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1. Preamble

In 2018, the accreditation system in Germany underwent substantial changes. With the entry into force of the Interstate Study Accreditation Treaty on 1 January 2018, the roles of stakeholders have fundamentally changed: decisions on the accreditation of study programmes (programme accreditation) or quality assurance systems (system accreditation) are no longer the responsibility of the agency that carried out the assessment procedure, but of the German Accreditation Council (GAC). The intention is to take into account the requirement of the Federal Constitutional Court, according to which key decisions on accreditation may not be largely entrusted to other stakeholders, but must be made by the legislator. Consequently, GAC has become the central decision-making authority for accreditation in Germany.

This reorganisation of the German accreditation system had far-reaching consequences for AQAS and has had a significant impact on its work in recent years. When the new requirements became known at the end of 2017, almost all of the Agency's procedure-related processes had to be revised and the relevant procedure materials and document templates had to be adapted or newly created. Parallel to the establishment of the new structures, procedures under the old regulatory framework had to be completed without any loss of quality, which meant that work had to be performed in both systems simultaneously. The conversion process was largely completed by 2019 and the relevant processes and procedures have been successfully established.

Since 2020, the outbreak of the SARS Cov-2 virus has posed new challenges for the accreditation system. The dynamic spread of the virus and the associated restrictions on travel and gathering have meant that most AQAS staff have been working from home since March 2020, with site visits generally being conducted online. This situation again led to the need to adapt processes and procedures; also new challenges arose regarding not only the communication structure within the Agency, but also communication with experts and universities. This self-assessment report was prepared during this period.

The self-assessment report is the basis for the review of AQAS by ENQA. The aim of the review for AQAS is not only to renew its ENQA membership, but also to renew the Agency's listing in the European Quality Assurance Register for Higher Education (EQAR), which is the prerequisite for authorisation in Germany by GAC.

The structure of the self-assessment report follows the *Guidelines for ENQA Agency Reviews* and documents the implementation of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* by AQAS. Comprehensive annexes are appended to the self-assessment report to document the structures and procedures described. In addition to references, internal regulations and procedure materials as well as sample documents from the accreditation procedures conducted by AQAS are also provided.

The annexes are structured thematically as follows:

Core annexes[1]

1.1 Organisational documents
1.2 Documents in use for procedure specifics
1.3 Internal quality assurance
1.4 Documentation of previous reviews

Additional annexes

2.1 Commissions / Management Board
2.2 Staffing
2.3 Further annexes

[11] The list of annexes is provided at the end of the document.

The aim of this self-assessment report is to provide a comprehensive picture of the profile, structures and work of AQAS.

2. Development of the self-assessment report (SAR)

The self-assessment report was prepared in a multi-stage process. AQAS attached importance to involving all employees in the preparation of the self-assessment report. In summer 2020, two rounds of discussions were held with the entire team as part of a SWOT analysis, as was the case at the "Future Workshop", where the future direction of AQAS in the years ahead was discussed. The results of the team activities were also discussed with the Management Board, whose suggestions were incorporated into the process. Based on the results of these self-reflective discussions, the AQAS Strategy and the Mission Statement were revised and incorporated into this self-assessment report. A core team (Dr. Kloeters, Ms. Herrmann, Mr. Heinzer, Ms. Büning) was responsible for preparing the self-assessment report, but because of the widespread expertise in the whole team, other AQAS colleagues were asked to contribute to the SAR. Preparation of the SAR started in 2020 after the SWOT analysis and the drafting started in January 2021. On 10th of May 2021 the final draft was send to ENQA. A particular challenge was the fact that some of the texts had to be written in parallel with the change in processes taking place as a result of the coronavirus pandemic, and that all coordination processes had to be carried out online due to staff having to work from home.

3. Higher education and the quality assurance of higher education in the context of the Agency

German agencies operate in a context that is shaped by a multitude of stipulations and stakeholders. The Federal Republic of Germany is a federally organised state consisting of the federal state and 16 partly sovereign federated states, which perform their own state tasks. Each federal state has its own state constitution and consequently its own political institutions. According to the German Basic Law, the state tasks and competences for cultural and educational policy lie with the federated states. Each federated state has enacted its own law for higher education.

The state ministers responsible for education, research and cultural affairs voluntarily joined forces to form the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* in the Federal Republic of Germany (Kultusministerkonferenz – KMK). The objective of this consortium is to ensure that the individual federal states apply as uniform criteria as possible in their education systems. However, the KMK has no direct legislative competence. Its decisions are therefore not directly binding, but must be enacted by the respective federal state as legislation under state law.

Higher education studies in Germany are offered at three types of higher education institutions (HEIs)[2]: *universities, universities of applied sciences (FH or HAW)* and *universities of Art/Music*. HEIs are either state or state-recognised institutions that are subject to the relevant state's higher education legislation. According to the German Rectors' Conference (*Hochschulrektorenkonferenz* – HRK), there were 390 HEIs in Germany in 2020. More detailed data on the German higher education system (from 2020) can be found in the HRK overview here. Since 1998, almost all study programmes have been transformed to the two-tier system (Bachelor's and Master's degrees). However, there are still programmes that conclude with a state examination (e.g. law, medicine, and also teacher training in some federal states).

[2] In the context of its procedures and for the purposes of the SAR AQAS uses the terms "university" and "higher education institutions" interchangeably.

Bachelor's and Master's study programmes may be offered by all of the aforementioned higher education institution types and can be studied consecutively, at different HEIs, at different types of HEIs and with phases of professional work between the first and the second qualification level. The organisation of study programmes makes use of modules and of the European Credit Transfer and Accumulation System (ECTS).

The Qualifications Framework for German Higher Education Qualifications (*Qualifikationsrahmen für Deutsche Hochschulabschlüsse* – HQR) describes the degrees conferred in the German higher education system, including the classification of the qualification levels as well as the resulting qualification goals and competences of graduates. The three HQR levels correspond to levels 6, 7 and 8 of the European Qualifications Framework for Lifelong Learning (EQF).

To ensure the quality and comparability of qualifications, the organisation and structure of study programmes and general degree requirements have to conform to principles and regulations established by the KMK. Study programmes leading to a Bachelor's or Master's degree must be accredited in accordance with the Interstate Study Accreditation Treaty of 1 June 2017. By adopting the Interstate Treaty, the states implemented the requirements of the Federal Constitutional Court, which, in its decision of 17 February 2016, defined the legal requirements governing the accreditation system as a quality assurance tool in the higher education sector. This created the legal basis for accreditation as a binding science-based external procedure for quality assurance and development in learning and teaching. One of the stipulations was that only the state may take accreditation decisions. This task was assigned to a body of the Foundation for the Accreditation of Study Programmes in Germany – the German Accreditation Council (*Akkreditierungsrat* – GAC).

The Foundation for the Accreditation of Study Programmes in Germany is a joint institution of the federated states for quality assurance in learning and teaching at German HEIs. The Foundation's tasks are laid down in the Interstate Study Accreditation Treaty. GAC's main task is to decide on the accreditation of study programmes (programme accreditation) and the accreditation of quality assurance systems (system accreditation) on the basis of experts' reports. The implementation of assessment procedures in programme and system accreditation and the preparation of the relevant experts' reports are the responsibility of the accreditation agencies authorised for this purpose.

The decisions taken by GAC are administrative acts within the meaning of the Administrative Procedure Act. In contrast, the assessment and the preparation of experts' reports by the agencies are carried out on the basis of private law. The accreditation system in Germany was deliberately organised without being controlled by the government by entrusting the implementation of procedures to agencies under private law that compete with each other from the outset. This means that the agencies are required to develop further, to continuously improve processes, and to engage with stakeholders in a dialogue based on partnership.

At the time of application, a total of ten agencies were authorised by GAC to operate in Germany. Alongside eight German agencies, a Swiss agency and an Austrian agency also have authorisation. There are so-called "comprehensive agencies", which offer the assessment of study programmes in all subject disciplines and quality assurance systems, and so-called "specialist agencies", which operate exclusively in a specific range of disciplines. AQAS is a comprehensive agency.

As of 2018, the foundation and standard for assessing study programmes and quality assurance systems are governed exclusively by the regulations of the Interstate Treaty and the regulations of the so-called Specimen Decree (*Musterrechtsverordnung* – MRVO) of the KMK. Based on the Interstate Treaty, the MRVO regulates the details of the formal and academic criteria as well as the implementation of assessment procedures. As such, the Interstate Treaty and the MRVO provide the legal basis for the work of AQAS in Germany.

The German accreditation system requires that all Bachelor's and Master's programmes undergo initial accreditation before being launched or during their initial phase; initial accreditation focuses on the assessment

of the concept of the study programme. The special significance of accreditation is also reflected in the fact that most federal states have linked the successful accreditation of study programmes with state approval. According to the current provisions, accreditation of a study programme is granted for a limited period of eight years. After that, study programmes must be reaccredited, involving the review of the implementation of the concept and the enhancement of the study programme. The criteria set out in the MRVO apply to both initial accreditation and reaccreditation. The steps involved in the procedures are also similar. The criteria in the MRVO apply to all types of HEIs.

Private and State Higher Education Institutions can also apply for an institutional assessment of its QA-system (called “System Accreditation”) as explained below. Usually the Länder request that a private HEIs has to be accredited by the Council of Science and Humanities (Wissenschaftsrat), which checks the institution as a whole, before they can apply for institutional assessment of its QA-system by an agency.

With the entry into force of the aforementioned Interstate Treaty, the authorisation of agencies in Germany was also newly regulated: agencies must now be registered on EQAR; in addition, they must receive authorisation from GAC in order to operate in Germany. The previously stipulated assessment and accreditation of agencies by GAC has therefore become obsolete. In the opinion of AQAS, linking the authorisation of agencies with EQAR registration represents a clear commitment to the *ESG*. However, the new regulation of agency authorisation can also be understood as a move to open up the German system in the direction of the European Higher Education Area. In principle, any agency registered on EQAR that is able to prepare a report in German can obtain permission to conduct assessment procedures in Germany by GAC. If European agencies, which are often state-funded, become increasingly active in Germany, competing markedly with state-independent German agencies, this will change the face of the accreditation system, especially since the monitoring of competition between agencies, for which GAC was previously responsible, has already ceased.

4. History, profile and activities of the Agency

The “Agency for Quality Assurance through the Accreditation of Study Programmes” (AQAS) is a registered association that was established by universities and academic societies in 2002; it is dedicated to the quality assurance and quality development of learning and teaching at universities. AQAS has been an integral part of the German accreditation system for 19 years and has accredited or assessed more than 7,000 study programmes and given system accreditation to 18 universities. These figures demonstrate that AQAS not only regularly conducts external quality assurance procedures in Germany and abroad, but is also one of the most experienced agencies in Germany in a number of areas (e.g. teacher training and joint programmes).

The main task of AQAS is to assess the quality of study programmes, especially Bachelor’s and Master’s programmes, and of quality assurance systems at universities in the context of external assessments. The assessment procedures are based on national standards, which in turn have been defined in an ESG-compliant manner. The international procedures are directly oriented towards the ESG. By far the largest business area of AQAS are assessment procedures in preparation for programme accreditation in Germany.

AQAS e. V. is a comprehensive agency whose work extends across disciplines and types of HEIs. The Agency is currently supported by 93 member universities and sees itself as an organisation of universities with which AQAS cooperates in a spirit of trust.

The association has grown continuously since its foundation. The considerable amount of positive feedback from universities and experts, and the growing number of applications for membership of AQAS e. V. from universities throughout Germany testify to the high level of recognition that AQAS enjoys. The international

business field of AQAS is also growing. Two foreign universities also expressed an interest in becoming members of the association, resulting in the inclusion of Istanbul Gelişim University (Turkey) (since 2018) and Universitas Pendidikan, Bandung (Indonesia) (since 2020).

Until the legal reorganisation of the German accreditation system, authorisation in Germany was linked to the accreditation of the relevant agency by GAC. AQAS e. V. received its first accreditation from GAC after being founded in 2002 and was reaccredited in 2011 and 2016. The last reaccreditation of AQAS by GAC is valid until 31 March 2022. In the course of the transition to the new accreditation system, GAC authorised AQAS to conduct assessment procedures in accordance with Article 5(3) No. 5 of the Interstate Study Accreditation Treaty on the basis of a transitional regulation (Resolution of the Accreditation Council of 20 February 2018).

5. Higher education quality assurance activities of the Agency

The core business of AQAS is the organisation of external assessment procedures for study programmes. Around 90% of the procedures conducted by AQAS are assessment procedures for programmes. This means that, at the national level, assessments are conducted on the basis of the MRVO and, at the international level, on the basis of the ESG. At the national level, the MRVO leaves no room for own interpretations; both the verification of compliance with the criteria and the process itself are defined in such a way that the Agency essentially only implements the MRVO. The standard procedures conducted by AQAS are expert-centred and science-based.

Programme accreditation is also the standard procedure in the international domain. It usually concerns Bachelor's and Master's study programmes, as well as PhD programmes in a few cases. There are only very few institutional assessments because foreign universities usually have little demand for these complex assessment procedures. In the international domain, the Agency has more flexibility to design of procedures due to the generic ESG; AQAS opted to base its own criteria closely on the ESG nonetheless. In 2019, the tools for international programme accreditation were revised based on the experience gained with projects abroad. The international business area also includes procedures under the *European Approach for Quality Assurance of Joint Programmes* (or European Approach – EA for short), as described below.

The steps of the procedure correspond to those of previous national accreditation procedures, given that they are well established, e.g. involvement of the AQAS Standing Commission in the procedure from the very beginning. The best practices agreed upon at the European level regarding the implementation of procedures are taken into account. Following good European practice, stakeholders (representatives from academia and students as well as representatives of the labour market, who have equal standing) are involved in an appropriate way in both national and international procedures. In international procedures, it is common practice to involve experts with relevant regional competence, which means that panels of experts are also international.

Overview of the procedures conducted by AQAS that are ESG-relevant:

Subject matter of the procedure	Type of procedure / criteria	Decision taken by AQAS
Task areas of AQAS e.V.		
Programme assessment procedures (national) (including joint programmes with the participation of German universities)	Assessment, MRVO (ESG)	No, GAC
System assessment procedures (national)	Assessment, MRVO (ESG)	No, GAC
PhD assessment procedures (national)	Assessment, MRVO (ESG)	Yes
"Alternative Procedures" (national)	Assessment, MRVO (ESG)	No, GAC
Programme accreditation procedures (international)	Accreditation, AQAS criteria, (ESG)	Yes
Institutional accreditation procedures (international)	Accreditation, AQAS criteria, (ESG)	Yes
Procedures based on the European Approach (with the participation of German universities)	Assessment, MRVO (ESG)	Yes, possible recognition by GAC
Procedures based on the European Approach (without German participation)	EA/ESG	Yes, possible recognition by foreign agencies

Figure 1: Overview of the procedures conducted by AQAS that are ESG-relevant

One procedure which is not in the scope of the ESG but connected with an accreditation procedure is an evaluation on the basis of the criteria in § 27b of the Austrian Act on Quality Assurance in Higher Education (HS-QSG). An Austrian education provider which programmes are usually assessed by AQAS in accreditation procedures, asked AQAS to evaluate whether its study programmes which are offered in cooperation with a British university comply with § 27b of the HS-QSG. The background to this is that, in Austria, study programmes offered in cooperation with foreign institutions must be reported, and it must be determined whether the criteria of the HS-QSG have been met. Up-till-now two procedures have been finalized which did not conclude with a decision by the AQAS Standing Commission, but only with a confirmation stating that the criteria have been met. In this respect, they are not accreditation procedures in terms of either procedure or content and it was agreed in the ToR with EQAR that they are not part of the ENQA-Review.

AQAS ARCH is a daughter company of AQAS, founded in 2014 by the General Assembly in order to achieve a transparent separation between accreditation based on the ESG, which are conducted by the association (e.V.), and other services in higher education, was commissioned to carry out the evaluation procedure. By separating its activities between classic accreditation procedures (leading to the award of the GAC) and projects beyond the field of accreditation AQAS aims to achieve a greater degree of transparency internally and externally (for details on AQAS ARCH see annex II.3.5).

6. Processes and their methodologies

All procedures conducted by AQAS that are based on the ESG follow clearly defined processes. The procedures have a clear subject matter (study programmes or quality assurance systems) and are assessed according to clearly defined criteria. The procedures focus primarily on learning and teaching at universities, the mechanisms for assuring quality, learning environments, and the life cycle of students. In addition, research is considered in the assessment procedures insofar as it influences teaching, enabling the Agency to evaluate the academic orientation of study programmes.

Here is an overview of all procedures that are based on the ESG and are therefore relevant for the review coordinated by ENQA:

(1) National procedures (based on the MRVO)

a. Assessment of study programmes (Bachelor's, Master's and PhD)
b. Assessment of quality assurance systems (system accreditation)
c. Alternative procedures according to the MRVO

(2) International procedures (based on ESG criteria)

a. Programme accreditation (Bachelor's, Master's and PhD programmes)
b. Institutional accreditation of universities' quality assurance systems
c. Procedures based on the European Approach

In its assessment procedures, AQAS adheres to the four phases stipulated by the ESG which are described in detail also in the later chapters:

1. Self-evaluation
2. Site visit with experts
3. Final report
4. Follow-up

The basis of every assessment procedure conducted by AQAS is a self-evaluation report written by the university. In national procedures, this refers to the fulfilment of national criteria concerning programme or system accreditation. International procedures are based on the ESG. In an effort to assist universities in the process, AQAS provides working aids and guidelines with reference to the relevant standards and criteria, which are intended to guide the assessment process. All these materials are discussed in the AQAS Standing Commission (see Chapter 9.1.4), modified as required, and then adopted. Due to the corresponding composition of the commission, this ensures the participation of all stakeholders (universities, students, representatives of professional practice).

In selecting the members of our Standing Commission, the Management Board succeeded in gaining experts with previous experience in learning and teaching and/or with a genuine background in quality assurance. Since the student representatives are usually nominated by the German Student Accreditation Pool (similar to ESU), AQAS has found that they are very well prepared for their task.

An assessment by external experts involving one or two (national system accreditation) site visits is also part of every assessment procedure. Experts are appointed by the Standing Commission and they represent the different stakeholder groups: academics, students and representatives of the labour market. All experts deployed by AQAS confirm their impartiality in the procedure in writing (see Chapter 10.4.3 and Annexes).

The final report containing the experts' assessment is based on the criteria applicable to the procedure. Where applicable, it also contains proposals for any conditions and/or recommendations that the panel of experts

considers necessary as a basis for the final accreditation decision (see Chapter 10.3). In international procedures, the experts also provide a recommendation as to the final accreditation decision. The final report is published (see Chapter 10.6.1).

In national procedures, the follow-up takes place within the “deficiency rectification loop”. In international procedures, the follow-up process takes place as part of the fulfilment of conditions, retaining the practice that used to be common in national procedures.

The following overview provides information on the distribution of the different procedures over the last five years. The number refers to the procedures, not to the programmes:

Type of procedure	Completed procedures					
	2016	2017	2018	2019	2020	2021[3]
National procedures[4]						
Programme accreditation procedures						
Old regulatory framework	144	147	137	107	17	2
New regulatory framework[5]	/	/	-	37	83	20
System accreditation procedures						
Old regulatory framework	3	1	4	2	1	
New regulatory framework[6]	/	/	-	-	-	-
International procedures						
Programme accreditation	10	7	14	8	12	-
Institutional accreditation	1	-	-	1	2	-
European Approach			3	2		1

Figure 2: Distribution of the different procedures

Thanks to the wide-ranging and extensive expertise of the experts involved in assessment procedures, of its commission members and Head Office staff, AQAS repeatedly receives positive feedback indicating that the processes it has developed and the optimisation of procedures generally are fit for purpose. These comments and suggestions for further development are directly incorporated into the processes and materials of procedures, provided that the responsibility lies with AQAS, or – in the case of issues concerning the accreditation system as a whole – are shared with the other agencies and GAC, where appropriate.

[3] As of April 2021.
[4] The figures refer to procedures under the old regulatory framework until 2018 as well as to procedures after Germany’s accreditation system changed on 1 January 2018.
[5] The date on which the final accreditation report was submitted to the Standing Commission is decisive, not the date of the final accreditation decision by GAC.
[6] Due to the coronavirus pandemic, five system accreditation procedures under the new regulatory framework, which were scheduled for completion in 2020 or early 2021, have been postponed.

7. The Agency's internal quality assurance system

7.1 Quality assurance concept

Being an agency for quality assurance, it goes without saying that AQAS places high demands on the reliability and quality of its assessment procedures. The Agency has a quality assurance concept which is based on Part III of the ESG. This concept describes the measures and approaches which ensure that the activities undertaken by AQAS are in line with the ESG; key aspects of this concept are also the basis for this self-assessment report.

The starting point is the Agency's understanding of quality, as expressed in its Mission Statement, which is fundamental to all quality assurance procedures in higher education for which AQAS is responsible. The QA concept refers to the various AQAS rules, decisions and procedure materials that have been adopted by the responsible body in each case for the purpose of fleshing out accreditation procedures.

The concept is published on the AQAS website and is included in the annexes (see Annex I.3.1).

In the view of AQAS, it is key that internal and external quality assessments and feedback loops take place at a wide range of levels and with a variety of tools, enabling any potential deficiencies to be identified and eliminated at an early stage.

7.2 Internal feedback mechanisms

At the **AQAS Head Office level**:

From the start of its operation, AQAS has been deeply aware of the fact that good and acceptable work results can only be achieved if there is a continual sharing of ideas and a critical and constructive reflection of the Head Office's own work. The staff continuously share information on aspects that, in their view or based on feedback from universities and experts, ought to be changed. The AQAS team is made up of a balanced mix of experienced and young consultants who support each other.

An essential element of how AQAS understands quality is that consultants, who coordinate the procedures but who are not part of the panel, oversee the accreditation procedures assigned to them from start to finish, i.e. they also participate in every single site visit. This means that they are familiar with all aspects of the procedure, they know all the stakeholders involved, and can respond very quickly if problems arise in the assessment process. In spite of the higher internal costs incurred, AQAS consciously decided that two consultants should oversee the complex procedures of system assessment and international procedures, not only to ensure continuity in the processing of procedures, but also to enable information sharing on the project.

If problems arise in national or international procedures, rapid adaptations are implemented immediately, while issues that may be relevant to the entire team are discussed at the next *Jour Fixe* meeting. A regular *Jour Fixe* (held twice a month) institutionalises information sharing among staff. This enables the early identification of weak points in procedures and processes, and the development of solutions. The *Jour Fixe* also serves as a platform to discuss current national and international developments. Where appropriate, the Agency can then incorporate them into its materials and implement them in its procedures. The findings are documented in minutes. The Chair of the Management Board also attends *Jour Fixe* meetings from time to time. Owing to the measures to contain the coronavirus pandemic, the *Jour Fixe* has been held online since spring 2020, enabling staff to attend the meeting from home.

For the purpose of reflecting on current procedures, regular team meetings are held at the Head Office, chaired by the Head of Programme Accreditation and/or the Head of Quality Assurance.

Internal working groups are regularly formed within the Head Office to address current issues, thematic areas and developments (e.g. study programmes parallel with employment, recognition of prior learning (RPL), ESG conformity, etc.). The working groups usually present their findings at a *Jour Fixe* meeting or the in-house retreat. Where necessary, procedure materials are then adapted in response to the findings. Besides ensuring that AQAS documents are regularly revised and adapted on the basis of the latest requirements, these thematic working groups also enable consultants to continuously address the enhancement of quality assuring study programmes and teaching. A Templates Officer for all national and international procedures ensures that documents are adapted without delay, as soon as there is a need to do so.

Head Office consultants hold a one-day retreat each year. Besides discussing the latest developments, the participants also reflect on their own work at this event. The management usually reports on how the business is developing, after which the findings of internal working groups are presented and discussed. They also discuss how materials, tools and processes can be enhanced, or brainstorm on key issues. The findings are documented in minutes. In 2020, this meeting was held online. The findings of this retreat also focused on an internal analysis of strengths and weaknesses. The findings were used to determine specific measures to be taken (see Chapter 13).

