

**Report: Findings of the cross-sectional sample survey on conditions imposed in accreditations**

1	Summary.....	2
2	Reasons for this study.....	3
3	Background situation and objectives .....	4
4	Data, sample and analysis factors.....	7
5	Methodology: document analysis .....	8
5.1	Coding scheme .....	8
5.2	Coding challenges.....	10
6	Findings .....	14
6.1	Findings relating to conditions .....	14
6.1.1	Study programmes without conditions.....	14
6.1.2	Conditions per study programme .....	17
6.1.3	Conditions versus concerns .....	21
6.2	Analysis of the categories .....	23
6.2.1	Overall frequency of categories.....	23
6.2.2	Frequency of categories relative to the AC criteria .....	26
6.2.3	Frequency of categories among agencies.....	29
6.2.4	Formal versus academic concerns under the Specimen Decree.....	31
7	Summary and discussion .....	34
8	Annex (tables, additional charts and references).....	39

## 1 Summary

This study covers a total of 1,233 conditions imposed by eight agencies in Germany on 452 study programmes.

5 In 16% of accreditations, no conditions were imposed. The majority of accreditations without conditions were reaccreditations. Regarding accreditations with conditions, however, there is no discernible difference between initial accreditations and reaccreditations. The average number of conditions (for both categories) is 3.3 per study programme.

10 Some conditions raise multiple concerns. The most frequent concern by far (14%) is the need for editorial revision of module descriptions, which in the terminology of the Specimen Decree under the new legal framework for accreditation is a formal defect. Over half (56%) of deficits relate to academic aspects.

15 The agencies vary significantly in some cases regarding the number of study programmes accredited without conditions, the number of conditions per study programme, the number of concerns raised per condition and the most frequent concerns. Practice regarding the wording of decisions and conditions varies considerably.

Further findings could be obtained from a more detailed analysis including structure variables (type of higher education institution, funding entity, size, special forms of study programmes, academic discipline, agency subject specialisation, Land, etc.) and the time dimension (such as 1st/2nd/nth reaccreditation); these are not covered in the present analysis.

20 INCHER came to similar conclusions in the April 2018 final report on a study conducted as part of the EIQSL research project on external and internal quality assurance in higher education by means of accreditation and evaluation. It found that conditions mainly address study programme concepts and formal criteria.

25 The main conclusion of the analysis is that the Accreditation Council faces the task of developing a body of 'decision-making practice' to ensure consistency in decisions (and any conditions imposed). The newly defined relationship between the Accreditation Council, higher education institutions and agencies under the new legal framework has yet to develop in practice.

## 2 Reasons for this study

The Act of 15 February 2005<sup>1</sup> establishing the *Foundation for the Accreditation of Study Programmes in Germany* – which on 1 January 2018 became the *Foundation Accreditation Council* – assigned the Foundation the task of monitoring accreditations “undertaken by the Agencies”. In September 2016, the Accreditation Council decided as part of its ‘monitoring portfolio’ to carry out a file-based, cross-sectional sample survey in 2017 on conditions imposed and recommendations made in accreditations of study programmes. Unlike other monitoring tools used by the Accreditation Council, the analysis was not restricted to specific programme accreditations and instead aimed to obtain general findings. As the analysis of conditions proved highly time-consuming and took up the entire estimated work volume, it was decided that recommendations should no longer be included in the analysis.

The cross-sectional sample survey aims to obtain findings on a general basis for all agencies and on a comparative basis among agencies. Although conditions (and recommendations) are a key tool guiding (programme) accreditation, the Accreditation Council has not previously published any analysis. A first analysis in 2009 was presented to the Accreditation Council but not adopted. The findings were not published. A second attempt failed due to an overly complex study design. In view of the practical importance of conditions attached to accreditations, a new attempt has now been made, which – in a development that could not be foreseen when planning the monitoring portfolio in the summer of 2016 – will now also provide important insights with regard to the Accreditation Council’s new task, under the legal framework in effect from 1 January 2018, of making accreditation decisions itself and where applicable imposing conditions on those decisions. Those findings include, among other things, the average number of conditions imposed per study programme and the (formal or academic) subject matter of the conditions or of the concerns raised.

Research on the impact and effectiveness of quality assurance in higher education institutions has been and continues to be carried out in diverse contexts, for example in the BMBF-funded research projects EIQL (on external and internal quality assurance of higher education by means of accreditation and evaluation procedures)<sup>2</sup>, WiQu (on impact research in higher education quality assurance, and in particular the procedural, structural and staffing-related explanations for the impacts of quality assurance organisations)<sup>3</sup> and

---

<sup>1</sup> Gesetz zur Errichtung einer Stiftung „Stiftung zur Akkreditierung von Studiengängen in Deutschland“ [http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/ASG\\_Stiftungsgesetz.pdf](http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/ASG_Stiftungsgesetz.pdf), English translation: Act establishing a foundation “Foundation for the Accreditation of Study Courses in Germany” [http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/en/ASG\\_Stiftungsgesetz\\_en.pdf](http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/en/ASG_Stiftungsgesetz_en.pdf)

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

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

WirQung (on the organisation of quality management, with particular regard to impact mechanisms and the effectiveness of organisational approaches in higher education)<sup>4</sup>. The topic of conditions imposed in accreditations was expressly addressed by EIQSL; the final report on the project was presented in April 2018<sup>5</sup>. A further relevant study on conditions from 2012 is contained in the publication from a project comprising an empirical analysis of the Bologna reform by Suchanek et al.<sup>6</sup>, which also led among other things to a doctoral thesis presented by Manuel Pietzonka at INCHER in 2013 on study programme design under Bologna, looking at the implementation of the higher education reform and the effectiveness of accreditation. Both of these publications were based on an analysis of conditions imposed in accreditations at higher education institutions in Lower Saxony over the period 2004 to 2009. AQAS also published a study at the beginning of 2017 comprising a thematic analysis of conditions imposed on its own accreditations in relation to the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)<sup>7</sup>. Supplementing the studies mentioned, the present study provides findings on programme accreditation by different agencies, both on a general basis for all agencies and on a comparative basis between agencies, and without any specific regional focus.

### 3 Background situation and objectives

The Accreditation Council decided in 2015 to revise its rules, firstly to take account of the revision of the ESG following the resolution of the 2015 Yerevan Ministerial Conference and secondly to make higher education quality development a greater focus of its own work. Feedback from within the accreditation system included criticism that the Accreditation Council's criteria were often perceived solely as a controlling instrument and too infrequently as a benchmark for study programme quality.

Following the February 2016 decision of the Federal Constitutional Court, which resulted in a change in the legal framework, it quickly became apparent that the Accreditation Council would no longer have the task of setting rules on accreditation to implement the guidelines of the Standing Conference of Ministers of Education and Cultural Affairs of the states (*Kultusministerkonferenz*, henceforth the Standing Conference). In December 2016, the ministers of education and cultural affairs adopted the Interstate Study Accreditation Treaty

---

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

<sup>5</sup> Steinhardt et al. (2018), "Externe und interne Qualitätssicherung von Studium und Lehre durch Akkreditierungs- und Evaluationsverfahren – Ergebnisbericht". INCHER Working Paper No. 9. Kassel, 2018.

<sup>6</sup> Suchanek et al. (2012), "Bologna (aus)gewertet – Eine empirische Analyse der Studienstrukturreform". In "Gesellschaft – Wirtschaft – Medien", Vol. 3, 2012. Göttingen: V&R unipress.

<sup>7</sup> [http://www.aqas.de/downloads/analysen/Reflexion\\_Beauftragung\\_2017.pdf](http://www.aqas.de/downloads/analysen/Reflexion_Beauftragung_2017.pdf)

(*Studienakkreditierungsstaatsvertrag*<sup>8</sup>, henceforth the Interstate Treaty). This was ratified by the states parliaments in 2017<sup>9</sup>, entered into force on 1 January 2018 and reorganised the German accreditation system. Among other things, it gave the Accreditation Council the new task of making decisions in future programme and system accreditations itself. This transfer of the power to make accreditation decisions to the Accreditation Council was accompanied by the withdrawal from the Accreditation Council of the power to lay down rules on accreditation, which now lies exclusively with the states. On 7 December 2017, the Standing Conference adopted the Specimen Decree (*Musterrechtsverordnung*<sup>10</sup>) laying down details on the structure of the accreditation system and replacing the previous accumulation of rules relevant to accreditation (*“Konvolut akkreditierungsrelevanter Vorgaben”*)<sup>11</sup>.

