

Analysis of the thematic sample “System Accreditation,” conducted in 2017¹

Contents

1	Introduction	2
2	Summary.....	2
3	Introduction and Development of System Accreditation.....	3
4	Thematic sampling – scope and procedure of the sampling.....	5
4.1	Overview of Relevant Terms.....	7
4.2	Information on accredited quality management systems.....	9
5	Exercise of self-accreditation rights and external evaluation of degree programs: Findings from the thematic review.....	13
5.1	Exercise of self-accreditation rights	13
5.1.1	Awarding of seals and internal decisions.....	13
5.1.2	Implementation of requirements and recommendations.....	15
5.1.3	Consideration of degree programs with a distinctive profile	16
5.2	External evaluation of degree programs.....	17
5.2.1	Publication of evaluation results.....	18
5.2.2	Involvement of external experts	20
6	Effectiveness of the developed QM systems: Results of interim evaluations conducted	22
7	Additional insights from the expert discussion	23
8	Conclusion	24
9	Appendices	25

¹ For the sake of readability, gender-neutral language is not used in certain instances. In accordance with the principle of equal treatment, the relevant terms apply equally and universally to both women and men.

1 Introduction

In fulfillment of its legal duty to “monitor the accreditations carried out by the agencies”⁽²⁾, the Accreditation Council, among other things, regularly conducts a thematic random sample. Such differentiated analyses are gradually replacing the previous practice, in which the Accreditation Council conducted full procedural reviews—initially in program accreditation and later also in system accreditation—based on randomly selected cases. In the area of system accreditation, a thematic sampling is hereby conducted for the first time—and, due to the elimination of the Accreditation Council’s monitoring role in the State Treaty as well as in the amended North Rhine-Westphalian Accreditation Foundation Act, also for the last time³—.

To ensure a dialogue-oriented approach to the sampling process, an expert discussion was organized following the comprehensive analysis of the individual procedures, to which the system-accredited universities and all relevant stakeholders were invited. This discussion took place on November 13, 2017, at the FU Berlin with approximately 60 participants.

Valuable suggestions from the agencies and the expert discussion have been incorporated into the report. The Accreditation Council extends its sincere thanks to all participants, and in particular to the FU Berlin for its hospitality.

2 Summary

The overarching finding of the sample review is that the agencies generally meet the Accreditation Council’s current expectations regarding system accreditation procedures. The procedures carried out were generally suitable for making reliable quality assessments of the QM systems established by the universities. Although there were points in some procedures that required clarification, these can mostly be addressed within the framework of the upcoming interim evaluations or system reaccreditations at the universities.

Nevertheless, in future accreditation procedures, greater importance must be attached to the principle of self-accreditation of degree programs within system-accredited institutions of higher education. This requires clear prerequisites and criteria for the awarding of the seal

² See Section 2 of the previous Act on the Establishment of a Foundation “Foundation for the Accreditation of Degree Programs in Germany” - http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/ASG_Stiftungsgesetz.pdf

³ See <https://www.landtag.nrw.de/portal/WWW/dokumentenarchiv/Dokument/MMD17-494.pdf>, adopted on October 11, 2017.

or regarding the revocation of accreditation for internally reviewed degree programs, which must be addressed and evaluated in greater detail in the reports.

The agencies generally address the integration of external expertise into the institutions’ own accreditation procedures in an appropriate manner. In doing so, the primary focus is on taking all stakeholders (academia, professional practice, students) into account. Furthermore, it is of great importance that external reviewers act independently and without instruction during the institutions’ internal procedures.

This report also provides a brief overview of degree programs with a distinct profile in the context of the exercise of self-accreditation rights. The review found that the agencies only partially addressed the Accreditation Council’s criteria regarding this aspect and instead focused primarily on traditional degree programs. However, degree programs with a distinct profile must meet the same quality standards as the rest of the institution’s academic offerings and be specifically addressed in the institution’s internal quality management system. This must be examined during system accreditation; the results must be documented.⁴

3 Introduction and Development of System Accreditation

In 2008, the Accreditation Council, together with the Standing Conference of the Ministers of Education and Cultural Affairs, introduced a new quality assurance instrument⁵ for higher education institutions, intended to strengthen institutional autonomy and transfer overall responsibility for quality assurance to the institutions. System accreditation aimed to offer German higher education institutions an alternative concept to program accreditation within the European Higher Education Area—where an increasing number of member states have shifted their external quality assurance to the institutional level—that would establish and promote an autonomous, continuously evolving quality culture in the areas of study and teaching.

The subject of system accreditation is a higher education institution’s internal quality assurance system and, within that, primarily the structures and processes established for teaching and studies. Upon successful completion of system accreditation, higher education institutions can accredit and re-accredit their degree programs themselves. This means that for degree programs that the higher

⁴ See page 23 of the report “Degree Programs in a Franchise Context: Recommendations for Accreditation” - http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Beschluss_Franchise_Auswertung_2016.03.17_Drs.21-2016.pdf

⁵ The umbrella term “quality assurance” refers to all activities within the framework of the continuous improvement process (i.e., ensuring and improving quality). See also Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG): https://www.hrk.de/uploads/media/ESG_German_and_English_2015.pdf, p. 12.

have already undergone the institution’s internal quality assurance system, the seal of the Accreditation Council is awarded. The basis for this is Section 4.1 of the current rules of the Accreditation Council:

Degree programs that are established in accordance with the requirements of the accredited system, or that were already subject to internal quality assurance in accordance with the requirements of the accredited system, are therefore accredited.