By providing all these opportunities for sharing ideas and information, the general intention is to create an atmosphere in which staff see and embrace the capacity for self-criticism and the willingness to continuously develop as a sign of professionalism. This is also expressed in the “consultants’ self-conception” (see Annex II.2.6).

Various measures are in place to assure the quality of the procedures:

- In national procedures, formal reports (*Prüfberichte*) are read by a colleague before being sent to the university. The wording of shortcomings in this report is reviewed by the Head of Quality Assurance when the minutes of the Standing Commission meeting are checked.
- The summaries of findings (*Ergebniszusammenfassung*) which follows a site visit are checked according to the two-man rule: the divisional head only needs to check through the findings if experts identify any shortcomings. In all other cases, the consultant responsible decides whether a colleague should read the summary of the findings or whether a divisional head should be consulted. The main aim is to ensure that universities have a clear understanding of what is expected of them in terms of the potential rectification of deficiencies.
- AQAS attaches great importance to preparing experts’ reports that present the situation found at universities in a transparent and appropriate manner. Experts’ reports are usually read by a colleague and by a divisional head before being sent to the university. The consultants inform the divisional head of who has read the experts’ report and whether they have encountered any problems or particularities in the procedure. The divisional heads decide on a case-by-case basis whether or not they ultimately need to check through the experts’ report. In both national and international procedures, the two-man rule is a minimum requirement.
- Experts’ reports that present problems or peculiarities of general interest or that serve as examples for other procedures (e.g. for large cluster procedures, teacher training) are discussed at team meetings (see above).

The following mechanisms are implemented at the level of the Standing Commission:

AQAS attaches importance to dialogue-oriented cooperation with the commission. For this reason, feedback on organisational, technical or content-related problems is usually provided during the meetings of the commission. After each meeting of the Standing Commission, Head Office staff meet to reflect on the findings of the meeting. If any potential for improvement is identified, this is addressed without delay.

The members of the Standing Commission receive the results of the external survey of universities and experts (see below) (see Annex I.3) and have the opportunity to discuss the findings.

Once a year, AQAS holds a feedback session with members of the Standing Commission where problems and opportunities for improvement can be discussed. Any criticism of organisational aspects (e.g. problems accessing files remotely) was raised promptly and addressed quickly by AQAS. On the whole, however, the Head Office has received much praise for its work throughout the years, particularly with regard to the preparation of meeting documents.

7.3 External feedback mechanisms

Since December 2007, universities and experts have been surveyed on the quality of national programme accreditation procedures conducted by AQAS, following their completion. For reasons of objectivity, these surveys were outsourced to an external institution. They are conducted professionally by the Center for Evaluation and Methods (ZEM) at the University of Bonn. The results of surveys are usually summarised in half-yearly reports. These are sent to the Management Board, the Standing Commission and the Head Office, and discussed with them. A summary of the results is published on the AQAS website. In system assessments and in international procedures, feedback was usually obtained verbally, due to the small number of procedures and individuals involved. Due to the growing number of international procedures, a specially designed questionnaire has been used in this field since 2021 (see below). In cases where criticism is raised by universities or experts, it frequently relates to aspects of a systemic nature (e.g. the workload and costs of procedures). Examples of criticism of the approach taken by AQAS included the provision of information on the website or of digital documents for the panels of experts – aspects that were usually addressed without delay. The AQAS team is very proud to have received consistently good to very good feedback from universities and panels of experts in recent years. AQAS experts are generally exceedingly pleased with their cooperation with the AQAS Head Office and, in particular, with consultants. Universities confirm the Agency’s high level of professionalism in the implementation of accreditation procedures, and speak highly of how procedures are conducted reliably and effectively.

The questionnaire that had been used by the ZEM for years was adapted to the new regulatory framework. Consequently, surveys undertaken after January 2020 refer to procedures conducted under the new regulatory framework, whereas surveys on accreditation procedures under the previous regulatory framework were discontinued at the end of 2020 owing to the small number of remaining cases.

The positive trend continues in the surveys of universities and panels of experts regarding the procedures based on the MRVO. In the two surveys completed to date, the universities and panels of experts surveyed confirmed the Agency’s consistently high level of quality. Around 96% of the experts stated that they would be willing to act as experts again for the Agency; AQAS was awarded an average grade of 1.17 (German school grading scale, 1 = top grade, 6 = lowest grade). The universities also gave AQAS very good marks, with a mean value of 1.35 on the satisfaction scale (see Annex I.3).

In the table below the results of the survey January/February 202 and August till October 2020 are compared because during the pandemic and the limited number of site visits in Summer only two surveys took place.

A number of exemplary values are shown in the scales below:

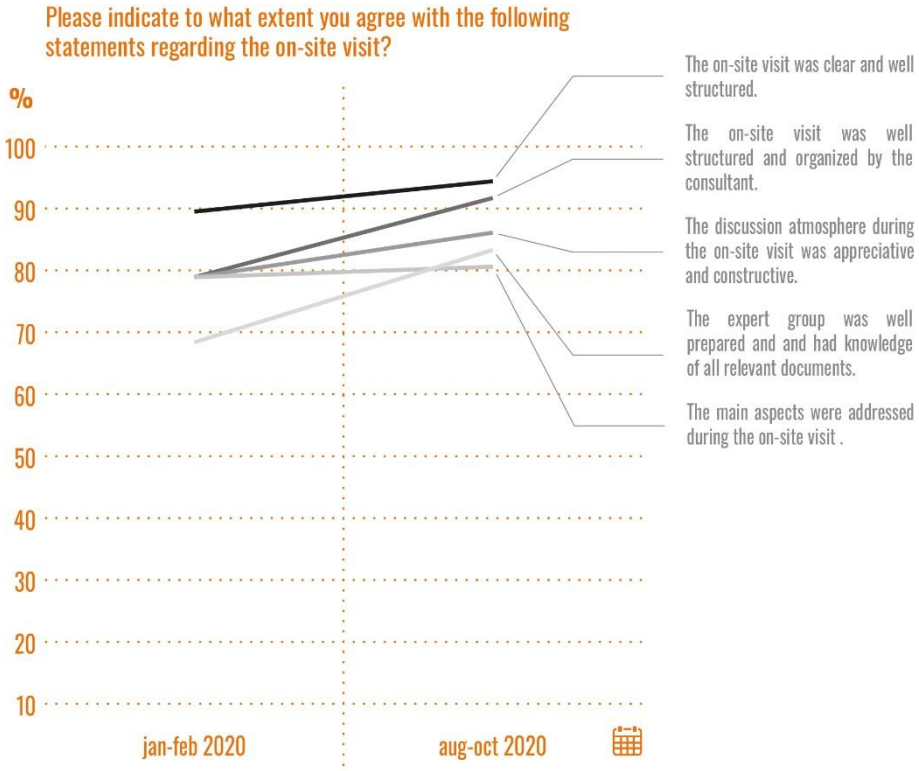

Figure 3: Satisfaction of university representatives with AQAS

The questionnaire also contains free-text boxes for experts and universities to provide individual feedback. It is worth noting that criticism expressed in this context rarely refers to the work of AQAS, but rather to the new legislation concerning the system and the requirements of the MRVO. The universities mainly criticise the noticeable prolongation of the procedures and the decision-making process at GAC, which – according to the feedback of a few representatives – is not always consistent in basing its decisions on uniform principles. Universities suggested that AQAS should expand the range of workshops offered on specific issues and we followed this wish.

The German system allows to evaluate programmes of similar disciplines or characteristics in one joint procedure (cluster accreditation). In cluster procedures, a few points of criticism from the experts referred to the number of study programmes under assessment. Due to the complexity of cluster assessments, this cannot always be avoided, particularly when universities take advantage of the possibility to have the size of a cluster approved in advance by GAC without involving the agency.

For the first time, AQAS also conducted a survey of experts and universities in international procedures at the beginning of 2021, taking into account the special situation during the coronavirus pandemic (see Annex I.3.3). Besides covering general satisfaction, this survey particularly focused on the implementation of online site visits, which took the place of face-to-face site visits. An important indicator of satisfaction among the experts surveyed is that almost 92% stated that they would be willing to serve as experts for AQAS again. The mean value of satisfaction with AQAS on the satisfaction scale was 1.25 (German school grading scale, 1 = top grade). The university representatives in international procedures rated cooperation with AQAS with a grade of 1.0. The survey is to be continued on an ongoing basis in the future.

8. The Agency's international activities

As stated in its Mission Statement, AQAS sees itself as a stakeholder involved in the further development of the European Higher Education Area and intends to contribute to the development of reliable and comparable quality standards and assessment systems in both national and international contexts. For this reason, involvement in national, European and international networks is an important element of the Agency's work, not only to incorporate experience gained into the networks, but also to reflect on new developments in standards and tools and to integrate them into our own procedures. This helps to ensure the continuous enhancement of our own procedures, and is in keeping with the self-conception of AQAS.

AQAS is a full member of ENQA and INQAHEE and is registered on EQAR. As we see it, however, membership alone does not reflect our goals; instead, AQAS attaches importance to being involved to varying degrees in various working groups, projects and committees in networks within Europe and beyond. Activities at the European level are particularly worthy of note, where colleagues from AQAS contribute their expertise at different levels. One of the managing directors and the Head of International Procedures both serve as experts for ENQA in the assessment of quality assurance agencies. The managing director is also a member of a ENQA Agency Review Committee. The divisional head is involved in the work of the European Consortium for Accreditation (ECA) as a board member. This means, among other things, that AQAS played an active role in the "Facilitating implementation of the European Approach for Quality Assurance of Joint Programmes" (ImpEA) project to implement the European Approach, and was co-organiser of the very well-attended final online conference of this project in 2020 (see video on the AQAS website). In addition, the divisional head has served on the EQAF Programme Committee for several years, acting as its chair in 2019.

Thanks to our diverse activities in recent years, the visibility of AQAS has increased considerably. As a result, several different institutions have approached the Agency asking us to become involved in projects or giving us the opportunity to present our findings and experiences at international conferences.

AQAS has been collaborating closely with the German Academic Exchange Service (DAAD) for many years, particularly in the accreditation of joint programmes and the implementation of training courses. In the last two years, AQAS has conducted training in East Asia for the DAAD as part of the SHARE project. In the Twinning project in Georgia, two colleagues contributed their expertise as short-term experts. For years now, one of the managing directors is regularly asked by the DAAD to provide training and conference presentations in Africa, especially within the EU's HAQAA project and an IIEP-UNESCO project.

AQAS is also represented in the ECA Certification Group, which coordinates the award of the Certificate for Quality in Internationalisation (CeQuint). CeQuint resulted from an Erasmus+ project and has since been available as a service to all ECA member agencies.

Since AQAS is particularly keen to cooperate with other accrediting organisations in a spirit of trust, the Agency cooperates at various levels with colleagues from Europe and around the world. AQAS has worked closely with the Basque agency UniBasq in recent years. Together, we have, for example, conducted joint training courses for Spanish experts who speak German and for German experts who speak Spanish, so as to be able to involve trained international experts in the Agency's own procedures. A report on this project was also given at an EQAF workshop.

The Agency has enjoyed many years of exchange, based on trust, with partner agencies in international projects. These include HCERES (France), NVAO (the Netherlands), THEQC (Turkey), PKA (Poland) as well as agencies outside Europe like BAN-PT (Indonesia), AAC (Curacao) and NAQAAE (Egypt).

A key element of the international activities undertaken by AQAS are accreditation procedures abroad. These activities began several years ago, either because foreign universities approached AQAS and asked for an

external assessment procedure based on international standards (ESG), or because they built on previous experience with AQAS in the accreditation of a joint programme in cooperation with a German university.

This business area of the Agency, which has been in existence for years, was initially of secondary importance. In the last six years, however, it has grown in importance due to the internationalisation efforts of universities; it is now an important pillar of the procedures conducted by AQAS, alongside its national activities.

The aim of AQAS is to contribute its expertise and experience gained at European level to discussions on quality assurance and quality development outside Europe. As a result of providing training and being involved in projects, AQAS has gradually developed expertise in the higher education system of a number of Arab, African, Asian and Latin American countries. This in turn has led to further requests for project participation and assessment procedures.

The following list gives a short overview over the countries in which AQAS worked either on the basis of ESG-oriented criteria or by applying the European Approach without the participation of German universities (see Chapter 10.1.4).

I. Europe
   - Austria
   - Finland
   - Northern Cyprus
   - Turkey

II. Africa
   - Ghana
   - Malawi
   - Nigeria

III. Middle East
   - Oman
   - United Arab Emirates

IV. Latin America
   - Chile
   - Curaçao/The Netherlands

V. Asia
   - Indonesia

9. Compliance with European Standards and Guidelines (Part 3)

9.1 Activities, policy and processes for quality assurance (ESG 3.1)

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

9.1.1 Aims

AQAS acts on the basic premise that universities are responsible for the quality of teaching and learning, while quality assurance procedures are appropriate to assess whether specific quality assurance criteria have been met and if there are areas of concern for which quality improvement measures need to be taken. With this in mind, AQAS sees itself as a partner for universities and educational institutions, and makes its expertise available to them with the aim of helping them develop and advance their educational programmes. The aim is to

contribute to the quality assurance and quality development of learning, teaching and training by means of external assessment procedures. This understanding of quality assurance by AQAS is a guiding principle that is reflected in the Agency's Mission Statement (see Annex I.1.5).

The assessment and accreditation of study programmes promotes the diversity and quality of the courses offered, contributes to international comparability and recognition, and creates transparency for study applicants.

AQAS is one of the stakeholders involved in the creation of the European Higher Education Area and contributes to the development of reliable and comparable quality assurance systems in a national and international context.

As stated in our Mission Statement, AQAS meets this mandate by:

- *Setting high standards for the professional, transparent and responsible implementation of assessment procedures*
- *Regularly reviewing the quality of our own work in order to further develop the organisation, its processes and its services*
- *Cooperating reliably, respectfully and in a dialogue-driven way with higher education institutions, expert groups and other institutions in the field of education*
- *and by deploying natural, material and financial resources efficiently.*

AQAS sees itself as a learning organisation, and attaches importance to creating a working atmosphere in which employees collaborate to achieve the Agency's goals, interact with each other in a trusting and constructive spirit, and develop their competencies and skills by means of projects, exchange among colleagues, and further training.

The aims mentioned above determine the operational work of AQAS. In addition, AQAS works on the basis of strategic planning that has been discussed and adopted by the Management Board.

9.1.2 Structure of the Agency

The structure and responsibilities within the Agency are determined by the Articles of Association of AQAS e.V. (see Annex I.1.6). These have to follow the German regulations for Non-Profit-Associations. According to the Agency's Articles of Association, the association's bodies are

- the General Assembly,
- the Management Board,
- the Standing Commission (StäK),
- the Complaints Commission (CC).

In light of the above, the association's organisational chart is as follows:

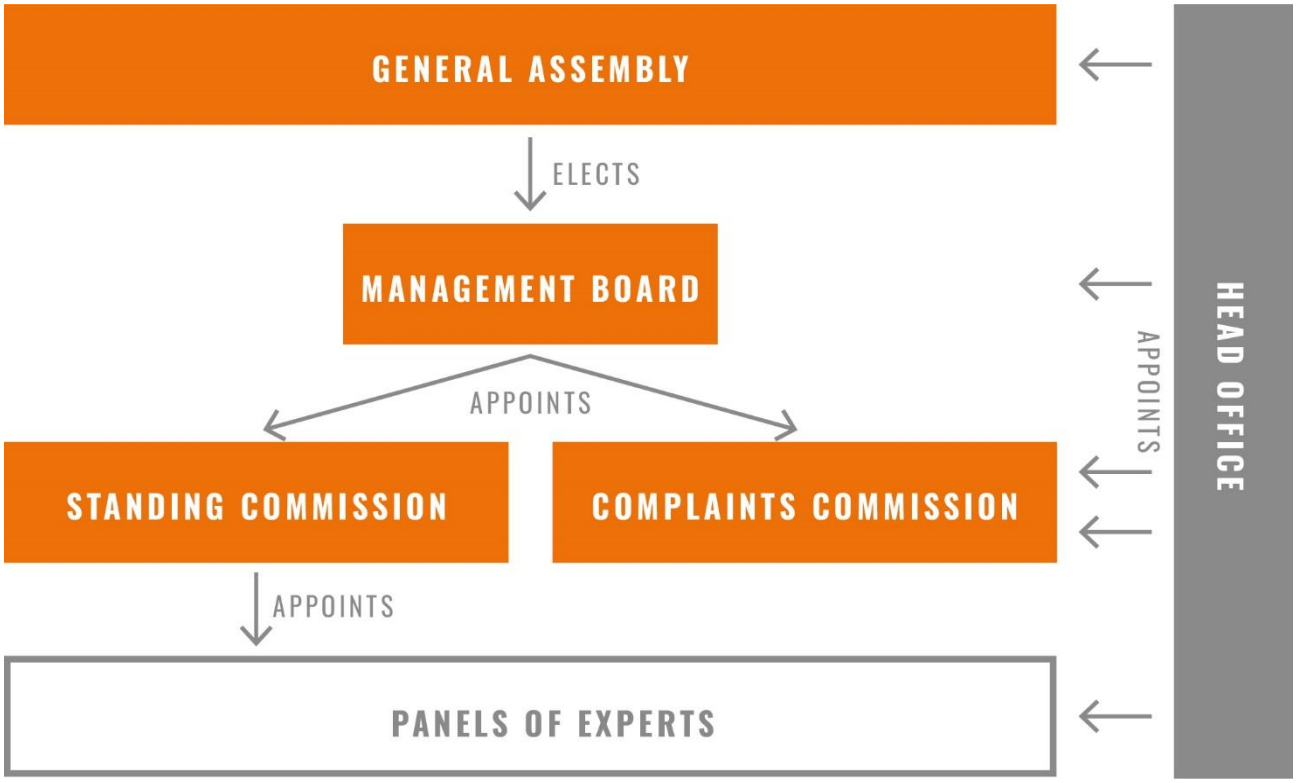

Figure 4: Organisational chart of AQAS e. V.

9.1.3 The Management Board

Members of the Management Board are reputable academics with experience in managing universities or universities of applied sciences. They identify with the goals of the Bologna Process and share the understanding of quality assurance in teaching and learning as expressed in the Agency's Mission Statement. When appointing Management Board members, care is taken to ensure that individuals with experience outside of higher education, such as in business or industry, are included (Annex II.1.1).

The current Management Board of AQAS e. V. comprises:

- Professor Dr. Eberhard Menzel, *Ruhr West University of Applied Sciences, Chair*
- Professor Dr. Jens Hermsdorf, *Hochschule Worms, Deputy Chair*
- Professor Dr. Adriaan Dorresteijn, *Justus Liebig University Giessen, Board Member*
- Professor Dr. Stefan Herzig, *Technische Hochschule Köln – University of Applied Sciences, Board Member*
- Professor Dr. Kornelia Freitag, *Ruhr-Universität Bochum, Board Member*

9.1.4 Commissions

AQAS commissions are composed according to the stakeholder principle so as to accommodate the different perspectives of the groups involved in assessment and accreditation procedures. Consequently, AQAS seeks to include the different stakeholders in the structures and work of the Agency; academic representatives have a majority in all the commissions. This ensures that procedures are conducted in a science-based manner. The processes for implementing procedures were designed to enable maximum support for the relevant commissions.

The reorganisation of the German accreditation system that came about with the entry into force of the Interstate Study Accreditation Treaty in Germany on 1 January 2018 meant that the structures of AQAS had to be changed in several ways. One such change was the merger of the two previously existing Accreditation Commissions (for Programme Accreditation and for System Accreditation) into one joint AQAS Standing Commission by way of a resolution of the AQAS General Assembly in 2018. The Standing Commission has been the central decision-making body of AQAS since 2019.

In accordance with Section 8 (a) of the Articles of Association of AQAS e. V., the Standing Commission is responsible for all decisions required in connection with the implementation of assessment and accreditation procedures at national and international level. In assessment procedures under German law, this body is responsible in particular for appointing panels of experts and adopting the formal reports on formal criteria in programme and system assessment procedures. In international procedures, the Standing Commission makes decisions on programme accreditations and institutional accreditations on the recommendation of the respective panel of experts. If decisions need to be made regarding other assessment procedures, e.g. certifications, the commission is also responsible for taking those decisions. It is also responsible for the adoption of resolutions regarding process principles and standards.

Moreover, during the transition phase from the old to the new regulatory framework, the Standing Commission has taken on all tasks for all national procedures that were (and are still being) conducted under the old regulatory framework, which used to be the task of the two Accreditation Commissions. This is also enshrined in the Articles of Association of AQAS e. V.

Owing to the requirements of the new German accreditation system, a structural adjustment of the commission had been planned for 2020, but this was delayed due to the challenges associated with the coronavirus pandemic. In light of the above, the AQAS Management Board asked the commission members to continue their work until the end of 2021. A first step towards restructuring the commission was the adoption of a concept for the commission's work from 2021 onwards by the AQAS Management Board (see Annex II.1.4).

The Complaints Commission has the task of assessing objections of universities, within the framework of the appeals and complaints procedure, that could not be resolved through further consultation in the Standing Commission or referral to the Management Board or the management of AQAS, and of making a final decision. Complaints concern the conduct of the procedure. Appeals, on the other hand, refer to the formal results of the procedure. The appeals and complaints procedure of AQAS is presented in detail in Chapter 10.7 (see Annex II.1.7).

At the time of submitting the self-assessment report (in April 2021), the two commissions of AQAS comprised:

Standing Commission (StäK)

- Professor Dr.-Ing. Elisabeth Dennert-Möller, *Hannover University of Applied Sciences and Arts*
- Professor Marc Grief, *Mainz University of Applied Sciences*
- Professor Dr. Jens Haustein, *Friedrich Schiller University Jena*
- Professor Dr. Manfred Hopfenmüller, *Ostbayerische Technische Hochschule Regensburg*
- Professor Dr. Ilka Mindt, *Paderborn University*
- Jenny Rath, *University of Bonn (student member)*
- Professor Dr. Dietmar von Reeken, *Carl von Ossietzky University of Oldenburg (Deputy Chair of the Commission)*
- Professor Dr. Jürgen Rekus, *Karlsruhe Institute of Technology*
- Professor Dr. em. Falk Roscher, *Esslingen University of Applied Sciences*
- Dipl.-Kfm. Stefan Scheidgen, *Deutsche Post AG, Cologne (representative of professional practice)*
- Professor Dr. Richard Sturn, *University of Graz*

- Professor Dr. em. Urbaan Titulaer, *Johannes Kepler University Linz (Chair of the Commission)*
- Professor Dr. Dr. Ewald Werner, *Technische Universität München*
- Professor Dr. em. Reinhard Zintl, *University of Bamberg*

Complaints Commission (CC)

- Professor Dr. Thomas Kaul, *University of Cologne*
- Professor Dr. Dieter Kilsch, *Bingen Technical University of Applied Sciences (Chair)*
- Professor Dr. Stefan Müller-Stach, *Johannes Gutenberg University Mainz*
- Katrin Lückhoff, *University of Bonn* (student member)
- Georg Reschauer, *Accreditation Agency in Health and Social Sciences, AHPGS*
- Professor Dr. em. Falk Roscher, *Esslingen University of Applied Sciences (advisory member)*
- Professor Dr. Wilhelm Schneider, *Hochschule Bonn-Rhein-Sieg, University of Applied Sciences*
- Dr. Daniel Voll, *Director Group Accounting at Deutsche Wohnen Group, Berlin (representative of professional practice)*

All commission members are appointed by the Management Board for a period of three years. Re-appointment is permitted.

All AQAS bodies have adopted Rules of Procedure (see Annexes).

The work of the commissions is supported by the Head Office, which also continuously provides information on national and international developments relevant to the work of the Agency.

The CVs of all AQAS commission members can be found in the Human Resources Handbook in the Annex (see Annexes II.1.3 and II.1.6).

9.1.5 Implementation of external quality assurance procedures

The purpose of the Articles of Association is particularly fulfilled through the implementation of procedures at national and international level. They consist of the assessment of study programmes and quality assurance systems with external involvement and, where applicable, their accreditation. The activities of the association are aimed at securing high educational quality at universities and promoting the international recognition of degrees, taking into account the national and international specifications. Selecting a university that is suitable for them and a study programme is made easier for the students particularly through the publication of the results.

