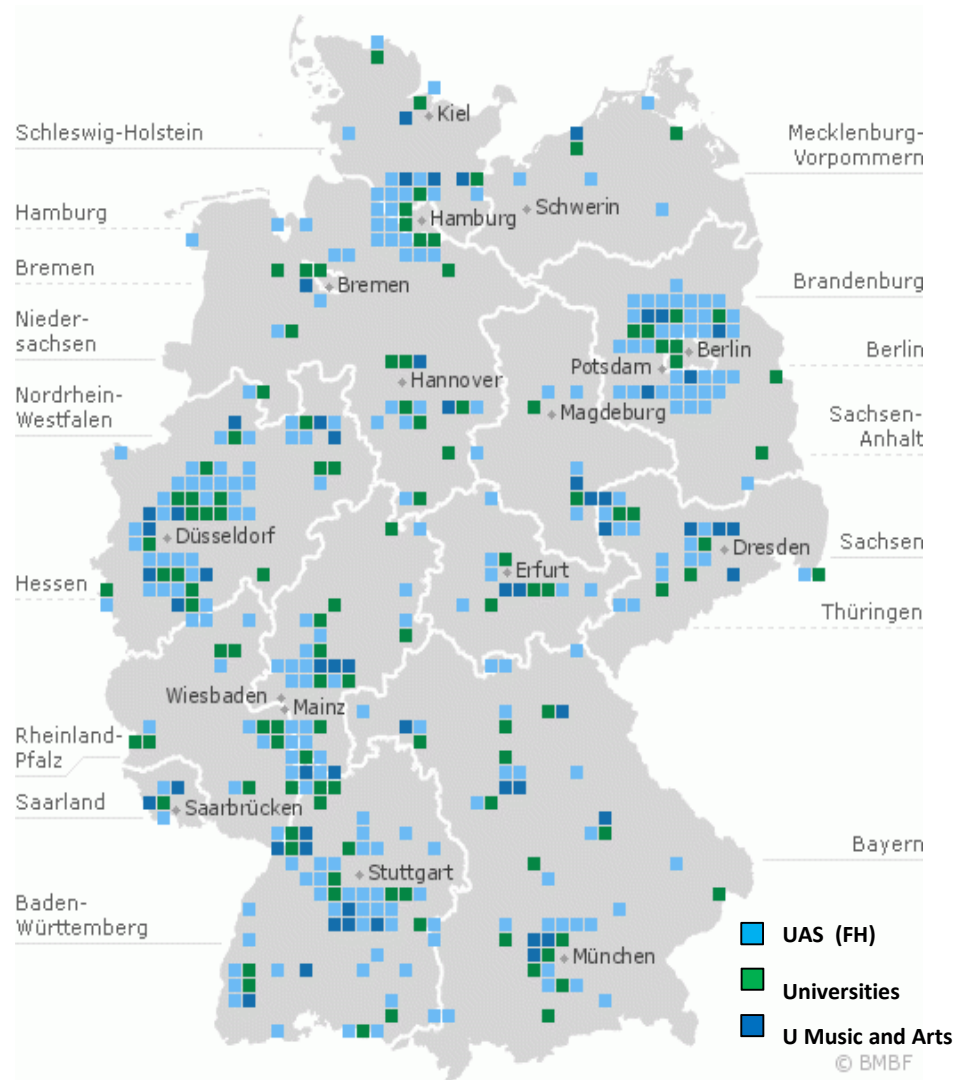# Changes in the German Accreditation System

A new equilibrum between universities, agencies and the German Accreditation Council

Doris Herrmann (AQAS) and Barbara Michalk (HRK)

