common categories ("Top 5") within individual agencies largely correspond to the seven most common categories ("Top 7," see Figure 9) overall overlap.

The charts showing the five most common categories ("Top 5"<sup>30</sup>) for each agency (relative to the number of complaints for that agency) can be found [in the appendix](#) (Charts 12–19).

20 Differences become apparent regarding the share of the five most common categories in the total number of complaints: Depending on the agency, this ranges from 41.5% % (Agency A) and 60.9% (Agency H). Since there is such a wide variation among the agencies, it is not worthwhile for the purposes of this analysis to further differentiate the "other" categories when the percentage exceeds 50%.

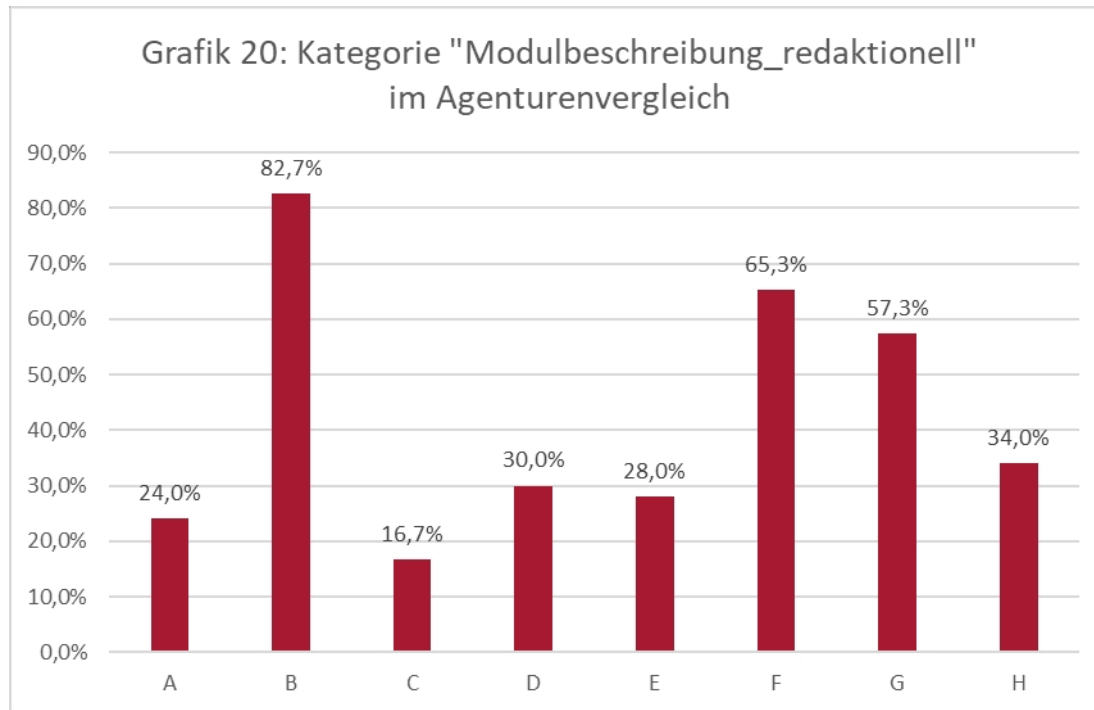
<sup>29</sup> Deviations from 100% result from degree programs for which it is not known whether they have been newly accredited or reaccredited. See footnote 18.

<sup>30</sup> Among the top 5, in two cases (Agency A and Agency D) six categories should strictly speaking have been counted: Agency A had two fifth-place finishes, and Agency D had three fourth-place finishes. To avoid statistical distortion, these two categories were not included.

It is not surprising that many of these "Top 5" overlap with the seven most frequent categories overall ("Top 7," see Section 5.2.1). Additional categories among the top 5 agencies include "Working Hours/CP" (A), "Publication" and "Exam Format" (B), "Thesis Processing Time" (C), "Modularization" (D), "Exam Regulations

5 "Law Exam Regulations" (E), "ECTS Grade" (E and F), "Diploma Supplement" (F), and "One Exam per Module" (G).

Based on the number of degree programs examined in each case, it became apparent that there are significant differences between the agencies in some categories. This is illustrated in Figure 20 using the category "Module Description\_Editorial" as an example.



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At Agency B, an average of 82.7% of degree programs receive a request for editorial revision of the module description; at Agency C, the figure is only 16.7%.

The reasons for this are varied and cannot be conclusively determined here: On the one hand, this could be related to the agencies' differing approval practices;

15 On the other hand, the causes may also be related to the size of the institution, the academic discipline<sup>31</sup>, etc. An analysis of additional structural variables could be illuminating in this regard. It would also be interesting to investigate which complaints lead to mandatory requirements versus recommendations in different agencies. A cursory review of the wording of the recommendations reveals that similar

<sup>31</sup> In their study, Suchanek et al. concluded that these structural variables (size of the institution, academic discipline) have an influence. (see p. 38 ff.)

wording (here: in the category "Module Description\_Editorial") was issued as a requirement by one agency, whereas another agency treated it as a recommendation. In some cases, this observation even applies to requirements/recommendations within a single agency.

After this chapter has provided an overview of the frequency of complaints across agencies,  
, the next chapter shows how the complaints could be categorized based on the new legal framework and the MRVO.

#### 6.2.4 Formal vs. Substantive Objections According to the MRVO

The MRVO, adopted by the KMK on December 7, 2017, distinguishes accreditation requirements according to formal and substantive criteria (see Part 2 or §§ 3–10 and  
10 , Part 3, and §§ 11–21). The formal criteria essentially correspond to the joint structural guidelines of the federal states and will in future be reviewed by the agencies and summarized in the so-called review report. "This relieves the experts on the review panel of the burden of assessing purely formal criteria"<sup>32</sup>. The experts are responsible for evaluating technical and substantive criteria, whereby "the review report is not binding for the review panel  
15 is not binding"<sup>33</sup>. Conditions are to be "considered only in exceptional cases in the future"<sup>34</sup>.