For initial system accreditation, the accreditation period is six years. An interim evaluation is conducted halfway through the accreditation period. According to Section 5.17 of the current regulations, this

“essentially an overview of the quality assurance procedures carried out during the accreditation period to date. The Agency prepares a report on the results of the interim evaluation, which may contain recommendations for addressing quality deficiencies, makes it available to the institution, and publishes it.”

To date, approximately 60 higher education institutions in Germany have completed system accreditation and thus successfully established a QM system⁶. From the outset, the Accreditation Council has set itself the task of supporting this new process and gaining overarching insights. Five years after the introduction of system accreditation, a report⁷ on the first six procedures and the Accreditation Council’s statement⁸ on the further development of system accreditation were first made available to the public.

In addition, as part of its statutory monitoring mandate, the Accreditation Council has regularly conducted random spot checks in the area of system accreditation to, on the one hand, verify the applicability of the current regulations and, on the other hand, gather ideas and suggestions for further development. Over the past few years, the Accreditation Council has evaluated numerous responses from the various stakeholders involved in the review measures (universities, agencies, expert groups) and used the results to optimize the regulatory framework.

The accreditation system is currently facing a major transformation. In implementation of the decision of the Federal Constitutional Court of February 17, 2016, the states have

⁶ The terms “quality management (QM) system” and “quality assurance system” are used synonymously here.

⁷ See the Accreditation Council’s report on the evaluation of initial experiences with system accreditation dated September 12, 2012 - http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Berichte/AR_Bericht_Auswertung_Systemakkreditierung.pdf

⁸ See the Accreditation Council’s statement on the further development of system accreditation - http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Stellungnahme_Systemakkreditierung.pdf

On June 12, 2017, an agreement was reached on a State Treaty on Study Program Accreditation, which is set to enter into force.

To implement the State Treaty, revised criteria for program and system accreditation are being prepared by the KMK in the form of a model statutory ordinance and will be enacted by the federal states. This will standardize future procedures. According to the current state of discussions, the accreditation period for both program and system accreditation is to be set at eight years (with the exception of joint programs, for which the accreditation period is six years).

In the future, the Accreditation Council will no longer adopt rules itself, but will act as a decision-making body to pass resolutions on program- and system-related procedures conducted under German law. At the same time, while the current system is phasing out, it will continue to exist for a certain period because contracts concluded between universities and agencies under still-valid law will be processed according to the “old rules.”

In light of this transition process, the thematic sample offers an opportunity to create, together with the system-accredited universities, evaluators, agencies, and the KMK to create a dialogue-oriented basis for discussion and to support both the Accreditation Council in carrying out its new tasks and the agencies and system-accredited universities in preparing for the upcoming accreditations under both the old and new laws.

4 Thematic Audit – Scope and Procedure of the Audit

In 2014, the Accreditation Council passed a resolution to expand its monitoring instruments in order to more closely align regular monitoring with the Council’s systemic responsibility and with a focus on dialogue. To date, two topic-specific spot checks have been conducted in program accreditation: one on “franchise” degree programs⁹ and one on “joint programs”¹⁰.

System accreditations are gradually becoming more significant in terms of volume and can make a substantial contribution to the development of quality in study and teaching. Against this background, the Accreditation Council has decided to conduct five completed system accreditations in 2017

⁹ See the evaluation report on the thematic sample “Franchise”:
http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Beschluss_Franchise_Auswertung_2016.03.17_Drs.21-2016.pdf

¹⁰ See the evaluation report on the thematic sample “Joint Programs”:
http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Berichte/AR_Bericht_Stichprobe_JointProgrammes.pdf

to review the accreditation procedures in order to take a systemic look at two topics in particular:

- the application of self-accreditation rights and
- how universities handle the external evaluation of degree programs.

In addition, the review examined whether the structures and processes developed by the institution ensure the achievement of qualification objectives and a high quality of the offered degree programs in a manner that guarantees compliance with the criteria of the Accreditation Council, the European Standards and Guidelines for Quality Assurance in Higher Education (ESG), and the requirements of the KMK for each individual degree program.

In doing so, the Accreditation Council's intention is fundamentally not to question the quality of the procedures or even the quality of the universities or their QM systems. Any deficiencies identified mostly concerned only individual parts of the accreditation procedures carried out and also pointed to complications in application with regard to the current decision-making framework for accreditation.

The thematic sample consists of two steps, the first of which is a document-based review characterized by a predominantly deficiency-oriented approach. After identifying potential existing deficiencies, the respective agencies are given the opportunity to comment on the listed points. On this basis, the Executive Board of the Accreditation Council makes decisions regarding the individual procedures. The second step involves a cross-procedural analysis, the results of which are published in the form of a report (this document).

In total, system accreditation procedures of three agencies at five higher education institutions were reviewed. These took place in five different federal states at four universities, including a technical university and a private higher education institution. The accreditation procedures selected for review were examined based on the available documentation to determine whether the relevant—i.e., those relevant to the subject matter—had been observed, and whether the accreditation decision was plausible and substantively justifiable.

The Accreditation Council does not prescribe in its regulations what a specific quality assurance system should look like. This gives higher education institutions considerable flexibility and allows them to implement internal structures and processes for the Accreditation Council's certification of degree programs in accordance with their own vision. It is important that universities exercise their self-accreditation rights in a way that allows them to establish and develop a continuous and sustainable quality assurance process.