A detailed description of the different procedures is provided in Chapter 10.3.

9.1.5.1 National procedures in accordance with the MRVO

Article 3 of the Interstate Study Accreditation Treaty defines the following procedures provided for within the national accreditation system:

(1) Procedures for ensuring and enhancing the quality of individual study programmes with external involvement (programme accreditation)
(2) Procedures for ensuring the performance of internal quality assurance systems of universities with external involvement (system accreditation),

(3) Other procedures agreed with GAC and the respective state of the university (alternative procedures).

At the same time, Article 2 of the Interstate Treaty specifies which criteria apply to study programmes and are the subject of quality assurance within the aforementioned procedures. A distinction is made between formal criteria (Part 2 of the MRVO) and academic criteria (Part 3 of the MRVO).

Programme accreditation

The subject matter of programme accreditation in accordance with the MRVO are Bachelor's and Master's programmes offered by state or state-recognised universities in Germany. The following aspects are assessed in the context of programme accreditation procedures: the appropriateness of a study programme's qualification goals and the competences expressed therein, as well as their implementation in a coherent study programme concept and the subject-content organisation of the study programme, the resources, the organisation of studies and examinations, and the university's internal procedures for ensuring academic success. The procedures are intended to promote the further development of study programmes and contribute to enhancing their quality.

The following aspects apply to the implementation of programme accreditation procedures:

- The procedures comply with national and European standards (MRVO/ESG).
- The procedure aims to ensure the comparability of study programmes, hence equivalence rather than similarity.

Since it was founded in 2002, AQAS has conducted 2,280 programme accreditation procedures under the old regulatory framework and accredited 7,006 study programmes,[7] including 79 joint programmes. 1,226 national procedures were conducted at universities, including 155 procedures for teacher training study programmes. 1,054 procedures were for study programmes at universities of applied sciences. 5,653 programmes were accredited with conditions.

1,353 programmes were granted accreditation without any conditions imposed. In six cases, AQAS denied accreditation. 217 study programmes were revised following the suspension of the procedure and were then successfully accredited. In the case of 18 study programmes, the application for assessment was withdrawn, meaning that no final accreditation decision was taken.

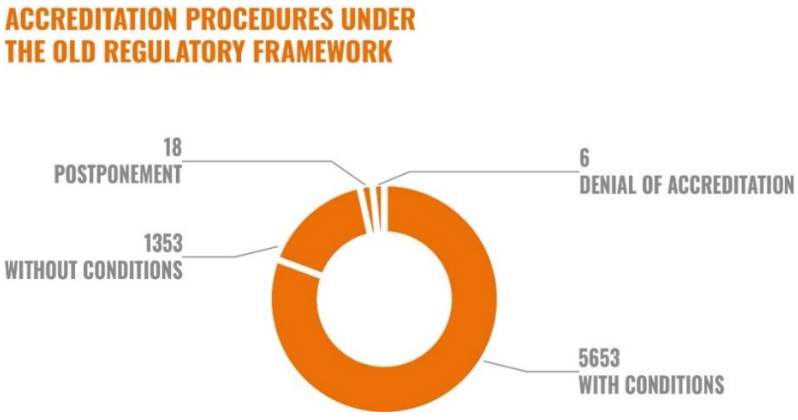

Figure 5: Accreditation Procedures under the old regulatory framework

[7] The figures concerning study programmes refer to the number of decisions taken, i.e. study programmes that have been accredited by AQAS several times (e.g. initial accreditation, reaccreditation and re-reaccreditation) are included multiple times.

At the international level, AQAS conducted since its foundation in 2002 73 covering 144 study programmes at foreign universities, of which 107 were accredited subject to conditions and 32 without the imposition of conditions. Ten study programmes were revised following the suspension of the procedure and were then successfully accredited. In the case of five study programmes, the application for assessment was withdrawn by the university.

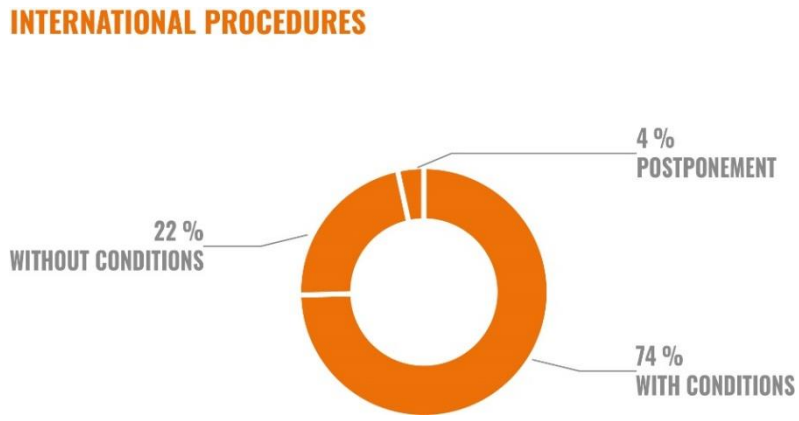

Figure 6: International Procedures

Since the restructuring of the German accreditation system in 2018, 354 study programmes have been assessed in 140 procedures in accordance with the requirements of the MRVO. By April 2021, GAC had already taken a final decision in the case of 104 procedures (234 study programmes); in the case of 185 of those study programmes, GAC followed the recommendation of the panel of experts. GAC has the right to decide differently from the experts' vote, e.g. by imposing conditions when the experts suggested none (and vice versa). It made use of this possibility in the case of 49 study programmes. This also includes cases in which conditions recommended by the panel of experts no longer had to be issued by the GAC, because the university had already notified the fulfilment of the conditions when submitting the application to GAC. Nevertheless, some Higher Education Institutions are irritated by this difference between the assessment by the panel of experts and the decision making by GAC.

The German-speaking agencies and GAC have been exchanging information recently concerning the analysis of divergent decisions (see remarks in Chapter 10.3.1).

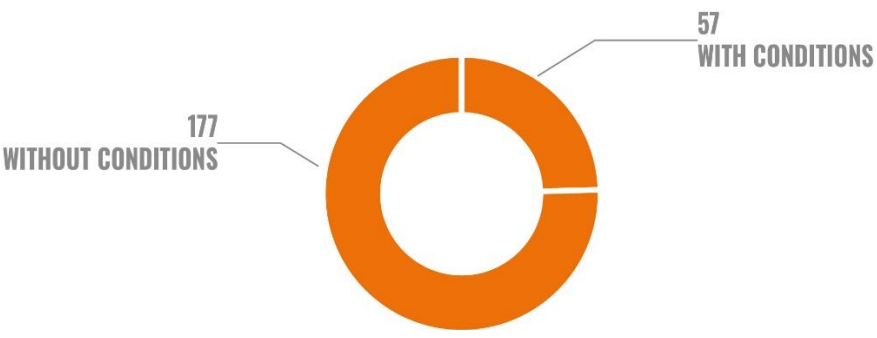

Figure 7: Final Decisions GAC

System accreditation

A system accreditation provides an alternative to programme accreditation that places greater emphasis on the university's self-responsibility. The subject matter of a system accreditation procedure is a university's internal quality assurance system. Here, too, the process and criteria of the procedure are stipulated by the MRVO. Universities that wish to internally accredit their study programmes are given the opportunity to demonstrate that their internal QA system enables them to ensure that their study programmes meet the defined qualification goals and quality standards. The procedure involves examining whether the university has a closed QA system within which it systematically reviews and implements the formal and academic criteria for study programmes laid down in the MRVO, with the involvement of external expertise. After successful system accreditation, therefore, universities are granted the right to dispense with external programme accreditation and to award the GAC seal for study programmes that they have assessed themselves.

So far, AQAS has successfully completed 18 procedures of first-time system accreditation under the old regulatory framework (7 of which at universities and 11 at universities of applied sciences). The first system reaccreditation procedure (under the old regulatory framework) is expected to be completed in May 2021. At the time of submitting the self-assessment report, seven procedures under the new regulatory framework were ongoing (four of which are system reaccreditations).

Alternative procedures

The aim of this new type of procedure is to give universities the opportunity to try out alternative paths towards accreditation other than programme and system accreditation. However, these procedures must also meet the requirements of the MRVO and can only be carried out with the approval of GAC and the competent state Ministry of the university's home state. Since the introduction of this option, two such projects have been launched in Germany, albeit without the involvement of AQAS.

Prior to the legal restructuring of the German accreditation system in 2018, GAC announced a pilot project to enable universities, possibly in cooperation with agencies, to develop their own assessment procedures and, if approved by GAC, test these accordingly ("experimentation clause").

Together with Pforzheim University (HS PF), AQAS participated in the tender and was awarded a contract for the "Programme Accreditation in Faculty Review" project; three other universities were also awarded contracts for other projects. The AQAS project was the only one in the context of the experimentation clause that built on and enhanced the approach of programme accreditation rather than system accreditation. The project has since been successfully completed and viewed favourably by GAC. AQAS and Pforzheim University summarised and published their experiences in a joint essay (see Annex II.3.3).

9.1.5.2 International procedures

In the case of international procedures, a distinction must be made between programme accreditation and institutional accreditation carried out at foreign universities and the accreditation of joint programmes (with or without the participation of German universities).

The international procedures were based directly on the national practices of AQAS at the time with regard to the accreditation process, which, in the view of universities and AQAS, had proven successful (see process diagram in Chapter 10.3.2). With regard to criteria, AQAS aimed for a clear orientation towards the ESG from the outset. The criteria and indicators developed by AQAS proved to be fit for purpose. In the light of the Agency's increased experience with programme accreditation abroad, however, AQAS decided in 2019 to

revise its criteria and indicators, to eliminate ambiguous wording, and to align them even more closely with the ESG (which had been reviewed in 2015).

Institutional assessments, which have a higher degree of complexity, have only been conducted at two foreign universities to date (in Oman and Chile) to date. The assessment process follows the course of German procedures under the old regulatory framework (opening and completion of a procedure by the Standing Commission). To enhance the validity of institutional assessments, AQAS combines the analysis of the institutional level with that of the programme level in this procedure. Each site visit for institutional accreditation also includes an analysis of whether and how the university's quality assurance system influences its study programmes.

There are various reasons why foreign universities are interested in being assessed by a German agency on the basis of the ESG. Examples include their hope of raising the profile of their institution, their ambition to enhance the quality of their teaching programmes by seeking input from an international panel of experts, the desire to use successful accreditation as a marketing tool, or the fact that an external funding body requires such international accreditation. AQAS makes it clear at the acquisition stage that international accreditation is no grounds for a legal claim to recognition. In the past, however, several national authorities have agreed to officially recognise the accreditation decisions taken by AQAS.

Procedures based on the European Approach for Quality Assurance of Joint Programmes (or European Approach for short) are a special case, because two variants are possible:

1. An assessment based on the MRVO in accordance with Section 10, because it mentions EA as a potential procedure for ensuring the quality assurance and quality development of individual study programmes with external involvement (programme accreditation). However, the MRVO defines these possibilities such that procedures based on the European Approach may only be conducted for joint programmes that lead to a joint degree if previously determined requirements governing the joint programmes have been met. The AQAS Standing Commission is responsible for taking decisions in these procedures. However, the result must be recognised by GAC.
2. In contrast, procedures based on the European Approach for joint programmes without the involvement of German universities may only be conducted on the basis of the resolution of the EHEA Ministers on the European Approach adopted in May 2015. Accreditation decisions are taken by the AQAS Standing Commission. There is no recognition by GAC in this case because no German universities are involved.

9.1.5.3 Other activities

Based on a resolution of the General Assembly, AQAS founded AQAS ARCH GmbH ("Accreditation, Reviews and Consulting in Higher Education") as a spin-off on 1 January 2015 in order to achieve a transparent separation between accreditation based on the ESG, which are conducted by the association (e.V.), and other services in higher education, to be conducted by the limited liability company (GmbH).

At that time, there was a noticeable increase in demand for AQAS services in the national and international context that went well beyond the Agency's core business (carrying out assessment and accreditation procedures). The GmbH was to take on tasks that correspond to the association's purpose of promoting education and training and that are related to the activities of German universities or German and European scientific organisations (e.g. Erasmus+, Twinning or DAAD projects). AQAS considers it essential to participate in international projects and to share knowledge with international stakeholders because the Agency sees itself as a partner of German universities in promoting their internationalisation efforts. AQAS ARCH was founded at a

time when most other German agencies had already created their own spin-offs to be able to respond flexibly to the diverse requests received from the higher education sector.

By separating areas of activity – with the traditional implementation of assessment and accreditation procedures in the association on the one hand, and other projects beyond those activities in the GmbH on the other – the Agency sought to achieve greater transparency, both internally and externally, and to avoid mixing consultancy and accreditation within a single organisation. Consequently, the association (AQAS e. V.) now only serves its actual purpose (assessment/accreditation of universities' quality assurance systems and study programmes). All projects beyond that remit (e.g. in the international context) are to be performed by the GmbH. The business area of the GmbH is to be expanded in the future, depending on German universities' demand for services focusing on the topic of quality assurance (e.g. evaluation procedures or the organisation and implementation of peer reviews as a service for system-accredited universities).

We agree with GAC that it is unacceptable for an accreditation agency to be involved in a procedure, whether programme accreditation or institutional accreditation, if the agency has provided (or is currently providing) consultancy to the same university.[8] AQAS will continue to abide by this rule.

The following table shows how AQAS e.V. task areas differ from those of AQAS ARCH GmbH:

Task areas of AQAS e.V.	Task areas of AQAS ARCH GmbH
Programme assessment procedures (national)	Involvement in EU projects as a project partner (e.g. for trainings)
System assessment procedures (national)	Assessment of further education (certificate)
Programme accreditation procedures (international)	Workshops on specific issues (e.g. joint programmes, dual study programmes, ISO)
Institutional accreditation (international)	Consultancy projects in the area of quality assurance (e.g. preparation for system accreditation to be conducted by another agency)
Networking (ECA, ENQA, EUA)	Evaluation on the basis of the Austrian Act on Quality Assurance in Higher Education (HS-QSG) Notification Ordinance (confirmation)
	Evaluation procedures with no reference to the ESG (evaluation of research, administration, etc.)

Figure 8: Task areas of AQAS e.V. and AQAS ARCH GmbH

Concept

The basic model of the spin-off company can be outlined as follows:

- Spin-off as a GmbH company (*Gesellschaft mit beschränkter Haftung* – limited liability company) (formation by cash subscription),
- AQAS e. V. (represented by the General Assembly) as the sole shareholder,
- The Management Board, representing the e. V., constitutes the shareholders' meeting.

[8] GAC set out its considerations on this matter in the following resolution: "Standards for arrangements of system accreditation in relation to consulting services", Resolution of the Accreditation Council of 31 October 2008, as amended on 20 February 2013.

Up to now, the GmbH's activities have been limited to individual projects, because the core business of AQAS continues to be assessment and accreditation procedures.

Income from business operations is subject to corporation tax and trade tax.

9.2 Official status (ESG 3.2)

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

9.2.1 Legal basis

AQAS e. V. was entered as an association under No. VR 17554 of the Register of Associations of Cologne Local Court (*Amtsgericht Köln*) on 24 January 2013 and was recognised as charitable[9] (see Annexes I.1.1 and I.1.2).

The AQAS General Assembly is held annually.

Until 2018, it was mandatory for AQAS e. V. to be accredited by GAC. Membership of ENQA and listing in EQAR were based on GAC's review report. In this process, the Agency was able to request that GAC review and comment on the extent to which AQAS complies with the ESG. AQAS was then able to submit GAC's review report to ENQA in order to apply for continued full membership and to apply to EQAR to be listed on the register. Both organisations had the right to request additional documents or statements, which they did. In the last procedure, EQAR mentioned "flagged issues" that went beyond the conditions imposed by GAC. AQAS informed ENQA and EQAR after GAC confirmed that the conditions had been met in 2017, and also commented on the flagged issues. The explanations were accepted by EQAR and the registration of AQAS was confirmed in 2017 (see Chapter 12).

As of 2018, German agencies are no longer reviewed by GAC, but can be reviewed instead by ENQA. The ENQA review report is then the basis for a decision by EQAR on whether the agency can continue to be listed in the register. According to Article 5(3) No. 5 of the Interstate Study Accreditation Treaty, one of GAC's tasks is to certify agencies for operations in Germany. Agencies are certified by being listed on EQAR.

The extensive review of AQAS by external institutions also includes regulatory controls under German law. For example, the Tax Office and other authorities check the Agency to ensure that it meets the requirements for being a registered association (financial, tax and social audits) (see Chapter 9.5.1).

9.2.2 National recognition

AQAS e. V. was accredited for the first time by GAC on 14 March 2002, and has been authorised to carry out programme accreditation procedures in Germany ever since. This has also been the case for system accreditation procedures since 2008. Since the entry into force of the Interstate Study Accreditation Treaty on 1 January 2018, GAC has been responsible for accreditation decisions and the associated awarding of seals. In

[9] AQAS e. V. was founded in 2002, and was entered in the Register of Associations of Bonn Local Court (*Amtsgericht Bonn*) (20 VR 8059) until February 2013.

procedures where the contract was concluded before 31 December 2017, AQAS remains entitled to award the GAC seal (see Annex I.4.c).

9.2.3 International recognition

AQAS e. V. has been a full member of ENQA since 19 November 2008 and has been listed on EQAR since 2010 (see Annex I.4.a and I.4.b).

9.3 Independence (ESG 3.3)

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

9.3.1 Organisational independence

AQAS e. V. is an organisation of universities, each of which is represented in the General Assembly by a member of the university management. The supporting association is organised under private law and operates independently of the state or ministries.

When setting up the Agency, importance was attached to structuring AQAS such that member universities can have a say in its strategic orientation, whilst having no influence on the implementation of individual procedures. The General Assembly elects the members of the Management Board, decides on the approval of the actions of the Management Board, decides on amendments to the Articles of Association and, if necessary, makes strategic decisions on the future orientation and potential tasks of the Agency (e.g. the AQAS ARCH GmbH spin-off). The Articles of Association of AQAS, which are available on the internet, define the responsibilities of the General Assembly and the Management Board.

The Management Board is accountable to the General Assembly, decides on the strategic orientation of AQAS in detail, recruits employees and appoints the members of the Standing Commission and the Complaints Commission. Both commissions operate independently of the General Assembly and the Management Board, and are not accountable to them. Simultaneous membership in the General Assembly or Management Board and the Standing Commission or Complaints Commission is ruled out by the statutes. Consequently, neither the Management Board nor the General Assembly can influence the content of decisions taken by the commissions. The experience of recent years shows that universities tend to choose official channels in the event of dissatisfaction, and therefore use the AQAS appeals and complaints procedure.

According to the AQAS complaints procedure (see Annex II.1.7), only the Complaints Commission, which acts independently of the other bodies, can reverse decisions of the Standing Commission or work towards their amendment.

In addition to academics from both types of higher education institutions (universities / universities of applied sciences) from both Germany and abroad, representatives of professional practice and students also sit on the AQAS Standing Commission and the Complaints Commission. In international procedures and in procedures under the old regulatory framework, the Standing Commission is responsible for the final decision on accreditation of a study programme or a quality assurance system. In justified cases, the commission may decide to deviate from the experts' recommendation. Within the Standing Commission, members are not involved in decision-making regarding procedures relating to their own university.

9.3.2 Operational independence

In national procedures, the steps of assessment procedures for the preparation of programme or system accreditation is laid down in binding form by the MRVO. In international procedures, the Standing Commission determines the course of procedures (see Annex I.2.c.2 and I.2.d.1).

The Standing Commission appoints panels of experts for all assessment procedures conducted by AQAS. The Head Office notifies the university in good time of the composition of the relevant panel of experts, and gives the university a certain period of time to raise reasoned objections to members of the panel of experts. Reasoned objections must be submitted in writing. The university has no right of proposal and/or veto.

For assessment procedures in Germany, the composition of panels of experts is based on the specifications of the MRVO and the relevant HRK guidelines on the nomination of professors for review panels of 24 April 2018.

The processes for the nomination and appointment of experts in international procedures are laid down in corresponding resolutions of the Standing Commission, taking into account the stakeholder principle. The resolutions reflect the “Principles for the Selection of Experts” of the European Consortium for Accreditation (ECA) (see Annex I.2.c.7).

9.3.3 Impartiality of results

AQAS is aware that a key responsibility of an accreditation agency is to ensure that the results of its assessment and accreditation procedures are impartial. After all, the system as a whole will only be accepted if there is trust in the neutrality of the different stakeholders.

The measures AQAS takes to ensure impartiality address different levels:

a) Appointment of members of commissions and panels of experts
b) Oversight of procedures by the Head Office
c) Separation of the assessment and decision-making levels

Regarding a)

The composition of the Standing Commission is defined in the Articles of Association of AQAS e. V. such that additional expertise can be added in case this is needed. At the same time, it is always ensured that academics have a majority in the commission. Commission members from academia and the representatives of professional practice have professional expertise or experience relevant to the commission’s work. The student members usually have previous experience as student experts in assessment and/or accreditation procedures. Other criteria for appointment are a sound professional reputation, openness to different approaches, receptiveness to the Bologna Process, and a good overview of the subject concerned.

All commission members are aware that they perform this task on account of their personal expertise, and not as representatives of their organisation, even if proposed for the role by their organisation.

The impartiality of results is also ensured by the relevant criteria for the nomination and appointment of experts (see above). Members of the panel of experts must sign a declaration of impartiality which, among other things, addresses the main aspects of potential bias and in which the experts undertake to treat with confidentiality all documents and the insights gained.

Regarding b)

All communication within the procedure takes place via the AQAS Head Office, in its capacity as a neutral body in the procedure; the Head Office also accompanies all site visit and coordinates the preparation of the experts' report. In national procedures, the structure for the experts' report stipulated by GAC must be used.

If, contrary to expectations, it becomes apparent during the assessment procedure that members of the panel of experts pursue their own interests, it is the duty of the consultant overseeing the procedure to intervene in a moderating capacity during the site visit, where necessary. In procedures under the new regulatory framework, any individual opinions, dissenting opinions and such must be indicated accordingly so that GAC, as the decision-making body, can consider them. The university is also given the opportunity to submit a written statement to the Agency (with the consultant responsible forwarding the statement to the experts, where applicable), and to submit a written statement to GAC before it takes its decision.

Regarding c)

When designing accreditation procedures, it is common practice in the European context to separate the assessment level from the decision-making level.

In national assessment procedures, the AQAS Standing Commission decides on the Agency's proposal regarding the fulfilment of formal criteria in procedures for the preparation of programme and system accreditation. It is the sole responsibility of the panel of experts to review the academic criteria. The experts' assessment is not bound by instructions and is undertaken on the basis of their own expertise. The MRVO gives the university the possibility to comment on the experts' report. No resolution is passed by the Standing Commission on this matter. In the course of the internal quality assurance of AQAS, however, the Standing Commission is provided with the accreditation report for its information following the completion of the assessment. In national procedures, the final decision is taken by GAC on the basis of this accreditation report.

In international accreditation procedures, the experts' report containing their recommendation for decision and any comments that may have been submitted by the university are the basis for all decisions by the Standing Commission. The Standing Commission takes its decisions autonomously and without being bound by instructions. This separation of the assessment and the decision-making levels complies with usual good practice in the European Higher Education Area.

9.4 Thematic analysis (ESG 3.4)

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Sharing experiences and feeding them back into the system is considered essential by AQAS to enable enhancement of the accreditation system. For this reason, AQAS continuously strives to actively participate in the discourse on accreditation issues at both national and international levels. AQAS attaches great importance to presenting its results and experiences such that, by way of "reporting back", it also reaches the stakeholders involved, enabling other actors to benefit, too. To this end, AQAS staff give lectures and presentations at conferences hosted by a wide range of organisations (e.g. HRK, Stifterverband, Student Accreditation Pool, EQAF, INQAHEE), as well as participating in panel discussions and publishing thematic analyses in journals or on the AQAS website. If a thematic area offers sufficient contextual substance, analyses addressing specific issues are published. After AQAS had implemented a number of procedures based on the ESG in the international context, for example, an article was published on an employee's experiences. The involvement of AQAS in a national project ("alternative procedure") was also considered of sufficient interest to be published

in a journal, owing to its pilot character. One to two articles are published each year, depending on the topic. Therefore, usually AQAS e.V. publishes the results of assessment procedures. As part of the Twinning project with Georgia (see Annex), AQAS ARCH is also involved in an activity concerning the structural implementation of thematic analyses in agencies. If the results of these projects are not confidential, then usually the project provider (DAAD, EU) publishes the presentations, instruments/methodologies or summaries of the results.