As a result of this, the Accreditation Council was unable to complete the process of revising the rules according to plan. However, the preliminary outcomes of that process were used by the states in drafting the Specimen Decree. The Accreditation Council is now responsible for the new system’s practical implementation, in which it will incorporate the findings from this sample survey.

The findings on (established) practice with regard to such conditions can also be valuable for the Accreditation Council in light of the expectation formulated in the Interstate Treaty that “doing away with the agency standards, which were often very different in the past” would encourage “consistent decision-making practice on the basis of given criteria”.<sup>12</sup>

---

<sup>8</sup> *Staatsvertrag über die Organisation eines gemeinsamen Akkreditierungssystems zur Qualitätssicherung in Studium und Lehre an deutschen Hochschulen (Studienakkreditierungsstaatsvertrag)*, <https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Studienakkreditierungsstaatsvertrag.pdf>; English translation: Interstate Treaty on the Organisation of a Joint Accreditation System to Ensure the Quality of Teaching and Learning at German Higher Education Institutions (Interstate study accreditation treaty) [https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen\\_beschluesse/2016/2016\\_12\\_08-Studienakkreditierungsstaatsvertrag-englisch.pdf](https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen_beschluesse/2016/2016_12_08-Studienakkreditierungsstaatsvertrag-englisch.pdf)

<sup>9</sup> See [http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/Ratifizierung\\_des\\_Studienakkreditierungsstaatsvertrags\\_in\\_den\\_16\\_Bundeslaendern\\_Vorgangsdokumentation.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/Ratifizierung_des_Studienakkreditierungsstaatsvertrags_in_den_16_Bundeslaendern_Vorgangsdokumentation.pdf)

<sup>10</sup> *Musterrechtsverordnung gemäß Artikel 4 Absätze 1-4 Studienakkreditierungsstaatsvertrag* <https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Musterrechtsverordnung.pdf>; English translation: Specimen Decree Pursuant to Article 4, Paragraphs 1-4 of the Interstate Study Accreditation Treaty [https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen\\_beschluesse/2017/2017\\_12\\_07-Musterrechtsverordnung-englisch.pdf](https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen_beschluesse/2017/2017_12_07-Musterrechtsverordnung-englisch.pdf)

<sup>11</sup> Pietzonka, Manuel. “Der Patient Akkreditierung zwischen Hospital und Hospiz. Eine Evaluation des deutschen Akkreditierungssystems durch Analyse von Akkreditierungsaufgaben und Befragungen.” In Winfried Benz (Ed.): *Handbuch Qualität in Studium und Lehre*. HQS F 1.13 2 40 12 12. p. 11.

<sup>12</sup> Explanatory memorandum to the Interstate Treaty, p. 7. <http://akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/Studienakkreditierungsstaatsvertrag.pdf>

The explanatory memorandum to the Specimen Decree additionally states with regard to section 24 that conditions “should only come into question in future in exceptional cases”<sup>13</sup>. From this it is inferred that the states desire a change relative to established practice with regard to the imposition of conditions. This study will therefore also address how this requirement can be taken into account in light of experience from past years.

The study can also provide an overview of and learn from common practice so far with regard to conditions attached to accreditation and help adopt a body of good practice. Finally, conditions are analysed relative to the division into formal and academic criteria as laid down in the Specimen Decree.

---

<sup>13</sup> Explanatory memorandum to the Specimen Decree, p. 34.  
<https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Musterrechtsverordnung.pdf>

#### 4 Data, sample and analysis factors

Taking into account agencies' market shares, from all agencies performing programme accreditations (eight out of ten), a selection was made among programme accreditations carried out in accordance with the Rules for the Accreditation of Study Programmes and for System Accreditation<sup>14</sup> as last amended on 20 February 2013 (henceforth the Rules). Cluster accreditations were split into individual study programmes, and partial study programmes (meaning study programmes within combined study programmes) were regarded as separate study programmes.

The number of study programmes analysed per agency depended on its market share, with ten study programmes from one small agency, 50 each from three medium-sized agencies and 75 each from four large agencies. The accreditations were selected chronologically: Accreditations from 2015 were selected first – because any conditions imposed then were meant to have been met by the time of compiling the data (spring 2017) – and then earlier accreditations, working backwards to when the new Rules entered into effect in 2013. If that was not enough to make up the number wanted, more recent accreditations were added from 2016 onwards (subject to the requirement that the process of meeting any conditions was complete). For one now medium-sized agency, the small number of accreditations carried out in the analysis period meant that instead of the targeted 50 study programmes, only 42 were accredited in accordance with the 2013 Rules, as a result of which a total of 452 (instead of the planned 460) study programmes were ultimately included in the analysis.

The study programmes were identified with the aid of accreditation notifications from the respective agencies and their review reports, most of which were found in the database of accredited study programmes. However, some links to review reports were incorrect or missing in the database. In such cases, the review reports were found using the agencies' own databases and the agencies were asked to correct or add the links in the database of accredited study programmes.

One challenge in compiling the data consisted of actually locating the conditions in review reports because review reports from some agencies vary considerably in structure. Some agencies place the decision together with any conditions at the beginning of the review report and some at the end, and in some cases conditions are specified at several places in the

---

<sup>14</sup> *Regeln für die Akkreditierung von Studiengängen und für die Systemakkreditierung*  
[http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR\\_Regeln\\_Studiengaenge\\_aktuell.pdf](http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Regeln_Studiengaenge_aktuell.pdf), English translation: Rules for the Accreditation of Study Programmes and for System Accreditation  
[http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/en/AR\\_Regeln\\_Studiengaenge\\_en\\_aktuell.pdf](http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/en/AR_Regeln_Studiengaenge_en_aktuell.pdf)

report. Sometimes, in addition to the conditions imposed by accreditation committees, reviewers' recommendations as to the wording of conditions are also cited.

There were no further restrictions regarding the make-up of the sample. It thus included accreditations at a variety of higher education institutions throughout Germany and at the three main categories of higher education institution (mainstream higher education institutions, higher education institutions of applied sciences and colleges of art and music) and at schools of cooperative education, as well as higher education institutions of varying sizes and with various funding entities. There were also no restrictions regarding the range of subjects. In contrast to Suchanek et al., such 'structure variables'<sup>15</sup> (type and size of higher education institution, funding entity, Land, information on selected study programmes, special forms of study programmes, etc.) were not analysed in this study for reasons of capacity<sup>16</sup>. The one exception to this is that initial accreditation versus reaccreditation is used and analysed as a structure variable to see if the number of imposed conditions decreases or the substance of conditions changes the longer a study programme has been accredited.

The analysis was not intended to cover agencies' internal processes. The process by which conditions are met was also of no interest in this study. Consequently, no accreditations were included where the process of meeting conditions was not yet complete. The analysed data thus provide a suitable basis for addressing the questions raised in the present study with regard to conditions imposed in accreditations.

## 5 Methodology: document analysis

This section presents the methodology used and is to be read together with the [tables](#) in the Annex. Qualitatively derived categories are quantified; arithmetic means are shown in bar charts.

### 5.1 Coding scheme

The present study is based methodologically on document analysis, a research method commonly used in the social sciences. One of the central tasks in document analysis is the development of a coding scheme<sup>17</sup>. The primary aim of coding in this study is to match the

---

<sup>15</sup>Suchanek et al. (2012), p. 29.

<sup>16</sup> Suchanek et al. (2012) concluded that the structure variables 'type of higher education institution', 'funding entity' and 'type of degree' did not play any role as influencing variables. The situation was difficult with regard to the variable 'size of higher education institution'. Cf. pp. 38 ff.

<sup>17</sup> Cf. Suchanek (2012), pp. 29-30.

concerns raised in the text of a condition ('concern' here meaning that part of the condition which names a defect) as clearly as possible to the Accreditation Council's criteria.

5 First, the eight agencies were asked about their experience in the use of internal categorisations of conditions and recommendations. All but one agency provided information in response to the planned study. As mentioned, AQAS had already addressed the topic in a thematic analysis published in early January 2017. The remainder provided information about their experience in imposing conditions and made reference, among other things, to the challenge of finding a good choice of wording that identified the defect concerned without pre-empting a solution. On the other hand, they said, it was important to formulate conditions  
10 in an action-oriented manner in order to aid implementation, although this greatly impaired comparability. For example, standard wording had become established for those defects which often result in conditions being imposed, which helped maintain consistency within an agency. Conversely, agencies referred to the need to tailor the wording of conditions to the situation and institution. One agency rightly (although see footnote 16) raised the importance  
15 of structure variables for the information value of this study, although these were only partly included in the analysis for capacity reasons, as mentioned.