Document-based reviews always focus on whether the agencies have applied the applicable rules and how they have addressed the resulting issues.

This review was guided by predefined key questions (see Appendix ##), which were developed on the basis of current decisions regarding accreditation and taking into account other relevant reports and positions. In particular, decisions and recommendations from the Accreditation Council of the Standing Conference of the Ministers of Education and Cultural Affairs, the agencies, the Science Council, and the German Rectors’ Conference were used to formulate the guiding questions.¹¹ As part of the sample survey, the agencies were primarily asked to provide an assessment or statement on issues that appeared to require clarification across the system.

4.1 Overview of Relevant Terms

The Accreditation Council’s current regulations for system accreditation provide a reference framework for higher education institutions, which they subsequently implement independently. Both the right to accredit their own degree programs (the quality of the evaluation processes) and the decision to assign a result to internal and external quality assurance (the quality of the results) lie solely in the hands of the higher education institutions.

The term “**self-accreditation rights**” has not yet been included in the rules for system accreditation. However, in light of practical experience, the term and the underlying concept have since become established, as they capture the decision-making consequences associated with system accreditation in accordance with Section 4.1 of the rules:

¹¹ See the resolutions, reports, and recommendations relevant to the thematic sample:

- Rules for the Accreditation of Degree Programs and for System Accreditation - http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Regeln_Studiengaenge_aktuell.pdf
- Report of the Accreditation Council on the evaluation of initial experiences with system accreditation: http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Berichte/AR_Bericht_Auswertung_Systemakkreditierung.pdf
- Statement by the Accreditation Council on the further development of system accreditation: http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Stellungnahme_Systemakkreditierung.pdf
- Joint State Structural Guidelines for the accreditation of Bachelor’s and Master’s programs: http://akkreditierungsrat.de/fileadmin/Seiteninhalte/KMK/Vorgaben/KMK_Laendergemeinsame_Strukturvorgaben_aktuell.pdf
- Further Further of accreditation system – Design of the institutional quality audit: http://akkreditierungsrat.de/fileadmin/Seiteninhalte/HRK/HRK_2012_Audit.pdf
- Recommendations on Accreditation as instrument for Quality assurance: <https://www.wissenschaftsrat.de/download/archiv/2259-12.pdf>
- Experience Report on System Accreditation: http://www.aqas.de/downloads/analysen/Bericht_Systemakkr_2017.pdf

"Degree programs that are established in accordance with the requirements of the accredited system or that were already subject to internal quality assurance in accordance with the requirements of the accredited system are thus accredited."

A (positive) decision on system accreditation does not mean that all degree programs at a university are automatically accredited. On the contrary: In exercising its self-accreditation rights, the university must itself determine under what conditions it grants, withholds, or revokes the Accreditation Council's seal for a degree program.

In this context, the university must also periodically reassess the decision to grant or withdraw the seal for degree programs, as these programs are regularly subject to the university's internal quality assurance. The quality assurance instruments implemented by the university must be evaluated during the review process and confirmed or mandated as part of the decision on system accreditation.

The institution is responsible for comprehensively and systematically reviewing the Accreditation Council's criteria to ensure that only those degree programs bearing the quality seal meet the criteria applicable to program accreditation. Furthermore, the institutions must determine the applicable deadlines for degree programs that have received the Accreditation Council's seal.

As a result of the verified quality of degree programs at system-accredited institutions of higher education, the **"awarding of a seal"** is envisaged.¹² In the current version of the applicable rules, this term has not yet been directly enshrined either. However, it follows from section 4.1 of the rules cited above.

The internal evaluation procedures at higher education institutions that lead to an accredited degree program are often referred to as **"internal accreditation."** They refer to the institution's own procedures/processes that result in a specific outcome (in the form of a report or the closure of a quality control loop or...) which, in turn, entitles the institution to award the Accreditation Council's seal for the respective accreditation period.

Internal accreditation should therefore ideally provide for a fixed accreditation cycle to ensure the regularity of internal and external evaluations of degree programs. This applies to both higher education institutions that conduct the pro-

¹² See the circular from the Chair of the Accreditation Council dated July 14, 2016 - http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/20160714_Systemreakkreditierungen_Rundschreiben.pdf

internal program accreditation, as well as for higher education institutions that have established a continuous monitoring system (see Chapter 5.1.1).

4.2 Information on the accredited quality management systems

The evaluation focused on the QM systems and their understanding of quality assurance and development, as well as the interaction among the committees and stakeholders involved in the universities’ quality processes. All procedures under review were assessed and concluded in accordance with the current version of the “Rules for the Accreditation of Degree Programs and for System Accreditation” dated February 20, 2013. The following table (starting on page 11) provides an overview of the reviewed QM systems. These proved to be diverse and varied—entirely in line with the regulations, which provide for a high degree of flexibility.

As part of the thematic review of individual procedures, it was found that four out of five universities implement program accreditation internally. One institution had established a so-called accompanying quality management system in which the focus is on internal evaluation instruments and external evaluation is carried out by faculty advisory boards involved at the departmental level. In this context, these advisory boards are integrated into the evaluation process as consultative bodies.

The mechanisms for implementing program accreditation also differ from one another, particularly in the allocation of responsibilities and the involvement of external parties in the internal review processes. One of the universities, for example, follows the traditional program accreditation procedure, involving the formation of an external review panel and an accreditation commission, which are responsible for the review and subsequent decision on internal accreditation.