Higher Education in Germany

Responsibility for HE lies
with the federal states:
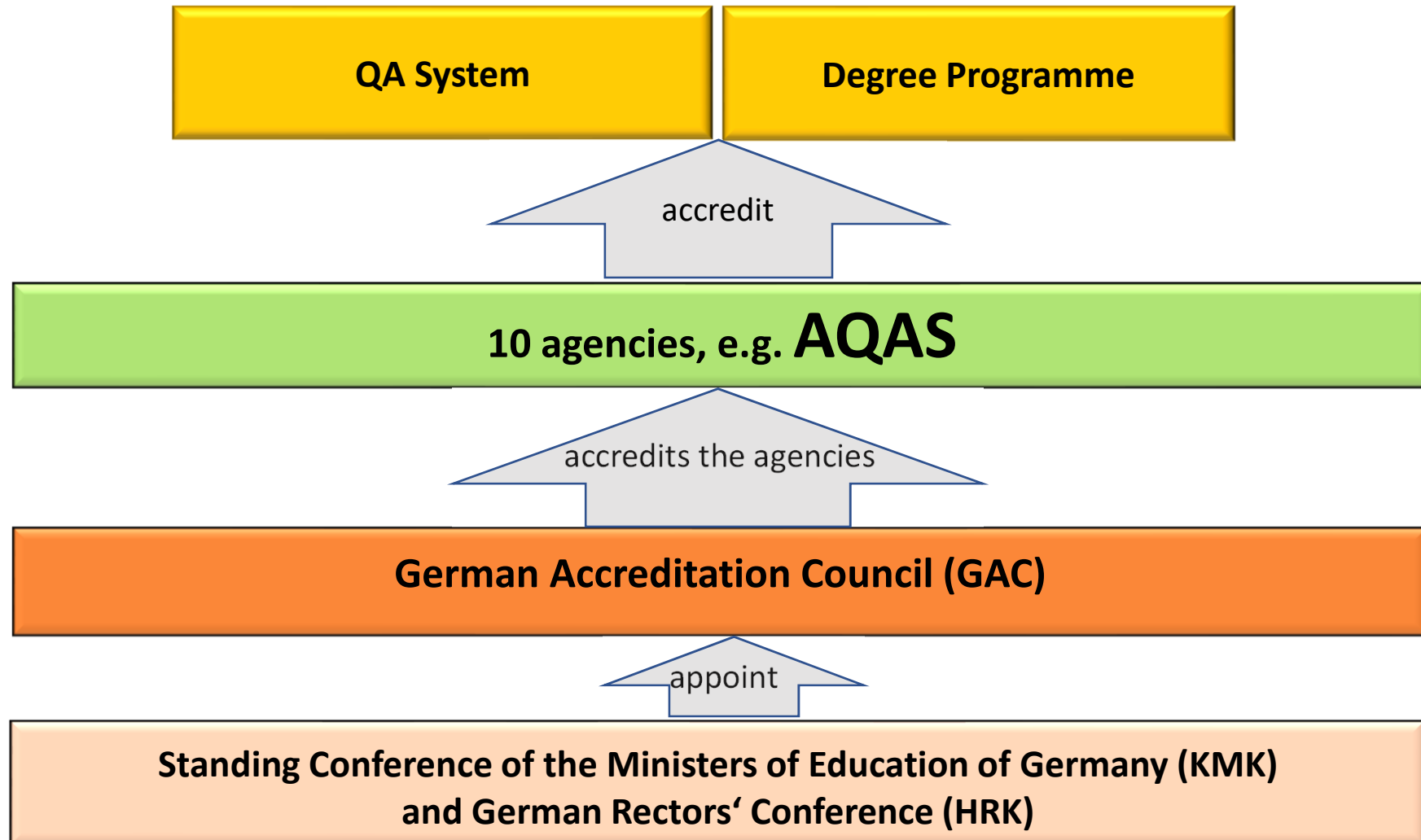
→ one federal framework
for HE, but >16 state laws

→ Education is funded by
the Länder; federal ministry
pays only for specific
initiatives and projects

→ funding differs,
depending on the economic
situation of the state

→ different political
viewpoints on education
and research, depending on
the state government

2

HRK German Rectors' Conference

The German Accreditation System before 2018

QA System	Degree Programme

↑ accredit

10 agencies, e.g. AQAS

↑ accredits the agencies

German Accreditation Council (GAC)