On a national and international basis, the range of “reporting back” activities include:

- Conference contributions, lectures and presentations
- Provision of training and workshops
- Participation in interviews and panel discussions
- Publication of articles on specific contemporary issues
- Posts on social media, as well as publications on the website and in ad hoc newsletters.

An overview of the thematic activities undertaken over the past five years is provided in the Annex to this application (see Annex II.3.3 and II.3.4).

9.5 Resources (ESG 3.5)

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

In Germany, the accreditation system is organised on a non-profit basis. In light of this, AQAS e. V. is organised as a non-profit organisation, which, among other things, means that all procedures must be calculated to break even, without making a profit.

Since AQAS has received a continuously increasing number of contracts in the past, the Agency has steadily grown. New staff had to be taken on accordingly. To be able to operate at break-even, AQAS has defined the number of procedures that a consultant should conduct each year. In consultation with the relevant divisional head (see below), the management determines how procedures are allocated among the consultants to ensure an equal distribution of the workload.

Each year, the Management Board discusses the budget plan and the goals and key areas of work for the coming year, as well as measures to implement them, and an appropriate time frame. The General Assembly adopts the budget plan and is informed of the goals and key areas of work for the coming year, as decided by the Management Board.

The management is responsible for the implementation of strategic planning, including financial planning. It reports regularly to the Management Board and provides it with extensive information on the development of the Agency.

AQAS is not only organised independently with regard to the implementation of procedures, but also concerning the administration of the Agency: for example, preparatory accounting or payroll processing is done by the administrative staff from Head Office (in cooperation with a tax consultancy), without drawing on third-party resources (of individual member universities, for instance). This is also taken into account in resource planning.

9.5.1 Financial planning

AQAS must follow the legal requirements for registered associations in its internal administration. The annual budget plan for AQAS e. V. is prepared by the association's Management Board in cooperation with the management and the Agency's tax advisor, and adopted by the General Assembly. In addition, AQAS voluntarily prepares balance sheets for the information of its members. The draft of the budget plan for 2021, which has been adopted by the Management Board of AQAS e. V., is included in the Annex (see Annex I.1.4). Due to the coronavirus pandemic, it can only be formally adopted by the General Assembly of AQAS e. V. in June 2021 (retrospectively).

The Agency's non-profit status is reviewed by the Tax Office every three years. Besides reviewing the Agency's non-profit status, the financial administration also conducts external audits of wage tax on an irregular basis, special VAT audits and audits for all forms of taxes.

Confidential information was removed.

In addition, regular checks are carried out to ensure that social security contributions for employees have been properly paid. Social security audits are also conducted every three to four years;

Confidential information was removed.

To monitor the economic development of the Agency, its tax advisor prepares a monthly controlling report documenting, among other things, the Agency's revenues and costs broken down by cost type. In accordance with a Decision of the Management Board of 21 May 2007, these controlling reports are distributed to all members of the Management Board on a monthly basis.

Confidential information was removed.

9.5.2 Material resources

The AQAS Head Office currently has 480 square metres of office space at its disposal in Cologne city centre. In most cases, offices are shared by two AQAS employees. One of the two meeting rooms can be used as a break room.

AQAS attaches great importance to appropriate workplace equipment:

All workstations are equipped with ergonomic desks and chairs, as well as with telephones, and laptops or computers. Consultants have mobile printers and business smartphones. If technical devices are needed on an individual basis to improve ergonomics, these needs are addressed. A multifunctional device (for photocopying, scanning and printing) is available in every office at the AQAS Head Office. All multifunctional devices are available to all staff via the LAN and the RDS ("Remote Desktop Services") virtual environment.

At AQAS, the work of consultants in particular involves a lot of travel. Ensuring communication and coordination within the team is therefore key to maintaining work processes. At the same time, one of the Agency's strengths is the smooth cooperation within its team. To facilitate the continuation of work processes and a healthy balance between the different areas of life, AQAS created the technical requirements for mobile working several years ago. Now, with a few exceptions, all data and applications are made available in an external data centre in the virtual working environment RDS via streaming over the internet. AQAS also uses Microsoft 365 in a hybrid model with RDS. The existence of the appropriate structures meant that it was possible at short

notice to switch to working from home in March 2020, due to the coronavirus pandemic. Since a video conference system was already installed at the AQAS Head Office, only the relevant conference software (ZOOM, Microsoft Teams) had to be added at short notice. The Head Office also started using Microsoft Teams for (internal) communication in 2020. The program has also been installed onto business smartphones, which allows for quick and easy communication.

AQAS implements the requirements of the EU's General Data Protection Regulation (GDPR) in all processes, and in 2017 nominated a senior consultant to act as data protection officer; she was appointed to this role by the Management Board after receiving the necessary training. Information security and data protection are also ensured, among other things, by requiring two-factor authentication for access to the Remote Desktop Service and to Microsoft SharePoint. Additional measures are implemented as required by the system administrator or in consultation with the system service provider.

An IT Policy adopted by the Management Board governs employees' rights and obligations with regard to ensuring data security (see Annex II.2.3). Among other things, it regulates the use of passwords, company data and company hardware. Internal data protection training for all employees was provided in 2019.

The AQAS Head Office is divided into several areas with clear responsibilities: the Head Office is led by the Managing Directors. The responsibility for individual accreditation procedures lies with consultants, who are supported by two project assistants and an organisational assistant. The administration comprises the following areas: Administration of Procedures, Accounting, and HR and Organisation. In addition, individual consultants are responsible for performing other administrative tasks along the lines of "support processes" (e.g. legal, system administration, etc.). Some student job positions are also in place.

At the time of submitting the self-assessment report in 2021, a total of 23 employees worked for the Head Office of AQAS e. V. (as of: April 2021): besides the two Managing Directors, there were thirteen consultants (including three "Senior Consultants"), three administrative employees and the three assistants mentioned above. Two student assistants currently support the work of the AQAS Head Office.

In 2016, the AQAS Head Office was split into three divisions that reflect the Agency's main business segments. Each division is headed by a Senior Consultant:

- Programme Accreditation: Dr. Kroschel
- System Accreditation: Dr. Kloeters
- International: Ms. Herrmann / Mr. Heintze

The International division is led by two people because Ms. Herrmann is responsible for the International division alongside performing general managerial tasks, while Mr. Heintze is responsible for operational management.

The Quality Assurance division, led by Ms. Fischer, is an independent area that acts across divisions. The QA concept on which its activities are based is provided in the Annex (see Annex I.3.1).

AQAS assumes that the demand for system accreditation procedures will continue to grow in future and that national programme accreditation will decline in importance. This increases the strategic importance of international projects; strong growth has been observed in this area for several years. For AQAS consultants, this means that they must be able to work in at least two of the three aforementioned business areas.

The organisation of the Head Office can therefore be illustrated as follows:

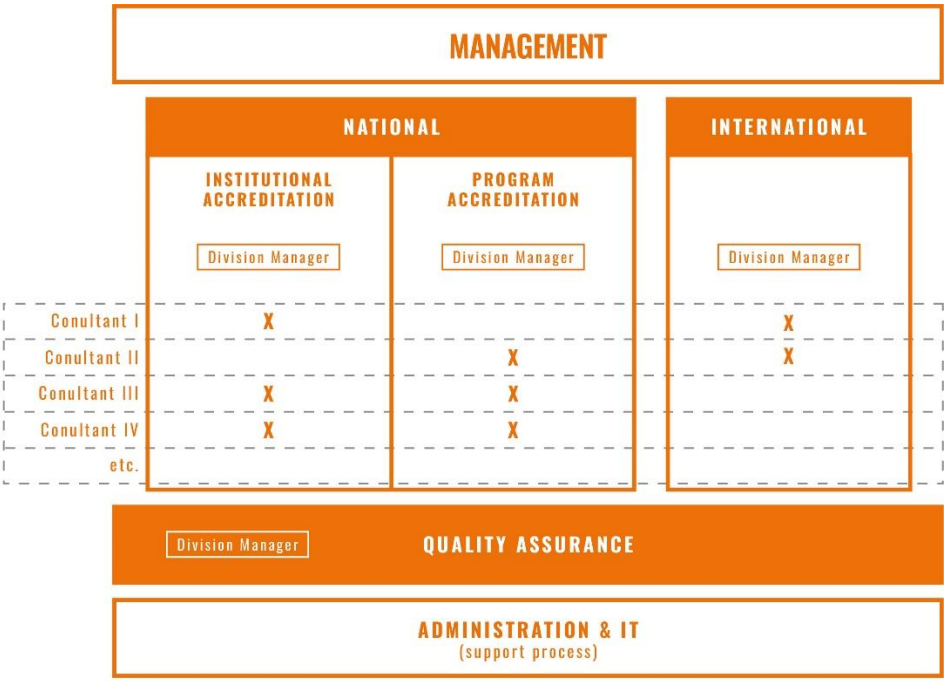

Figure 9: Organisation of the AQAS Head Office

In recent years, the complexity of the national and international accreditation system has increased, and the Head Office has expanded in order to meet the growing demand for external assessments. For many years, AQAS has taken the approach that the management should also conduct procedures to ensure they 'remain in touch' with practice. For this reason, the two managing directors, Ms. Herrmann and Dr. Kloeters, devote 50% of their time to operational activities (implementation of assessment procedures and projects).

Staff are recruited on the basis of previously defined criteria (related to their respective position) and as part of an official application procedure. AQAS attaches great importance to all consultants having relevant prior experience. In the International division, additional importance is attached to them having worked and/or studied abroad. The CVs of the consultants and the management are provided in the Human Resources Handbook (see Annex II.2.1).

The Head Office has developed measures for integrating new consultants, preparing them adequately for their work (see Annex II.2.5): before taking responsibility for their own procedures, new consultants shadow their experienced colleagues during site visits. All new consultants complete a basic seminar on moderation/facilitation. Staff training is provided on the basis of their proposals and/or in the form of in-house training for the entire team or for specific groups. Special measures (e.g. security training) are offered as required. Consultants are expected and encouraged to participate in relevant conferences. A list of conferences attended by staff over the previous accreditation period is included in the Annex (see Annex II.2.7). The annual in-house retreat also provides an opportunity for professional exchange. At the retreat, staff discuss new developments in the field of higher education and solutions to problems. Where appropriate, working groups are formed and responsibilities for adjustments are agreed upon. Employees' individual skills are honed, where required, by offering appropriate professional development measures.

In 2010, the Management Board adopted a concept for individual further development and training of all staff members (see Annex II.2.4): AQAS provides an annual budget for training; these funds can be used to participate in training under the statutory educational leave system in Germany. In line with the statutory regulations of the Further Education and Training Act for Employees in North Rhine-Westphalia, two years' worth of entitlement to educational leave may be combined. Work-related training is unaffected by this regulation, and is taken care of by AQAS. At the employees' request, as of 2014, this budget can also be used in the context of occupational health care.

The Management Board also adopted a concept for the reconciliation of work and family life in 2012 (see Annex II.2.2).

9.6 Internal quality assurance and professional conduct (ESG 3.6)

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

Internal and external mechanisms of quality assurance at AQAS have already been described in detail in Chapter 7, hence additional aspects that implicitly or explicitly serve to monitor and improve quality and to create transparency are addressed below:

9.6.1 Accountability and transparency

AQAS is subject to both internal and external accountability:

The Head Office is accountable internally to the Agency's bodies, including the Management Board. In view of this, the agenda item "Report of the Management" is an integral part of meetings of the Management Board, the Standing Commission and the General Assembly. The Management Board is in turn accountable to the members of AQAS e. V.. The Management Board reports to them annually during the General Assembly.

For information on accountability to the German authorities (Tax Office), reference is made to Chapter 9.5.1 Financial planning.

Experts' reports on all assessment procedures completed by the Agency are published on the AQAS website (see Chapter 10.6.1.). In this way, the Agency can also inform the interested public.

Transparency of the quality assurance procedures implemented by AQAS is especially ensured by the following individual measures:

- Concerning national assessment procedures, AQAS provides all key information on its website as well as links to other websites that may be relevant for universities. These include links to the website of GAC, as the decision-maker, and to the state decrees that essentially determine the criteria and the course of procedures. The AQAS website also provides information on the course of assessment procedures at the Agency; information on special study programmes (such as teacher training programmes and joint programmes); and information on the procedure for appeals and complaints. The website also contains details on who to contact at the AQAS Head Office.
- In the case of international procedures where – in contrast to procedures in the national accreditation system – the decision falls within its area of responsibility, the Standing Commission adopts the following documents, which are published in the relevant information material on the procedure as well as on the AQAS website:

- Sequence of the procedure
- Assessment criteria that reflect the content of the ESG and also contain examples of indicators that can be used to determine whether a criterion has been met.

In addition, clients of AQAS receive further information on preparing for the procedure, such as guidelines and handouts.

In preparation for the procedure, the AQAS Head Office draws up the following documents (see Chapter 10.3):

- A cost estimate (including a timeline),
- A contract.

For each procedure, a consultant is designated early on as the responsible contact person; this is announced to the university. Larger projects, whether national or international, are always overseen by a minimum of two consultants. The consultants responsible provide the university with feedback on the status of the procedure at each defined stage.

Each assessment and accreditation procedure is submitted to the Standing Commission at the initialisation stage. In national procedures, this occurs in the context of approving the formal report. In international procedures, provision is made for an official opening of the procedure in which the Standing Commission usually also nominates the panel of experts. The universities are informed of the result in writing without delay.

In international procedures, the Standing Commission also takes the final decision on international programme and institutional accreditation.

AQAS aims to inform its member universities and the interested public about current developments at AQAS and in national and international accreditation systems. The central information medium is the AQAS website; however, social media has also been used increasingly in recent years to provide information about the latest developments.

9.6.2 Professionalism and integrity

The professionalism and integrity of all stakeholders involved with procedures is ensured as follows:

Consultants

Consultants at the Head Office are recruited and trained in accordance with the requirements described in Chapter 9.5.3. Their professional suitability takes centre stage in this process. As a matter of principle, consultants are not deployed to conduct procedures at universities where they studied and/or obtained a doctorate and/or were employed. AQAS consultants regularly reflect on their role (e.g. during the annual in-house retreat); they have also put their “self-conception” into writing (see Annex II.2.6).

Commissions

When selecting members of the Standing Commission, AQAS strives to recruit renowned experts with previous experience in learning and teaching and/or with a genuine background in quality assurance. The same applies for representatives of professional practice. Student representatives are usually put forward by the Student Accreditation Pool. The Management Board appoints the members of the commission. The Head Office informs the Standing Commission about current developments and decisions within the accreditation system.

Experts

Experts are nominated and appointed in accordance with the resolution of the Standing Committee, taking into account the relevant requirements (see below). The involvement of students in procedures is expressly prescribed; they are also consistently included in international procedures.

All status groups are treated equally in procedures, i.e. academics, representatives of professional practice and students have the same rights and obligations to participate in the procedure.

All experts sign a declaration confirming their willingness to participate in the procedure and their impartiality with regard to the relevant procedure (see Annexes I.2.a.5 and I.2.b.4 and I.2.c.8). To prepare for national programme accreditation, experts receive a written handout on expert activities as well as additional information on the procedure (especially on the requirements of the MRVO) (see Annex I.2.a.6). In addition, for each procedure a preparatory meeting of the panel of experts takes place.

In the case of system accreditation, the panel of experts is briefed in a separate preparatory workshop, which is conducted by the consultants responsible. Before each site visit, the panel of experts usually meets for half a day to discuss the criteria with regard to the specific procedure and to record the key points of discussion. The result is made available to the panel of experts in writing in the form of a questions catalogue for the site visit.

The preparation of experts in international procedures is conducted in the same way as for programme accreditation in national procedures. Experts receive a handout beforehand containing key information on their role and tasks and the criteria for accreditation. Depending on the country where the university under assessment is located and the composition of the panel of experts, summary information on the country's higher education system is distributed to the experts (e.g. for Turkey, Indonesia). A preparatory meeting of the panel of experts lasting several hours takes place for each individual procedure; during this meeting, the consultants present the cornerstones of the AQAS-procedure and the panel of experts has the opportunity to discuss the university's application. Additionally, in preparation for a procedure in Nigeria for example, an education expert from the country was invited to familiarise the experts with issues specific to that country.

In recent years, AQAS has offered thematic workshops for university staff and experts, e.g. on the European Approach and for preparing German-speaking Spanish experts in the context of cooperation with the Spanish agency UniBasq. A scheduled workshop on digital forms of teaching and learning, which was planned for spring 2020, had to be cancelled due to the sudden crisis situation; however, it will be held at a later date.

9.6.3 Compliance with formal requirements (MRVO/ESG)

Besides its core task of supporting the development the quality of learning and teaching, AQAS has the remit to check compliance with formal criteria in all external quality assurance procedures. In Germany, these are legally imposed by the Interstate Study Accreditation Treaty and the MRVO; at the European level, the ESG form the basis for assessment procedures. AQAS ensures compliance with these external requirements at different levels:

- The AQAS Head Office informs universities of the criteria and requirements that are relevant to the procedure in question. This takes place in personal discussions and through the AQAS website. In the case of international procedures, AQAS has developed its own criteria on the basis of the ESG. Where possible, AQAS provides universities with guidelines and/or work aids addressing the relevant criteria and requirements to help them prepare their self-evaluation reports. The Head Office checks all self-evaluation reports for compliance with the formal requirements and lets the university know if anything is missing in the application documents.

- In all assessment procedures, AQAS informs the panel of experts about the criteria and requirements underlying the relevant procedure; these must be observed. In its guidelines for experts, AQAS has developed key questions (national procedures) or potential indicators (international procedures) that draw on the relevant criteria. These are intended to provide guidance to experts in preparing their assessments. In this way, the AQAS Head Office ensures that experts' reports are complete, i.e. that assessments have been made on all criteria.
- The Head Office regularly informs members of the Standing Commission about current changes in national requirements and of the resolutions of GAC and/or the latest discussions and developments at European level. The Head Office also prepares documents for the Standing Commission, taking into account the relevant requirements. The Commission considers the relevant requirements in its decisions. In national procedures, this is particularly relevant when approving reports on the formal criteria (see Chapter 10.3.1).

The criteria applicable to national accreditation procedures are set out in the MRVO. To demonstrate that the MRVO reflects the ESG in terms of content, GAC compared the two regulations in July 2018 and made the results available to all agencies (see Annex II.3.1).

The AQAS criteria applicable to international accreditation procedures are closely modelled on the ESG 2015. In addition, procedures according to the European Approach use the criteria ratified by the EHEA Ministers, which essentially include the ESG.

9.7 Cyclical external review of agencies (ESG 3.7)

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG

Since the foundation of AQAS, the Agency has been externally reviewed on a regular basis. In accordance with the second sentence of Article 3(2) and Article 5(3) No. 5 of the Interstate Study Accreditation Treaty, AQAS must undergo an external review at regular five-year intervals. Previously, reaccreditation was conducted in the context of an agreement between GAC and ENQA, which enabled ENQA membership to be renewed based on the review report and decision of GAC (see Annexes I.4). This decision was also taken as a basis for EQAR registration. This agreement was terminated following the change of the German accreditation system in 2018. The authorisation of agencies by GAC is since then subject to their EQAR registration.

10.Compliance with European Standards and Guidelines (Part 2)

10.1 Consideration of internal quality assurance (ESG 2.1)

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

10.1.1 Procedures before the change of the accreditation system on 1 January 2018

All national procedures (programme and system accreditation) for which the contract between university and agency was concluded before 31 December 2017 are conducted on the basis of the relevant (old) GAC criteria. These criteria are drafted in accordance with the applicable ESG 2015. While the ESG were being updated, AQAS set up an internal working group with the aim of bringing the guidelines used by the Agency into line with the ESG and the GAC criteria.

10.1.2 Procedures in Germany

In the restructuring of the German accreditation system in 2017/18 by the KMK, the ESG were incorporated at various levels. As stated elsewhere, the fact that registration with EQAR (and the associated implementation of the ESG) was defined in the Interstate Study Accreditation Treaty as a prerequisite for an agency to operate in Germany is already a clear indication of the importance of the ESG in Germany. In light of this, the KMK also emphasises in the explanatory memorandum to the MRVO that the provisions of the MRVO are based, among other things, on the ESG (see Chapter 9.6.3.).

10.1.3 International procedures

International accreditation procedures at AQAS are not bound to GAC requirements and are not explicitly conducted in accordance with the MRVO, but are based on the current version of the ESG.

10.1.3.1 Programme accreditation (international)

The procedures are based on criteria catalogues (“International programme accreditation”, “International PhD programmes” and “International institutional procedures”) that have been approved by the AQAS Standing Commission. Thanks to the active participation of AQAS in the context of its ENQA membership, the Agency can respond quickly to current discussions and implement changes easily. Following a major update of the criteria catalogues after the adoption of the ESG 2015, the criteria catalogues were revised in 2019 on the basis of practical experience gained abroad in the meantime. To this end, an internal working group was set up with the aim of critically reviewing the structure and wording of the criteria and indicators for the accreditation of Bachelor’s, Master’s and PhD programmes. Since, for example, PhD programmes were increasingly assessed within projects in Africa, the working group also drew up a document setting out more explicitly the indicators for these procedures (see “Criteria and indicators for Bachelor’s and Master’s programmes” and “Criteria and indicators for PhD programmes” and “Criteria for Bachelor’s, Master’s and PhD programmes”). The criteria used by AQAS also include a direct reference to the ESG Part I (see appendix).

10.1.3.2 Institutional accreditation (international)

In analogy to the international procedures described above, AQAS has adopted a criteria catalogue for institutional procedures that is closely aligned with the ESG. In contrast to the programme accreditation procedures described above, institutional accreditation procedures focus on universities’ QA systems. In the course of enhancing its instruments, one of the aspects discussed by the internal working group was the extent to which these complex systemic assessments can be designed so that experts can conduct an evidence-based assessment of the effectiveness of the QA system. As a result, AQAS decided to integrate “programme samples” into procedures abroad. To this end, the university must briefly present at least one programme. These “programme samples” therefore help to show how the relevant university’s QA system implements or supports study programmes. Alternatively, an institutional accreditation procedure can also be combined with programme accreditation in order to create synergies and document evidence.

10.1.4 European Approach

Procedures according to the European Approach for Quality Assurance of Joint Programmes are a special case because the consortia involved may or may not include German universities. Although the European Approach may only be used by German universities in the case of joint degrees at present (see Chapter 9.1.5.2

and Section 10 MRVO), AQAS uses the same criteria catalogue in both cases. As a participating agency in pilot projects for the European Approach, AQAS was able to successfully assist in the design of criteria and the implementation of the first procedures. Since the introduction of the European Approach, AQAS has conducted five European Approach procedures, making the Agency one of the most experienced agencies in this field. Looking ahead, AQAS expects that a growing number of transnational study programmes will opt for this type of procedure in the future.

10.2 Designing methodologies fit for purpose (ESG 2.2)

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

10.2.1 Objectives of procedures

Within the Agency, the objectives of quality assurance are defined, among other things, in the AQAS Mission Statement, which was adopted by the association's Management Board on 7 July 2007 and updated on 18 March 2021.

According to the "self-conception" of AQAS, assessment procedures should not only promote the diversity of study programmes, but also ensure the quality of teaching and learning. By creating transparency and assuring quality, these procedures should contribute to the international comparability and recognition of study programmes and degrees, providing sound guidance for university applicants.

In the context of assessment and programme accreditation procedures, panels of experts check in particular the implementation of a study programme's qualification goals within a study programme concept that is coherent in terms of subject matter, content and academic feasibility, as well as the occupational field / labour market orientation of degrees awarded by all types of HEIs. In this way, AQAS seeks to promote the enhancement of higher education and contribute to the development of quality.