In a second step, a subset of conditions (n=50, conditions from various agencies) was subjected to a preliminary analysis and initial categories were developed. The analysis is based on the criteria for the accreditation of study programmes (Section 2 of the Accreditation Council Rules as amended in 2013 – henceforth the Criteria). Grouped under each  
20 criterion are varying numbers of requirements; these are referred to in the present study as *subcriteria*. Analysis of subcriteria makes it possible to draw detailed conclusions about the defects named by agencies and about any resulting need for action.

The subcriteria together with the actual wording of conditions served as the basis for  
25 developing categories. The Standing Conference's Common Guidelines<sup>18</sup> (referenced in criterion 2.2 of the Rules) also served as a source for additional distinguishing characteristics. The figure below illustrates the approach followed:

---

<sup>18</sup> *Ländergemeinsame Strukturvorgaben für die Akkreditierung von Bachelor- und Masterstudiengängen*  
[http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/KMK/Vorgaben/KMK\\_Laendergemeinsame\\_Strukturvorgaben\\_aktuell.pdf](http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/KMK/Vorgaben/KMK_Laendergemeinsame_Strukturvorgaben_aktuell.pdf), English translation: Common Structural Guidelines of the Länder for the Accreditation of Bachelor's and Master's Study Courses  
[http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/KMK/en/KMK\\_Laendergemeinsame\\_Strukturvorgaben\\_en\\_aktuell.pdf](http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/KMK/en/KMK_Laendergemeinsame_Strukturvorgaben_en_aktuell.pdf)

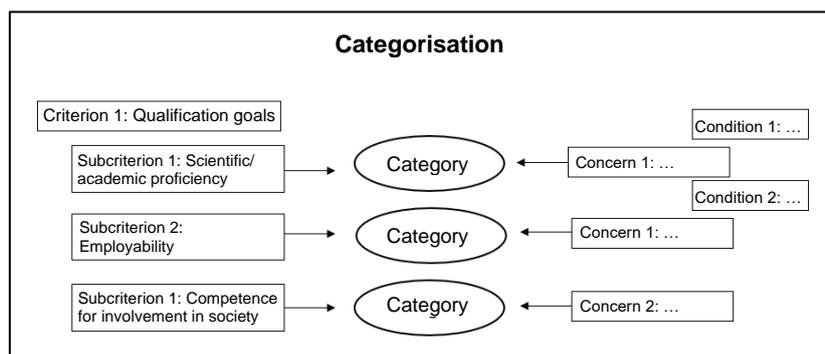


Figure: Categorisation

Additional categories were developed when the analysis was extended to take in the total number of conditions imposed. Some conditions raised multiple concerns; all concerns were used in the derivation of categories. The result was a system of 42 categories (see Annex, Tables 6-9). In a second step, the categories were matched as closely as possible to the Accreditation Council's criteria. Like Suchanek et al., Pietzonka and AQAS, the present study also comes to the conclusion that a perfect match is not always possible here. Section 6.2.4 also addresses how the categories can be analysed in terms of formal characteristics (such as transparency and names of degrees) versus academic characteristics (such as expertise and academic feasibility) in line with the Specimen Decree.

Various challenges were encountered in coding and are briefly described in the following.

## 5.2 Coding challenges

### Challenge 1: Accreditation Council Criteria contain cross-references to third-party documents

The Accreditation Council's Criteria contain cross-references to third-party documents of relevance to accreditation. Criterion 2.2 references both the *Qualifications Framework for German Higher Education Qualifications* (henceforth the Qualifications Framework) and the Standing Conference's common and states-specific structural guidelines. It transpired that a single category was sufficient to classify concerns relating to the Qualifications Framework, whereas it appeared more useful to have several separate categories for the Standing Conference guidelines, and particularly the Common Guidelines.

### Challenge 2: Duplication/overlapping of AC criteria with other documents

There are also requirements that are referred to both in the Accreditation Council Criteria and in third-party documents. For example, recognition in accordance with the Lisbon Recognition Convention of credits earned at other higher education institutions is enshrined both in criterion 2.3 of the Accreditation Council Rules and heading 1.2 of the Framework Guidelines

for the Introduction of Credit Point Systems and the Modularisation of Study Courses (the annex to the Common Guidelines).

In cases like this, the category was assigned first (in this instance, for example, ‘crediting/recognition’); when subsequently matching the categories to AC criteria, the category was then matched to heading/criterion 2.3.

### Challenge 3: Overlaps between criteria within the Accreditation Council Rules

The subcriterion “Every module, as a rule, concludes with an examination covering the entire module” (category: ‘One examination per module’) can be matched both with criterion 2.5, ‘Examination system’ (which contains the exact wording of the subcriterion) and with criterion 2.4, ‘Academic feasibility’ (in connection with “frequency and organisation of examinations which is adequate and has a reasonable workload”). The different Accreditation Council criteria overlap here; AQAS also found in its study that “the Accreditation Council’s criteria cannot be clearly separated without overlaps and certain conditions can be related to multiple criteria”<sup>19</sup>.

Some review reports specified the criterion that a condition related to; in many cases, multiple criteria were cited as ‘reference’ for a given condition. Both practices were helpful in understanding the direction in which a condition was meant. However, not all agencies consistently stated the link to an AC criterion<sup>20</sup>. Two of the eight agencies did not provide any reference to an AC criterion.

Hence, for example, all concerns relating to the ‘One examination per module’ category were matched in this study to criterion 2.5 – in the knowledge that this may be at variance with the reviewer’s intention.

### Challenge 4: Purpose of a condition not understandable without context

It was not always evident at first glance – without knowing the broader context – what defect a condition, as worded, was addressing. Two examples:

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

---

<sup>19</sup> AQAS, p. 5.

<sup>20</sup> The wording of a condition was extracted from a review report at the first place where it occurred in the report; if the condition was brought into relationship with a criterion in the main text, by means of headings or (when a condition was cited twice) at a later point, this fact was not taken into account in the present study.

*“Important aspects of the guideline-oriented approach are to be included in the study programme concept. The revised curriculum is to be presented.”*

In the first example, it was unclear (pending publication) what the changes were that had to be made to the examination regulations. Where the concern being raised in a condition was unclear, with no additional detail provided, it was helpful for the purposes of categorisation – in a similar way to the situation described under Challenge 3 – for the number(s) of the corresponding Accreditation Council criterion (or criteria) to be cited beside the text of the condition, where this was the agency’s custom. In some cases, the review report had to be consulted for further context in order to better understand the purpose of a condition.

#### 10 Challenge 5: Assignment of categories where a condition raised multiple concerns

Conditions frequently raised multiple concerns – sometimes as many as five. To determine frequencies for specific concerns/defects, the concerns in such cases were categorised separately. For this purpose, the conditions were split into the individual concerns raised. For example, one condition read as follows:

15 *“The examination system must be revised. In doing so, it must be ensured that as a rule there is only one examination per module, that examinations relate to the module and not to individual course units and that examinations as a whole are geared to the competencies to be acquired in the module. If in exceptional cases multiple examinations are provided for in a single module, this must be verifiably justified from an educational perspective.”*

While the condition as a whole relates to AC criterion 2.5, “Examination system” (and combining the concerns raised in a single condition therefore makes sense), the two concerns could be assigned to two different categories (‘One examination per module’ and ‘Examinations competence-oriented’).

25 Logically, the same approach was applied if a condition raised multiple concerns that related to different criteria. To cite an example relating to the categories ‘Facilities’ (AC criterion 2.7) and ‘Expertise’ (criterion 2.1):

30 *“The higher education institution must ensure that the subject area of building services engineering is covered academically in an engineering-oriented manner and at a scientific level. The higher education institution must explain how this is done. The area of building services engineering should also be integrated in the curriculum on a larger scale and interlinked with design modules.”*

If a condition raised a concern that involved multiple aspects but these related to the same category, then that category was not counted twice. To illustrate this with an example, in this case with the 'Module manual (editorial)' category (AC criterion 2.2 in conjunction with Standing Conference Framework Guidelines 1.1):

- 5            *"The module manuals must be revised. In doing so, particular attention must be given to the following aspects:*
- a. It must be more clearly shown which modules cover quantitative methods.*
- b. In the modules in the areas of control and intercultural management, it must be made clearer what basic competencies are taught in the Bachelor's study programmes*  
10            *and what advanced competencies are taught in the relevant Master's study programme."*

These challenges and the solutions applied in each case should be borne in mind when assessing the findings presented in the following section.

## 6 Findings

The findings are divided into findings on conditions (Section 6.1) and categories (Section 6.2).