↑ appoint

Standing Conference of the Ministers of Education of Germany (KMK) and German Rectors' Conference (HRK)
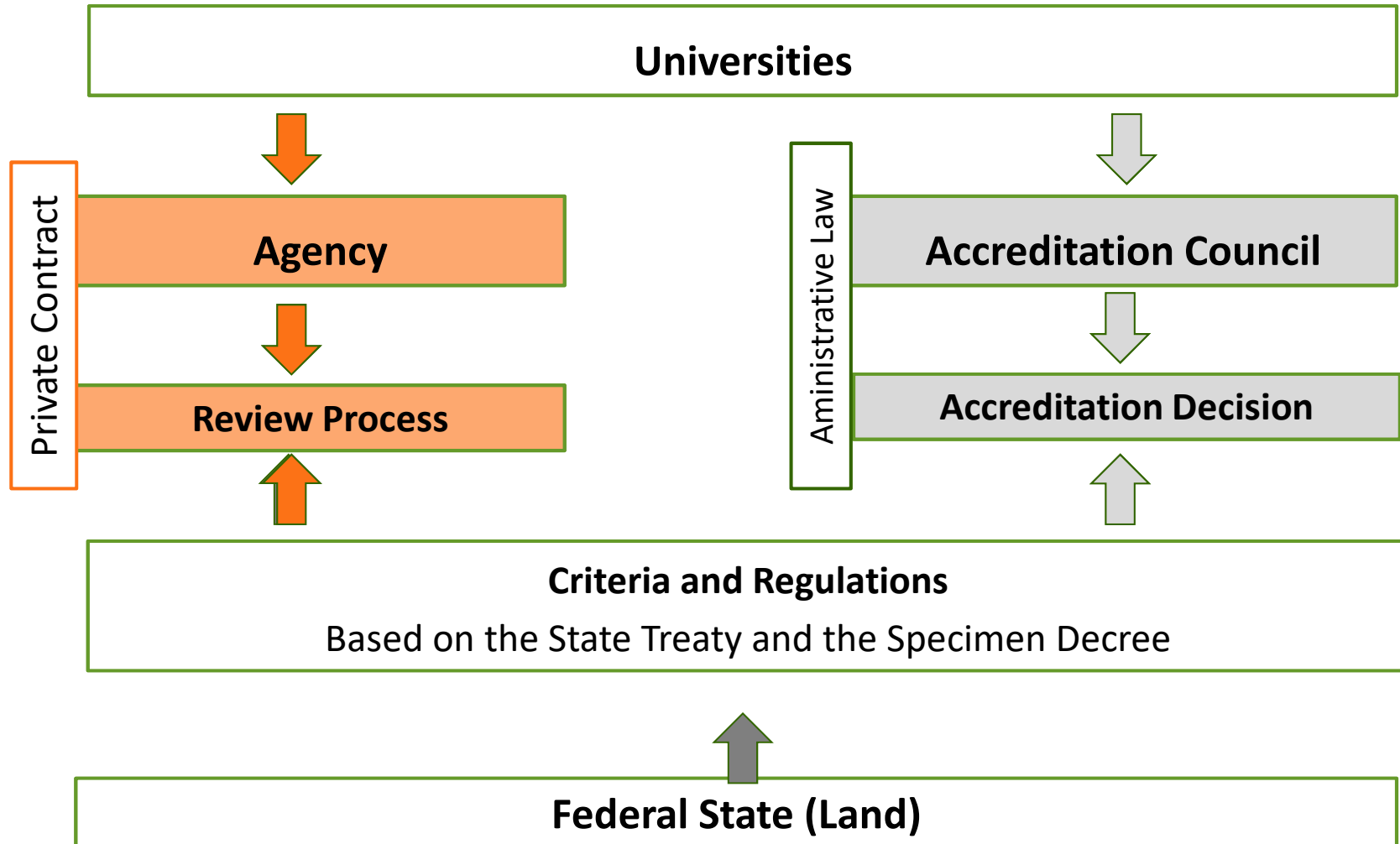
Why change a running system?

- A private HEI took an accreditation process to court because it was not satisfied with the result.
- Finally, the Federal Constitutional Court (FCC) decided on the case:
— External quality assurance is legitimate but the regulators (ministries of the Länder) are responsible for the final decision taking. Therefore external bodies can carry out the accreditation procedure but the state has to stay responsible for result.
— The regulations for accreditation must guarantee the adequate participation of academics.
— The set of rules and regulations has to be created in a way that provides for the consistent application of the administrative law.