Furthermore, there are models in which universities join forces and outsource services related to internal quality assurance and development. Different processes are also often established for initial and reaccreditation (see table on page). Finally, two systems were identified in which universities distinguish between two aspects of evaluation: formal (legal) and developmental (substantive) review. In this configuration, external expertise is typically involved in the evaluation of substantive issues related to degree programs.

Even though the accredited quality management systems at universities are predominantly oriented toward program accreditation—i.e., they introduce a classic peer-review concept within the QM system—they nevertheless reflect the freedom of design afforded by the regulatory

regulations of the Accreditation Council. As part of an empirical study on governance and quality assurance at system-accredited universities, the HIS Institute for Higher Education Development also addressed questions regarding the structures, actors, procedural, and decision-making models of the accredited QM systems and published a summary of the results in its Journal of Higher Education Development.¹³ This study had already shown that universities design their own processes and accreditation procedures in a heterogeneous manner. The finding regarding the heterogeneity of quality management systems is confirmed by the present sample.

The conditions and recommendations issued by the agencies in the procedures examined frequently related to the focal points of the thematic sample, without this having influenced the selection of cases in advance. For example, at three universities, conditions were imposed regarding the concept for awarding the seal. Two universities had no clear instruments for implementing the conditions or recommendations issued in the internal accreditation procedures. Furthermore, the independence and freedom from instructions of external experts was also part of the conditions issued at four universities. One system accreditation procedure was concluded without conditions.

¹³ Journal for Higher Education Development 2/2016; “Quality Assurance and Development at System-Accredited Universities—Organizational Development and Governance”: https://his-he.de/fileadmin/user_upload/Publikationen/Magazin/mag_022016.pdf

Overview of the QM systems examined

Higher education institutions	Internal university accreditation procedures Procedures	Accreditation decision	External evaluation of degree programs
University 1	Two steps: 1. Formal legal review (every five years) 2. Monitoring of Further Development (every 2 years)	An independent review committee , composed of several internal and external stakeholders, decides on the accreditation and awarding of the seal to existing degree programs. The University Council decides on the accreditation of new degree programs. This council also consists of internal and external members.	External expertise is sought at least every two years. In successive cycles, different groups are surveyed (academia, professional practice, graduates), so that an external perspective from all groups is available within six years.
University 2	An external review panel evaluates the degree program and issues a recommendation for a decision. The academic departments have the opportunity to submit a statement before the final decision is made. The evaluations take the form of on-site visits . Abbreviated procedures without an on-site visit are possible in the event of significant changes possible	Decisions are made by the Accreditation Committee . A positive accreditation decision is a prerequisite for launching a new degree program.	The external review panels always consist of at least one representative each from academia, professional practice, and the student body .
University 3	The university distinguishes between acc-	The Rector's Office decides on both the acc-	In the case of the accreditation of a newly established

	<p>accreditation of newly established degree programs and the reaccreditation of existing degree programs.</p> <p>A relatively large number of different stakeholders and institutions are involved in both the accreditation and reaccreditation processes.</p>	<p>accreditation as well as the reaccreditation of degree programs.</p>	<p>A working group is formed for each newly established degree program. The working group also includes external experts from academia, professional practice, and the student body.</p> <p>In the reaccreditation process, external reviewers from the aforementioned stakeholder groups are appointed.</p>
University 4	<p>The evaluation process for degree programs is conducted regularly using various survey instruments. The results of these surveys, together with recommendations from external advisory boards, are compiled into a report that outlines the necessary measures for further quality development</p>	<p>After conducting various surveys and incorporating the recommendations of external faculty advisory boards, the reports are submitted to the Executive Board. When necessary, the Executive Board initiates, coordinates, and oversees the necessary measures for quality development.</p>	<p>To involve external experts, a faculty advisory board is established for each department, typically comprising members from academia and professional practice. This board meets annually and issues recommendations for the further development of the degree programs offered within the respective department</p>
University 5	<p>Operational tasks in quality management are handled by an external service provider. An inter-university audit committee has been established for the regular internal review of degree programs</p> <p>committee has been established.</p>	<p>The university's steering committee decides on the accreditation of degree programs upon the recommendation of the audit committee.</p>	<p>External experts are represented on the reviewing audit committee. This committee is designed to include all stakeholder groups.</p>

5 Exercise of self-accreditation rights and external evaluation of degree programs: Findings from the thematic review

5.1 Exercise of self-accreditation rights

5.1.1 Awarding of seals and internal decisions

In the current set of regulations, Criterion 4.1 (see Section 4.1) establishes the connection between the subject of institutional accreditation and the degree programs that were already subject to internal quality assurance. In this context, neither the existence of the internal quality assurance system in and of itself nor the mere institution-specific accreditation procedure is a sufficient prerequisite for system accreditation. Rather, the requirement is broadly linked to the expectation that the institution regularly and systematically scrutinizes the quality of its academic programs and, on this basis, implements quality-enhancing measures.

However, the institution's self-accreditation rights do not relate solely to criterion 4.1 of the Accreditation Council's current regulations, but also encompass the criteria for internal university governance and quality assurance, specifically criterion 6.2:

"The system ensures... that the results of internal quality assurance are taken into account and that faculty and students, graduates, and external experts, as well as representatives from the professional field, are involved in the development and further development of degree programs"

and Criterion 6.3 (excerpts):

"The internal quality assurance system [...] specifically includes regular internal and external evaluations of degree programs [...] and binding procedures for implementing recommendations [...]. It ensures the participation of faculty and students, administrative staff, graduates, and representatives from the professional field, and guarantees that independent bodies (individuals) conduct quality assessments as part of internal and external evaluations."