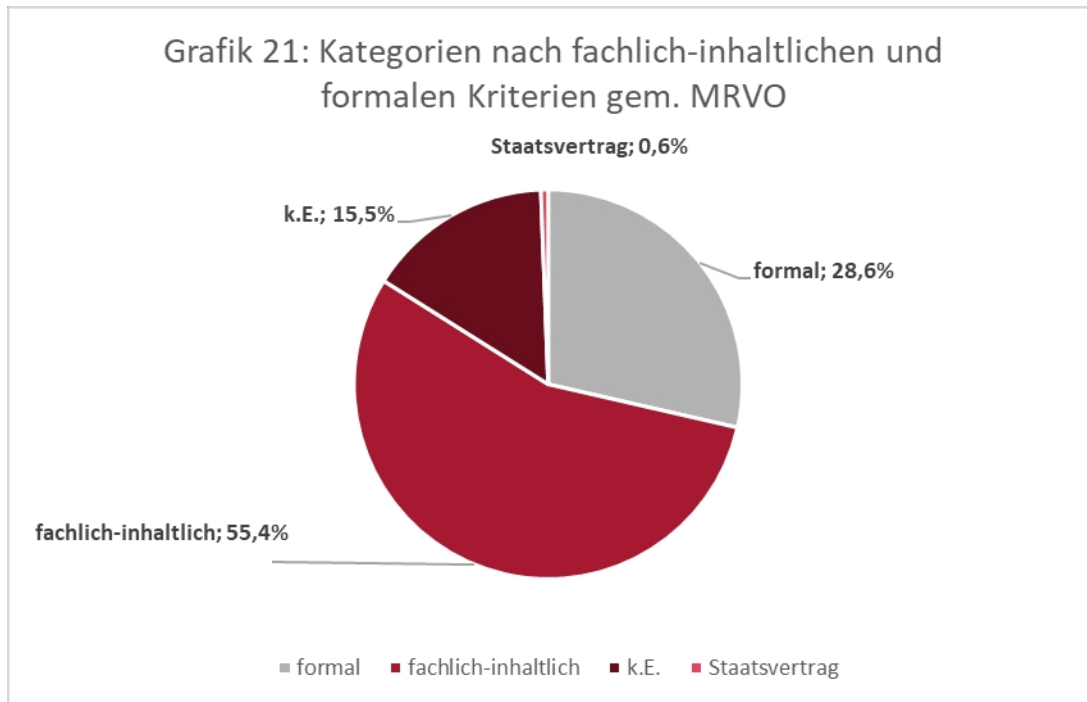
These regulations had not yet formed the basis for the procedures examined. However, the question of whether the requirements considered in this study can be waived in light of this is significant for future accreditation practice. To this end, the categories established were aligned with the formal and technical-substantive criteria of the MRVO  
20 (see Table 8 in the Appendix). A few criteria refer to requirements that are no longer explicitly mentioned in the MRVO, as they are already included in the StAkkStV ("professional competence"; "capacity for social engagement"). The fourth (and third most frequent) subset includes those categories that no longer have a counterpart in the MRVO/StAkkStV (e.g., "transparency," "publication," "examination regulations\_legal  
25 examination").

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<sup>32</sup> See Explanatory Memorandum to the MRVO, p. 34.

<sup>33</sup> See *ibid.*, p. 34.

<sup>34</sup> See *ibid.*, p. 35.



As shown in Figure 21, more than half (55.4%) of the objections relate to subject-matter content, and slightly more than a quarter (28.6%) to formal criteria. Just under one-sixth (15.5%) of the objections have no counterpart in the MRVO, and 0.6% to the StAkkrStV without being explicitly mentioned again in the MRVO. Since the categories assigned to the StAkkrStV are also of a substantive nature, it can be summarized that 56% of the objections are of a technical-substantive nature. It should be emphasized, however, that only 1.4% of the complaints overall relate to subject matter in a narrower sense or subject-specific reference frameworks (see Table 6)<sup>35</sup>; the

The largest shares are attributed to feasibility (8.4%), facilities (7.4%), recognition/credit transfer<sup>36</sup> (7.2%), quality assurance (5.2%), and program concept (4.5%), as described in Chapter 5.2.1. The category of program concept could be characterized as “academic rigor in the broader sense.”

The only noteworthy feature is the classification made in this study of the “modularization” category (overall frequency: 3%), which was assigned when the requirement aimed at a thematic or content-related (re)design of a module. For this reason, this category was also assigned to “subject-matter and content” and not—as in MRVO § 7 (modularization)—to the formal criteria. This makes it clear that a strict separation between formal and subject-matter and content criteria cannot always be clearly drawn.

<sup>35</sup> Steinhardt et al. reach a similar conclusion; see *ibid.*, 26f.

<sup>36</sup> See footnote 41 for the classification.

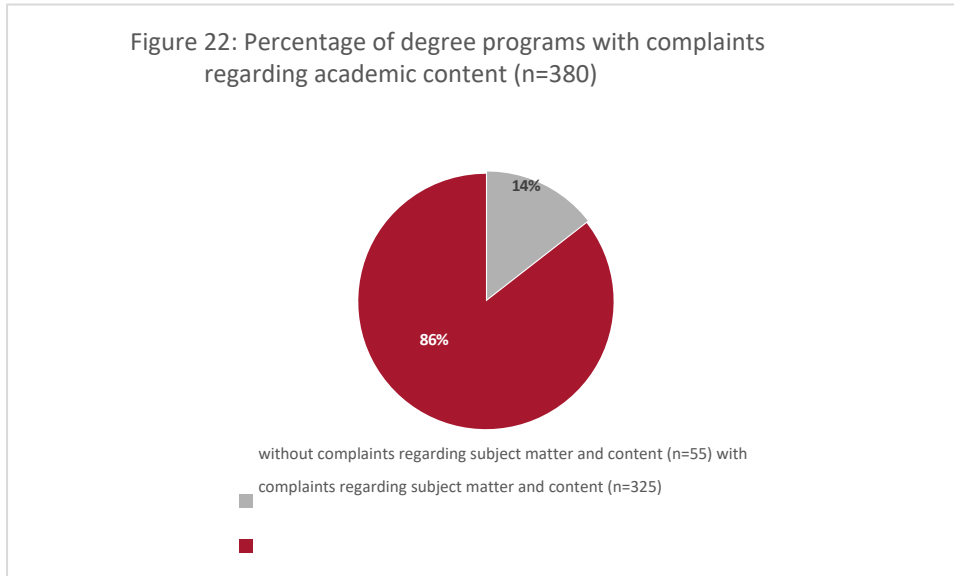
The category "Credit Transfer/Recognition" is also ambiguous under the MRVO. Since recognition ("Lisbon") is assigned to the explanatory text of MRVO §12 (and thus to the subject-matter section), the entire category "Recognition/Credit Transfer" is assigned to the subject-matter objections—with the understanding that the transfer of credits for

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Finally, we examined the proportion of degree programs with subject-specific

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objections. As Figure 22 shows, only 14% of degree programs contained exclusively formal objections:



## 7 Summary and Discussion

Across all agencies, it was found that the proportion of (partial) degree programs without conditions for the programs examined was 16%. The proportion of reaccreditations was 64%. The fact that reaccreditations are more strongly represented among accreditations without conditions

5 could indicate that the requirements (of the AR, the KMK) were effectively implemented in the case of re-accreditations. This could lead to a trend in the coming years where the number of programs without conditions increases.

In programs with objections, an average of 3.3 conditions per program were imposed; there was no difference between initial and reaccreditations. Just over

10 than half of all conditions were actually imposed in reaccreditation procedures (50.2%, see Figure 7).

A comparison of accreditation agencies revealed that, for six of the eight agencies, the majority of reaccreditations were granted without conditions. Only two agencies showed different results (each with over 70% of initial accreditations for programs without conditions). Regarding the

15 requirements per program, there were significant differences between the agencies, as well as within the agencies themselves between initial and reaccreditation procedures. As with most agency-comparative results that revealed significant differences, an examination of additional structural variables could offer potential explanations here (e.g., the agency's subject-specific specialization, private/public university, specific program format, etc.).