In the case of assessments in preparation for system accreditation and institutional accreditation in international procedures, the university's responsibility for the area of learning and teaching is given greater emphasis. Universities that wish to become system-accredited are given the opportunity to demonstrate that their internal quality assurance system is capable of ensuring the same level of quality as external programme accreditation.

In any case, however, the responsibility for teaching and learning, and for ensuring the quality thereof, lies with the universities.

The objective of AQAS e. V. is set out in the preamble of the Agency's Articles of Association, where it is also defined as the purpose of the association.

The sequence of procedures is presented in detail in Chapter 10.3.

10.2.1.1 National procedures

Stakeholder participation has been an important issue for AQAS since the Agency was founded. In national procedures, this is achieved by including stakeholders in the AQAS Standing Commission and in the all panels of experts. An appropriate composition of representatives from universities, professional practice and students ensures that all relevant groups are involved.

For many years, AQAS has also maintained trusting relationships not only with higher education organisations (e.g. the HRK, Fakultätentage, DAAD), but also with business-related associations, foundations and consultancies (e.g. DIHK, IHK, Stifterverband, CHE). Furthermore, AQAS cooperates with the Student Accreditation Pool, a self-organised student body for accreditation procedures, which it also supports financially so that it can fulfil its tasks. As such, there is exchange with stakeholder groups at very different levels on all kinds of aspects related to the accreditation system. Their feedback concerning aspects such as dual study programmes, joint programmes, system accreditation and employability is usually incorporated into our procedures, provided that the decision to adapt criteria or processes lies with the Agency. As already mentioned, the results of ZEM surveys are also important for the continuous reflection of our work.

The approval of the formal report by the AQAS Standing Commission is a special feature of the design of procedures by AQAS. According to the MRVO, the formal report is drawn up by the Agency. However, AQAS does not want to leave the associated task of making a proposal to determine compliance with the formal criteria to individual consultants. Instead, this task was assigned to the Standing Commission to ensure that this step, too, is science-based and involves all stakeholders. This applies equally to programme and system accreditation procedures.

Owing to the strict requirements of the MRVO, there are relatively few options for customising national procedures or the associated process steps. AQAS meets universities' needs in particular by determining the composition of the panel of experts and coordinating the timing of site visits.

All AQAS procedures (programme and system accreditation) are designed to be very feedback-intensive in a bid to achieve full transparency. Universities receive feedback at all key stages of the procedure.

Furthermore, AQAS attaches importance to ensuring a continuous flow of information by appointing dedicated contact persons within the Agency for each university and procedure.

Programme accreditation (national)

The subject matter of programme accreditation in Germany are Bachelor's and Master's programmes offered by state or state-recognised universities.

Within the procedure, a review is undertaken of the appropriateness of a study programme's qualification goals and the competences expressed therein, as well as their implementation in a coherent study programme concept and the subject-content organisation of the study programme, the resources, the organisation of studies and examinations, and the university's internal procedures for ensuring academic success as well as procedures regarding gender equality and the compensation of disadvantages.

In assessment procedures in preparation for the initial accreditation of what tends to be new study programmes, the focus is on the question of whether, with regard to the quality of the programme design and implementation, there is a "fitness for purpose" (e.g. suitability for achieving the stated aims of the programme) as well as a "fitness of purpose" (e.g. suitability of the programme's objectives). In view of this, initial accreditation usually only enables the assessment of the "anticipated effectiveness" of the study programme concept.

When study programmes are assessed in reaccreditation procedures, the university is requested to demonstrate in the self-evaluation report whether the study programme concept has proven to be viable and academically feasible, and which measures the university has taken, based on the data and results of internal QA processes, in response to potential problems. This self-evaluation by the university makes it easier for the panel of experts to assess whether the university's internal quality assurance system has proven effective. To present the evidence, the university must provide certain data that GAC requires (see Chapters 10.3.1 and 10.3.2). All criteria of the MRVO must be checked in reaccreditation procedures, too. AQAS also aims to focus

on the question of how the study programme has evolved since its initial accreditation. Our assessment approach in reaccreditation procedures is based on the assumption that the university has followed the development of a study programme since its previous accreditation, identified its strengths and weaknesses, and enhanced the study programme as required. For this reason, data on student and graduate numbers, evaluation results and other aspects concerning academic feasibility (e.g. workload surveys) play an important role. In addition to evaluation results, developments in the subject, or in the subjects involved, as well as changing framework conditions should also have been considered. AQAS is aware that study programmes are caught between the requirements imposed by various stakeholders. It is therefore important that those responsible have addressed the results of internal quality assurance procedures, as well as the feedback from various stakeholders, and that possible conclusions are discussed and substantiated decisions taken on how the results and feedback are incorporated into the enhancement of the study programme. In addition to the criteria, this should be the starting point for the expert evaluation.

When conducting assessments, AQAS endeavours to meet the needs of individual universities by structuring each procedure to suit the needs of the university in question. In assessment procedures in preparation for programme accreditation, efficient procedure design is achieved thanks to the option of clustering study programmes. This creates synergy effects not only for the university, which has to prepare the procedure, but also for the panel of experts that conducts the assessment and for the AQAS Head Office, which is responsible for organising the procedures.

To ensure the consistent assessment of several cluster procedures at a university, AQAS introduced “model observation” several years ago. This tool has proven particularly useful in the assessment of complex study programme combinations such as two-subject study programmes or teacher training programmes. The assessment of individual partial study programmes in clusters basically involves reviewing the structural model of the study programmes (“model observation”). The subject matter of the assessment are the basic structure and interdisciplinary aspects of each respective study model (e.g. university-wide services to advise and support students, measures to help to prevent overlaps in study programmes, and university-wide quality assurance measures). The main objectives of model observation are as follows:

- The university should be given feedback on structural issues that can only partially be addressed when assessing individual programme clusters.
- Assessments should be conducted across subjects and study programmes, enabling statements to be made on the extent to which criteria have already been implemented at the model level (e.g. by means of provisions in framework examination regulations).
- Questions arising from the model observation should be noted for the assessment of individual programme clusters to ensure that they are addressed universally and that the connection between the model level and the subject level is maintained.

To conduct model observation, a “central peer group” is established; its members should ideally also be involved in assessing programme clusters, enabling them to assume the role of multipliers in panels of experts. For the purpose of model observation, the university prepares an additional self-evaluation report that addresses interdisciplinary aspects. A one-day site visit takes place for the model observation. Following the site visit, an experts’ report is prepared containing their assessment of interdisciplinary aspects and, where applicable, raising questions that the individual panels of experts should subsequently consider when assessing the programme clusters.

System accreditation (national)

In the context of system accreditation, German universities have the opportunity to demonstrate that their internal quality assurance system is capable of ensuring the same quality of study programmes as external programme accreditation.

The subject matter of an assessment in preparation for system accreditation is consequently a university's quality assurance system in the area of learning and teaching. The procedure involves examining whether the university has a closed QA system within which it systematically ensures compliance with the relevant criteria, and regularly reviews them within the university's own procedures for the accreditation of study programmes. Following successful system accreditation, the university is granted the right to dispense with external programme accreditation, and to internally accredit its own study programmes, i.e. award the GAC seal itself.

AQAS assumes that system accreditation is an interesting alternative to programme accreditation, particularly for universities that pursue more a quality-oriented management with regard to their overall management concept. System accreditation may also help enhance the processes related to the quality of learning and teaching. With that in mind, AQAS is open to universities' responses and to quality assurance systems that meet the relevant university's needs.

10.2.1.2 International procedures

Outside Germany, AQAS offers procedures for programme accreditation as well as procedures with a focus on institutional accreditation. While the focus of international programme accreditation procedures is on each respective study programme, institutional accreditation procedures abroad focus on the effectiveness of an institution's quality assurance system in accordance with the ESG criteria. Since the areas of research and governance are not explicitly the subject matter of the procedure, they are only addressed if there are direct overlaps with the processes of learning and teaching.

The AQAS Standing Commission is responsible for initiating all international procedures with an official decision; it also takes the final decision on the accreditation. In line with the "self-conception" of AQAS, the aim of procedures outside Germany is to ensure the quality of study programmes in accordance with the ESG, while preserving the diversity of study programmes. As intended with the introduction of the ESG, assessment procedures based on these international criteria should help ensure the comparability of study programmes. Since the recognition of study achievements is generally the responsibility of receiving universities, accreditation only contributes to this by strengthening confidence in the quality of study programmes that have undergone such a procedure.

Programme accreditation (international)

The subject matter of international programme accreditation procedures are Bachelor's, Master's and PhD programmes offered by state and state-recognised universities outside Germany. As stated in 10.5.2, the procedures use the AQAS criteria so that the appropriateness of the learning outcomes of the relevant study programme and the competences expressed therein, as well as the concept and the suitability of the study programme, the resources, the organisation and the universities' quality assurance concepts for the achievement of these goals are checked within the procedure. The procedures are designed such that the criteria are regarded as the benchmark, while also taking into account the goals set by the universities themselves.

The most common type of procedure in the international arena is initial programme accreditation. Requests for reaccreditation procedures have only been received in the past few years.

International initial accreditation focuses on study programmes that have never undergone international accreditation by AQAS before. Consequently, the subject matter of the assessment may be study programmes that are already up and running and from which students have already graduated. The procedures also include evaluating the effectiveness of the internal quality assurance system. In their applications, universities must therefore explicitly address how the QA system works at the study programme level, whether the study programme concept has proven to be viable and academically feasible, how student figures have developed over the past few years, and which measures the universities have taken, based on the data and results of internal QA processes, in response to potential problems. In this context, greater emphasis can also be placed on the aspect of employability, given that the whereabouts of graduates can be used to determine whether the study programme is able to achieve its qualification goals.

Although international reaccreditation involves using the same criteria catalogues as in initial accreditation, there is an increased focus on student data from past years. In addition, evidence must be provided on the functioning of the internal QA system. The university is also asked to show to what extent the study programme has developed since the last accreditation and how any possible recommendations have been addressed. The accreditation period for both initial accreditation and reaccreditation is six years.

Institutional accreditation (international)

Institutional accreditation procedures abroad involve assessing the internal QA systems of universities. In these procedures, universities can demonstrate the capability of their internal QA systems to ensure the quality of study programmes and their compliance with the ESG. Consequently, these procedures involve reviewing whether the university has a closed QA system that checks the university's internal procedures for assessing the quality of its study programmes. Based on its previous experience of such procedures, AQAS introduced an approach whereby the QA system is to be reviewed on the basis of a "programme sample". The aim of this is to provide the panel of experts with a case study that can be used as an example to review the effectiveness of the relevant university's mechanisms. However, the focus of the case study is such that a programme accreditation procedure is not automatically conducted in the context of institutional accreditation. If the university requests this, however, the procedure can theoretically be extended (additional expertise may be required in the panel of experts) to make this possible. In both procedures, however, separate experts' reports are prepared on the basis of the procedure-specific criteria.

European Approach

The subject matter of procedures based on the European Approach are Bachelor's and Master's programme offered by state and state-recognised universities both in Germany and further afield. The criteria used are those of the European Approach introduced in the 2015 Yerevan Communiqué, which can be found in 10.5.3. In this procedure, besides the aspects mentioned above under "Programme accreditation (international)", emphasis is placed on factors such as the issue of "eligibility", which consider the status of the participating universities, joint implementation, and the cooperation agreement. Study programmes that have successfully undergone a European Approach procedure are accredited for six years.

10.2.2 Calculation, conclusion of contracts, billing

As a non-profit organisation, AQAS e. V. is not permitted to make a profit. Even so, AQAS is an organisation under private law that must finance itself, requiring it to act as a business and calculate break-even costs.

Confidential information was removed.

10.2.2.1 Assessment procedures for study programmes in Germany

An individual procedure (in preparation for programme accreditation of a single study programme) currently costs: *Confidential information was removed.*

In addition, AQAS offers the assessment of study programmes in clustered form (see Chapter 10.3.1.1). Care is taken to ensure that all study programmes in the cluster are covered by experts with relevant expertise and that the panel of experts is composed in such a way that synergies are created and the experts can make a group decision for all of the study programmes in the cluster.

Confidential information was removed.

The university management places the order with AQAS. AQAS sends the university a contract that has been signed by the Management Board Chair and the management. The contract is always concluded with the university management. The contract sets out the course of the procedure, the budget and the envisaged timeline.

Confidential information was removed.

10.2.2.2 Assessment procedures for quality assurance systems in Germany

In the public debate in Germany, it is often said that universities expect a reduction in costs and effort from system accreditation (compared to programme accreditation). And yet what is often overlooked is that, despite the procedure of assessing the entire university by the Agency appearing leaner (and more cost-effective) compared to programme accreditation, effort is shifted from the Agency to the university. After all, following the university's successful system accreditation, it must organise the systematic review of its study programmes for compliance with the relevant criteria (including external evaluation with the involvement of all stakeholders) and their internal accreditation itself (see Chapter 10.3.1.2).

Confidential information was removed.

Stage I – informative site visit:

The first stage of the procedure begins after conclusion of the contract. It includes the preparation of the formal report, the nomination of experts by the AQAS Standing Commission, the first site visit, and the preparation of a summary of results containing the main findings of the first site visit.

Confidential information was removed.

Stage II – programme sample:

The second stage of the procedure involves the preparation and implementation of the second site visit (programme sample). It starts with the submission of the summary of results for the first site visit and ends on submission of the summary of results for the second site visit.

Confidential information was removed.

Stage III – preparation of the expert's report:

The third stage of the procedure involves the coordination and preparation of the experts' report and preparation of the final accreditation report. It starts after the second site visit and ends on submission of the accreditation report to the university.

Confidential information was removed.

10.2.2.3 International procedures

International programme accreditation procedures are calculated based on similar principles as for national procedures. In this case, however, adjustments may have to be made, depending on the country and the effort involved in the procedure; this means that costs are calculated individually for each procedure.

Confidential information was removed.

10.3 Implementing processes (ESG 2.3)

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include

- *a self-assessment or equivalent;*
- *an external assessment normally including a site visit;*
- *a report resulting from the external assessment;*
- *a consistent follow-up*

10.3.1 Procedures in accordance with the MRVO (national procedures)

The basic procedures of external quality assurance in Germany have been refined and tested in many ways over the past 20 years, so that there should be little doubt about the fundamental fitness for purpose of external quality assurance. This is confirmed by the decision of the Federal Constitutional Court of 17 February 2016,

which confirms the conformity with the Constitution of external quality assurance through accreditation. The decision explicitly states that quality assurance for academic teaching need not be limited to scientific and technical criteria, but may also be used to assess the organisation of study courses, academic requirements and academic success. However, it also called for the elaboration of an adequate legal basis. The federated states met this request by elaborating the so-called Interstate Study Accreditation Treaty, which came into force on 1 January 2018.

Procedures building on this legislation follow the principle of "self-evaluation report – peer review – experts' report – decision". In this context, the agencies are responsible for the first three steps, i.e. the implementation of the assessment procedure; GAC is responsible for the final accreditation decision. This transfer of decision-making power to GAC from the agencies has led to considerable change within the German accreditation system. The provisions of the new regulatory framework, presented below, apply to both programme and system accreditation.

The provisions of the Interstate Treaty are transferred to the relevant law of the individual states by decree, given that the responsibility for universities in Germany lies with the states. In order to create a uniform basis for procedures and to continue to enable national comparability, the states agreed on a Specimen Decree (MRVO), which was adopted by the KMK on 7 December 2017 and which serves as a basis for the individual state decrees.

According to the Interstate Treaty, the German Rectors' Conference should develop a procedure which ensures that academia is adequately involved in the appointment of all experts taking part in accreditation procedures. The agencies – and therefore also AQAS – are bound to this procedure. The HRK adopted the relevant guidelines on the nomination of professors for review panels on 24 April 2018. In addition to the appointment procedure itself, the guidelines also define the criteria for selecting experts. The university can make a proposal for the professional profile of the experts, but it may not name specific individuals it wishes to have nominated as experts. The Head Office contacts the experts in question and compiles a proposal for a panel of experts. According to the HRK guidelines, this proposal is initially sent to the university, which may point out any possible lack of impartiality on the part of the selected experts.

The panel of experts is then confirmed by members of the Standing Commission: the rapporteur (usually a professor who assumes this role for the assessment procedure concerned), the Chair, a representative of professional practice and a student representative. This procedure ensures that all stakeholder groups are involved in the nomination and appointment of experts. Consequently, the requirement set out in the HRK guidelines to appoint experts "in a science-driven procedure" is met. However, AQAS also believes it is important to include the other stakeholders in order to ensure that they are all adequately involved in the nomination process.

In all forms of accreditation, the Interstate Treaty differentiates between formal and academic criteria. In this connection, panels of experts should concentrate on discussing the academic issues (and draw up an experts' report); it is the task of the agency to check the formal criteria (documented in the formal report). Both documents are to be prepared based on a structure specified by GAC for the relevant procedure format; together, they make up the accreditation report, which is then to be submitted to GAC by the university as a basis for decision-making. This report has the character of an expert opinion.

Concerning the formal report, it is the task of AQAS to check compliance with the formal criteria (Part 2 of the MRVO). At AQAS, the formal report is approved by the Standing Commission. The formal report is brought to the attention of the university and made available to the panel of experts, which is responsible for checking the academic criteria (Part 3 of the MRVO).

In reviewing the formalities, the agencies are given an explicit mandate to check compliance with the formal criteria, for which there was no equivalent in the old system. It used to be the task of the experts to check all relevant criteria, while the agencies were only responsible for the process and their commission for the final decision on accreditation (based on the opinion of the panel). In the new system, the agency is responsible for preparing the formal report, including the proposal for a decision (by GAC) on the compliance with the formal criteria.

In the context of assessing the academic criteria, the panel of experts conducts a site visit during which the experts hold discussions with various stakeholders within the university.

The experts' report on the fulfilment of the academic criteria is subsequently prepared. AQAS gives the university the opportunity to comment on the report before the final accreditation report is drawn up.

It is incumbent on GAC to decide which conditions for the accreditation may be imposed. The legal provisions of the MRVO relating to the formal report and experts' report do not contain any regulations on possible conditions because these "should only come into question in future in exceptional cases" (see explanatory memorandum to the MRVO). Agencies are expected to support universities in the procedure, rendering it unnecessary in as many cases as possible for GAC to impose conditions. The MRVO (unfortunately) does not regulate this aspect in any further detail.

After the site visit, AQAS therefore gives universities the opportunity to address any shortcomings identified in the process as quickly as possible ("deficiency rectification loop"). For this purpose, the panel of experts provides verbal feedback at the end of every site visit, which is then drawn up in writing and made available to the university ("summary of results"). The feedback shows to what extent the panel of experts believes that the criteria have not been met, and what measures need to be taken to ensure that the criteria are fully met.

If the university wishes to make use of this option, it has up to three months to submit additional documents based on the summary of results. Alternatively, it may suspend the assessment procedure once in order to carry out a more far-reaching revision of the relevant study programme. The assessment procedure must be resumed within twelve months of a suspension. The relevant adjustments are then taken into account by the panel of experts when preparing their experts' report. The "deficiency rectification loop" is the Agency's own follow-up procedure, which the university can choose whether to use or not. If, therefore, a university does not want to implement the experts' recommendations or if time restrictions prevent an adjustment before the final decision is taken, GAC may have to impose conditions (and verify the fulfilment of those conditions itself). It may also impose conditions that are not criticised in the formal report or that were not deemed critical by the experts.

AQAS provides experts with a structure for the experts' report and – a draft version of – the descriptive part of the report. Assessments are written by the panel of experts. Even if the work for preparing the experts' report can be divided into different parts, the full text is agreed upon by all of the experts involved. After all, the experts' report represents a group decision, which each member of the panel of experts supports in terms of content. In the event of a dissenting opinion, this will be indicated accordingly.

Before the final accreditation report – comprising the formal report and the experts' report – is drawn up, the university is given the opportunity to comment on the experts' report. Where necessary, AQAS provides feedback on the statement to the panel of experts, which is responsible for deciding on the final version of the experts' report.

Experience

Since the last accreditation of AQAS, the switch to the new legal basis has been at the forefront of the enhancement of the procedures for national programme accreditation. In adapting the Agency's processes, an

attempt was made on the one hand to retain, wherever possible, procedural features of AQAS that had proven effective under the old regulatory framework. These include:

- *Involvement of the Standing Commission*

  Despite the fact that the Standing Commission is now only responsible for appointing the panel of experts and adopting the formal report, the latter is considered an important element in the differentiation between the operational implementation of procedures by the Head Office and science-driven decision-making. In particular, by developing decision-making practices, the Standing Commission contributes to transparency, predictability and equal treatment in procedures.

- *Preliminary statements by the experts before the site visit*

  In all procedures, AQAS asks the participating experts to prepare, based on the university's documents, a short written statement summarising the strengths and weaknesses of the study programme, as well as any outstanding issues, in advance of the site visit. Concerns and criticism should be expressed openly at this point, possibly in the form of questions, so that the university gets a realistic initial assessment. AQAS sends all statements to the university as well as to each member of the panel of experts in preparation for the site visit. As universities have repeatedly told us, these statements make it easier for them to prepare for the discussions with the panel of experts; they also enable universities to submit additional information, and add to the quality of discussions.

- *The preparatory meeting with the panel of experts*

  Detailed preparation of the panel of experts on the day before the site visit helps ensure that they are familiar with the criteria and procedures for the assessment; that they are aware of their role and the challenges involved; and that they conduct the discussions in a structured, criteria-based and results-driven manner. The experts' preliminary statements help the Head Office to prepare for the preliminary meeting.

On the other hand, an attempt was made to implement the new requirements such that they result in added value for the procedures, and therefore ultimately for the quality of study programmes. Examples include:

- *Structuring of all documents according to the criteria for the accreditation of study programmes pursuant to the MRVO*

  In addition to the structures prescribed by GAC, AQAS has adapted all document templates (e.g. work aid for drafting a self-evaluation report, template for preliminary statements by experts) to the structure according to the criteria of the MVRO. This provides guidance for all those involved, and helps establish a highly criterion-based, comparable approach.

- *Written summary of results after the site visit*

  Since universities receive the experts' key impressions in written form after the site visit, there is a documented basis for further action that is accessible to all participants. Compared to verbal feedback, this written document provides clear information about where the experts see a need for change, and contributes to transparency and comprehensibility at this stage of the process.

10.3.1.1 Programme accreditation in accordance with the MRVO

The following diagram shows the course of the procedure for programme accreditation at AQAS:

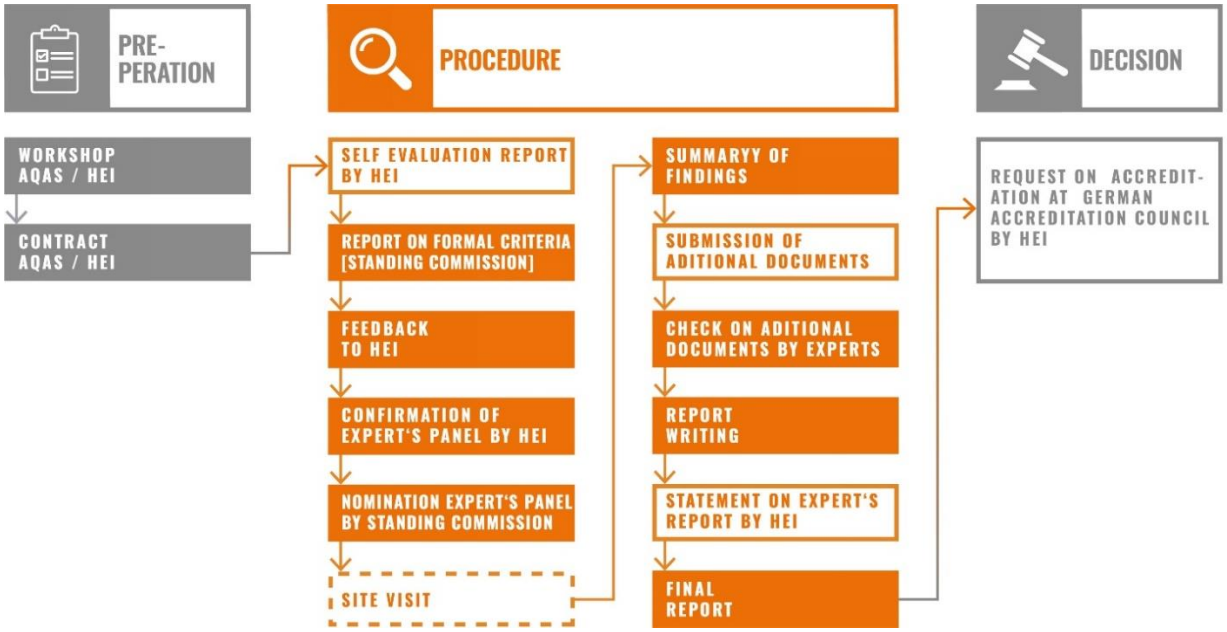

Figure 10: The course of assessment for programme accreditation

Preparation of the accreditation procedure

The course of the programme accreditation procedure at AQAS follows the relevant provisions under the MRVO.