5 It should be mentioned at the outset that the study aims to safeguard agency anonymity. The eight agencies involved are therefore designated by the letters A to H<sup>21</sup>. All comparisons are based not on the absolute number of conditions/concerns etc. analysed but always on the percentage of study programmes analysed for each agency.

### 6.1 Findings relating to conditions

10 The findings on (study programmes with) conditions are presented first. Based on the total number of study programmes, the first question of interest is the percentage of study programmes without conditions and the average number of conditions per study programme.

In each case, the variable ‘initial accreditation and reaccreditation’ is analysed and compared among agencies. The selected data contains about equal numbers of initial accreditations and reaccreditations: for all accreditations (n=452), the split is 47% initial accreditations and 15 52% reaccreditations<sup>22</sup>.

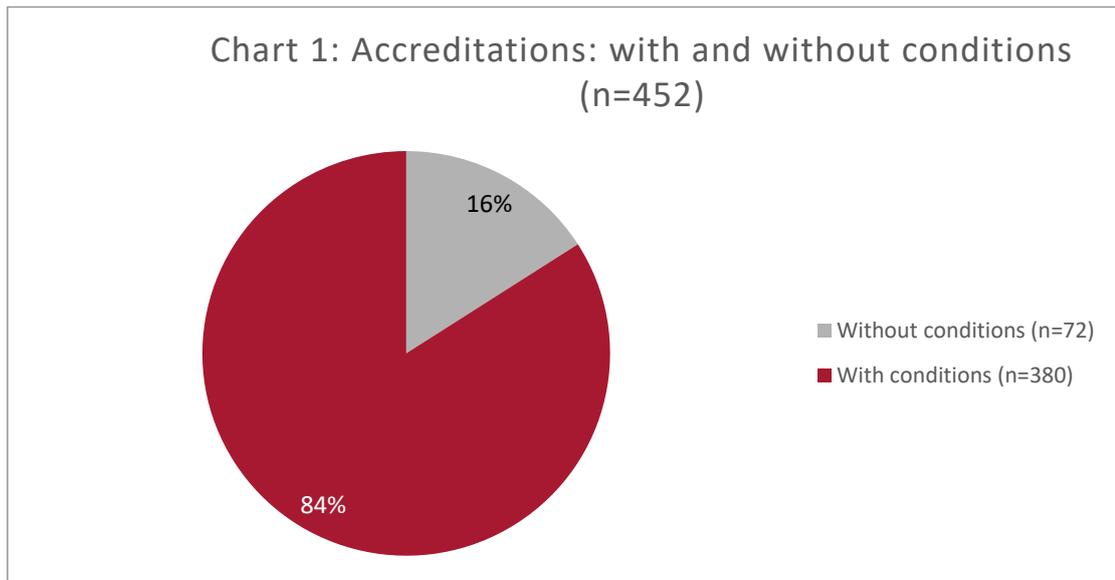
#### 6.1.1 Study programmes without conditions

The first part of the analysis looked at how many of the study programmes included in the analysis were accredited without conditions. Of 452 (partial) study programmes, 72 were accredited without conditions. This corresponds to 16% (see Chart 1).

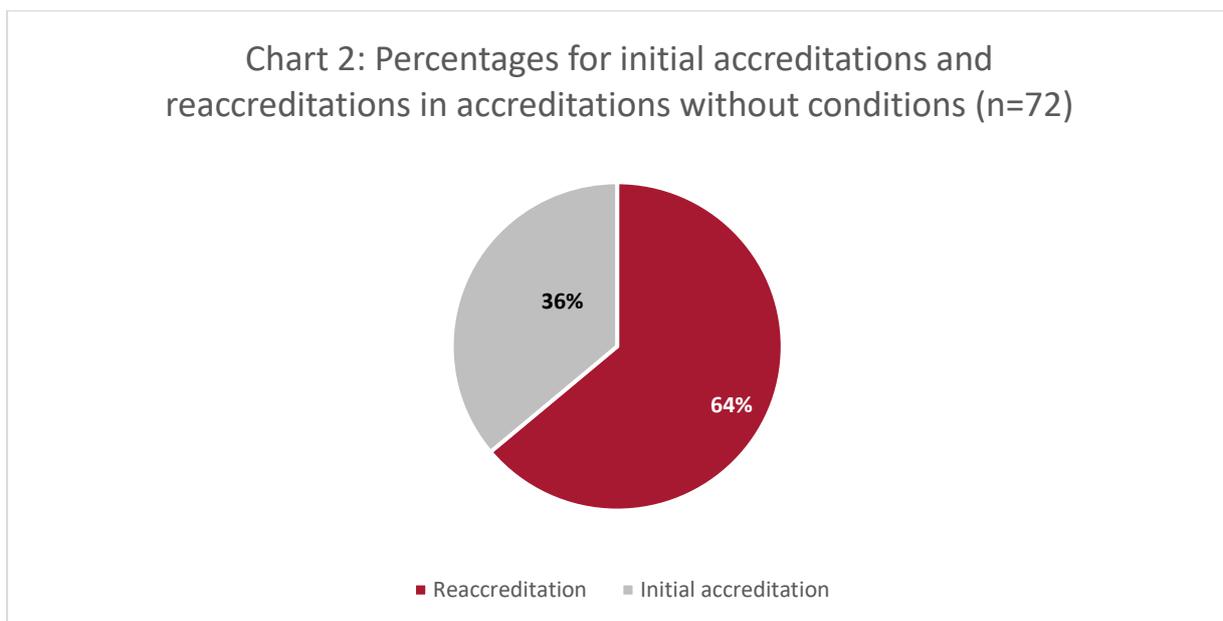
---

<sup>21</sup> Each agency has been told which letter is assigned to it.

<sup>22</sup> In two accreditations (with a total of five conditions), it was not possible to determine whether they were initial accreditations or reaccreditations, which is why the figures do not add up to 100%. These were study programmes at schools of cooperative education (*Berufsakademien*), where the review reports did not state this information. Study programmes at schools of cooperative education are also not listed in the German Higher Education Compass (*Hochschulkompass*) and hence are not included in the database of accredited study programmes, where – besides in the review reports – such information could otherwise be found.



The majority of the 16% of study programmes accredited without conditions are reaccredita- tions. 64% of the study programmes without conditions (n=72) related to reaccreditations and 36% to initial accreditations (see Chart 2).



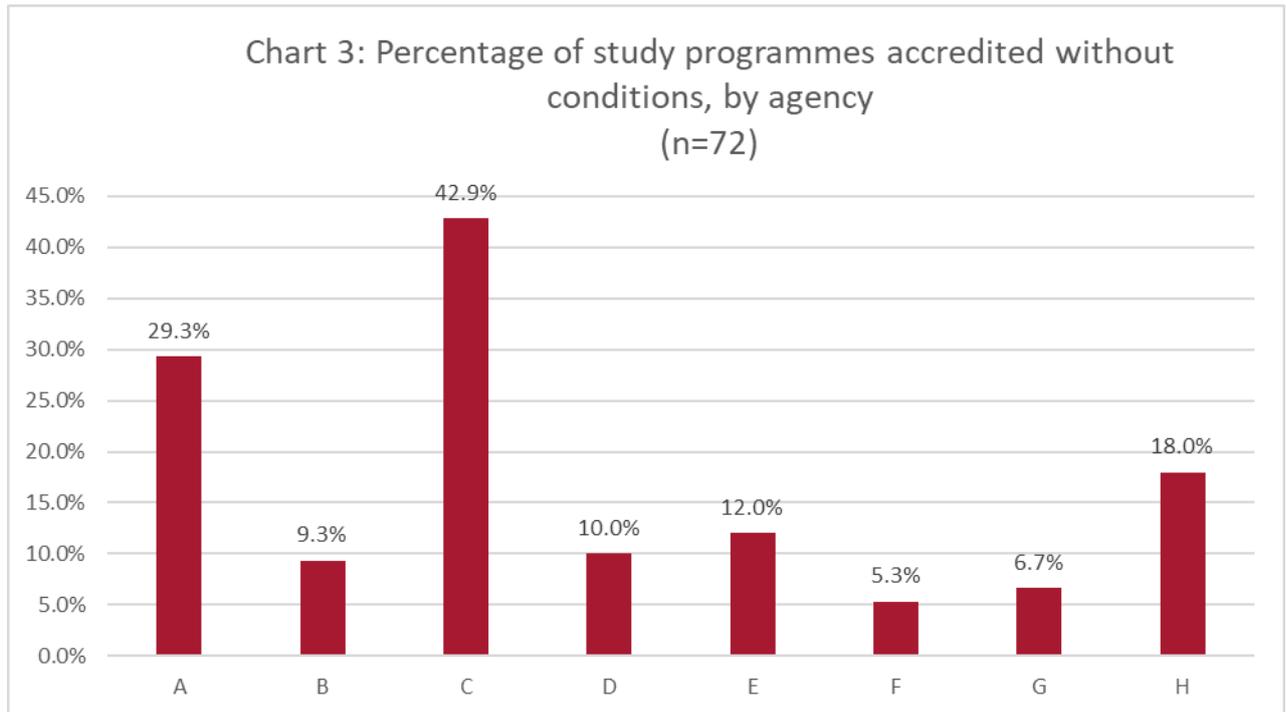
5

Looking only at accreditations where conditions were imposed (84% of the total; n=380), 49% of study programmes related to initial accreditations and 50% to reaccreditations<sup>23</sup>.