For this reason, in the course of the review conducted, the Accreditation Council highlighted selected sub-aspects that were relevant to decisions regarding the quality of a degree program. In the reviewed accreditation procedures, these sub-aspects were taken into account in various ways¹⁴.

¹⁴ For specific aspects regarding the involvement of external expertise, see, for example, the table on page 11—external evaluation of degree programs.

Ultimately, when awarding the seal to degree programs, the institution must ensure that the procedures of the evaluation processes are characterized by a clear structure, regularity, and plausibility. The design of the decision-making processes, competencies, and responsibilities must be presented in a transparent manner and form the basis of the internal quality assurance system.

Overall, it can be stated that the agencies have generally met the expectations for system accreditation procedures in their application of criterion 4.1. In all cases, the focus was not merely on the university's internal quality assurance as such, but the universities' handling of the results obtained from it was also evaluated.

However, it was noticeable that in the reviewed procedures, the awarding of the seal—certainly due to its lack of direct anchoring in the regulations of the Accreditation Council—led in some cases to an insufficient examination of the topic. In four out of five universities reviewed as part of the sample, at least one implicit procedure for awarding the seal was in place. However, the term "seal" appeared explicitly in the evaluators' assessments in only two cases. In the first phase of the review, it could therefore only be assumed that the regular evaluations of degree programs were linked to the awarding of the seal. This was confirmed in the second phase through the agencies' explanations.

The agencies rightly pointed out that the awarding of the seal is not explicitly addressed in the Accreditation Council's rules. In his circular dated July 14, 2016, the Chair of the Accreditation Council emphasized that, within the framework of system accreditation, the handling of universities' "self-accreditation rights" must also be evaluated. This includes an examination of whether the institution uses the Accreditation Council's seal in good faith and awards it only when the respective degree program has been fully subject to the internal quality assurance system and meets at least the quality criteria for program accreditation. Likewise, the review panel should assess whether it is sufficiently clear when and for what period the institution awards the Accreditation Council's seal and under what conditions it may be revoked, if applicable.¹⁵

However, the reviewed procedures were completed at a time when the requirements regarding self-accreditation rights had not yet been clarified by means of the aforementioned circular. Since the majority of the procedures already covered the essential aspects in

¹⁵ See page 2 of the circular from the Chair of the Accreditation Council dated July 14, 2016.
http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/20160714_Systemreakkreditierungen_Rundschreiben.pdf

Given that internal institutional accreditations and accreditation rights have been incorporated, it can be concluded that this issue has been sufficiently addressed. Nevertheless, in the future, the evaluation of procedures for awarding and revoking seals should be a standard component of institutional accreditations, and corresponding assessments should be included in the evaluation report.

In the case of QM systems oriented toward program accreditation, both the awarding and withdrawal of seals were possible in most cases. In the accompanying system under review, the procedure for awarding seals remained largely undefined. It seemed plausible that accompanying systems generally face significant challenges in this regard; all stakeholders should keep this in mind in the future.

Against this backdrop, the review of accreditation procedures initially raised questions regarding the vagueness of seal awarding within the framework of the institutions' own accreditation processes. In particular, the modalities for awarding/withdrawing the seal and for internal accreditation decisions—including the implementation tools for conditions and recommendations—were lacking in some areas.

For example, it was not always possible to determine whether the results of internal and external evaluations led to the awarding of the seal for degree programs. Similarly, it was unclear whether the universities had intended to provide for the possibility of withdrawing the AR seal and the option for individual departments to opt out (e.g., returning to program accreditation).

System re-accreditations are already pending for some universities. Neither the current regulations nor the existing drafts of the model ordinance prescribe any specific criteria for system re-accreditations. However, the upcoming reaccreditations are accompanied by the expectation (also expressed in drafts of the model regulation) that all bachelor's and master's degree programs have already been subject to internal quality assurance systems, with the exception of programs that continue to be evaluated under program accreditation.

5.1.2 Implementation of Conditions and Recommendations

Internal decisions regarding individual program accreditations within a quality assurance system also include requirements and recommendations. In the quality management systems of the reviewed procedures, both requirements and recommendations were possible in most cases. In accompanying quality assurance models, it is quite common for external advisory boards to be able to issue only recommendations for the further development of degree programs.

Since requirements are based exclusively on the existing shortcomings of a degree program, it is assumed that failure to meet them could have a negative impact on quality. For this reason, a requirement is usually linked to a fixed deadline. In the institutions that provide only recommendations, the internal procedures are predominantly development-oriented. The reverse conclusion is not valid here: the possibility of imposing requirements by no means precludes a development-oriented approach.

In both models, it should be determined and evaluated in the reports on system accreditation what steps will be taken if the institution or the department does not intend to comply with the requirements or recommendations. The evaluation of this aspect was not always sufficiently addressed. In some cases, this is also due to the fact that, in the course of establishing new quality assurance systems, the institutions only optimized certain aspects upon fulfilling the conditions for system accreditation imposed by the agencies.

This aspect of conflict resolution, including any escalation levels, also falls under the institution's self-accreditation rights and should therefore always be reviewed and explicitly evaluated as part of upcoming interim evaluations or system reaccreditations.