20 Nevertheless, it seems plausible that a large part of the discrepancies stem from the agencies' differing decision-making practices, which have developed independently of one another over the years and which, due to the Accreditation Council's oversight—which could only cover small samples—were evidently not identified or could not be identified.

25 While these figures suggest an improvement in quality—with a rising rate of reaccreditations, it is expected that the proportion of degree programs without conditions will continue to increase—it also became clear that there is no difference between reaccreditation and initial accreditation procedures in terms of the average number of conditions (in cases where conditions were imposed; 3.3 conditions per degree program in each case). (Partial) degree programs with a very high  
30 conditions were extremely rare; in each case, just under 90% of the procedures had a maximum of 5 conditions, with a maximum of 11 for initial accreditations and 9 for reaccreditations. In less than 7% of the (partial) degree programs, 7 or more conditions were imposed.

To draw specific conclusions about defects, the reported defects (=complaints) were examined. It became clear that some requirements were the subject of multiple complaints

35 complaints . In comparison of agencies were significant differences in the

"practice of formulating requirements"; while one agency never formulated multiple objections in a single requirement, another agency had an average of 1.47 objections per formulated requirement.

Significant differences were also evident regarding the structure of the expert opinions (see p. 6),

5 which make it difficult to compare the expert opinions (e.g., for the public, laypeople). However, there will no longer be different report structures in the future, as pursuant to § 24(3) sentence 4 and § 24(4) sentence 5 MRVO, inspection reports and expert reports must be drafted using a template specified by the Accreditation Council, and the template for program accreditation has already been adopted and published by the Accreditation Council.<sup>37</sup> In the  
10 creation of the expert report template, the "best practices" of the agencies were drawn upon, and these agencies were also involved in its development.

The study highlighted the significant effort required on the part of the agencies to maintain the data records in the database of accredited degree programs: For example, if the (file names of) expert opinions change due to the addition of decisions regarding the fulfillment of requirements,

15 , the updated link must also be updated in the Accreditation Council's database. The Accreditation Council will keep this in mind in the future when it publishes the reports along with its decisions.

Regarding statements on deficiencies/complaints, it can be noted *across all agencies* that an (editorial) revision of the module description was by far the most

20 (14.2%). The next most frequent complaints were regarding feasibility of study (8.4%), facilities (7.4%), credit transfer/recognition (7.2%), transparency (5.8%), quality assurance (5.2%), and program concept (4.5%). More than half of the complaints (52.9%) fell into these seven categories.

It was found that facilities were criticized with above-average frequency in initial accreditation proceedings

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*A comparison of agencies* revealed that the most common categories for individual agencies ("Top 5") largely corresponded to the most common categories *across all agencies* ("Top 7"). Nevertheless, there were also some agency-specific peculiarities here. It was particularly striking  
30 was how large the share of the five most common categories was in relation to the total number of complaints per agency.

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<sup>37</sup> The evaluation grids are published at [www.akkreditierungsrat.de/index.php?id=antragstellung](http://www.akkreditierungsrat.de/index.php?id=antragstellung) .

Recommendations were not examined—contrary to what was originally planned in the monitoring portfolio; consequently, no comparison was made in the agencies' practices regarding which deficiencies are classified as requirements and which as recommendations. In addition to the comparative figures for recommendations per degree program or requirements per degree program,

5 a *comparison of agencies*, it would certainly have been interesting to know which agencies issue "only" a recommendation for the same (or at least similar) deficiency, whereas others impose requirements. How the Accreditation Council will decide on this in the future and where this line is drawn will have to be worked out in administrative practice.

10 Due to the new legal basis, the question of the *rules'* applicability took a back seat. Following the publication of the MRVO, the focus shifted to the distinction between formal and substantive criteria established by the MRVO, and the complaints examined in this study were categorized according to this distinction. It became clear that just over half of the complaints (55.4% or 56%) could be attributed to substantive

15 , while just under 30% of the complaints were attributable to formal issues. Only 14% of the degree programs subject to conditions exhibited exclusively formal deficiencies.

It should be emphasized here that approximately one-sixth of the objections related to deficiencies that no longer constitute such under the new legal framework (→ Transpa-

20 rency). Although the accreditation reports (review report + expert opinion) are to be published in the Accreditation Council's database, there are no (longer) requirements regarding transparency and the publication of relevant documents within a degree program.

The aspect raised by Steinhardt et al. of EIQSL (INCHER) is also worth noting: If reviewers can more easily agree on formal criteria<sup>38</sup> (and

25 (which may result in more formal deficiencies being addressed in the requirements), but not (or only slightly) regarding content-related requirements (and thus no requirements are formulated), it remains to be seen how this will play out in the new system. Will reviewers in the future—relieved of some of the burden by the review report to be prepared by the agency—have more room for discussion regarding content-related criteria? This would be expected. According to Steinhardt et al., the question remains open as to whether this will lead to more

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There is a debate as to whether the requirement formulated in the MRVO that states impose "conditions only in exceptional cases" is unrealistic. The implementation of this requirement remains to be seen; a prognosis cannot be drawn from the available material

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<sup>38</sup> See Steinhardt et al. (INCHER), p. 27.

cannot be inferred. The new system is intended to be accompanied by a shift in mindset: "The KMK assumes that universities will take responsibility for ensuring that the quality of education is a central focus across the board when designing their degree programs."<sup>39</sup> The agencies play a key role in supporting universities as they work toward developing degree programs that meet the requirements

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Among the tasks and major challenges facing the Accreditation Council in the coming months will be to develop a "decision-making practice" that—possibly through issued

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Whether the "previously often differing agency standards will be eliminated" <sup>40</sup> (this study also highlights significant differences among the agencies) remains to be seen in light of the preparation of accreditation reports ready for decision. The Accreditation Council should also keep this aspect in mind when developing its "decision-making practice" and examine whether differences among agencies exist regarding documents ready for decision  
and whether this may hinder the consistency of decisions.

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In any case, it remains to be seen whether the (majority of) procedures—as the states, as architects of the MRVO, have indicated—can be accredited without conditions. Not least, this will depend heavily on how the interaction between universities and agencies will develop until the finalization of the accreditation reports (keyword "quality improvement" or "deficiency rectification loop").

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Insofar as proposals for conditions are submitted to the Accreditation Council in the future, it must be taken into account that accreditations are administrative acts and that any conditions must be sufficiently specific, verifiable, and justified. The most common objection to date—a redaction of the module description—appears, in light of this, to be

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. The accreditation reports must clearly indicate the specific deficiencies underlying such a condition and how it is intended to remedy them.

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<sup>39</sup> Explanatory Memorandum to the MRVO, p. 2.

<sup>40</sup> Explanatory Memorandum to the MRVO, p. 7.

In principle, the interaction between agencies, universities, and the Accreditation Council must first find a new balance with regard to the new responsibilities.