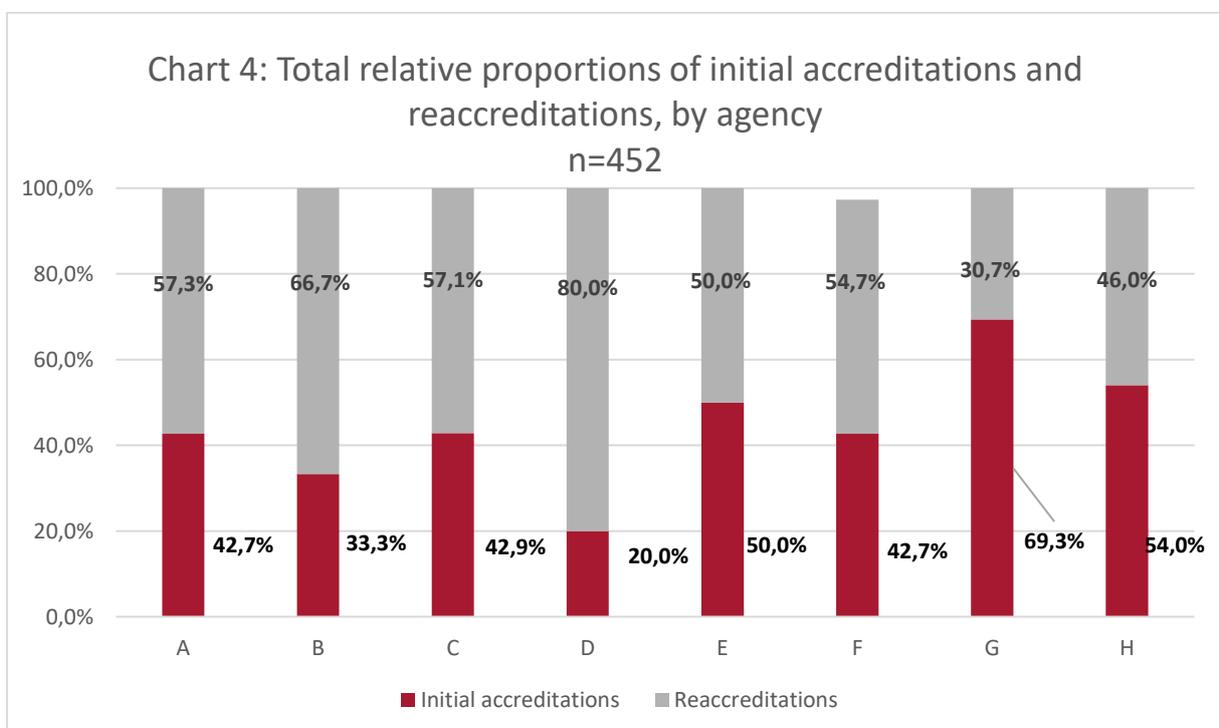
Comparing among agencies, there is marked variation regarding accreditations without conditions (as mentioned, relative to the total number of accreditations included in the analysis). Two agencies are outliers from the average (of 16%, see Chart 1): Agency C with just under 43% of accreditations without conditions and Agency F with 5.3% (see Chart 3).

10

<sup>23</sup> See Footnote 18 on why the figures do not add up to 100%.



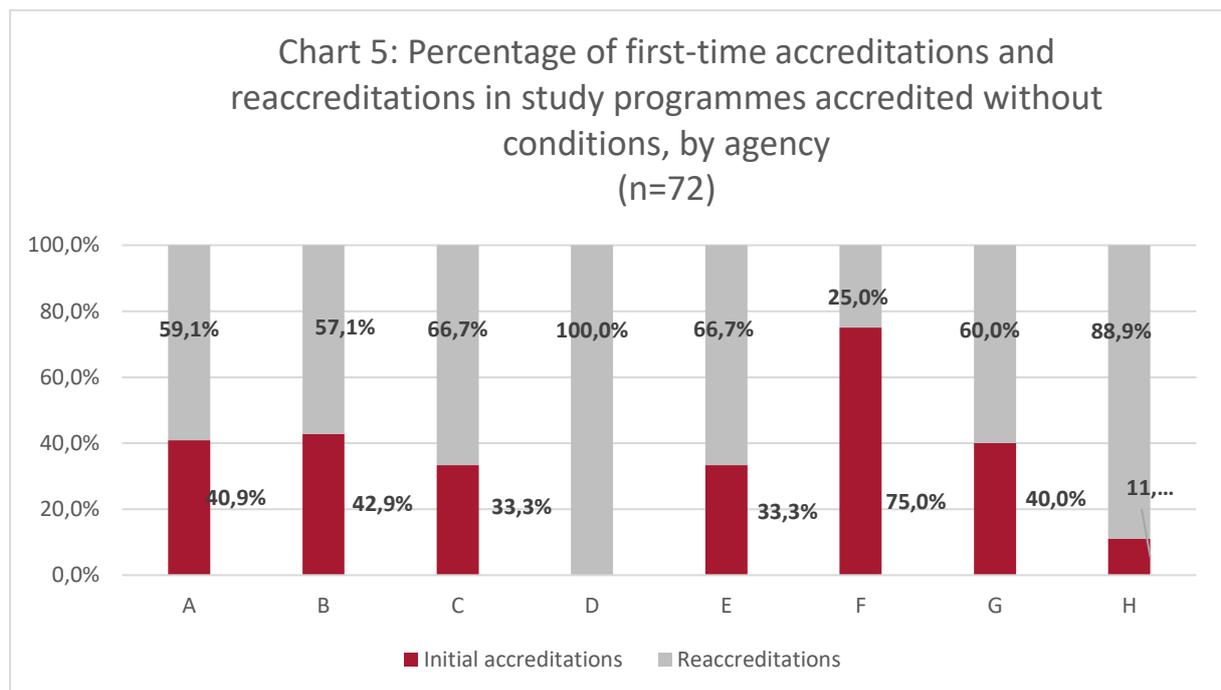
As Chart 4 shows, this is not related – when comparing among agencies – to the proportion of initial accreditations and reaccreditations *at one and the same agency*. There is no indication that above-average or below-average figures for accreditations without conditions also relate to initial accreditations and reaccreditations.



If they did, agencies with a large proportion of reaccreditations (most of all Agency D, but also B, A, C and F) should also have a large proportion of accreditations without conditions. As the two charts show, no such explicit link is apparent.

5 **The decision whether or not to impose conditions evidently strongly depends on the agency's 'decision-making practice'; this 'decision-making practice' varies considerably between agencies.**

Looking solely at accreditations without conditions, the following picture emerges (Chart 5):



10 For seven of the eight agencies (all except F), the majority of accreditations without conditions are reaccreditations; for two of them (D and H), this is true to an above-average extent. The only agency for which the assumption does not fit is Agency F, where initial accreditations, at 75%, account for a significantly greater proportion.

15 Analysis of additional structure variables could point to other explanations (such as agency subject specialisation, private/public higher education institution, special form of study programme, etc.). No such analysis is included in the present study, however.

### 6.1.2 Conditions per study programme

20 For the 452 study programmes included in the analysis, a total of 1,233 conditions were imposed; this corresponds to an average of 2.7 conditions per study programme. Looking solely at study programmes for which conditions were imposed (n=380), an average of 3.3 conditions were imposed per study programme.

The maximum number of conditions imposed in accreditations with conditions was 11 (in a single accreditation). Only in 6.6% of accreditations were seven or more conditions imposed.