5.1.3 Consideration of degree programs with a distinct profile

The internal accreditation procedures assess compliance with the criteria established by the Accreditation Council and the guidelines of the KMK for degree programs. During the review, the question arose as to what extent the university had taken into account all aspects of the degree programs. See Criterion 6.2:

"...In the case of degree programs leading to state-regulated professions, the relevant experts must be involved"

and Criterion 6.7:

"If the institution involves or commissions other organizations in the area of study and teaching, it shall ensure the quality of the relevant degree programs and their continuous improvement through appropriate measures."

In the case of such degree programs with specific profile requirements that are also carried out in cooperation with partners, the degree-granting institutions are responsible for ensuring that the degree programs meet the accreditation criteria and thus the quality standards applicable to all degree programs

. Therefore, in this context, it is crucial that universities take particular responsibility for the subject of accreditation.¹⁶ Consequently, the subject of accreditation and the scope of the accreditation decision must be sufficiently clear from the documentation of the accreditation process (the university's self-evaluation report, the expert report on system accreditation).

Overall, the review revealed that the expert reports sometimes addressed degree programs with a distinct profile in only a vague manner. The impression arose that both the agencies and the institutions pursuing system accreditation initially focused on traditional degree programs.

While such an approach is understandable, it cannot meet the requirements of system accreditation in the long term. For example, it must be capable of adequately and properly assessing joint programs, dual degree programs, collaborations with non-university educational institutions, or degree programs with direct implications for professional licensing. Accordingly, such issues must also be carefully examined in the system accreditation process, and the corresponding results must be documented in the reports.¹⁷

At this point, it should be explicitly noted that system-accredited institutions of higher education may resort to program accreditation in such special cases. This is already common practice in many places, for example in canonical degree programs or in teacher education, where professional licensing authorities accept only program accreditation. Furthermore, some system-accredited institutions of higher education have deliberately chosen not to build up their own assessment capacities, for example in the complex area of joint programs, but instead to make use of experienced agencies in this regard.

5.2 External Evaluation of Degree Programs

This section focuses on the interaction between internal and external evaluations at universities, the practice of publishing accreditation results, and the involvement of external expertise.

¹⁶ See Chapter 2.3.2. of the report "Degree Programs in a Franchise Context: Recommendations for Accreditation"—
http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Beschluss_Franchise_Auswertung_2016.03.17_Drs.21-2016.pdf

¹⁷ The guidelines published by the Accreditation Council from the working group "Degree Programs with a Distinctive Profile" have developed specific requirements in this regard and presented recommendations for a better understanding of the criteria, which are worth closer examination: http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Handreichung_Profil.pdf

First, it was necessary to determine how the institution's internal and external evaluation instruments interact. The results of the evaluations should be used to regularly close the quality control loops and, if necessary, to initiate the required measures. It was found that all universities examined as part of the thematic sample adhere to this principle and use internal and external instruments in an interactive manner.

The regular involvement of external expertise is also ensured at every institution, although stakeholder participation remains a challenge in some places. For example, at one institution that had introduced a model of external advisory boards for individual subject areas, the involvement of professional practice was not ensured for all faculties. The evaluating agency also highlighted this aspect as one of the main points of concern and included it among the key areas to be reviewed as part of the upcoming interim evaluation.

5.2.1 Publication of Evaluation Results

A university's primary responsibility for quality assurance in studies and teaching includes continuously ensuring the quality of its degree programs, improving them, and making the results transparent to the public. Internal accreditation is an integral part of this responsibility.

In accordance with Criterion 6.6 of the Accreditation Council's Rules

"the institution of higher education ... informs the public, as well as the institution's governing body and the state in which it is located, about the procedures and results of quality assurance measures in the area of study and teaching."

The institutions examined as part of the sample publish information on both the established QMS and the results of quality assurance measures on their websites. In addition, program-specific accreditation information must be entered into the central database of accredited programs. This database is currently used as an information portal for the interested public (students, prospective students, employers, foreign recognition bodies, and agencies) regarding currently accredited programs. Currently, the agencies inform the Accreditation Council of their accreditation decisions and publish the results together with the reports in the database of accredited degree programs operated by the Accreditation Council. System-accredited institutions that have applied for write access to the database can make the entries themselves.

The current data model (the database currently functions as part of the Higher Education Compass¹⁸) is insufficient to provide the necessary data foundation for publishing comparable accreditation results for degree programs. Therefore, accreditation results (both positive and negative) and reports are to be published in the future in a standalone database of the Accreditation Council. For system-accredited institutions of higher education, the option to enter the results of internally accredited degree programs will be retained. At the same time, the publication of accreditation results will be explicitly regulated in the model legal ordinance to be adopted.