Universities usually request a cost estimate or put out a call for (public) tenders before awarding the contract. Depending on the type of procedure, the cost estimate containing information on the relevant criteria is sent, enabling universities to obtain information on the underlying criteria, the specifics relating to the type of procedure, and on AQAS as an agency.

After accepting the offer, AQAS concludes a contract with the relevant university for the implementation of an assessment procedure in preparation for programme accreditation by GAC (see Annex I.2.a.1).

In all cost estimates, the university is invited to participate in a non-binding (complimentary) preliminary meeting at the AQAS Head Office with the aim of discussing with the university the procedure, the criteria and the approach taken by AQAS. Under the conditions of the pandemic (and probably also in the future), video conferencing can also be used in this context for both national and, in particular, international procedures. Specific questions concerning special features of universities or study programmes (e.g. dual study programmes, teacher training programmes) are also addressed individually. During these preliminary discussions, no mention is made, however, of the adequacy of the content of study programmes; they focus solely on formal and organisational issues relating to the procedure.

It is also still possible under the new regulatory framework to assess study programmes in clustered form (“cluster accreditation”). In accordance with the MRVO, the prerequisite for this is that the study programmes under assessment have a high affinity on the subject level that goes beyond the mere affiliation to a disciplinary culture (such as humanities and cultural studies, social sciences, engineering or natural sciences). According to the specifications of the MRVO, a cluster should consist of no more than ten study programmes. AQAS also attaches importance to keeping the number of grouped study programmes manageable so that each one can be explicitly discussed during the site visit. Universities have the option of requesting approval of the composition of a specific cluster by GAC before the start of the procedure. AQAS usually recommends that universities make use of this option.

Self-evaluation

Once the contract has been concluded, the university prepares a self-evaluation report. AQAS makes available a work aid for this purpose. In the German accreditation system, GAC is exclusively entitled to interpretations that go beyond the requirements of the MRVO and the GAC template for experts' reports. For this reason, the structure of the AQAS work aid essentially follows the structure laid down for the experts' report; all relevant aspects in accordance with the MRVO are addressed using key terms.

A full self-evaluation report comprises the following documents:

- Self-evaluation report,
- Module descriptions,
- Study and examination regulations,
- An example of the Diploma Supplement.

The university is expected to document the study programme in its current form. According to the wording in the Interstate Treaty, it is supposed to be a self-evaluation report. Universities should therefore focus on the development of the study programme in their self-evaluation report, particularly in the case of reaccreditation procedures. They may also focus on individual aspects (e.g. on essential structural features or changes that have been implemented). In the case of reaccreditation, the university is also expected to submit certain data and key performance indicators on study success[10] to enable an evidence-based assessment.

Since accreditation decisions are now administrative acts in the German accreditation system, statements in the self-evaluation report should be substantiated if possible, so that they can be understood not only by the experts, but also by GAC, as the decision-making body.

Preparation of the formal report

According to the provisions of the MRVO, the formal report must contain a proposal for determining compliance with the formal criteria. At AQAS, the Standing Commission is responsible for this because AQAS attaches importance to this step of the process also being implemented in a science-led manner. For each assessment procedure, a member of the Standing Commission is nominated as the rapporteur. The Head Office informs the university of the result of the formal review and, where applicable, of any further need for clarification or additions; the university is given the opportunity to submit additional documents before the assessment continues.

Appointment and preparation of experts

The experts involved in an assessment for programme accreditation are selected in accordance with the relevant HRK guidelines, as described above. In the case of cluster procedures, AQAS ensures that all study programmes in the cluster are covered by experts from a relevant academic field. All participating experts confirm their impartiality in a written declaration and undertake to treat as confidential all documents made available in the procedure (see Chapter 10.4.3). During an internal meeting of the panel of experts, lasting several hours, on the day before the site visit, the consultants describe the requirements and explain the

[10] GAC provides concrete specifications regarding this: a template for the necessary data sheet for the query of key performance indicators can be downloaded from the GAC website (https://www.akkreditierungsrat.de/de/antragstellung/antragstellung) as an Excel file. An explanation of the calculation models is also provided there.

assessment process. The panel of experts has the opportunity to discuss internally the university's self-evaluation report in detail.

Site visit

In order to review the academic criteria set in the MRVO, the panel of experts conducts a site visit. In preparation for the site visit, the experts receive the university's self-evaluation report and are asked to send the Head Office initial written feedback (preliminary experts' report).

For this purpose, AQAS provides a template based on the criteria of the MRVO to ensure that all relevant criteria are taken into account. The feedback is given to the university and to the other members of the panel of experts for their information prior to the site visit. These preparatory measures enable all those involved in the site visit to prepare adequately. Both formal and informal feedback from universities and experts regularly expresses the usefulness of this approach, given that it facilitates the targeted preparation of the site visit, enabling the relevant discussions to be held in a structured and criterion-oriented manner.

The preparatory meeting with the panel of experts on the day before the site visit serves to discuss in detail the criteria underlying the procedure and the self-evaluation report, and to jointly develop interview guidelines, which the experts can use as a basis for their discussions with the university.

During the site visit, discussions are held with all status groups, i.e. with the university management, departmental/faculty leaders, and programme directors, as well as with lecturers and students. All rooms and facilities that are relevant to the study programme are also viewed.

The site visit ends with feedback from the panel of experts, in which they summarise their main impressions and provide information on potential shortcomings with regard to meeting the criteria. The feedback is summarised briefly in writing (summary of results) and made available to the university after the site visit. On this basis, the university can decide whether it wishes to make use of the option to rectify any shortcomings, as described above.

Preparation of the experts' report

The experts' report is drawn up collaboratively within the panel of experts with the support of the consultant responsible. The report is based on the structure specified by GAC, as described above. In their report, the experts make a proposal regarding the fulfilment of the academic criteria. If a criterion is considered not to have been met, appropriate conditions are suggested. In addition, the experts have the opportunity to make recommendations. The university may comment on the experts' report. Where necessary, we provide feedback on the statement of the university to the panel of experts, which is responsible for deciding on the final version of the experts' report.

Accreditation report

After completion of the experts' report, it is joined with the formal report to create the accreditation report, and sent to the university. The procedure is completed once the accreditation report has been sent. The university can now apply to GAC for accreditation of the relevant study programme on the basis of the accreditation report.

Follow-up

Since, according to the new regulatory framework, the accreditation decision and any associated imposition of conditions (including checking whether those conditions have been met or not) is the responsibility of GAC, the possibility for AQAS to support a follow-up process is limited to the "deficiency rectification loop". AQAS by all means perceive this as an opportunity: in our experience, the possibility for universities to make adjustments to their study programmes and the relevant documents, such as module descriptions and examination regulations, after the site visit has a positive effect on the procedure, and consequently on the quality of study programmes. Whereas under the old legal basis, universities were only allowed to make changes once the accreditation decision had been made and the corresponding conditions imposed, under the new legal basis they are able to take action immediately after the site visit if they wish. The advantage of this is that improvements deemed appropriate by the university are made voluntarily and do not have to be achieved by imposing conditions. This has contributed to an open-minded and objective approach to the need for improvements. However, this also changes the role of AQAS from a decision-making body to a stakeholder that assists the university in making improvements. The procedure also means more work for the AQAS Head Office, however, and a longer procedure for all those involved. Under the old regulatory framework, procedures at AQAS usually took nine months from the official opening of the procedure to the final decision. Under the new regulatory framework, AQAS reckons on twelve months from the formal report to the submission of the final accreditation report, if the university exercises the option to remedy any shortcomings. Only then can applications for accreditation be submitted to GAC. Experience shows that, after submission of the application, it may well take another six to nine months before GAC reaches a decision.

In 72 of the 140 programme accreditation procedures conducted so far under the new regulatory framework, the relevant panel of experts identified shortcomings with regard to the fulfilment of the criteria, and AQAS gave the university the possibility of remedying the shortcomings. In 65 of these procedures, the university made use of this option. As a result, AQAS was able to confirm in 57 cases that the shortcomings specified by the relevant panel of experts had been satisfactorily addressed, which meant that, in the end, all criteria in the experts' report were deemed to have been met.

In the experience of AQAS, GAC generally followed the panels of experts' assessments. In ten cases, GAC came to a different conclusion and, for its part, imposed conditions.

GAC's decision-making practices will decisively shape the future development of the accreditation system. The universities will have to see whether it makes strategic sense to address criticism immediately after the site visit and remedy shortcomings in advance, or to first await GAC's decision.

Experience

Meanwhile, initial experiences with the implementation of assessment procedures under the new regulatory framework have been gained. Apart from the modified structures of the self-evaluation report and the final accreditation report, which are based on the structure of the MRVO and the template prescribed by GAC, the course of the actual assessment process, and especially the site visit, has remained almost unchanged.

The challenges in procedures under the new regulatory framework result primarily from the separation of the assessment by the Agency from the accreditation decision by GAC. Based on previous experience in programme accreditation, for example, the following aspects can be mentioned at this point:

- *Individuality of experts' reports*

  AQAS has always attached importance to the evaluative parts of experts' reports being written by the experts (and not by the consultants), because the experts are in a better position to provide individual and

competent feedback on a particular study programme. Since GAC takes decisions on the basis of the experts' statements without them or AQAS being able to comment on them, there is a risk, however, that highly individual texts may give rise to misunderstandings and lead to conditions being imposed by GAC that had not been intended by the experts. The challenge for AQAS lies in supporting experts in the preparation of the evaluative parts so that such consequences are avoided wherever possible, while at the same time providing open and constructively critical feedback that is tailored to the specific situation.

- *Weighting of formal aspects*

  Previous decisions taken by GAC show that it sometimes focuses heavily on the details of formalities. As a result, additional conditions on formal or legal aspects (such as detailed regulations in examination regulations) that were not suggested by the Agency or the experts are imposed. AQAS is concerned that such aspects will gain in significance, overshadowing the assessment of academic criteria. In our experience to date, however, GAC often does not address aspects of content that would suggest a decision differing from the experts' assessment. In our view, an overly strong shift to emphasising formal aspects should be avoided so as not to lose sight of the original goal of improving the quality of study programmes for the benefit of students.

- *GAC's decision-making practices*

  AQAS has heard from universities that there is considerable uncertainty surrounding GAC's decision-making. In procedures under the old regulatory framework, the agencies had established decision-making practices that were largely predictable for universities. So far, GAC has taken decisions on many aspects very much on a case-by-case basis. This makes it difficult to give universities authoritative information on whether, for example, particular approaches to the enhancement of study programmes will be accepted by GAC or not, because there is no discernible pattern in similar cases. It would be desirable for consistent decision-making practices to be developed in this area that can be taken into account by universities and agencies alike.

Overall, the switch to the new regulatory framework has led to AQAS putting many processes to the test and redesigning them when required.

It is already apparent that, due to the interplay of two legal acts (assessment procedure on the basis of a private contract between university and agency and accreditation decision as an administrative decision by GAC) as well as the integration of the "deficiency rectification loop" as described above, procedures take considerably longer and are also much more expensive for universities than under the old regulatory framework, not least because of the payment of fees to GAC.

10.3.1.2 System accreditation in accordance with the MRVO

The diagram below shows the course of the procedure at AQAS:

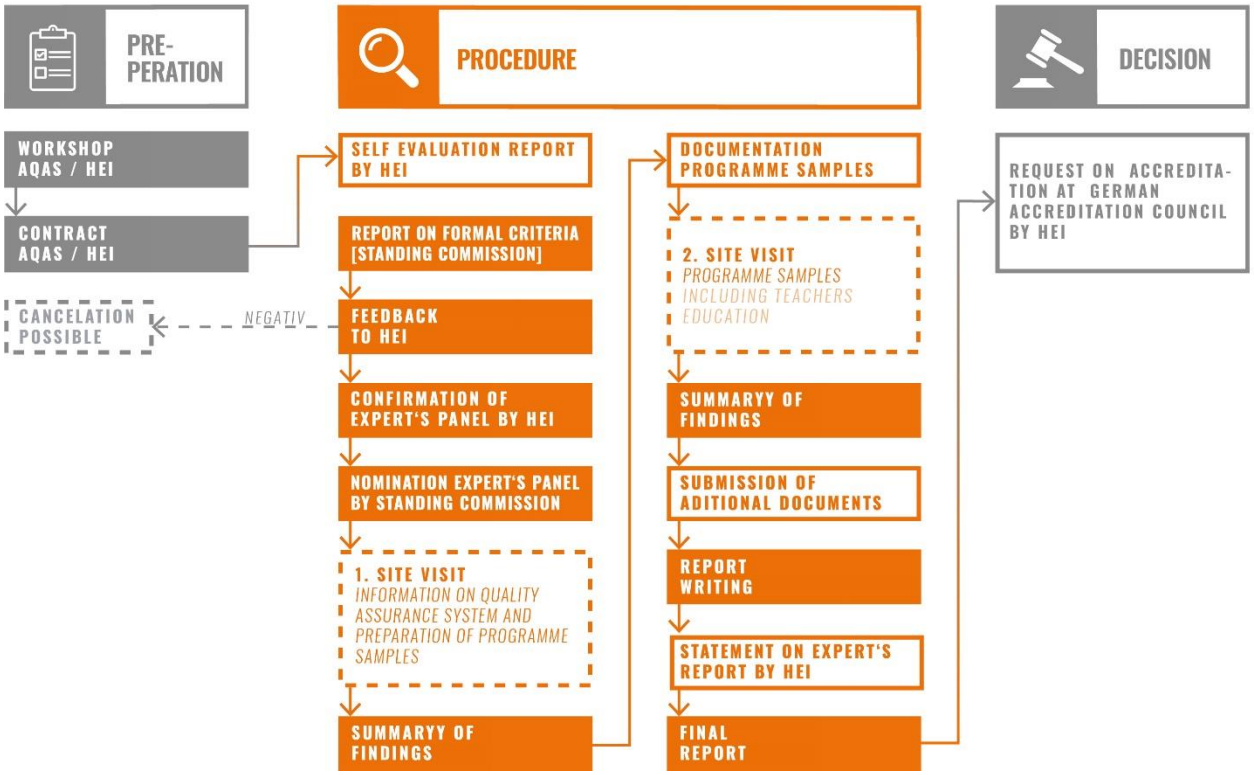

Figure 11: Course of the assessment for system accreditation

Preparation of the accreditation procedure

The course of the system assessment procedure at AQAS follows the relevant rules set out in the MVRO. In the following, the procedure is described without taking into account teacher training programmes.[11]

First of all, the Head Office (usually the Head of System Accreditation) holds an information meeting with representatives of the interested university and tells them about the objectives and course of the procedure as well as the criteria underlying the procedure. If the university decides to go ahead with the procedure, AQAS concludes a contract for conducing the assessment with the university in question (see Annex I.2.b.1). The relevant cost calculation and a time schedule are always an integral part of the contract.

Assessment by AQAS

To clearly define the due dates for each payment and the university's option of withdrawing from the contract, AQAS defines a total of three stages within the assessment process:

[11] If a university also offers teacher training programmes, Section 31(3) MRVO requires that one study programme from every type of teacher training programme offered (meaning for different types of schools and levels (primary/secondary) of education) is included in the programme sample. AQAS implements this requirement by ensuring that the panel of experts scrutinises the underlying "model" of teacher training and how it is fleshed out taking the example of several teaching subjects. The focus in on the integration of teacher training in the relevant university's internal QA system.

(1) **Stage I – informative site visit:**

The first stage of the procedure begins after conclusion of the contract. It includes the preparation of the formal report, the nomination of the experts by the AQAS Standing Commission, the first site visit, and the preparation of a summary of results containing the main findings of the first site visit.

(2) **Stage II – programme sample:**

The second stage of the procedure involves the preparation and implementation of the second site visit (programme sample). It starts with the submission of the summary of results for the first site visit and ends with the submission of the summary of results for the second site visit.

(3) **Stage III – preparation of reports**:

The third stage of the procedure involves the coordination and preparation of the experts' report for system accreditation and preparation of the final accreditation report. It starts after the second site visit and ends with the submission of the accreditation report to the university.

At AQAS, assessments for system accreditation are always overseen jointly by two consultants from the Head Office (one of whom being a Senior Consultant).

Preparation of the formal report

In analogy to programme assessment, in assessment procedures for the preparation of system accreditation, a distinction is also made between formal and academic criteria. However, the only formal criterion for first-time system accreditation is that proof must be provided at the time of application that at least one study programme underwent an internal assessment using the university's internal QA system (Section 23 (1) No. 3 MRVO) or, in the case of procedures for system reaccreditation, proof must be provided that all Bachelor's and Master's study programmes went through the internal QA system at least once (Section 23 (1) No. 4 MRVO).

As described above, at AQAS the determination of compliance with this formal criterion is made by the Standing Commission, which approves the formal report.

Appointment and preparation of experts

The experts involved in an assessment for system accreditation are selected in accordance with the relevant HRK guidelines, as described above.

The criteria for selecting experts presented in the HRK guidelines stipulate, among other things, that academics in the panel of experts must "have already participated in accreditation procedures (experts with experience in system accreditation and newcomers to this type of accreditation)". For this purpose, AQAS can draw on an extensive pool of experts who, thanks to our previously conducted system accreditation procedures, also have adequate expertise in system accreditation.

In system assessment procedures, too, all participating experts confirm their impartiality in a written declaration and undertake to treat as confidential all documents made available in the procedure (see Chapter 10.4.3).

The university's self-evaluation report

The basis of the assessment procedure is the university's self-evaluation report, plus annexes, demonstrating the binding nature and the individual steps/processes of the internal QA system (e.g. evaluation regulations, process descriptions, QA manual, framework regulations, internal checklists and templates for internal accreditation, etc.). The university may therefore submit documents that, due to the existing control system or the internal reporting system, are available anyway or are regularly produced as part of the internal QA process.

According to Section 24 (2) MRVO, the self-evaluation report must contain information on at least the university's quality goals and on the formal and academic criteria of system accreditation. AQAS asks universities to use GAC's structure for system accreditation as a template when creating their self-evaluation report.

In analogy to programme assessments, experts in system assessment procedures are also asked to provide a short written preliminary experts' report before both site visits.

Assessment

The main aim of the first site visit is to check whether the university's internal QA system is fundamentally appropriate to meet the criteria for system accreditation, i.e. whether all essential elements are embedded in the system. The aim of the first site visit is therefore to inform the panel of experts about the university and the basic structure of its QA system. At this point, it is important to AQAS that the experts get the broadest overview possible of the university's internal QA system. This will enable them to identify deficits at an early stage and provide advice accordingly, so that the university can use the time between site visits to make the necessary adjustments. In our experience, any shortcomings in terms of meeting the criteria can usually be remedied at this stage. For this reason, AQAS provides for discussions with all status groups even during the first site visit, i.e. with the university management and Equal Opportunities Officers, QA Officers and the administration, representatives of departments and student representatives.

In addition, the panel of experts agrees on the composition of programme samples and their documentation during the first site visit. By taking this approach, the Agency meets the specifications of the MRVO, according to which the panel of experts must determine the random samples (see Section 31 MRVO and the explanatory memorandum). Furthermore, AQAS would like to give the panel of experts the opportunity to agree on site with the university on what would be the most appropriate way of documenting the samples.

The key findings of the first site visit are summarised in a short report ("summary of results"), which also includes information on which samples the panel of experts has chosen and, if applicable, specifications and agreements regarding the documentation of samples (see Annex I.2.b.4). The summary of results is made available to the university.

During the second site visit, the panel of experts reviews the comprehensive application of the QA system within the university, based on programme samples. According to Section 31 MRVO, the subject matter of random sampling is, on the one hand, the consideration of the formal and academic criteria for study programmes within the QA system as determined by the panel of experts and, on the other, the implementation of the internal review mechanisms, including all criteria, taking the example of a study programme that went through the university's QA system. Where applicable, a sample related to teaching training programmes is also reviewed. The specific selection of the "features" to be considered in the sample is left to the panel of experts, as described above, enabling them to respond to the individual situation of the university and to design the sample accordingly.

If the composition of the programme sample necessitates it, AQAS will engage an additional expert for the second site visit. If the content of the sample study programme is not covered by the existing panel of experts,

it will be expanded so as to be able to understand the results of the university's internal procedure for the study programme from an academic perspective.

The documentation of random sampling depends on the design of the university's QA system, and is therefore customised accordingly. The course of the second site visit also depends on the composition of features in the sample and the type of documentation required. It is devised individually in each system assessment procedure, taking into account the experts' requirements with regard to content and the time frame.

Rectification of deficiencies

After the second site visit, a so-called "deficiency rectification loop" may be applied, if necessary and if desired by the university. This is done to enable the university to rectify any shortcomings identified by the panel of experts during the procedure with regard to meeting the criteria for system accreditation before the experts' report is prepared. After that, the experts' report on the assessment of the academic criteria for system accreditation is drafted.

There is already a fundamental possibility to remedy shortcomings in system accreditation in the period between the two site visits. In our experience, universities generally like to take up the experts' advice from the first site visit, with the result that many aspects that appeared problematic during the first site visit have already been addressed by the time the panel of experts conducts its second visit.

Preparation of the experts' report

The experts' report is created collaboratively, following the structure set by GAC. In their report, the experts assess whether the university's QA system meets the academic criteria of the MRVO for system accreditation, and is therefore suitable for ensuring the quality of study programmes, taking into account all relevant requirements, and whether this finding was confirmed by the programme samples. If shortcomings were identified when assessing the programme samples, it must be determined whether the cause of the quality deficiencies is of a systemic nature or whether the university's QA system is not responsible for the deficiencies. If a criterion is considered to have not been met or only partially met, conditions are proposed accordingly by the panel of experts. In addition, the experts have the opportunity to make recommendations for further improvement.

The university receives the experts' report and has the opportunity to comment on it; where applicable, these comments are then forwarded to the experts.

Accreditation report

After completion of the experts' report, it is joined with the formal report to create the accreditation report, and sent to the university. The procedure is completed once the accreditation report has been sent. The university can now apply to GAC for system accreditation on the basis of the accreditation report.

Follow-up

Since no system assessments have been completed yet under the new regulatory framework, the general remarks above on programme assessment apply analogously.

Experience

As of April 2021, AQAS had successfully completed 18 system accreditation procedures under the old regulatory framework. The last procedure under the old regulatory framework is expected to be completed in May 2021. Since the procedures were based on different GAC procedural rules and the total number of cases is small, it was not possible to perform a statistical analysis of the results. In 2017, however, we summarised our experiences in an analysis that is published on the AQAS website (see Annex II.3.3).

The changes in system accreditation due to the new regulatory framework relate not only to changes in the implementation of the procedure, but also to changes in the criteria that a system-accredited university must meet.