## 8 Appendix (Tables, Additional Figures, References)

**Table 6: Overview of the categories, sorted by frequency:**

	Categories: Individual evaluation	AR criterion	Total	Relative
1.	Module Description_Editorial	AR 2.2	213	14.3%
2.	Studyability	AR 2.4	126	8.4%
3.	Facilities	AR 2.7	111	7.4%
4.	Credit/Recognition	AR 2.3	107	7.2%
5.	Transparency	AR 2.8	87	5.8%
6.	Quality assurance	AR 2.9	78	5.2%
7.	Program Concept	AR 2.3	68	4.6%
8.	Publication	AR 2.8	58	3.9%
9.	Examination Regulations_Law Examination	AR 2.5	52	3.5%
10.	Qualification Objectives (General)	AR 2.1	49	3.3%
11.	One exam per module	AR 2.5	49	3.3%
12.	Hours worked/CP	AR 2.2	48	3.2%
13.	Modularization	AR 2.2	45	3.0%
14.	ECTS Grade	AR 2.2	42	2.8%
15.	Admission	AR 2.3	41	2.7%
16.	Competency-based exams	AR 2.5	38	2.5%
17.	Implement examination regulations	AR 2.5	33	2.2%
18.	Diploma Supplement	AR 2.2	32	2.1%
19.	Examination formats	AR 2.5	29	1.9%
20.	Subject-specific knowledge/FBR	AR 2.1	21	1.4%
21.	HQR	AR 2.2	18	1.2%
22.	Testing system	AR 2.5	18	1.2%
23.	Cooperation	AR 2.6	18	1.2%
24.	Minimum module size: 5 ECTS	AR 2.2	17	1.1%
25.	Equal Opportunity/Gender Equality	AR 2.11	12	0.8%
26.	Access/Admission_Continuing Education	AR 2.3	11	0.7%
27.	Examination Regulations (General)	AR 2.5	11	0.7%
28.	Vocational Competence/Employability	AR 2.1	7	0.5%
29.	Thesis completion time	AR 2.2	7	0.5%
30.	ECTS_Thesis	AR 2.2	7	0.5%
31.	ECTS	AR 2.2	6	0.4%
32.	Standard duration of study	AR 2.2	6	0.4%
33.	Compensation for Disadvantages	AR 2.3	6	0.4%
34.	Degree title/designation SG	AR 2.2	5	0.3%
35.	Prerequisite for ECTS credits	AR 2.2	4	0.3%
36.	HQR_BA vs. MA	AR 2.2	3	0.2%
37.	Report Card	AR 2.2	3	0.2%
38.	Selection process	AR 2.3	3	0.2%
39.	Competence_Social Engagement	AR 2.1	2	0.1%

40.	Mobility (window)	AR 2.3	2	0.1%
41.	Practical component	AR 2.3	2	0.1%
42.	State-specific requirements	AR 2.2	1	0.1%

**Table 7: Overview of the categories, sorted by AR criteria 2.1–2.11**

AR criterion	Categories	Total	Relative
AR 2.1	Qualification objectives (general)	49	3.3%
AR 2.1	Competence_Social Engagement	2	0.1%
AR 2.1	Vocational Competence/Employability	7	0.5%
AR 2.1	Professionalism/FBR	21	1.4%
<b>AR 2.1</b>	<b>Total</b>	<b>79</b>	<b>5.2%</b>
AR 2.2	Degree title/designation SG	5	0.3%
AR 2.2	Hours of work/CP	48	3.2%
AR 2.2	Thesis completion time	7	0.5%
AR 2.2	Diploma Supplement	32	2.1%
AR 2.2	ECTS	6	0.4%
AR 2.2	ECTS_Thesis	7	0.5%
AR 2.2	ECTS Grade	42	2.8%
AR 2.2	HQR	18	1.2%
AR 2.2	HQR_BA vs. MA	3	0.2%
AR 2.2	Country-specific requirements	1	0.1%
AR 2.2	Minimum module size: 5 ECTS	17	1.1%
AR 2.2	Modularization	45	3.0%
AR 2.2	Module Description_Editorial	213	14.3%
AR 2.2	Standard duration of study	6	0.4%
AR 2.2	Prerequisite for ECTS credits	4	0.3%
AR 2.2	Transcript	3	0.2%
<b>AR 2.2</b>	<b>Total</b>	<b>457</b>	<b>30.6%</b>
AR 2.3	Credit Transfer/Recognition	107	7.2%
AR 2.3	Selection Process	3	0.2%
AR 2.3	Mobility (window)	2	0.1%
AR 2.3	Compensation for Disadvantages	6	0.4%
AR 2.3	Practical component	2	0.1%
AR 2.3	Program Concept	68	4.6%
AR 2.3	Admission/Enrollment_Continuing Education	11	0.7%
AR 2.3	Admission requirements	41	2.7%
<b>AR 2.3</b>	<b>Total</b>	<b>239</b>	<b>16.0%</b>
<b>AR 2.4</b>	<b>Studyability</b>	<b>126</b>	<b>8.4%</b>

AR 2.5	One exam per module	49	3.3%
AR 2.5	Competency-Based Exams	38	2.5%
AR 2.5	Exam formats	29	1.9%
AR 2.5	Examination Regulations (General)	11	0.7%
AR 2.5	Enact Examination Regulations	33	2.2%
AR 2.5	Examination Regulations_Law Examination	52	3.5%
AR 2.5	Examination System	18	1.2%
<b>AR 2.5</b>	<b>Total</b>	<b>230</b>	<b>15.4%</b>
<b>AR 2.6</b>	<b>Cooperation</b>	<b>18</b>	<b>1.2%</b>
<b>AR 2.7</b>	<b>Equipment</b>	<b>111</b>	<b>7.4%</b>
AR 2.8	Transparency	87	5.8%
AR 2.8	Publication	54	3.6%
<b>AR 2.8</b>	<b>Total</b>	<b>145</b>	<b>9.7%</b>
<b>AR 2.9</b>	<b>Quality assurance</b>	<b>78</b>	<b>5.2%</b>
<b>AR 2.11</b>	<b>Equal Opportunity/Gender Equality equity</b>	<b>12</b>	<b>0.8%</b>

**Table 8: Overview of the assignment of categories to MRVO/StAkkStV**

AR	MRVO	Substantive Content/formal	Categories	Overall	relative
AR 2.1	§11 (1) 1	Technical Content-related	Qualification Objectives (General)	49	3.28%
AR 2.1	SV Art. 2, para. 3 Sentence 1	Substantive Content	Competence_social engagement	2	0.13%
AR 2.1	SV Art. 2, para. 3 Sentence 1	Substantive content-related	Professional competence/employability	7	0.47%
AR 2.1	§13 (1)	Technical Content	Professionalism/FBR	21	1.40%
AR 2.2	§6	Formal	Termination designation/marketing SG	5	0.33%
AR 2.2	§8 (1) 3	Formal	Working hours/CP	48	3.21%
AR 2.2	§8 (3)	Formal	Thesis processing time	7	0.47%
AR 2.2	§6 (4)	Formal	Diploma Supplement	32	2.14%
AR 2.2	§8 [(2)]	Formal	ECTS	6	0.40%
AR 2.2	§8 (3)	Formal	ECTS_Thesis	7	0.47%
AR 2.2	/	Formal	ECTS Grade	42	2.81%
AR 2.2	§11 (2)	Substantive Content	HQR	18	1.20%