To ensure the traceability of external reviews within the context of the institutions' own accreditation processes, it would be desirable to establish transparent processes for the publication of accreditation results. The practice, previously followed in some cases, of entering internally accredited degree programs into the database of accredited degree programs using only data from the system accreditation process results in a loss of information regarding the individual degree program. To improve the comparability of accreditation results for both program-accredited and system-accredited study programs that have undergone internal review by the institutions, the database of accredited study programs will continue to be maintained in the new system. It is recommended that universities publish not only the results but also the reports, as well as the names and roles of the evaluators appointed by the university, in full in the database of accredited degree programs. The practice of the University of Greifswald can be regarded as a "best practice" for the publication of internal process results within the framework of the current database.¹⁹

In order to make comparable accreditation results available to the public, the new system will establish a separate database for the Accreditation Council, in which the accreditation results of individual degree programs can be recorded along with their respective accreditation periods, information on conditions or recommendations, on the external evaluation of degree programs, and on the expert reports (quality reports). This is also intended to contribute, through the "obligation to ensure quality—particularly external quality assurance" provided for in the ESG, to "make quality visible and increase transparency."²⁰ However, when speaking of the comparability of accreditation results, one does not expect system-accredited universities to necessarily produce comparable quality reports (expert opinions). Rather, the necessary transparency should be ensured at this point, also in the interest of the European context

¹⁸ For further information on the Higher Education Compass, see the link: <https://www.hochschulkompass.de/home.html>

¹⁹ Using the search function of the database of accredited degree programs—<http://www.hs-kompass2.de/kompass/xml/akkr/maske.html>—you can view all degree programs accredited by the University of Greifswald

⁽²⁰⁾ See ESG Criterion 2.3. Implementation of Procedures: https://www.hrk.de/uploads/media/ESG_German_and_English_2015.pdf

be established to, in turn, promote mutual trust and the cross-state recognition of degrees.

The latter set of issues was discussed at length during the expert meeting. The specific future requirements for system-accredited universities still need to be defined more precisely.

5.2.2 Involvement of external expertise

According to Section 6.3. of the Rules for the Accreditation of Study Programs and for System Accreditation, the institution's quality management system must ensure the participation of faculty and students, administrative staff, alumni, and representatives of professional practice, and must guarantee that independent bodies (individuals) conduct quality assessments as part of internal and external evaluations.

Furthermore, the institution must ensure the independence of external evaluations through appropriate binding measures to guarantee the impartiality and freedom from instructions of external experts. The institution must approach the issue of independence with due care and take appropriate precautions in each case.

In the reviewed procedures, in most cases the agencies mandated both the involvement of external expertise (compliance with the stakeholder principle) and the determination of the independence/freedom from instructions of the external reviewers. Furthermore, in all cases the agencies demonstrated sensitivity in assessing the involvement of external parties against the backdrop of the specific requirements of the current regulations. This issue featured more prominently in the evaluations, particularly when the expert groups identified structural problems (for example, when the tasks, functions, and expectations of the external experts were not documented) or when this quality assurance instrument had recently been developed or was in the process of being revised during the procedure.

The previous practice of incorporating external expertise into the institution's own accreditation procedures raised two fundamental questions. First, it was not always clear from the reports in what form the external perspective was incorporated into the evaluation. Were on-site visits always planned? If external input was obtained only in writing, how did the institution ensure that all criteria for the accreditation of degree programs requiring an on-site evaluation (e.g., qualitative and quantitative staffing, material resources, and facilities) were properly assessed? The so-called stakeholder principle, particularly the involvement of professional practice, also emerged as one of the central challenges.

Criterion 6.3 of the Accreditation Council's current regulations stipulates that the university must use an internal quality assurance system that meets the requirements of the European Standards and Guidelines for Quality Assurance in Higher Education (ESG). Successful accreditation of such a system implies that the university complies with the ESG at both the internal and external quality assurance levels. According to the ESG guidelines, reliability, consistency, and transparency are elements of an appropriate quality assessment.

During the expert discussion, it was also noted that on-site visits should be made the standard practice in the universities' own accreditation procedures as well. This would facilitate an exchange with the respective representatives of the departments or degree programs on an equal footing and also give the expert panel the opportunity to discuss the further development of quality among themselves. However, this does not preclude external evaluations from allowing for a certain degree of flexibility regarding implementation and design if the universities can demonstrate the effectiveness of their own internal quality assurance measures.

During the discussion, the topic of "Appreciation." There are significant differences among various system-accredited institutions in the importance attributed to external expertise. The spectrum ranges from an involvement similar to program accreditation to a written procedure in which one neither gets to know the other evaluators nor is informed of the outcome of the process, and is furthermore admonished by the university's quality management office not to contact the relevant department independently under any circumstances. The latter scenario is not recommended.

External evaluation is inextricably linked to the goal of ensuring the participation of all relevant stakeholder groups. Criterion 6.3 of the Accreditation Council's currently applicable regulations takes this goal into account; however, it is not yet being implemented in the desired manner in current accreditation practice. There was a particular need for action regarding the involvement of external representatives from professional practice as well as external students in the external evaluation processes. Since the latter is not explicitly stated in the Accreditation Council's rules, it was not included in the first draft of this report following the document-based review of individual procedures. The expert discussion conducted provided further insights on this matter.

There are already some universities that use external students as evaluators for their accreditation procedures. To this end, many institutions have established their own pools of evaluators. To recruit external students, system-accredited universities can also turn to

the Student Accreditation Pool²¹, which sees itself as a nationwide association of students and addresses issues of quality assurance and accreditation from a student perspective. While the pool cannot cover every (specialized) subject, the students it places are highly qualified in matters of quality assurance and can also be deployed in fields outside their own discipline, according to a university representative.

Paragraph 18 of the Model Statute provides a welcome clarification by stipulating regular evaluations of degree programs by internal and external students, academic experts from outside the university, representatives from the professional field, and graduates. This provision establishes the obligation to involve all stakeholders.