As AQAS sees it, the main changes with regard to the specifications for implementing the procedure (apart from transferring decision-making to GAC) are as follows:

- *Discontinuation of the formal preliminary assessment*

  In the old system, the preliminary assessment represented a first “hurdle” to ensure that only universities that met the basic requirements, giving rise to a subject matter for assessment, were admitted to system accreditation. Evidence had to be provided of the existence of a formalised university-wide QA system for teaching and learning, and its application based on the example of at least one study programme. Although the MRVO also stipulates that at least one study programme must go through the QA system as a formal criterion for system accreditation, the wording of the MRVO provides flexibility as to when this criterion must be met. If the MRVO is taken verbatim, then proof would only have to be provided “with an application for system accreditation” (third sentence of Section 23 (1) MRVO), i.e. when applying to GAC, namely at the end of the assessment procedure. The MRVO also requires that the panel of experts receives the formal report (second sentence of Section 24 (4)), again with no specification of timing. AQAS interprets the MRVO at this point along the lines of the old regulatory framework, and places the preparation of the formal report at the beginning of the assessment process. AQAS continues to consider expedient the idea that a QA system should have proven its effectiveness in reality, at least on the basis of an example, before the assessment process begins. Further AQAS still considers it important that the formal report is approved by our Standing Commission. This ensures that initial science-based feedback is available already at the start of the procedure. If it becomes apparent at this point that a QA system is not sufficiently “mature” for system accreditation, this can be pointed out to universities at an early stage, enabling procedures that are not effective to be aborted. This way, unnecessary effort and costs can be avoided.

- *Explicit definition of requirements applying to programme samples*

  While under the old system, experts were relatively free in their design of the random sample, under the new regulatory framework, sampling is precisely defined: as described above, the implementation of formal and academic criteria must be examined on a random basis using the example of several study programmes. In addition, the panel of experts should be able to comprehend, using the example of one study programme, how it went through the university’s QA system (old regulatory framework: programme random sample). This regulation under the MRVO to review “broadly [as well as] in depth” corresponds to existing practice at AQAS, since this very structure has shown positive results.

- *Discontinuation of a separate random sample related to teacher training*

  According to the old GAC requirements, teacher training programmes had to be considered at two levels in the process of system accreditation: as a feature during the second site visit and in the context of an additional random assessment of these study programmes. In the past, a separate (third) site visit was

conducted to this end with a panel of experts put together especially for the topic of teacher training. This ceases to apply under the new regulatory framework. According to Section 31 (3) MRVO, with regard to random sampling for teacher training programmes, one study programme each from each type of teacher training qualification offered must be included in the random sample. AQAS considers this streamlining of the procedure to be expedient because the additional knowledge gained is disproportionate to the effort, given that it necessitated a third site visit within the procedure. Nonetheless, AQAS considers it important that teacher training is also integrated carefully into the procedure under the conditions of the MRVO. AQAS implements this requirement by ensuring that the panel of experts scrutinises the underlying "model" of teacher training and how it is fleshed out taking the example of several teaching subjects. The focus is on the integration of teacher training in the university's internal QA system. In the case of assessment procedures at universities offering teacher training programmes, AQAS additionally makes sure that individuals with proven expertise in teacher training are included in the panel of experts. In addition, the panel of experts for random sampling is usually expanded by an additional expert with expertise in teacher training.

In the redesign of criteria for system accreditation, it is emphasised in particular that the MRVO clearly specifies various aspects that were already necessary under the old regulatory framework, but that were not recognisably embedded in the criteria. This refers in particular to the self-accreditation rights associated with system accreditation, which had received growing attention in procedures under the old regulatory framework. For example, the MRVO now explicitly requires universities to implement internal accreditations and to award the GAC seal. In addition, there are publication obligations (analogous to the agencies), which GAC fleshed out further in its "Information regarding quality reports by system-accredited higher education institutions" (Resolution of the German Accreditation Council of 17 September 2019). AQAS welcomes this clarification. Universities are required to adhere to the same standards in their internal accreditation procedures to which agencies are also bound in programme assessment. In this context, other aspects of the ESG, for which there was no explicit requirement in the old set of rules, but only a general reference to the ESG, are now an explicit part of the criteria. This particularly concerns the obligation to involve external students and the existence of an internal complaints system. The stakeholder principle is further strengthened by the new requirement for internal and external participation in the development of the QA system. In addition, the MRVO includes an obligation to further develop the QA system. In place of an "educational profile of the university", as required under the old regulatory framework, the new regulatory frameworkalso requires that the university has a "mission statement for teaching".

Overall, it can be stated that the new version of the criteria for system accreditation in the MRVO strengthens the systemically intended equivalence of programme and system accreditation (or internal accreditation).

After the legal basis of the German accreditation system was restructured, it was noted that universities had a certain reluctance to embrace system accreditation. There was a sharp drop in the demand for quotations and presentations. It seemed that universities in Germany wanted to wait and see how the requirements for system accreditation would change due to the stipulations of the Interstate Study Accreditation Treaty and the MRVO. Demand has been increasing noticeably again since 2019. At the time of preparing this self-assessment report (April 2021), seven assessment procedures for system accreditation were being conducted under the MRVO in Germany by AQAS.

The first four site visits by AQAS under the new regulatory framework had been scheduled for the summer semester 2020, but they all had to be postponed to the winter semester 2020/21 due to the coronavirus pandemic. In line with this, the corresponding second site visits will also take place much later than originally planned. With one exception, all of the appointments for second site visits are scheduled for the fourth quarter of 2021. At the time of application, therefore, the Agency had no experience with the entire implementation of assessment procedures in system accreditation under the MRVO.

The constraints on the normal implementation of procedures due to travel restrictions amid the coronavirus pandemic led AQAS to conduct its site visits for programme and for institutional assessment, as described above, online.

10.3.2 International procedures

All international procedures can be divided into three stages: preparatory stage – assessment stage – decision-making and follow-up stage. This means that all procedures can follow a clearly defined schema, represented as follows:

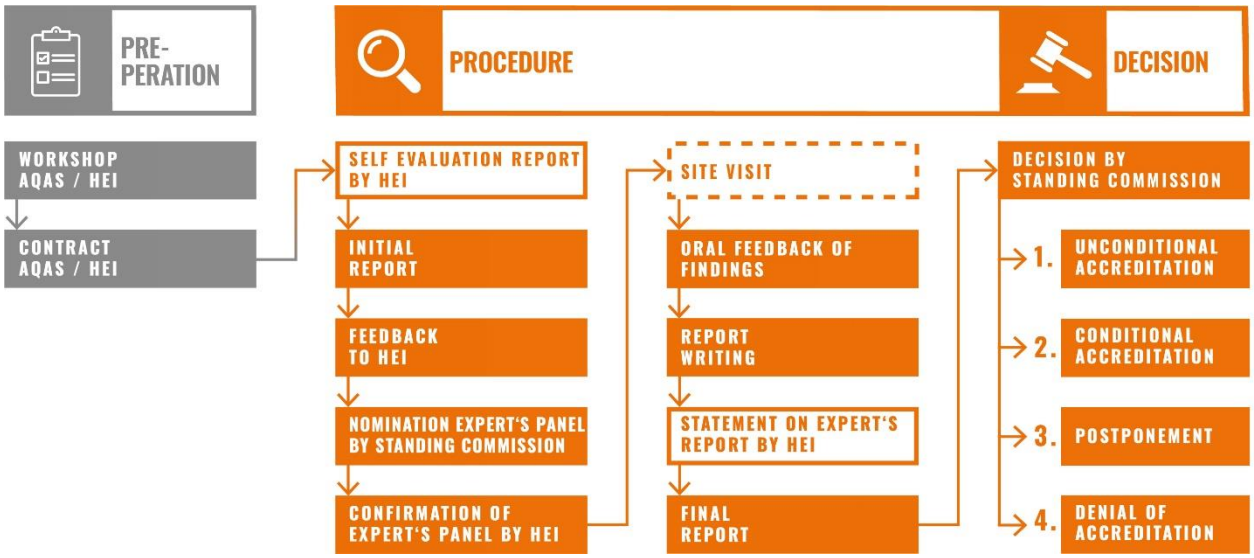

Figure 12: Course of the assessment for international procedures

10.3.2.1 Preparatory stage

Preliminary talk

AQAS offers all international clients a free preliminary discussion at the Head Office (also online during the pandemic) and emphasises the importance of having such a meeting so as to be able to agree mutual expectations and enable the client to make an informed decision on having an accreditation procedure conducted by AQAS.

The aim of the preliminary talk is to discuss the procedure, the criteria and the approach taken by AQAS with the university. However, questions related to the content of study programmes are expressly not addressed in the preliminary talk; only formal questions regarding the preparation of the self-evaluation report and organisational questions associated with the implementation of the procedure are discussed. While in national procedures only a very small number of universities make use of such a talk, there is a greater need for information on the procedure and the criteria in the case of international procedures.

Preparation of the accreditation procedure

Foreign universities usually request a cost estimate or invite tenders before placing a contract. An individual cost estimate is prepared for each procedure and sent together with the relevant criteria (see Chapters 10.5.2 and 10.5.3).

Once the cost estimate has been accepted, AQAS concludes a contract for the implementation of the accreditation procedure with the university in question (see Annexes I.2.c.1). In addition, universities receive with the

contract information about the sequence of the procedure, which has been decided by the AQAS Standing Commission (see Annex I.2.c.2).

10.3.2.2 Stages of the procedure

The university's self-evaluation report

Once the contract has been concluded, the university receives guidelines from AQAS to help them prepare their self-evaluation report. In the case of international initial accreditation (programmes that have already been launched) or reaccreditation, a full application comprises the following documents:

- Self-evaluation report
- Course/module handbook
- Study and examination regulations
- Admission regulations
- Examination and student statistics, data and key performance indicators on academic success, a list of titles of recent final theses
- Analysis of internal quality assurance on the study programme
- An example of the Diploma Supplement.

Since there may be aspects that are specific to certain countries, foreign universities should also explain in their self-evaluation report the context of the country's higher education system, the university's position in the system, and national specifics such as the country's credit system.

Preparation of the baseline report; opening of the procedure

The Standing Commission opens all international procedures conducted by AQAS with a resolution. This gives the commission the opportunity to call for the improvement of applications where there are obviously serious shortcomings in the presentation. For each procedure, a member of the Standing Commission is appointed to act as rapporteur for that particular procedure. Procedures are opened once all of the application documents have been submitted. If a procedure is not opened, the Head Office notifies the university of the reasons; after revising its application, the university may resubmit it. After the opening of a procedure, the university is informed of the commission's decision.

Appointment of experts

At the time of submitting its self-evaluation report, the university has the option of sending AQAS a proposal for the professional profile of the panel of experts, with the aim of increasing the fit between the experts' field of knowledge and the content of the study programme. It is not permitted to state the names of potential experts. During the opening of the procedure, the Standing Commission confirms the relevant qualification profile of the panel of experts, and where applicable, appoints the experts at its next meeting. In this way, all stakeholder groups are involved in the nomination of experts.

The AQAS Head Office informs the university of the composition of the panel of experts, and grants the university time to raise any reasoned objections, which are presented to the Standing Commission for decision. The university has no right of proposal and/or veto.

Assessment

In preparation for all procedures, the experts receive the application documents and are asked to send initial brief feedback in writing (preliminary experts' report) to the Head Office. This report should address strengths and weaknesses, and well as any outstanding issues. The aim of this step in the procedure is partly to enable the experts to familiarise themselves with the documents at an early stage so that they can request additional information, but also to simplify the discussion process within the panel of experts. The feedback is given to the university and to the other members of the panel of experts for their information prior to the site visit. These preparatory measures enable all those involved in the site visit to prepare adequately. Both formal and informal feedback from universities and experts regularly express the usefulness of this approach, given that it facilitates the targeted preparation of the site visit, enabling the relevant discussions to be held in a structured and criterion-oriented manner.

During the site visit, discussions are held with the university management, department/faculty leaders and programme directors, as well as with lecturers, students/graduates and labour market representatives for the relevant study programme. All rooms and facilities that are relevant for the study programme are also viewed. AQAS attaches importance to allowing sufficient time during the talks so that issues can actually be discussed rather than just obtaining the relevant information. As a result, individual talks may take up to 1.5 hours. These in-depth discussions often make it easier for the panel of experts to raise awareness on the part of the university that changes should be made to the study programme. Following the site visit, universities are given brief verbal feedback on the site visit, outlining the focus of the visit and the strengths and weaknesses identified in the process.

The constraints on the normal implementation of procedures due to travel restrictions amid the coronavirus pandemic led AQAS to conduct its site visits, as described above, online. It is of course important to ensure that all criteria can also be assessed in such procedures. In summer 2020, the Standing Commission decided that it may decide based on online site visits, but that the panel of experts can also recommend that a shorter site visit should be conducted ("confirmation site visit") in order to confirm the commission's decision.

Specific characteristics of institutional accreditation

Institutional accreditation procedures require that a "programme sample" is used as an exemplary object of assessment. In institutional accreditation procedures, therefore, discussions relating explicitly to the "programme sample" are held in addition to the aforementioned discussions.

Specific characteristics under the European Approach

Procedures conducted under the European Approach consider entire joint programmes. The consequence for site visits is that all partner institutions must be involved in the process. This means that heads of the consortium's universities, lecturers from all universities and students must usually be involved via video links.

Preparation of the experts' report

Following the site visit, the experts prepare a joint written experts' report containing a recommendation for accreditation, which serves as the basis for the Standing Commission's decision. The experts' report follows a structure specified by AQAS, which was determined by the Standing Commission (with regard to preparing experts' reports, see also Chapter 10.6.2).

Once the experts' report has been written, the Head Office forwards it to the university. The university is given the opportunity to comment on it.

10.3.2.3 Decision-making and follow-up stage

Decision

In all international procedures, the Standing Committee decides on the basis of the experts' report and the recommendation for decision made by the panel of experts, taking into account the university's comments, where applicable.

The Standing Commission has the following options for decision-making:

a) Accreditation without the imposition of conditions
b) Accreditation with the imposition of conditions
c) Suspension of the procedure
d) Denial of accreditation.

The AQAS Head Office communicates the Standing Commission's decision to the university. The university then has four weeks to object in writing to the decision or the imposition of conditions. The basis for the procedure is the complaints procedure at AQAS (see Annex II.3.2). If no written objection is made, AQAS publishes the result of the accreditation procedure, the experts' report and the names of the members of the panel of experts. These are also published in the case of negative decisions.[12]

Follow-up: (1) Notification and documentation of the fulfilment of conditions

If accreditation is granted with conditions, the university is required to implement the conditions and to document their implementation appropriately. The university usually has twelve months to inform AQAS that it has implemented the conditions.

The university is asked to describe how the conditions have been implemented, and which changes have been made. Relevant documents (e.g. module guide, examination regulations, and such like) must be enclosed to prove that the conditions have been implemented.

The implementation of conditions relating to more formal aspects (e.g. publication of information about a study programme on the Internet that was available during the procedure) is reviewed by the AQAS Head Office. Conditions relating to aspects of content are reviewed by one or more members of the panel of experts, who comment on whether they believe the conditions have been met.

After reviewing the documents, the AQAS Standing Committee makes a final decision on whether the conditions have been implemented. After the decision has been taken, the university is informed of the result in writing. If additional submissions or further revisions are deemed necessary before the conditions can be regarded as having been met, an additional deadline (usually of three months) may be granted.

Once all conditions have successfully been met, this is noted in the experts' report published on the website. The experts' report is also published in the European Database of External Quality Assurance Reports (DEQAR).

Follow-up: (2) Postponement of the procedure

The Standing Commission may suspend an accreditation procedure. Procedures are suspended if the quality requirements for accreditation have not been met, but the university is likely to be able to remedy the shortcomings identified within 18 months. Before a postponement is decided, the university is given the opportunity to comment.

[12] In this context, negative decisions are non-accreditations or procedures that have not been accredited following the suspension of the procedure and the associated follow-up process.

After 18 months at the latest, the university must apply for the procedure to be reopened, at the same time submitting revised application documents. If no request for reopening the procedure is made within the set period, AQAS reopens the procedure and denies accreditation.

If the university applies for the procedure to be resumed and submits revised application documents, these are sent to the experts with a request to review the extent to which the shortcomings have been rectified. If the panel of experts considers it necessary, another site visit may be conducted digitally or on site. The panel of experts prepares another short report with a recommendation for decision, which the Standing Commission uses as a basis for its decision, alongside further comments by the university. At this point, the Standing Commission may decide to grant accreditation with or without conditions, or to deny accreditation. It is not possible to suspend the procedure a second time.

Experience

The experience gained by AQAS in international accreditation procedures has generally been very positive. As outlined in our thematic analysis, many study programmes can be easily assessed using the criteria of AQAS, which are based on the ESG. Since foreign universities undergo assessment by an international panel of experts voluntarily, they are often highly motivated to present themselves well, in addition to being very willing to accept criticism.

Since the accreditation procedure in international procedures follows a process that has been established for years, AQAS is of the opinion that assessments are conducted satisfactorily at a high level. Although on-site visits are time-consuming, universities usually prepare them very professionally, and they have never given cause for serious organisational problems in the past.

Unlike in the national accreditation system, where some universities are already undergoing their second re-accreditation, external assessment is relatively new to some overseas clients. Although some universities have experience with their national accreditation procedure, this often has a different focus to ESG-based assessment. Consequently, both sides – the university and the Agency – have to invest more time and effort in preparing for international accreditation. AQAS attaches importance to universities receiving all relevant information at an early stage and, if necessary, to an information event being held by AQAS for all stakeholders from the university so as to prevent problems occurring at a later stage during the procedure. Nonetheless, universities still find it difficult to prepare a self-evaluation report in some cases, meaning that several revision phases or subsequent submissions are required.

There is also increased competition in international procedures. In international procedures in particular, AQAS endeavours to group study programmes into clusters so that they are not too heterogeneous from a subject perspective, also ensuring a manageable number of programmes. The aim is for all programmes to be discussed and assessed by a panel of experts within a reasonable amount of time. Since other agencies tend to have a more flexible business policy, AQAS sometimes loses potential contracts to competitors.

10.4 Peer-review experts (ESG 2.4)

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

10.4.1 Selection of experts

AQAS consistently follows the European principle of the stakeholder involvement when appointing panels of experts. In all procedures conducted by AQAS, the panel of experts comprises representatives of academia, professional practice and students. Therefore, at least four members with different backgrounds are involved in each panel. AQAS generally takes care to ensure in all procedures that the range of subjects involved is adequately represented by the panel of experts. In cases of cluster accreditation the panel of experts comprises more members from the different disciplines.

In national procedures, the Agency must additionally follow the HRK guidelines, as mentioned above (see Annex I.2.a.4). The representatives of academia always have the majority in each of the expert groups. Procedures in Germany must follow the so-called “proportionality rule”. This means that, for large clusters requiring four or more representatives of academia, an additional representative of professional practice and a second student must be included in the panel of experts. As a result, in the case of large clusters of study programmes, which may have been approved beforehand by GAC, very large panels of experts (with up to 13 members) have to be appointed in some cases, making it difficult to run the site visit efficiently.

At the time of submitting their self-evaluation report, all universities are given the opportunity to submit a profile for the panel of experts, in an effort to ensure a better matching of expertise. Universities are advised not to explicitly mention the names of potential experts. The Standing Commission examines the professional profile of the panel of experts and takes a decision on it. In national procedures, it appoints the panel of experts in accordance with the aforementioned guidelines. In the case of system assessments or international institutional accreditation, care is also taken to ensure that experts have experience in higher education management, enabling them to assess the relevant universities using a systematic approach.

Thanks to almost 20 years of cooperation with experts from all disciplines, the Agency has been able to establish a very large pool of experts with various areas of expertise (e.g. with experience in system accreditation or with an international profile). AQAS takes care to ensure that experienced experts usually work together with newcomers, facilitating the transfer of experience.

Student experts are recruited via the German “Student Accreditation Pool”, which also trains them, qualifying them for the task. There is an agreement with the pool that three student experts will be proposed for each procedure; AQAS can then appoint members accordingly. Problems in the search for experts invariably arise when there are no students in the pool for certain subjects (e.g. students from universities of applied sciences or historians) and AQAS has to contact individual student bodies directly to find students. Due to the lack of central funding from public money, most German agencies support the student pool with an annual basic amount; AQAS also covers the cost of one training course per year. In the view of AQAS, cooperation with the pool has proven successful because student experts are thoroughly prepared for the procedures in terms of content. There were problems with the collaboration at times when a handful of students were unable to find their role in the procedure.

In all international procedures, AQAS endeavours to incorporate regional expertise into procedures so as to be able to understand the context of the university better. The Agency’s many years of experience and its large network allow AQAS to conduct almost all procedures with at least one representative from the region or the country in question. In the majority of procedures, this competence is incorporated into the panel of experts by a university representative or a representative of the labour market. Experience shows that the inclusion of such expertise helps to explain potential country specifics, such as nationally mandated courses, at an early stage, enabling a better classification in the assessment.

For accreditation procedures abroad or for procedures based on the European Approach, there is also at least one expert with knowledge of the higher education system and/or with relevant language skills.

In these procedures, student experts are proposed by either the “Student Accreditation Pool”, the Austrian pool or the European Students’ Union (ESU).

Contrary to initial expectations, AQAS has always had positive experiences with internationally composed panels of experts. In many cases, only individuals with previous international experience participate in such procedures. Furthermore, the view of scientific practices among scholars from European and non-European countries does not differ as much as might have been expected. Universities benefit from the wide range of expertise within groups, and cooperation between international experts is usually very motivating and enriching.

10.4.2 Preparation of experts

AQAS attaches great importance to the thorough preparation of experts with regard to the procedure. The extent of preparation varies depending on the complexity of the procedure.

What all procedures have in common is that experts receive additional written information material and handouts on the procedure together with the university’s application documents. In addition, the panel of experts usually holds half-day preparatory meetings on the day before each site visit, which relate specifically to the procedure in question and its special features. These are relatively work-intensive workshop-style sessions lasting several hours, which are moderated by the AQAS consultant responsible for the procedure; in terms of time and space, they are kept separate from other items on the programme, such as the evening dinner. During these meetings, the criteria underlying the procedure, previously made available to the experts together with the university’s documents, are discussed, enabling the experts to use them as a framework for discussing their assessment of the study programme.

As already mentioned in Chapter 10.3, it is also a key procedural feature of AQAS to ask the experts involved in any procedure to write a short written statement before the site visit on the basis of the documents provided by the university. AQAS forwards these statements to all of the parties involved (universities and experts) for preparatory purposes. At the same time, these statements are used as a substantive basis for the expert panel’s preparatory meeting. The statements are usually based on the criteria, because they are usually addressed in the individual chapters of the universities’ self-evaluation reports. In national assessment procedures, AQAS additionally provides experts with a template showing the criteria, which they may use to prepare their statement if they wish.

In the experience of AQAS, experts generally have previous experience with accreditation and assessment procedures (from their work as experts, membership of agency commissions, etc.). This means that general training without a specific focus on a particular assessment format is usually unnecessary; instead, procedure-related preparation proves to be more effective. It is important to remember that the German accreditation system is based on the stakeholders’ voluntary involvement, so care must be taken not to overburden experts. AQAS has received considerable feedback from experts stating that they would no longer be willing to work as experts if, after years of involvement in the accreditation system, they were required to undergo compulsory general training. The results of the INCHER study “Quality assurance of studying and teaching via processes of accreditation and evaluation” also indicate that experts value peer exchange more highly than general training in preparation for procedures.[13] This finding is consistent with our experience.

[13] http://www.gutachternetzwerk.de/fileadmin/user/Veranstaltungsdokumentation/2015/06_Vortrag_INCHER_Kruecken.pdf

10.4.2.1 Programme assessments in accordance with the MRVO

At AQAS, experts are prepared for a national programme assessment procedure in two steps: besides receiving the university's self-evaluation report, the panel of experts is usually also provided with the following documents:

- Specimen Decree (MRVO)
- Handout for experts
- The formal report by the Standing Commission of AQAS
- Template for the preliminary experts' report.

This may be accompanied by preliminary information on the further course of the procedure. The "Handout for experts in assessment procedures for programme accreditation" addresses all key aspects – from the role of experts to travel expenses.

10.4.2.2 System assessment procedures in accordance with the MRVO

In system assessment procedures, provision is made for training the panel of experts before the first site visit. The aim of this workshop is to familiarise experts with the course of the procedure and the underlying criteria. The experts only receive the university's self-evaluation report after having attended this workshop. Given the complexity of the subject matter of the assessment, it seems more expedient to keep the basics and criteria of system accreditation separate from the discussion of the application documents.