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

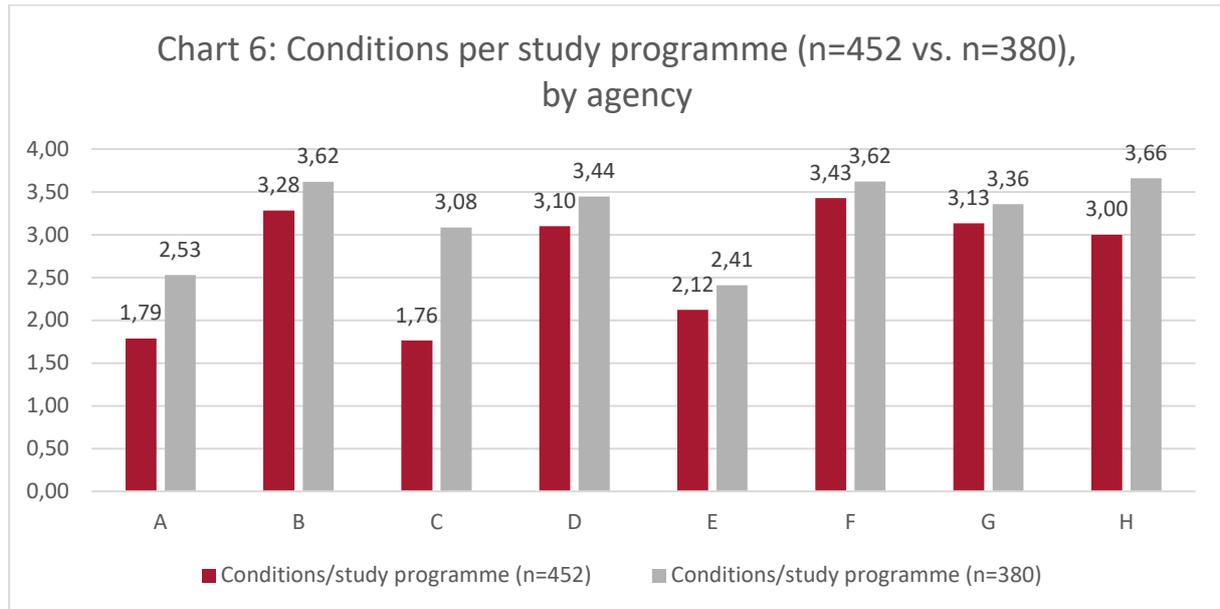
Table 1: Distribution of conditions per accreditation

Table 2 shows the maximum number of conditions imposed in a single accreditation by each agency:

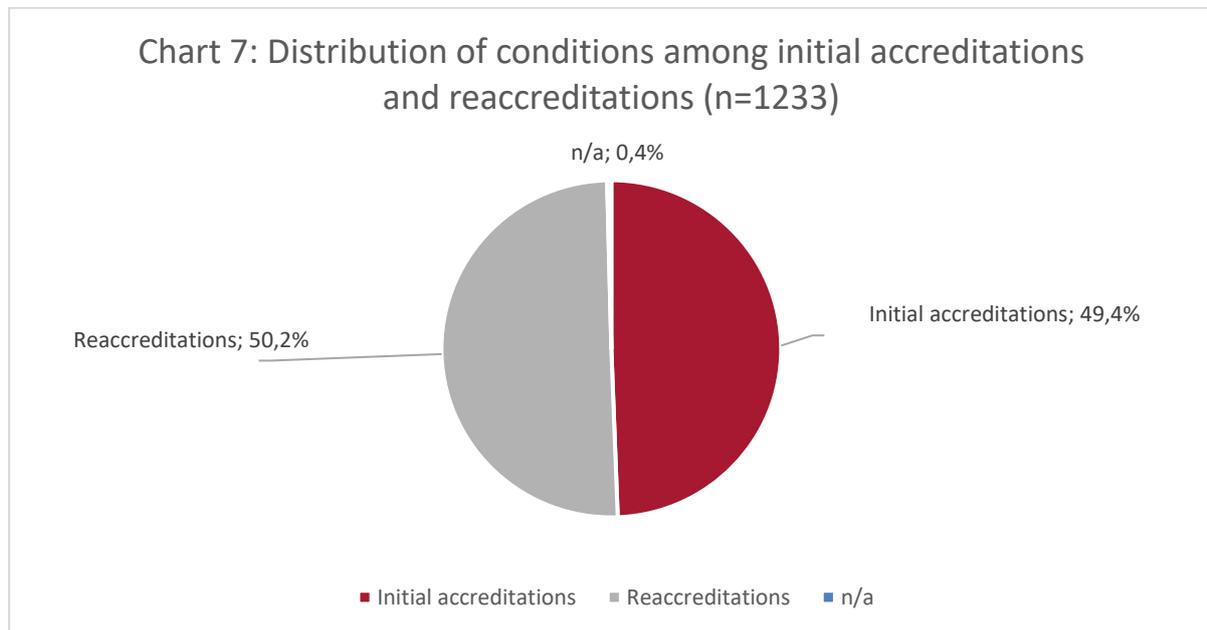
Agency	Maximum number of conditions
Agency A	7
Agency B	9
Agency C	11
Agency D	9
Agency E	8
Agency F	10
Agency G	7
Agency H	9

Table 2: Maximum number of conditions per agency

As Chart 6 shows, there are major differences among agencies. There is a conspicuous difference at Agency C; this is because Agency C accredited just under 43% of study programmes without conditions (see Chart 4). Another conspicuous feature is that Agencies A and E are also well below the averages of 2.7 and 3.3 conditions per study programme while the other five agencies are significantly above them.



609 of the 1,233 conditions imposed are for initial accreditations (with n=213) and 619 conditions are for reaccreditations (with n=237). This means the conditions are divided almost equally between initial accreditations and reaccreditations (49.4% in initial accreditations and 50.2%<sup>24</sup> in reaccreditations).



Relating this to the total proportion of initial accreditations and reaccreditations, this corresponds to an average of 2.9 conditions per initial accreditation of a study programme and 2.6 conditions per reaccreditation of a study programme. Looking solely at accreditations where conditions were imposed (n=380), the average number of conditions (in initial accreditations

<sup>24</sup> See Footnote 18 on why the figures do not add up to 100%.

and reaccreditations) is 3.3; the significant difference seen before has thus completely disappeared.

The maximum number of conditions (11 conditions per programme) was granted in an initial accreditation; the maximum number of conditions in a reaccreditation was nine (four reaccreditations in total).

Conditions/ accreditations	No. of initial accreditations (n=187)	Percent	No. of reaccred- itations (n=187)	Percent
1	33	17.6%	45	23.6%
2	39	20.9%	35	18.3%
3	46	24.6%	41	21.5%
4	28	15.0%	21	11.0%
5	20	10.7%	23	12.0%
6	10	5.3%	12	6.3%
7	6	3.2%	7	3.7%
8	2	1.1%	3	1.6%
9	1	0.5%	4	2.1%
10	1	0.5%	–	
11	1	0.5%	–	

Table 3: Distribution of conditions per accreditation, divided into initial accreditations and reaccreditations

It can be said that, where conditions are imposed, the average number of conditions per accreditation is the same in initial accreditations as in reaccreditations. In total, however, reaccreditations are more frequently without conditions. As the distribution in Tables 1 and 3 shows, accreditations with the greatest numbers of conditions are exceedingly rare; almost 90% of accreditations have a maximum of five conditions, with an absolute maximum of 11 for initial accreditations and nine for reaccreditations.

Comparing among agencies once again reveals major differences, as shown in Table 4: Whereas Agency D only imposed just under 10% and Agency B 26.4% of its conditions in initial accreditations, the figure for Agency G is just under 70%.