6 Effectiveness of the Developed QM Systems: Results of Interim Evaluations

As an additional procedural component, the Accreditation Council has introduced an interim evaluation for system-accredited institutions during their first accreditation period. This serves primarily to assess the effectiveness of the established QM system. The Accreditation Council has decided not to further specify the details of the interim evaluations and to leave their design to the agencies and institutions.

In his circular dated July 14, 2016, the Chair of the Accreditation Council noted that the upcoming system re-accreditations should serve as an indicator of the quality achieved in the internal accreditation results: *“Higher education institutions should view their self-reports as a form of self-evaluation and critically reflect on their own actions, taking into account the results of the interim evaluation (Section 5.17 of the Rules). Likewise, the agencies should pay particular attention to the quality achieved in the degree programs during their reviews. This can lead to a collegial exchange regarding further quality development.”*

The key topics addressed in the interim evaluations already conducted aim to assess the aforementioned quality of outcomes and to strengthen the perception of self-accreditation. In this context, it seemed appropriate to incorporate some findings from the interim evaluations into this report.

In most cases, an interim evaluation is used to assess whether the institution has already addressed the recommendations issued during the system accreditation process

²¹www.studentischer-pool.de

and what steps have been taken to fulfill them. Various agencies describe the further development of the established systems and offer some suggestions for further improvement potential.

An interim evaluation is not provided for in the new accreditation system. Nevertheless, a document-based review of previously conducted interim evaluations reveals that the instrument has generally proven effective so far, at least in cases where the agency did not opt for a minimalist summary. In addition to assessments of the current state of the QM systems, the reports of many agencies contain information on the possible involvement of students in quality assurance processes or on the regularity of internal accreditations (keyword: "accreditation cycle").

The publication practices of internally accredited degree programs, which are in some cases still handled by the agencies (if the institution does not apply for write access to the database), are described by the agencies as cumbersome, especially given that system-accredited institutions are becoming more autonomous and intend to take independent responsibility for all aspects of internal and external quality assurance of degree programs.

7 Further suggestions from the expert discussion

Due to the topic-specific sample, not all aspects relevant to the discussion of the selected key topics could be covered. During the expert discussion, additional topics were suggested:

The role of central QA units at universities. Based on empirical social science research involving a content analysis of reports on system accreditations at 24 different universities, it was found that the QA units of system-accredited universities gain spheres of influence by having individual departments/programs delegate tasks related to advising, coordination, and monitoring of internal quality assurance processes to them. However, this approach carries certain risks regarding the potential insufficient consideration of academic standards, which could lead in the long term to a distancing of the academic community from quality assurance. For this reason, regular two-way communication between quality assurance units and academics appears indispensable.

Handling conflicts. Another study found that the internal review procedures of system-accredited institutions include measures for implementing the requirements and recommendations issued during the review process, as well as conflict resolution mechanisms, including any escalation procedures. System-accredited institutions typically develop procedures for

dealing with conflicts that may arise in internal procedures. In principle, there are two types of conflicts: on the one hand, between the academic department and the expert group that assesses the quality of degree programs, and on the other hand, between the academic department and the body responsible for internal accreditation decisions. In both cases, following any attempts at mediation in the form of hearings, roundtable discussions, suspension of the procedures, or, if necessary, an extension of the deadline for fulfilling the conditions, a return to external program accreditation is provided for. In principle, therefore, two conflict resolution mechanisms can be identified: on the one hand, internal handling of conflict cases, which is often linked to management decisions, and on the other hand, external handling of conflicts, in which—program accreditation—a decision is to be reached with the help of external subject-matter expertise.

8 Conclusion

The primary objective of the study of the selected system accreditation procedures was to examine and analyze the applicability of the current criteria, procedural rules, and decision-making rules. The sample was selected through extensive consultation with the agencies. Other stakeholders also had the opportunity to contribute their suggestions during the expert discussion.

Based on the thematic analysis and the results of the expert discussion, system accreditation continues to be regarded as a suitable instrument. It remains important to grant higher education institutions the greatest possible freedom in designing their QM systems (increased institutional autonomy); however, this must occur within the framework of legal requirements for internal and external quality assurance.

To overcome the existing challenges—particularly the involvement of external stakeholders in internal procedures and the transparency of internal processes—an intensive, cross-institutional exchange among the relevant stakeholders (which already exists in many cases) is of great importance, as it contributes to improving acceptance and enhances the effectiveness and efficiency of further system accreditations.

With the reorganization of the accreditation system, the original goals associated with the introduction of system accreditation will continue to be pursued. The universities' flexibility in shaping the system remains intact.

9 Appendices

- [Quality Assurance and Development at System-Accredited Universities in the Tension Between Governance, Legitimacy, and Quality Development](#) – PD Dr. Edith Braun and Anna Sophie Beise (HIS Institute for Higher Education Development (HIS-HE)).
- [Closing the Quality Cycle and the New Spheres of Influence of Central Staff Units](#) – Prof. Dr. Wilfried Müller (see also System Accreditation: Closing the Quality Cycle and New Spheres of Influence of Central QA Staff Units and Departments. A document analysis, in: Quality in Science (QiW), Vol. 11 (2017), No. 3+4, pp. 67–73).
- Added value of external expertise: two levels of external expertise: Accreditation of QM systems and accreditation within the QM systems of higher education institutions – [Dr. Verena Kloeters](#) (Managing Director of the Agency for Quality Assurance of Study Programs through Accreditation – AQAS) and [Dr. Carsten Roller](#) – External reviewer, representative of professional practice (Association of Biology, Life Sciences & Biomedicine in Germany).