The workshop is conducted by the two AQAS Head Office staff members who also oversee the procedure.

The workshop covers:

- The subject matter and objectives of system accreditation
- MRVO specifications regarding the procedure and the assessment criteria in system accreditation
- The AQAS system assessment concept (course of procedure, stakeholders, structure of the application documents, assessment criteria)
- Information on expert involvement (status, tasks, distribution of roles within the panel of experts)
- Determination of the timeline for further steps of the procedure.

In this way, experts are familiarised with the general requirements for system accreditation and, at the same time, they can be individually prepared for the procedure, taking into account the special circumstances of the university in question.

In addition there is also an preparatory meeting on the first day of each site visit. During this meeting, the panel prepares the content of discussions with the university and concentrates on sharing information with one another about the specific subject of discussion concerning the assessment, taking the criteria into account.

10.4.2.3 International procedures

In all international procedures, the panel of experts is prepared in two steps, as is also the case with national programme accreditation. The panel of experts receives written information material on the procedure together with the application documents. These include the baseline report prepared by AQAS (a criteria-based summary of the application prepared by the Head Office), the relevant criteria with the associated indicators, and an overview of the course of the site visit.

The actual half-day expert training then usually takes place on site, and marks the official beginning of the procedure (usually held at the university on the day before the site visit). Due to the pandemic, both expert training and site visits are currently being conducted online, as is the case with national procedures. This

means that the preliminary meeting does not necessarily have to take place on the day immediately before the site visit, but can be scheduled more flexibly because the meetings do not have to be held at a specific location. This preparatory meeting refers specifically to the relevant accreditation procedure and its particularities. In addition, the application by the university is discussed jointly on the basis of criteria, taking into account the preliminary expert statements. The relatively work-intensive workshop-style sessions are moderated by the AQAS consultants responsible for the procedure; the aim is to ensure optimal preparation for the site visit and to bring together the stakeholders' different perspectives within the panel of experts. In an effort to make the focus of expert training even more procedure-specific, AQAS envisages the use of short videos that will be made available to experts together with the application documents. The video sequences are intended to familiarise experts with AQAS as an agency; the relevant type of procedure; and any specifics, so that the procedure-specific, customised training of experts can take place at an early stage. The plan is to create and use these video sequences some time in 2021. This is also conceivable for national assessment procedures, and is to be developed gradually.

10.4.3 Impartiality of experts

With regard to ensuring the impartiality of experts, reference is made to the information provided in Chapter 6. The declarations of willingness that have to be signed by experts for each procedure outline the criteria pertaining to impartiality. When selecting panels of experts, AQAS follows the DFG (*Deutsche Forschungsgemeinschaft*) guidelines for ensuring the integrity of review panels.

10.5 Criteria for outcomes (ESG 2.5)

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

10.5.1 National procedures based on the MRVO

The criteria for programme and system assessment are governed by the Interstate Treaty and the MRVO (see Annexes I.2.a.2 and I.2.b.2). AQAS does not apply any additional specific criteria for these procedures, and therefore follows the MRVO, which is based on the ESG. These criteria relate to all cases where GAC decides on the procedure. The MRVO is available on the AQAS website.

10.5.2 International procedures

As already explained, for all procedures outside Germany AQAS uses different sets of criteria for programme accreditation (see Annexes I.2.c.3-4) and institutional accreditation procedures (see Annex I.2.d.3). These are based closely on the current version of the ESG and vary only in terms of the focus of the procedure (study programmes or the quality assurance system). The generic character of the ESG means that panels of experts can introduce the academic standards of the relevant scientific community into the procedures. In this context, AQAS attaches importance to the fact that universities' well-founded and coherent concepts may also successfully undergo accreditation, provided they can be communicated plausibly to the panel of experts.

The documents to help universities prepare for procedures and the handouts for the panels of experts share the same structure with regard to criteria. Consequently, the university's self-evaluation report, the baseline report by AQAS, the statements by the panel of experts and the experts' report all address the same thematic

areas, allowing easy orientation. The indicators provided by AQAS reflect the ESG guidelines and support panels of experts in determining whether criteria have been met. The key questions contained in the expert report templates ensure that panels of experts fully address the relevant criteria in their assessments.

The criteria for programme accreditation and for institutional accreditation are available on the AQAS website. Other relevant documents such as the ESG and the European Approach can also be found on the website.

10.5.3 European Approach

In the past, contradictory decisions were sometimes taken in the assessment of joint programmes, because each European country where the participating universities were based applied its own national criteria as a benchmark. In one case, for example, this led to AQAS accrediting a German-Dutch study programme with the imposition of conditions, while the Accreditation Organisation of the Netherlands and Flanders (NVAO) initially denied accreditation. Thanks to the European Approach, which focuses on the joint character of programmes and defines the ESG as the main set of criteria, joint programmes can be assessed in their entirety, making the system more effective for universities and agencies alike. For these procedures, AQAS only uses criteria that were agreed by the EHEA Ministers in the 2015 Yerevan Communiqué (see Annex I.2.e.1).

10.6 Reporting (ESG 2.6)

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

10.6.1 Publication of experts' reports

Since the transformation of the German accreditation system, all accreditation decisions and the corresponding accreditation reports are published centrally by GAC. The AQAS website provides a link to GAC's ELIAS database, which can be used to retrieve accreditation reports.

Procedures in which the accreditation decision was taken by AQAS are published on the AQAS website. This is the case for all decisions in (old) national procedures and in international procedures. The experts' reports prepared for the latter type of procedures and for procedures based on the European Approach are additionally uploaded onto DEQAR (DEQAR database).[14] With these procedures, the internal process requires that experts' reports are published on the AQAS website and on DEQAR after the expiry of the objection period, i.e. approximately four weeks after the final documents have been sent to the university.

10.6.2 Structure of the reports

10.6.2.1 National procedures

Section 24 of the MRVO stipulates that, in the German accreditation system, accreditation reports (consisting of the formal report and the experts' report) are to be prepared in the structure specified by GAC. In light of this, GAC has adopted various templates for the different procedural models within the German system in the

[14] As of April 2021, 8,214 experts' reports prepared by AQAS are available on DEQAR.

context of programme and system assessment; these are binding for all agencies. As such, AQAS has no freedom whatsoever in the design of its reports, apart from the layout.

The structures contain all of the criteria set out in the MRVO. Additions are only permissible if they do not compromise the structure as a whole; they must be briefly explained and substantiated in Chapter 3.1 of the template (Information on the procedure). There are no specifications as to the length of individual chapters. In this context, agencies or panels of experts should decide on a case-by-case basis which aspects require a more detailed presentation and which can be dealt with more briefly.

Altogether, four different templates are available for download on the GAC website.

- Programme accreditation type – individual procedure
- Programme accreditation type – cluster procedure
- Programme accreditation type – combination course
- System accreditation type

In addition, there is an Excel spreadsheet for recording statistical data/key performance indicators related to programme accreditation procedures.

In its guidelines for experts for national programme accreditation, AQAS has developed key questions that draw on the relevant criteria and requirements. These are intended to provide guidance to experts in preparing their assessment. In this way, the AQAS Head Office ensures that experts' reports are complete, i.e. that all criteria have been assessed.

In system assessments, AQAS has so far refrained from providing key questions because we are of the opinion that there are no key questions beyond the thematic areas mentioned in the criteria of system accreditation (Section 17, 18 MRVO) that would be so universally valid as to do justice to the wide range of QA systems in place at universities. Consequently, the structure of system accreditation reports is defined to a greater extent by the specifics concerning the university in question.

10.6.2.2 International procedures

As explained above, all relevant documents in the procedures follow the same chapter structure to provide transparency and orientation. Experts' reports are preceded by a brief overview of the key points relating to the relevant study programme/university and the decision of the AQAS Standing Commission. The actual text of the experts' report begins with a reference to the criteria underlying the procedure, followed by a brief description of the course of the procedure. The section entitled "General information" enables the study programme to be set in the context of the university. The actual assessment of the study programme follows in the subsequent chapters.

Experts' reports are structured as follows:

Programme accreditation (Bachelor's or Master's programmes / chapters for PhD programmes in **bold**):

- Quality of the curriculum / **Aim and structure of the doctoral programme** (ESG 1.2)
- Procedures for quality assurance (ESG 1.1, ESG 1.7 & ESG 1.9)
- Learning, teaching, and assessment of students / **Learning and assessment of students** (ESG 1.3)
- Student admission, progression, recognition and certification / **Legal status, admission and certification** (ESG 1.4)
- Teaching staff / **Academic level of supervisory staff** (ESG 1.5)
- Learning resources and student support / **Support and research environment** (ESG 1.6)

- Public information (ESG 1.8)

Institutional accreditation

- Policy and procedures for quality assurance (ESG 1.1)
- Design and approval of programmes (ESG 1.2)
- On-going monitoring and periodic review (ESG 1.9)
- Learning, teaching and assessment of students (ESG 1.3)
- Student admission, progression, recognition and certification (ESG 1.4)
- Teaching staff (ESG 1.5)
- Learning resources and student support (ESG 1.6)
- Information (ESG 1.7 & ESG 1.8)

European Approach

- Eligibility
- Learning outcomes (ESG 1.2)
- Study programme (ESG 1.2)
- Admission and recognition (ESG 1.4)
- Learning, teaching and assessment (ESG: 1.3)
- Student support (ESG 1.5)
- Resources (ESG 1.5 & ESG 1.6)
- Transparency and documentation (ESG 1.8)
- Quality assurance (ESG 1.1)

10.7 Complaints and appeals (ESG 2.7)

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

The Management Board of AQAS decided on an appeals and complaints procedure on 26 September 2011, which it updated on 7 September 2020 (see Annex II.3.2). The subject matter of the appeals and complaints procedure are not only procedural processes, but also decisions by the Standing Commission in national and international procedures. Complaints refer to the implementation of the procedure or to the executing body. In contrast, appeals refer to the formal results of the procedure (i.e. the nomination/appointment of experts and the composition of panels of experts, the formal report, accreditation reports and the accreditation decision of the Standing Commission).

A university's complaint regarding the implementation of the procedure may, for example, relate to the timing of the procedure or to incorrect advice provided by Head Office staff. The university's complaint is first presented to the management, which endeavours to reach an amicable solution to the problem in a discussion with university representatives. If no agreement is reached, the university's objections are brought to the Management Board, which deals with the complaint and decides on the further course of action. If no agreement is reached, the AQAS Complaints Commission deals with the subject matter.

Within the appeals procedure against decisions of the Standing Commission, a university's objections are submitted to the Standing Commission, which deals with the appeal and makes a decision. If the university continues to maintain its objection after the Standing Commission has made its decision, the case is referred to the AQAS Complaints Committee for final decision. In the case of appeals against the Standing Committee's decision concerning the formal report, the appointment of experts and the composition of the panel of experts, these must be submitted in writing within two weeks of receipt of notification (unless otherwise stated). Appeals against accreditation decisions/conditions must be submitted in writing to the AQAS Head Office within four weeks of receipt of notification (unless otherwise stated).

The inaugural meeting of the Complaints Commission took place on 15 May 2013. Since then, there have only been further meetings in 2015 and 2017; in addition, three decisions were made using a written procedure without face-to-face meeting. One complaint procedure led to a court action. Apart from this, two actions brought by a university were pending before the Cologne Administrative Court in the last accreditation period. These related to formal conditions that had to be imposed because of KMK specifications. After one of the lawsuits was decided in favour of AQAS, the university withdrew the other lawsuit and the proceedings were discontinued.

The appeals and complaints procedure is published on the AQAS website.

Experience shows that most of the complaints submitted by universities can usually be resolved by discussions within the Standing Commission or in facilitated discussions. So far, there have not been any appeals or complaints in the context of international procedures.

11. Information and opinions of stakeholders

The aim of helping create transparency in the higher education and accreditation system is one of the distinguishing features of AQAS. In addition, awareness of the activities of AQAS is of great importance, particularly against the backdrop of a highly competitive market.

Being a membership organisation, it is likely that AQAS has a more direct link to "our members" than most European agencies might have. During the General Assembly, which takes place once a year, public as well as informal exchange takes place on the satisfaction of member universities with the work of AQAS and on topics of future relevance for universities and the Agency. At each General Assembly, the management looks back on the past year and presents the strategic developments for the next year. The Management Board, which represents the member universities, also ensures the regular sharing of information on strategic issues, new regulations in the system, procedure-specific experiences of universities as well as critical feedback.

All stakeholder groups are represented in the commissions of AQAS and, as explained above, there is always a report by the management and sharing of information on procedure-related questions during committee meetings.

Since all assessments implemented by AQAS are carried out by external panels of experts that represent the stakeholders, continuous information sharing is also ensured through personal contact. Even though assessment situations always take place in a very specific context, every university site visit also represents an opportunity for sharing information on issues concerning learning and teaching. The fact that AQAS is periodically on site

means that the Agency no doubt has a greater awareness of what concerns universities than some other organisations.

In several chapters of this SAR, AQAS has already referred to the ZEM survey, which is aimed at universities and panels of experts, and is conducted by an independent external organisation. The results of the survey are discussed in the Standing Commission and in the AQAS Head Office, and actions are derived from the results, provided that AQAS has an influence on them. A summary of the results is published on the AQAS website. https://www.aqas.de/die-agentur/ They show that assessment procedures have been conducted on a professional level for years, and that stakeholders appreciate the Agency's performance, irrespective of the overseeing consultant (see Chapter 7.3).

In addition, the website (AQAS website (German)) was relaunched in May 2020, following a revision of both content and the corporate identity. This means that interested universities are able to obtain information about relevant procedures quickly, as well as being able to find information about who to contact in the event of any queries.

Due to the comprehensive approach of reporting back adopted by AQAS, the Agency's staff are present at both national and international events. AQAS is represented in numerous international organisations (including ENQA, ECA, EQAF) and actively helps shape new developments in the European Higher Education Area, takes up these developments, and integrates them into new or existing approaches. AQAS was also able to contribute to the further development of agencies abroad (e.g. Egypt, Georgia) in the context of various Twinning projects, which also means that the Agency learnt more with regard to its own procedures and approaches.

At the national level, AQAS sits on committees (e.g. as an agency representative at GAC) and is involved in a variety of thematic activities (HRK working groups on Joint Programmes and on Online Teaching, presentations at the *Gewerkschaftliches Gutachternetzwerk*, see Annexes II.3.4).

12. Recommendations and main findings from previous review and the Agency's resulting follow-up

On 7 February 2017, GAC accredited the AQAS pursuant to § 2 Para. 1 No. 1 of the German Law on the Establishment of a Foundation "Foundation for the Accreditation of Study Programmes in Germany" in accordance with the following provisions and insofar thereby granted it the authority to accredit study programmes and the internal QA systems of higher education institutions by awarding the seal of the foundation. The accreditation and the authorisation pursuant were granted for a period of five years until March 2022.

The accreditation was granted under the following conditions:

Condition 1: AQAS expands the existing SharePoint server to the extent that the quality management processes display the requirements of the PDCA cycle. (Criterion 2.5. – Internal quality management)

Condition 2: AQAS looks for solutions together with the Accreditation Council and the personnel responsible for the database in order to resolve the entry problems in the central database. The disputed function restrictions and data losses must be documented. (Criterion 2.7 – Reporting)

GAC established on 7 September 2017 that AQAS had met both conditions.

Regarding Condition 1: AQAS now comprehensibly explains that the control loops of its internal quality assurance system are regularly closed, documented accordingly, and illustrated in the SharePoint Server. (…) It can therefore be established that Criterion 2.5 has been met.

Regarding Condition 2: The entry problems in the database of accredited study programmes raised by the panel of experts have since been rectified and the supposed glitches were likewise documented. (…) In the

course of the further development of the accreditation system in Germany, GAC intends to set up its own new database. AQAS and other authorised agencies in Germany are involved in this process.

ENQA informed AQAS in May 2017, that the Board of ENQA agreed that AQAS met the necessary requirements for reconfirmation of ENQA Membership for five years from that date. The ENQA Board concluded that AQAS is in substantial compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015). At its meeting in September 2019, the Board of ENQA considered the follow-up report arising from the external review in 2017. The Board approved the report and took note of the progress that had been made

EQAR renewed on 20 June 2017 the inclusion of AQAS in the register. EQAR confirmed in 2019 as a reaction to the Substantial Change Report that the changes in the German accreditation system and its impact on the work of AQAS are well noted and gave some comments on it (see Annexes I.4.b).

13. SWOT analysis

In summer 2020, the Agency's staff analysed and discussed the strengths and weaknesses of AQAS during several meetings. Three fields of action in particular were derived from the results of the discussions: process, acquisition and technology, for which three working groups were set up. All three working groups set themselves a work schedule and met several times in 2020 and 2021. The work of the working groups is still ongoing at the time of the application. Based on the analysis of strengths and weaknesses, the team also discussed the Agency's opportunities and threats. The results are also reflected in Chapter 14. Important for the further development of AQAS, however, is the "Future Workshop", where the team derived activities from previous discussions that are to be implemented over the next few years.

The SWOT analysis is presented in the overview below:

Strengths of AQAS	Weaknesses of AQAS

- Many years of experience
- Experience in special thematic areas such as:
  - System accreditation
  - Teacher training
  - European Approach
- Accreditation of more than 7,000 study programmes
- Good mix of long-standing staff and “young” employees
- Highly client- and service-oriented
- Knowledge management
  - Existence of numerous procedure-related, standardised templates containing practical information
  - Discursive process (e.g. team meetings, Jour Fixe meetings, etc.)
- Good and sound implementation of procedures
- Competent and committed consultants who are aware of their role
- International visibility
- Stable order situation thanks to two business areas (communicating vessels)
- Good national and international links; good reputation
- Association of universities (role)
- Standing Commission ensures a science-based procedure
- Independent agency (no funding from third parties)
- Relationship of trust between university representatives and consultants
- The Agency’s self-conception as a developer of quality, basic philosophy of enhancing universities
- High level of consistency of results
- Good feedback from ZEM
- Internal quality assurance
- Excellent technical equipment (hardware and software)

- Need for constant knowledge management
- Process for regular content update of templates should be defined
- External image could be optimised
  - Need to revise website content on a regular basis
  - Make greater mention/use of own strengths during order acquisition
- Two business areas (national and international) can create tension
- Non-profit association of universities (“break even”)
- Lengthy innovation cycles (e.g. revision of work processes, committee structure, digitalisation, etc.)
- Order situation can only be controlled to a limited extent; distortion in competition due to state funding of competitors
- Isolated use of digital possibilities
- Juncture between consultants and the administration sometimes falters

Figure 13: Overview SWOT analysis

From the staff perspective, the analysis of threats referred in particular to the following thematic areas:

In Germany, AQAS is not sufficiently recognised as a service provider, but more as an “accreditation authority”. Since the foundation of AQAS, all stakeholders of the Agency and the AQAS team have endeavoured to produce serious work, but the density of regulations and the demands placed on the Agency from the outside are increasing. If price levels for procedures stagnate, the Agency will no longer be able to cover its costs at some point. If orders decline, there is a danger of running into financial difficulties.

AQAS is very well established and experienced in certain special fields, e.g. teacher training and joint programmes. Outside the Agency, however, this is not as well perceived as one might wish. Competitors with less experience are often associated with specific topics more quickly or visibly than AQAS.

Staff members especially see opportunities where new services can be developed, e.g. by offering to assist system-accredited universities in the search for experts via the GmbH, to prepare reports or to have new study programmes assessed separately by an external agency such as AQAS.

If AQAS ensures that the expertise of its staff in specific areas is made visible to the outside world, this could also lead to universities approaching AQAS proactively.

The extensive network of experts that AQAS has could also be used more intensively to raise greater awareness of the services provided by AQAS. This complex of topics also includes improving the Agency's external image, e.g. by revising the website or making greater use of social media.

14. Current challenges and areas for future development

AQAS considers there to be far-reaching risks especially where systemic changes could occur:

- If the proportion of programme assessments fell below a certain level, the Agency's business model would be in jeopardy. System assessment is important for AQAS in terms of client retention, but the volume in this business area is not sufficient to maintain the AQAS Head Office on its current scale. This is further compounded by the fact that the loss of a system assessment contract to a competitor is much more difficult for agencies to substitute than in programme assessment. In particular, competitors' dumping prices, which AQAS is unable and unwilling to match, pose a serious problem.
- The pandemic will have social and economic consequences that cannot be estimated at this stage. The problems that could arise from this are referred to in more detail in the AQAS Strategy 2026.
- One possible systemic risk is that the accreditation system and universities' needs are increasingly diverging. By contrast, it would be desirable to see each other as partners with different roles in the higher education system who pursue the common goal of achieving the best possible quality of learning and teaching for the benefit of students. To achieve this, it would be helpful for the system to engage more closely with universities and other stakeholders about expectations and problems in the area of quality assurance. It would be desirable for universities to perceive agencies as centres of competence for external quality assurance. This division of roles could give rise to new projects and approaches that would also help enhance the accreditation system.
- Digitalisation is a complex of topics that presents both opportunities and challenges. The switch to online teaching at universities and online site visits in external quality assurance has considerable potential to change both areas in the long term, even after the pandemic:
  - Agencies could increasingly offer online training for universities and panels of experts.
  - Hybrid site visits could be conducted. The panel of experts would hold fundamental discussions with the university online and then only a few experts would travel to the university to verify the information.
  - In the case of repeated reaccreditation, on-site visits could, where applicable, be dropped altogether, helping to reduce the university's workload.
  - Learning and teaching would become more flexible in that universities would be able to offer more online study programmes and micro-credentials, for which agencies would have to develop instruments to adequately ensure quality.
  - The involvement of international experts could be made easier and staff from different agencies could exchange experiences.

- There is an increasing dependence on the technical infrastructure. If this is not in place, universities and agencies can only participate in the aforementioned innovations to a limited extent.
- Online fatigue could set in, and experts could lose interest in (online) participating in assessment and accreditation procedures.
- There will be a growing expectation for procedures conducted online to become more cost-effective. The downward pricing pressure on agencies could increase.

Even though the above challenges will have a serious impact on the work of AQAS in future years, the Agency also sees its potential to contribute to innovation as an accreditation agency. It is confident that, with a well-qualified team and supportive commission, building on the Agency's good reputation in higher education and with a willingness to respond flexibly to change, AQAS will be able to shape future developments.

15. Glossary of terms

AQAS – Agency for Quality Assurance through the Accreditation of Study Programmes

AQAS ARCH GmbH – Accreditation, Reviews and Consulting in Higher Education

CC – Complaints Commission

CHE (Centrum für Hochschulentwicklung) – Centre for Higher Education

DAAD (Deutscher Akademischer Austauschdienst) – German Academic Exchange Service

DEQAR – European Database of External Quality Assurance Reports

DFG (Deutsche Forschungsgemeinschaft) – German Research Foundation

DIHK (Deutscher Industrie- und Handelskammertag) – German Chambers of Industry and Commerce

GAC – German Accreditation Council

EA – European Approach

ECA – European Consortium for Accreditation

ELIAS (Elektronisches Informations- und Antragssystem) – Electronic application processing system

ENQA – European Association for Quality Assurance in Higher Education

EQAR – European Quality Assurance Register for Higher Education

ESG – European Standards and Guidelines

EUA – European University Association

HEI – Higher Education Institution

HRK (Hochschulrektorenkonferenz) – German Rectors' Conference

HQR (Qualifikationsrahmen für Deutsche Hochschulabschlüsse) – Qualifications Framework for German Higher Education Qualifications

IHK (Industrie- und Handelskammer) – Chamber of Industry and Commerce

ImpEA - Facilitating implementation of the European Approach for Quality Assurance of Joint Programmes

INCHER – International Centre for Higher Education Research

INQAHEE – International Network for Quality Assurance Agencies in Higher Education

KMK (Kultusministerkonferenz) - Standing Conference of the Ministers of Education and Cultural Affairs

MRVO (Musterrechtsverordnung) – Specimen decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treatySTäK (Ständige Kommission) – Standing Commission

ZEM (Zentrum für Evaluation und Methoden) – Centre for Evaluation and Methods