AR 2.2	§13 (Landscaping)	Technical Content	HQR_BA vs. MA	3	0.20%
AR 2.2	§4	Formal	State-specific requirements	1	0.07%
AR 2.2	§12 (5) 4	Technical Content	Minimum module size 5 ECTS	17	1.14%
AR 2.2		Subject-specific Content-based	Modularization	45	3.01%
AR 2.2	§7 (2)	Formal	Module Description_Editorial	213	14.25%
AR 2.2	§3 (2)	Formal	Standard period of study	6	0.40%
AR 2.2	§7 (3)	Formal	Requirements for ECTS credits	4	0.27%
AR 2.2	Implicit in §6 (4)	Formal	Certificate	3	0.20%
AR 2.3	Justification §12 / SV Art. 2, para. 2, sentence 1	Academic and Content-Related h <sup>41</sup>	Credit Transfer/Recognition	107	7.16%
AR 2.3	§10 and §16	Formal	Selection process	3	0.20%
AR 2.3	§12 (1) 4	Substantive Content-related	Mobility (window)	2	0.13%
AR 2.3	§15	Technical Content-related	Compensation for Disadvantages	6	0.40%
AR 2.3	§12 (1) 3	Substantive content	Practical component	2	0.13%
AR 2.3	§12	Subject-Content	Program Concept	68	4.55%
AR 2.3		Formal	Admission/Enrollment_Continuing Education	40	2.68%
AR 2.3		formal	Admission requirements*	11	0.74%
AR 2.4	§12 (5)	Substantive content	feasibility	126	8.43%
AR 2.5	§12 (5) 4 and §12 (4)	Technical content	One exam per module	49	3.28%
AR 2.5	§12 (5) 4	Technical Content-based	Exams_Competency-Based	38	2.54%
AR 2.5	§12 (4)	Subject-content-related	Exam formats (= types of exams)	29	1.94%
AR 2.5	Based on §12 on	Substantive in terms of	Examination Regulations (General)	11	0.74%
AR 2.5		N/A	Enforce Examination Regulations	33	2.21%
AR 2.5		N/A	Examination Regulations_Law Examination	52	3.48%

<sup>41</sup> Borderline case; classification within the meaning of the MRVO.

AR 2.5	§12 (5) 4	Substantive examination system	Examination system	18	1.20%
AR 2.6	§ 20	Subject-Content-related	Cooperation	18	1.20%
AR 2.7	§ 12 (2) and (3)	Substantive Content	Facilities	111	7.42%
AR 2.8		N/A	Transparency	87	5.82%
AR 2.8		N/A	Publication	54	3.61%
AR 2.9	§ 14, § 17, and § 18 and §12 (5) 3	Technical Content-related	Quality Assurance	78	5.22%
AR 2.11	§15	Technical Content	Equal Opportunity/Gender Equality	12	0.80%

**Table 9: Explanation of the categories**

AR Criterion	Categories	Explanation of the category (if necessary)	Example
AR 2.1	Qualification Objectives (General)		<p><i>"The profile of the program needs to be sharpened. The areas of marketing and sales need to be presented more clearly.</i></p> <p><i>"The program objectives and learning outcomes must describe the academic, technical, and professional classification of the qualifications associated with the programs. The program objectives must also be published in a uniform published in a uniform manner."</i></p>
AR 2.1	Competence_Social Engagement		<p><i>"It must be ensured that students are also empowered to engage in social responsibility during their education. This learning objective must be reflected reflected appropriately."</i></p>
AR 2.1	Professional Competence/Employability		<p><i>"The connection between the career fields targeted for graduates—as outlined in the program's promotional materials—and the social systems of developing and emerging countries, or, where applicable, the social systems of industrialized countries must be clearly and robustly articulated."</i></p>
AR 2.1	Subject-Specific Content/FBR		<p><i>"The program objectives and the curricular implementation must be revised to ensure that the interdisciplinary integration between mechanical engineering, electrical engineering, and computer science—which is typical of mechatronics—is effectively conveyed ."</i></p>
AR 2.2	Degree Title/Designation SG		<p><i>"In addition, the program must be designated as continuing education in the program regulations and the term 'non-consecutive' must be changed."</i></p>

AR 2.2	Working Hours/CP	Definition of credit hours per credit and their incorporation into the examination regulations.	<i>"It must be clearly stipulated which student workload forms the basis for the awarding of a credit point."</i>
AR 2.2	Time required for the thesis		<i>"The guidelines for the introduction of credit systems and the modularization of degree programs set forth in the Joint State Guidelines for the Accreditation of Bachelor's and Master's Degree Programs must be adhered to with regard to the completion times for Bachelor's and master's theses."</i>
AR 2.2	Diploma Supplement		<i>"The Diploma Supplements must provide information on the objectives, intended learning outcomes, and the structure of the degree programs and, in particular, address the specific features of dual degree programs."</i>
AR 2.2	ECTS		<i>"The ECTS credit load of the program must be clearly defined." "The module structure must be revised so that no more than 60 ECTS credits are awarded per academic year."</i>
AR 2.2	ECTS_Thesis		<i>"A maximum of 12 credit points may be awarded for the bachelor's thesis."</i>
AR 2.2	ECTS Grade		<i>"In addition to the final grade, statistical data must be reported in accordance with the ECTS Users' Guide for the classification of the individual degree ."</i>
AR 2.2	HQR		<i>"The degree program must fully meet the requirements of the Qualifications Framework for German Higher Education Degrees in the areas of in-depth knowledge as well as instrumental and systemic competencies."</i>
AR 2.2	HQR_BA vs. MA		<i>"When using bachelor's modules in a master's program, it must be ensured that the qualification level defined for the respective degree level is maintained."</i>
AR 2.2	State-specific requirements		<i>"Section 2, 'Requirements,' of the Enrollment Regulations must be adapted to the currently valid state-specific regulations regarding university admission ."</i>

AR 2.2	Minimum module size: 5 ECTS*		<p><i>"The modular structure should be revised so that modules are generally completed within a single semester or academic year and typically comprise 5 or more ECTS credits . Any deviations must be justified on a case-by-case basis."</i></p>
AR 2.2	Modularization		<p><i>"Modularization must be adapted so that related teaching and learning units are generally grouped together as modules."</i></p> <p><i>"The concept of the 'Thesis Practice Project' module must be revised. The module content and module title must correspond."</i></p> <p><i>"The modules must consistently represent thematically and chronologically self-contained self-contained units of study."</i></p>
AR 2.2	Module Description_Editorial	<p><u>Editorial</u> revision of the module description, which, however, does not result in any changes to the module itself.</p>	<p><i>"The module handbook should be revised to make the connections between the modules clearer."</i></p> <p><i>"The module handbook should be revised to make the program's academic focus more apparent."</i></p> <p><i>"The module handbook must specify the student workload and qualification objectives must be specified."</i></p>
AR 2.2	Standard Duration of Study		<p><i>"The standard duration of study must be corrected in both the examination regulations and the academic regulations."</i></p> <p>AR 2.2</p>
AR 2.2	Requirements for ECTS Credit Assignment		<p><i>"The department must describe the requirements for awarding credits in the practical project."</i></p>
AR 2.2	Transcript		<p><i>"The diploma, the Diploma Supplement, and the transcript of Records must be prepared and submitted."</i></p>
AR 2.3	Credit Transfer/Recognition*	<p>Requirements governing the credit transfer of non-university achievements <b>and/or</b> externally completed coursework and examination achievements.</p>	<p><i>"The recognition of externally completed coursework and examination achievements must be transparently incorporated into the study and examination regulations in accordance with the Lisbon Convention (competence-based recognition, reversal of the burden of proof).</i></p> <p><i>. Furthermore, it must be stipulated that competencies acquired outside the</i></p>