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

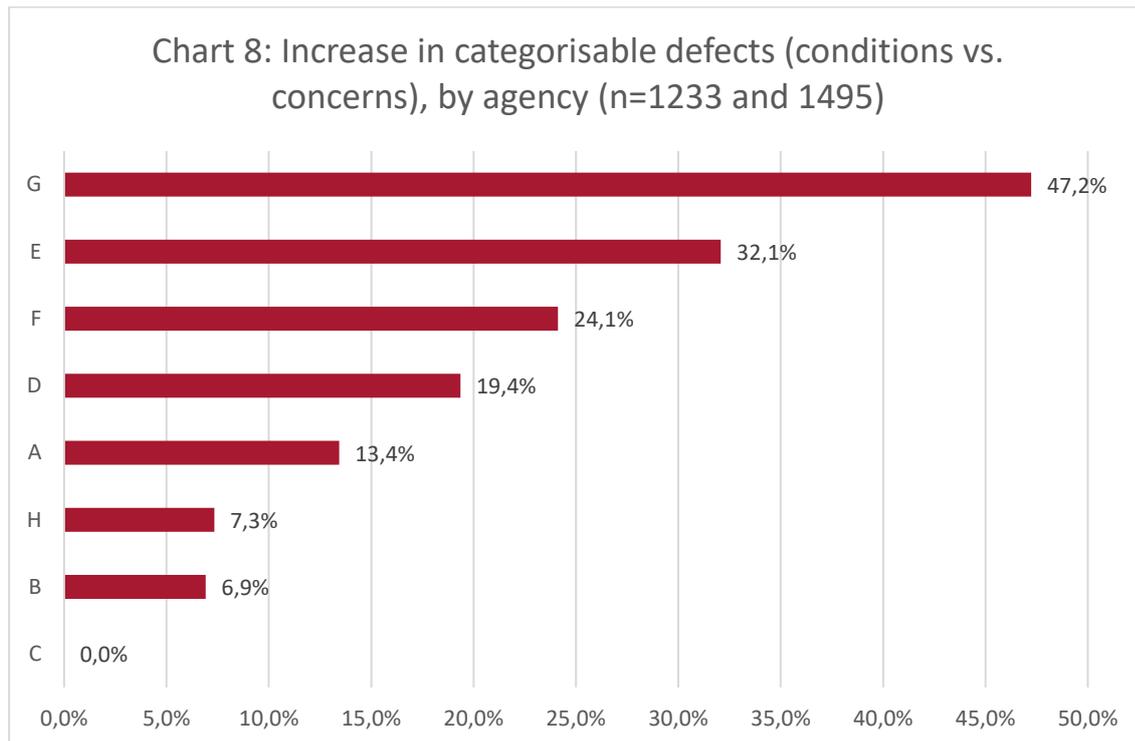
Table 4: Conditions imposed in initial accreditations and reaccreditations, in comparison among agencies

### 6.1.3 Conditions versus concerns

As mentioned in Section 5.1, some conditions raise multiple concerns that ultimately specify a defect that can be categorised. The 1,233 conditions included in this study raised a total of 1,495 concerns (262 or 21% more concerns than conditions). A total of 166 conditions (13.5%) were found that raised concerns relating to more than one defect; on average, a complaint raising multiple concerns related to 1.6 defects/concerns.

Looking at the total number of accreditations with conditions included in the analysis (n=380), it emerges that in slightly more than one third (143; 37.6%) of accreditations, at least one of the conditions imposed raises more than one concern.

Looking at the distribution among agencies once again reveals major differences. Whereas Agency C did not subject a single study programme to a condition raising multiple concerns, Agency G had 47.2% more concerns than conditions (see Chart 8):



The Accreditation Council's decision rules (see Section 3 of the Rules) do not set a quantitative upper limit for the number of conditions beyond which accreditation is refused. There is therefore no need or requirement that gives an incentive to combine multiple concerns in a single condition. Reviewers recommend and accreditation committees decide on accreditation according to defect severity: "The accreditation shall be granted with conditions if there are defects which can most likely be remedied within nine months" (Rules, criterion 3.1.2). No qualitative conclusion can therefore be inferred from this observation. For example, it is not possible to state that the agencies with the greatest number of concerns per condition have a correspondingly small number of conditions per study programme (see Chart 6).

The observation nevertheless points to considerable variation in agency practice regarding the wording of conditions.

All comparative observations between agencies in this quantitative analysis relating to the number of accreditations without conditions and the ratio of reaccreditations to initial accreditations reveal large differences. As the Accreditation Council itself (self-critically) noted in its 2007 Evaluation Report, "Having a system of [...] competing accreditation agencies means that decisions made by agencies are not always consistent, even if they all work on the basis of the same rules of procedure and criteria." Suchanek et al. likewise concluded on this point that "it is not therefore possible to expect a uniform decision-making

practice throughout Germany”.<sup>25</sup> Whether accreditation decisions and the wording of any conditions from one single authority (the Accreditation Council) prove to be more consistent in practice has yet to be seen.

## 6.2 Analysis of the categories

- 5 This subsection looks at the nature and frequency of defects leading to a condition being imposed in accreditations of study programmes included in the analysis. It also offers initial explanations with regard to experience and decisions made in accreditation practice.

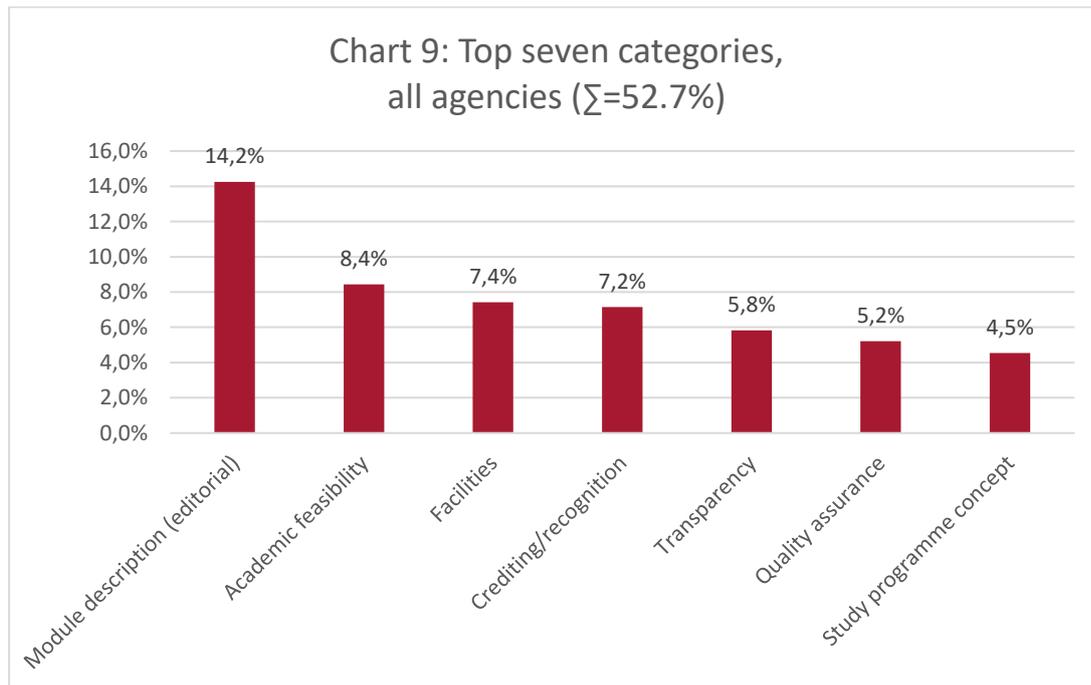
The coding scheme (see Section 5.1) comprises a total of 42 categories to which 1,495 concerns are assigned. In the following, the findings with regard to all categories are  
10 presented in order of frequency. Some of the categories are not self-explanatory; explanatory notes are provided in the [Annex](#), Table 9.

### 6.2.1 Overall frequency of categories

The most frequent concern raised is the need for editorial revision of one or more module descriptions (14.2%). This is followed, by a large margin, by concerns – fairly close together  
15 in frequency – relating to academic feasibility (8.4%), facilities (7.4%) and credit-ing/recognition (7.2%). These are followed in turn by concerns relating to transparency (5.8%), quality assurance (5.2%) and study programme concept (4.5%) (see Chart 9; for the frequency of all categories see Table 6 in the Annex). These top seven categories account for over half of concerns raised.

---

<sup>25</sup>Suchanek et al., pp. 24-25.



The most frequently identified defect by far, accounting for one-seventh of all concerns raised, is the need for editorial revision of a module description<sup>26</sup>. This includes stipulations for module descriptions to be made more consistent, for them to include specific information or for missing information to be added in accordance with the Common Guidelines or other guidelines. Many of these conditions relate to ensuring that module descriptions reflect established practice in a transparent manner.

This category is closely related to the fourth most frequent category, 'Transparency'. This is assigned wherever a condition relates to transparency/consistency of documents (other than module descriptions). Here again, conditions do not relate to specific content/structures being absent, but merely to the fact that there are gaps in the description relative to reality. A plausible explanation could be that higher education institutions initially hold back pending any further substantive or structural changes to meet conditions imposed in accreditation before subjecting the documents concerned to final revision. The two categories 'Transparency' and 'Module description (editorial)' together account for one-fifth (20%) of concerns raised.