Regulations for EQA as of 2018

- ESG for internal QA within HEI, for external QA and for the QA of QA agencies
- Treaty and common regulatory framework of the Länder that is implemented consistently in all of the German federal states and linked to their HE legislation. It contains
  - academic and formal criteria (in accordance with the ESG)
  - rules and procedures (in accordance with the ESG)
  - connections to the administrative law.
- There are 3 types of accreditation:
  - programme accreditation,
  - system accreditation,
  - "alternative procedures", i.e. new forms of EQA
- Additionally, private HEI have to undergo institutional accreditation and a procedure of state approval.
- There is no accreditation by professional bodies.

Responsibilities in the New System

Universities

Private Contract	Agency
	Review Process

Administrative Law	Accreditation Council
	Accreditation Decision

Criteria and Regulations

Based on the State Treaty and the Specimen Decree

Federal State (Land)

The new Accreditation System: German Accreditation Council

▪ Members of the GAC are appointed by the KMK (Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany) and HRK jointly:

- academics (8)
- HRK (1)
- state (4)
- students (2)
- professional practice (5)
- international experts (2)
- agency representative (1), in an advisory capacity – no vote

▪ GAC takes the final decision about an accreditation on the basis of the report of the agency and the statement of the university

The new Accreditation System: Agencies

▪ Agencies conduct the accreditation procedures and give recommendations for the accreditation:

- agencies check the formal criteria

- peer experts evaluate the academic / content related criteria

- for the reports a template has to be used that
  - covers all the criteria but
  - leaves room for individual evaluations and recommendations

- all agencies listed in EQAR can take up activities in Germany, but they need to undergo a certification procedure to prove that they comply with the German regulations; the universities have to hand in the reports in German

The new Accreditation System: Universities

- Universities can decide between three types of accreditation instead of two

- They need to adjust their quality management so they can report on a different set of external criteria

- They need to plan ahead for the preparation of the two phases of the accreditation process

- They have to be aware that their documents have to address the needs of the peer experts, of the agency and the GAC

- They have to calculate the costs (two services must be paid – agency and GAC)

The Accreditation Procedure

1. The university approaches an agency to conduct the procedure for a programme or system accreditation.

2. The agency checks the formal/organisational criteria. For the content related criteria a peer expert group is set up by the agency: at least 2 professors (in the field), a student and a representative of professional practice.

3. The university hands in a self evaluation report as the basis for the evaluation by the peer group, which includes a site visit.

4. The peers write their evaluation report and hand it to the agency. Both reports (formal + content) are delivered to the university.

5. The university applies for accreditation to the Accreditation Council, handing in both reports.

6. GAC discusses the reports and takes a decision.

7. The programme / QA system is accredited / not accredited.

University Perspective

+ increased role of academic expertise,

+ comparable legal framework in 16 Länder,

+ clearly defined legal status of accreditation decisions,

+ clear-cut role of agencies,

+ "alternative procedures" = HEI can explore innovative ways of
     EQA - if the GAC approves the new concept of the HEI,

+ …

− (pro)rectors and (vice)presidents are not considered to be
  academics → loss of expertise,

− system-wide regulations difficult to change → loss of flexibility, threat of
  patchwork regulations in single states,

− longer duration of the process as a whole and higher costs

- …

Perspective of the Agencies

+ clear legal regulations, private contracting

+ clear-cut role of agencies,

+ strengthening the service oriented aspect of their work,

+ review by ENQA, emphasising the European perspective,

+ no monitoring by GAC anymore

+ …

− loss of decision making power

− loss of long lasting experience by reducing or dismissing the commissions
    in which all stakeholders are represented

− formal straightjacket of detailed regulations and templates

− …

European Perspective

- "European Approach" only partly implemented - no regulations for Double Degrees

- Review of the agencies by ENQA brings them closer to the other European agencies and requests from ENQA and EQAR

- Choice of EQAR-registered agency opens up European cooperation for universities – drawback: language

- How can we organise international exchange?

Challenges in the System

for universities:

- need to adjust internal QA to changes in the regulations
- but "never change a running system"

for agencies:

- need to define new internal procedures
- need to revise all internal documents
- need to re-train peer experts

for everybody:

- need to change well-established habits
- need to find a new equilibrium between universities, agencies and GAC

For discussion

How can universities be encouraged to gain more autonomy and more scope for their own quality development under the new regime?

How will the new regulations impact changes of the internal quality management systems of universities? What can be the role of the agencies (based in Germany or in the EHEA) in this process?

Can options for change be enhanced by peer learning activities between similar systems of external quality assurance in the EHEA?