			<i>university sector may be recognized up to a maximum of 50% of the total course load."</i>
AR 2.3	Selection Process*		<i>"The university defines the form and content of the selection process in a binding regulation."</i>
AR 2.3	Mobility (windows)		<i>"The university ensures that periods of study at other universities and in professional practice are possible without loss of time."</i>
AR 2.3	Compensation for Disadvantages*		<i>"The university establishes provisions in the eligibility assessment process for applicants without a first university degree."</i>
AR 2.3	Practical Component		<i>"A plan for the implementation, regulation, and supervision of the must be submitted."</i>
AR 2.3	Program Concept		<i>"The program name and the program curriculum must be aligned." "The university is increasing the proportion of international content." "The qualification objectives and curricular content of the planned specializations ('Master's profiles') should be better coordinated with regard to the respective required and elective courses."</i>
AR 2.3	Admission/Enrollment_Continuing Education*		<i>"The admission requirements must include a mandatory requirement for proof of at least one one year of professional experience."</i>
AR 2.3	Admission Requirements*		<i>"The admission requirements for the program must be clarified to ensure that the assessment of prior knowledge in political science and law is regulated." "Admission requirements that go beyond the statutory provisions must be defined and made mandatory for the bachelor's program."</i>
AR 2.4	Feasibility		<i>"The structure of the program must be revised so that the student's "The workload underlying the degree program must be transparent and verifiable."</i>

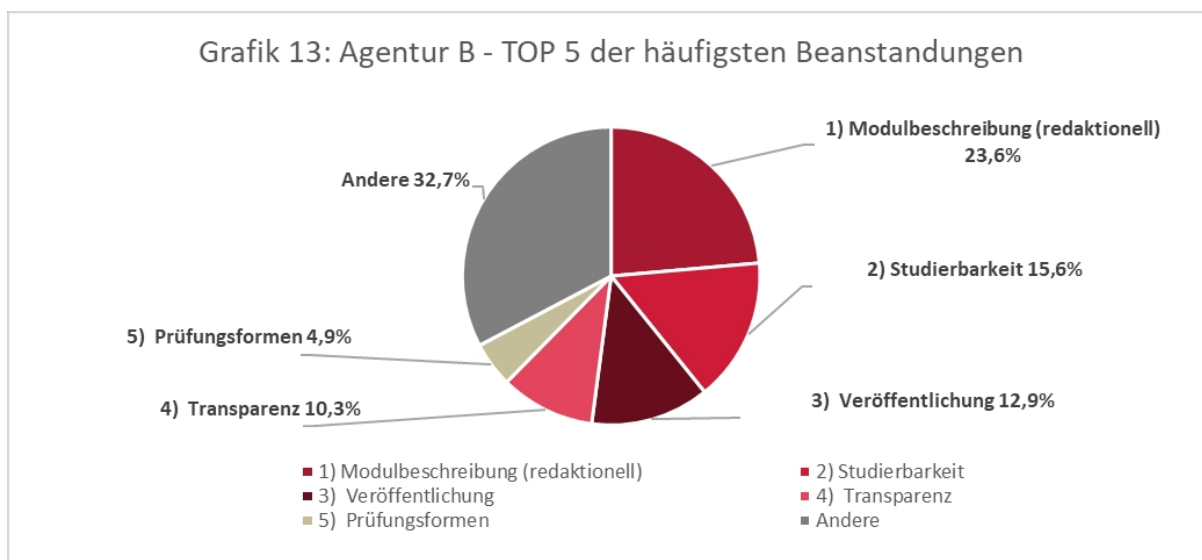
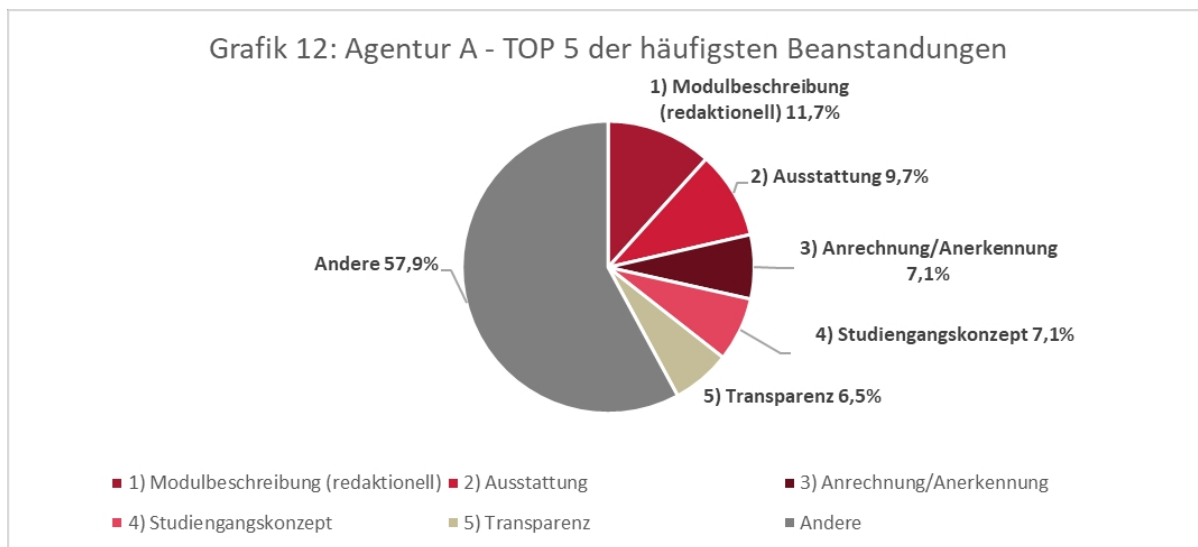
			<p>"The university must develop a concept for measuring students' workload."</p> <p>"The final phase must be structured in such a way that, for organizational reasons,</p> <p>AR 2.5</p>
AR 2.5	One exam per module*		<p>"The 'Fundamentals of Business Administration' module must conclude with a module exam."</p> <p>"The examination system must be revised. In doing so, it must be ensured that, as a rule, only one exam is administered per module."</p>
AR 2.5	Competency-Based Exams	Exams must be competency-based be	<p>"Module exams must be designed to be competency-based, in particular to ensure the master's level."</p>
AR 2.5	Examination formats	Definition and Variations of Examination Formats; Alignment of Examination Formats with Learning Outcomes	<p>"All forms of assessment used in the degree program must be defined in the academic and examination regulations."</p> <p>"The university must ensure that students in both bachelor's and master's programs are exposed to a variety of examination formats ."</p>
AR 2.5	Examination Regulations (General)*	Unspecified changes to the Examination Regulations, definition of exceptions for examinations	<p>"The examination regulations are to be published with the changes described in the statement dated May 29, 2015."</p>
AR 2.5	Implementing the Examination Regulations		<p>"The institution must demonstrate that the examination regulations attached to the accreditation documentation have entered into force."</p>
AR 2.5	Examination Regulations_Legal Review		<p>"The study and examination regulations must undergo a legal review [...]."</p> <p>"Proof of the legal review of the specific examination regulations for the sub-program must be provided."</p>
AR 2.5	Examination System	Additional requirements for the examination system that do not fall under any of the above categories categories under AR 2.5	<p>"The modularization concept must be revised with a view to a cumulative examination system <u>and</u> <u>module examinations must be implemented throughout</u> ."</p>

