



Agency for Quality Assurance  
and Accreditation of Canonical  
Programmes of Studies e.V.

## **Statement on the preliminary external review report**

### **Preliminary Remark**

On 22 October 2018 the preliminary external review report was sent to the Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany by the head office of the Accreditation Council with the request for comments. AKAST takes the possibility of the statement and would like to thank explicitly for the fair procedure, the constructive exchange in personal conversation with the review panel, further information in the review report and the competent accompaniment by the Accreditation Councils' head office.

We are glad about the overall appreciative and valued evaluation of our application. The review report confirms that the development and the work of AKAST is positively valued by the review panel. We read with joy that „AKAST is commanding high regard among all stakeholder groups in the field of Catholic theology and is valued as an informed service provider and a neutral agency“.

AKAST also especially honours the ascertained traceability of how the unique architecture and special status of AKAST follow from the fact that Catholic theology in higher education is a joint responsibility of the state and the Church and from associated stipulations under the law governing relations between the two.

We pick up the differentiated notes for the upcoming revision of AKAST's basic documents as well as the impulses for further development and profiling of the agency (e. g. widening the scope of activities). The recommendations 1 – 4 given by the review panel we make explicitly our own.

The statement is structured as follows: First of all some few factual rectifications are made. The page numbers and line references refer to the corresponding information in the external review report. In the following the statement refers to the section IV. „Compliance with the European Standards and Guidelines (ESG)“ and V. „Compliance with the Accreditation Council criteria for the Accreditation of Agencies“.

## **Factual Rectification**

Following factual rectifications respectively clarifications are brought up by AKAST:

- Page 3, section „II.4. Review process“, paragraph 3, last sentence, line 29-30: Should be possibly supplemented that Professor Grimm was not able to take part on the site visit due to scheduling reasons?
- Page 4, section „Self-Evaluation Report“, last sentence, line 14-15: please cancel, because there was no response attached by AKAST to the Accreditation Council´s progress report.
- Page 7, section „III.3 Funding“, paragraph 1, last sentence, line 21-22: please specify as follows: Under a cooperation agreement with the Catholic University of Eichstätt-Ingolstadt, the Head Office utilises premises in Ingolstadt.
- Page 8, footnote 6 should refer to Annex 3 of the external review report (not Annex 1).
- Page 30, section „Evidence“, paragraph 7, first sentence, line 18-20: please specify as follows: Regarding the implementation of Recommendation 2, the Agency explains that it has retained its previous practice of ~~solely~~ involving the Accreditation Committee´s observer as a rule and not regularly the chair of the review panel when verifying compliance with conditions or resuming suspended accreditation procedures.
- Page 31, section „Analysis“, paragraph 1, sentence 3, line 30-31: The phrasing „recently commenced“ could be misleading, if there is meant by it „formally opened/contractually initiated“. Possibly formulate more precisely: The review panel was able to satisfy itself that the preparation and information of higher education institutions which will shortly assign AKAST with the first peer reviews of canonical study programs under the new statutory framework are based on the Speciment Decree, the corresponding decrees issued by the Länder and the Accreditation Council´s accreditation report matrices.
- Page 59, Annex 3: line Münster, University: Indication of the year 2016 is missing at licentiate (time of the first-time accreditation)

#### **IV. Compliance with the European Standards and Guidelines (ESG)**

##### Standard 3.1 Use of external quality assurance procedures for higher education

Analysis, paragraph 2: *The review panel welcomes AKAST's announced plans to revise its Mission Statement and website with regard to the presentation of its objectives. The Agency could possibly incorporate the promotion of higher education didactics into its Mission Statement; in any case, it is the impression of the review panel that the events offered by AKAST in this area are well received.*

The whole basic documents will be revised successively and discussed and decided in the next meeting of the Executive Board. Submission of the revised documents for resolution by the AKAST General Meeting is planned for 25 January 2019.

##### Standard 3.4 Thematic analysis

Analysis, paragraph 3: *In the opinion of the review panel, AKAST already substantially met ESG Standard 3.4 in the past. However, the Agency should give greater weight in future to documenting such outcomes for the public. This could take the form, for example, of position papers by agency committees or the written outcomes of workshops where, as is indeed the case, they include description and analysis of findings from AKAST's own accreditation work.*

In view of the implementation of this pronounced recommendation 1 (*AKAST should publish more findings from analyses of its own work in future. At the same time, the neutral observer viewpoint should be preserved in tried and tested manner in order to avoid pre-empting university policy bodies such as the Association of Faculties of Catholic Theology.*), which we make explicitly our own, first steps have already been taken. Meanwhile the corresponding page on our Homepage (News and Events) has been amended by a full listing of the workshops organised by AKAST including program and/or written outcomes etc.

### Standard 3.6 Internal quality assurance and professional conduct

- Analysis, paragraph 2: *In isolated cases, an individual with observer status was seen to be involved in substantive debate. For feedback in this regard, the review panel recommends adding an item to the guided interview conducted with higher education institutions following completion of accreditation. Reviewers could also be asked at the end of an accreditation what they particularly liked about the accredited study programmes, in order to compile good practice examples for higher education in Catholic theology.*

AKAST takes up with pleasure the suggestions made by the reviewer to further development of our feedback-interview.

- Analysis, paragraph 4: AKAST agrees to the impression of the review panel that the members of the Advisory Board continue to take part in meetings of the Accreditation Committee but have neither meetings of their own nor a phase of internal reflection as a body in their own right and that this practice is not in line with the tasks and working methods stipulated in the Statutes of AKAST.
- Recommendation 2: *In the forthcoming revision of the Agency's basic documents, either the Statutes should be brought into line with the Advisory Board's working practices or the Advisory Board should also hold meetings as a separate body.*

AKAST will take up this recommendation and examine in which way this can be realized best.