		and regulations regarding examinations	<i>"Special provisions for exams (e.g., bonus points) must be clearly [...]"</i>
AR 2.6	Cooperation*		<i>"The cooperation between the Dresden University of Music and the Dresden University of Technology must be formalized in a contract." "The University of Music must ensure that the cooperation with all clinics [...]"</i>
AR 2.7	Facilities	Facilities, without distinction between personnel, material, or spatial	<i>"The appointment to the advertised professorship, equivalent to 0.6 FTE, must be reported prior to the start of the academic year."</i>
AR 2.8	Transparency	Something must be presented transparently/consistently that does not in itself require any change in content. Making English documents available.	<i>"All examination requirements to be fulfilled in the degree program must be presented transparently." "Discrepancies/inconsistencies [...] must be resolved." "The program name must be standardized in program-related documents."</i>
AR 2.8	Publication	Information about the degree program must be published.	<i>"The learning outcomes, module handbooks, and other program-related information must be made available to all relevant stakeholders [...]"</i>
AR 2.9	Quality Assurance	A plan for the regular use of data (systematic evaluation) regarding the program must be developed.	<i>"For the further development of the program, statistical data on academic success, student workload, etc., must be regularly provided and utilized." "The student workload must be systematically evaluated and incorporated into the further development of the existing degree programs [...]"</i>

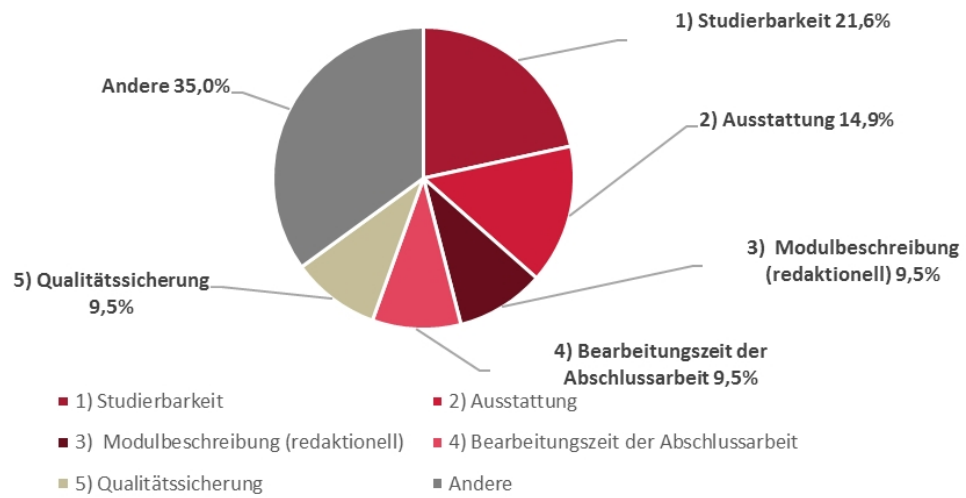
<p><b>AR 2.11</b></p>	<p><b>Equal Opportunity/Gender Equality</b></p>		<p><i>"A diversity concept aimed at promoting equal opportunity must be developed and implemented."</i>  <i>"A plan for gender equity and equal opportunity must be created."</i></p>
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**Additional graphics**

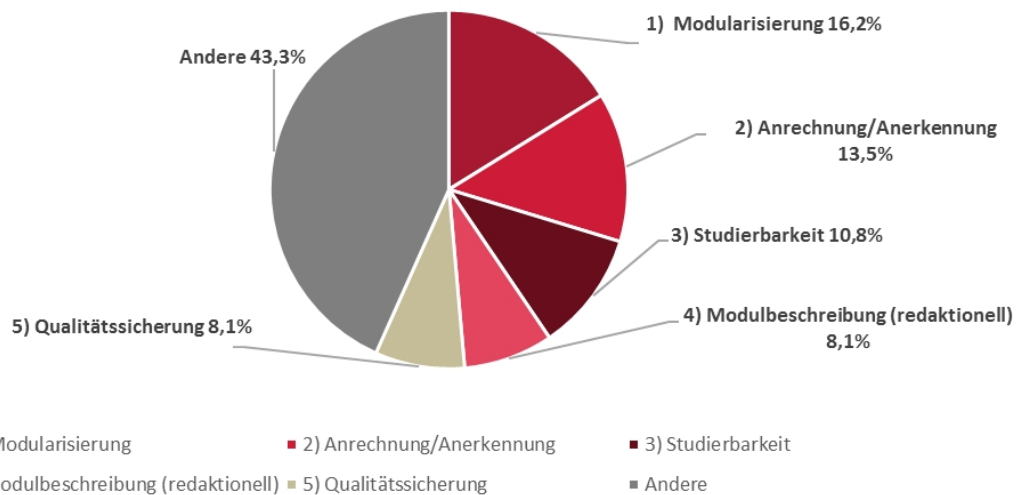
Supplementary graphics for Chapter 5.2.3:



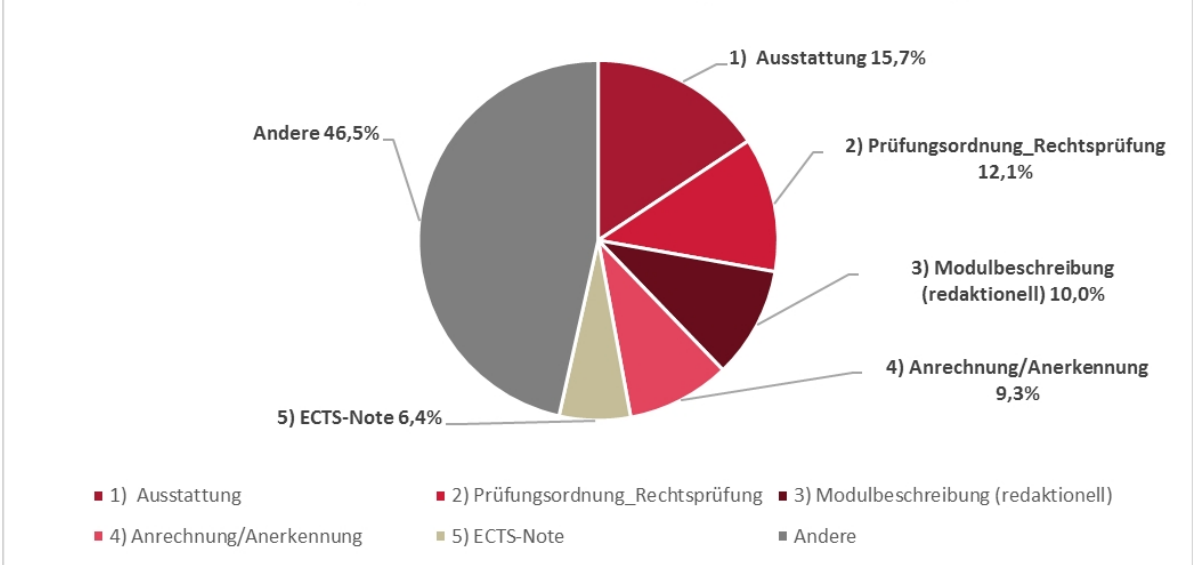
Grafik 14: Agentur C - TOP 5 der häufigsten Beanstandungen



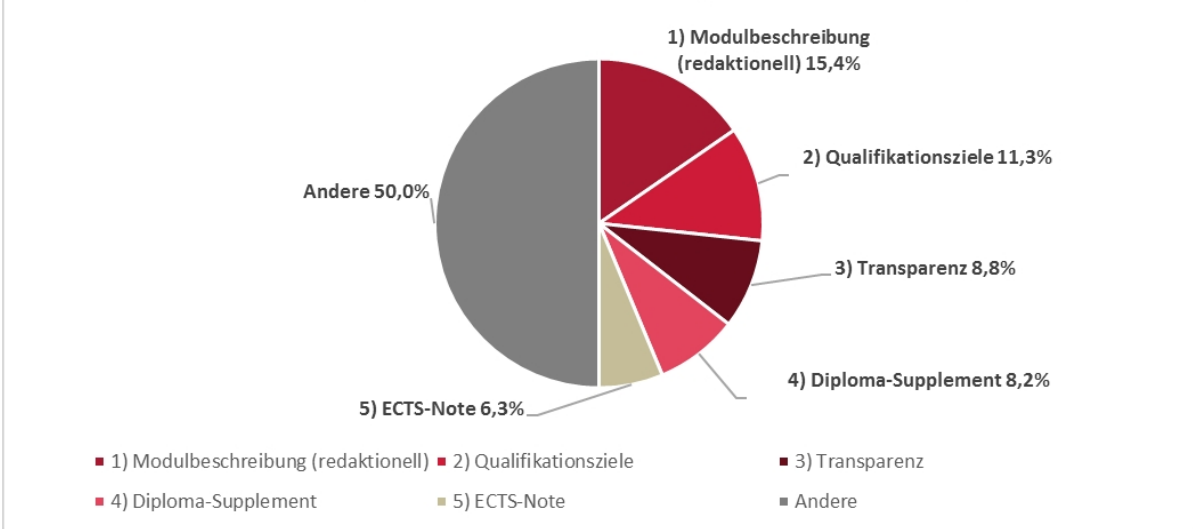
Grafik 15: Agentur D - TOP 5 der häufigsten Beanstandungen



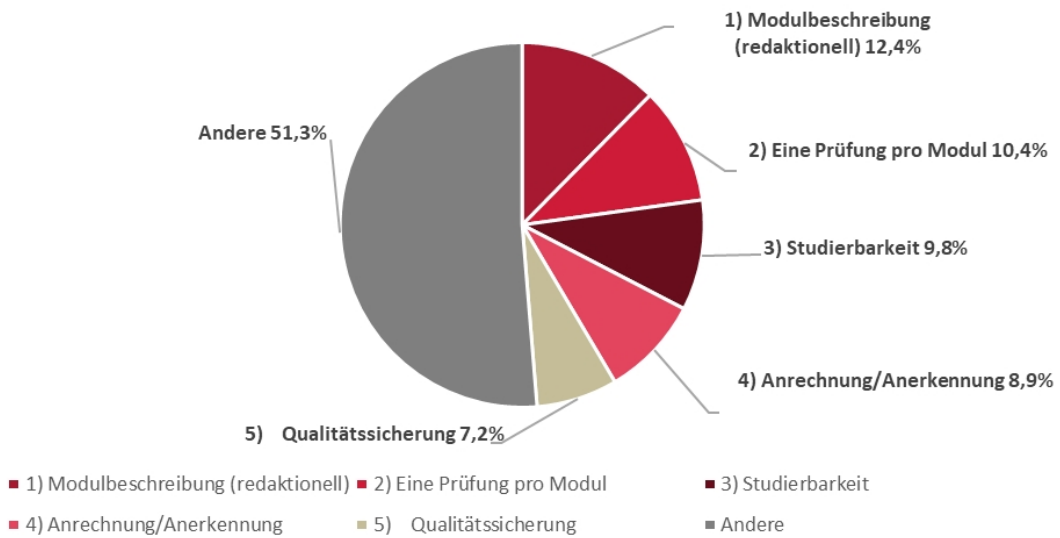
Grafik 16: Agentur E - TOP 5 der häufigsten Beanstandungen



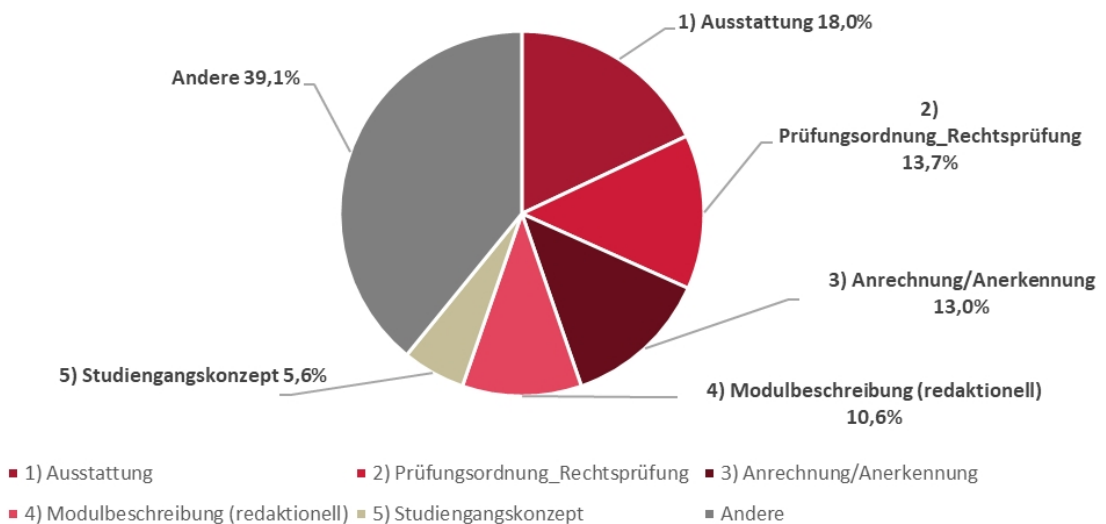
Grafik 17: Agentur F - TOP 5 der häufigsten Beanstandungen



Grafik 18: Agentur G - TOP 5 der häufigsten Beanstandungen



Grafik 19: Agentur H - TOP 5 der häufigsten Beanstandungen



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