### Standard 2.1 Consideration of internal quality assurance

- Evidence, paragraph 4: *To date, the Guidelines on Programme Accreditation have also been used for canonical study programmes with ecclesiastical degrees such as the licentiate. In the course of revising the current documents, AKAST will consider developing separate guidelines for this purpose.*

In the course of revision of the existing documents AKAST will work out a corresponding stand-alone document and publish it on the AKAST website.

#### Standard 2.2 Designing methodologies fit for purpose

- Recommendation 3: *AKAST should commence the process of revising the relevant documents in line with the new statutory and canon law framework as soon as possible and should combine this with the revision of the website.*

As mentioned at the beginning AKAST makes this recommendation explicitly its own. The whole basic documents are revised currently and discussed and decided in the next meeting of the Executive Board. Submission of the revised documents for resolution by the AKAST General Meeting is planned for 25 January 2019.

#### Standard 2.4 Peer-review experts

- Analysis, paragraph 1: *The reviewer nomination procedure for programme accreditation submitted by AKAST is fit for purpose and contains suitable criteria for reviewer selection. It complies with the guidelines for reviewer appointment under the new legal framework for the accreditation system, comprising the resolution of the German Rectors' Conference (HRK) General Assembly of 24 April 2018, which was adopted by the Foundation Council of the Accreditation Council Foundation in accordance with Article 3 (3) of the Interstate Treaty. Under that resolution, AKAST is to add an opportunity at the beginning of the procedure for higher education institutions to submit suggestions regarding the professional profile for reviewers.*

AKAST thanks the reviewer for this hint and will implement it at the upcoming revision of the key documents.

- Analysis, paragraph 2: *The review panel welcomes the Agency's practice in programme accreditation of appointing a further reviewer from professional practice alongside the rector of a seminary in order also to cover non-ecclesiastical professions. In the impression of the review panel, however, there is scope for including a greater range of such professions. For example, with the aid of higher education alumni associations, the Agency could specifically target theologians in the charities, non-profit or policy consulting sectors.*

AKAST is aware of this situation and can partly understand that it can give the impression that the diversity of non-ecclesiastical professions could be more taken in account.

In previous procedures persons from different areas e. g. media, publishing, adult education, foundations and charities could be appointed. AKAST is aware of the importance to maintain continuously the reviewer pool.

#### Standard 2.5 Criteria for outcomes

- Analysis, paragraph 1: *The review panel understood that oversight of accreditations by members of the Accreditation Committee or the Advisory Board also contributed to the formation of a collective memory on matters such as the design of study programmes in Catholic theology and thus to consistency in the Agency's decisions. The Agency could possibly do more to record such findings in writing, resulting in a form of documented decision-making practice.*

AKAST appreciates that AKAST's established practice of accompanying an accreditation procedure by one more person is positively honoured by the review panel. We take up with pleasure the formulated suggestion to put into writing the obtained suggestions with regard to a documented decision-making practice.

#### Standard 2.7 Complaints and appeals

- Evidence, paragraph 3: *The appeal procedure does not state whether it also covers institutional evaluations.*

We thank for this hint that the appeal procedures does not yet state that it also covers procedures of institutional evaluations and we will correct this oversight at the upcoming revision of the complaints procedure.

- Analysis, paragraph 2: *The review panel suggests that, when bringing the appeal procedure into line with the new statutory framework, a distinction should be made in future between accreditations in which the decision is made by the Accreditation Council and those where the Agency itself decides. The standard contractual agreement should also be updated.*

As already mentioned AKAST's whole basic documents are in a review process, this is also valid for the complaints procedure and the standard accreditation agreement. We pick up the suggestion to differentiate in future between procedures decided by the Accreditation Council and procedures decided by AKAST.

### **Compliance with the criteria for the accreditation of agencies**

Criterion 3.3 The agency does not work on a for-profit basis and carries out accreditation procedures on a full-cost basis.

- Evidence, paragraph 3: *AKAST reports on page 31 of the self-evaluation report that the Agency will remain unable to be self-funding in the future because of the limitation of its area of activities by the Accreditation Council.*
- Analysis, paragraph 3: *As the costing shows only the number of working days needed and not the cost of reviewers or committees, it only serves as a rough guide. Further information would be needed in order to verify that individual accreditations are performed on a full-cost basis.*

We agree that a complete self-funding of the agency is not possible because of the unique architecture and the limitation of its area of activities by the Accreditation Council. However, we are of opinion to essentially meet the requirements to carry out procedures on a full-cost basis and would like to amend as follows: The fee calculation (Annex 17) shows a basic fee and a procedure fee. As enshrined in AKAST's sample accreditation agreement the procedure fee contains all the accrued travel and accommodation expenses as part of a procedure; furthermore a symbolical expense allowance for the reviewer. The internal listing of the procedural costs shows that the named costs are covered by the procedure fee.

The basic fee contains the usually required working days as well as the proportionate costs for the Accreditation Committee meeting, which are to be set at an average of 1.500 Euro.

- Analysis, paragraph 4: *In relation to recommendation 5, it is noted that the submitted budget for 2019 and the use of funds statement for the 2017 financial year do not differ in structure to the documents presented for the last reaccreditation.*

AKAST agrees that the submitted budget documents 2017 do not differ in structure to the documents presented for the last time. To comply with the recommendation 5 and to make the inflows and outflows including the costs for the service offered by the Catholic University of Eichstätt-Ingolstadt more transparent, the documents were supplemented to that effect that those administrative and operative costs that accrue for the service of the Catholic University of Eichstätt-Ingolstadt are provided with the addition „(to KUE)“.