The 'Academic feasibility' category covers defects associated with calls for better organisation of examinations (such as with regard to examination workload). In many cases, the structure of a study programme is to be revised with regard to workload (such as with a view to part-time study options) or to a risk of exceeding the standard period of study. Defects

<sup>26</sup> This accords with the findings of the thematic analysis by AQAS.

relating to one examination per module are not included here as they comprise a category of their own.

The 'Facilities' category covers human, material and spatial resources in both quantitative and qualitative terms. If a condition relates to defects in terms of both material and human resources, it is not counted twice (see Challenge 5, Section 5.2, p. 12). Policies with personnel development measures are stipulated so infrequently that there was found to be no need to subdivide criterion 2.7 for the analysis. With regard to human resources-related defects, on the other hand, higher education institutions are frequently required to demonstrate that vacant professorships have been filled (or at least suitably substituted).

Concerns in the 'crediting/recognition' category frequently relate to the need to incorporate, in examination regulations, rules on recognition in accordance with the Lisbon Recognition Convention or on the crediting of prior learning in accordance with resolutions of the Standing Conference. The frequency of conditions relating to crediting rules may relate to the fact that the Accreditation Council, in consultation with the Standing Conference, resolved in February 2014 to temporarily suspend the imposition of conditions in that connection until the end of 2014 "in order to give higher education institutions more time for implementation given the potential substantive complexity of the rules involved"<sup>27</sup>. The accreditations included in the analysis relate to precisely the period (1 January 2015 onwards) when there may have been an increase in such conditions after that suspension expired. Although no valid conclusion can be inferred in this regard, a connection is indeed plausible, especially since the Accreditation Council's interpretation guidance specified the cases in which conditions were to be imposed.

As to their practice regarding the wording of conditions, it should be mentioned here that some agencies impose separate conditions relating to crediting and recognition, even in the accreditation of one and the same study programme<sup>28</sup>. Other agencies combine these in a single condition, in some cases with other respects in which examination regulations require revision.

Conditions concerning quality assurance relate in some cases to the provision of statistical data and the regularity and detail level of surveys (such as graduate questionnaire surveys).

These mainly call for systematisation and for it to be specified that, and in what manner, the survey findings are to be used in revising study programmes.

---

<sup>27</sup> See Accreditation Council circular, "*Anrechnung außerhochschulisch erworbener Kenntnisse*" (Crediting of prior learning) dated 19 December 2014, [http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/AR\\_Rundschreiben\\_Anrechnung.pdf](http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Sonstige/AR_Rundschreiben_Anrechnung.pdf)

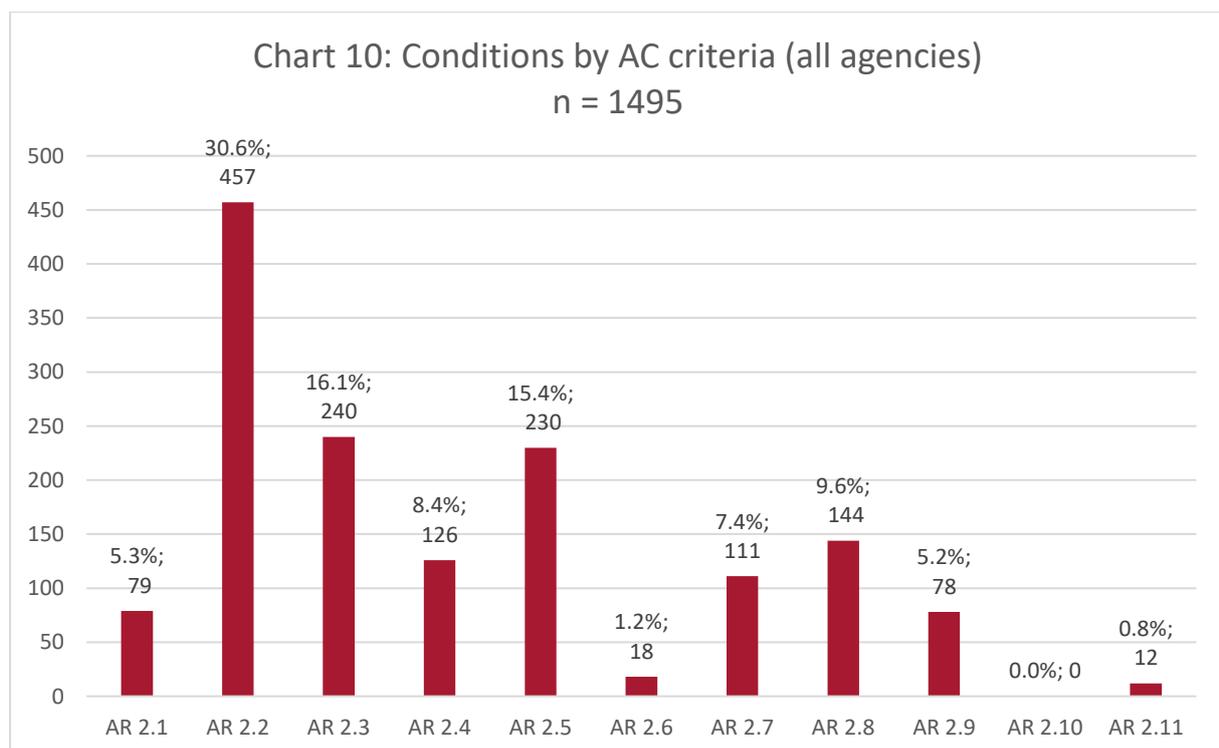
<sup>28</sup> Agencies B, E and H.

Defects concerning a study programme concept frequently relate to the need for consistency between the name, content and educational objectives of the study programme, and less frequently also to (substantive) revision of the study programme structure, the provision of further details on a number of modules, making a (partial) study programme’s academic profile more distinct, or substantive revision of all documents relating to the study programme.

These top seven categories account for over half of concerns raised (52.7%). As some of these categories relate to a subcriterion and others to an entire criterion (2.4 Academic feasibility; 2.7 Facilities), it is useful to take a look at how all categories are distributed across the AC criteria.

### 6.2.2 Frequency of categories relative to the AC criteria

Categorising concerns relative to Accreditation Council Criteria results in the following chart:



It can be inferred that the objectives and academic profile of study programmes in most accreditations are verifiable; the most frequently cited defects relate to the Common Guidelines. Concerns are raised in some cases about implementation of the study programme concept and the curriculum, although mostly not with regard to academic content. The same findings are seen in the April 2018 INCHER study<sup>29</sup>.

<sup>29</sup> Steinhardt et al. (INCHER), pp. 26-27.

Compared with other AC criteria, the academic feasibility criterion is identified as a concern less frequently than may appear from Section 6.2.1. The second most frequent category, 'academic feasibility', and also the 'facilities' category, are not divided into subcriteria (unlike, for example criterion 2.5). This is because the conditions, or the concerns raised in them, could only be partly matched on the basis of their wording to the subcriteria (as potential categories). Conditions relating to 'one examination per module' (which were also frequently imposed in connection with AC criterion 2.4) are not included here; these comprise a separate category with a frequency of 3.3% that is assigned in Chart 10 to AC Criterion 2.5. The challenges referred to in Section 4 should also be borne in mind here. For example, concerns relate less frequently to criterion 2.4 than to criteria 2.2, 2.3, 2.5 and 2.8.

This study found no concerns raised in connection with Criterion 2.10 of the Rules; this is unsurprising, as Criterion 2.10, which relates to study programmes with specific profile attributes, merely states that the "aforementioned criteria and rules of procedure have to be applied"<sup>30</sup>. Categorising concerns without knowing that a study programme is a study programme with a specific profile attribute automatically results in the concerns being assigned to other criteria. An analysis with a 'specific attributes' structure variable could provide further insight here.

That twice as many concerns are raised in relation to criterion 2.2 than in relation to the next most frequent criterion follows directly from the fact that the criterion relates to the entirety of the Standing Conference's Common Guidelines (see Challenge 1, Section 5.2). These contain a large number of individual stipulations, which can lead to a large number of related concerns. The categories developed from these are based on formal requirements where noncompliance is unquestionably a defect. As Steinhardt et al. also pointed out in the INCHER study, formal criteria are "inter-subjectively verifiable and [enable] consensus within the review panel"<sup>31</sup>.

#### Frequency according to initial accreditation and reaccreditation

Looking now at the frequency of concerns in relation to initial accreditation versus reaccreditation (see Charts 10 and 11), it is clear that the most frequent concerns are those relating to the 'Module description (editorial)' category, irrespective of whether it is a case of initial accreditation or reaccreditation. The remaining six categories are divided among initial accreditations and reaccreditations (see Charts 10 and 11). An additional 'Study hours/CP'

---

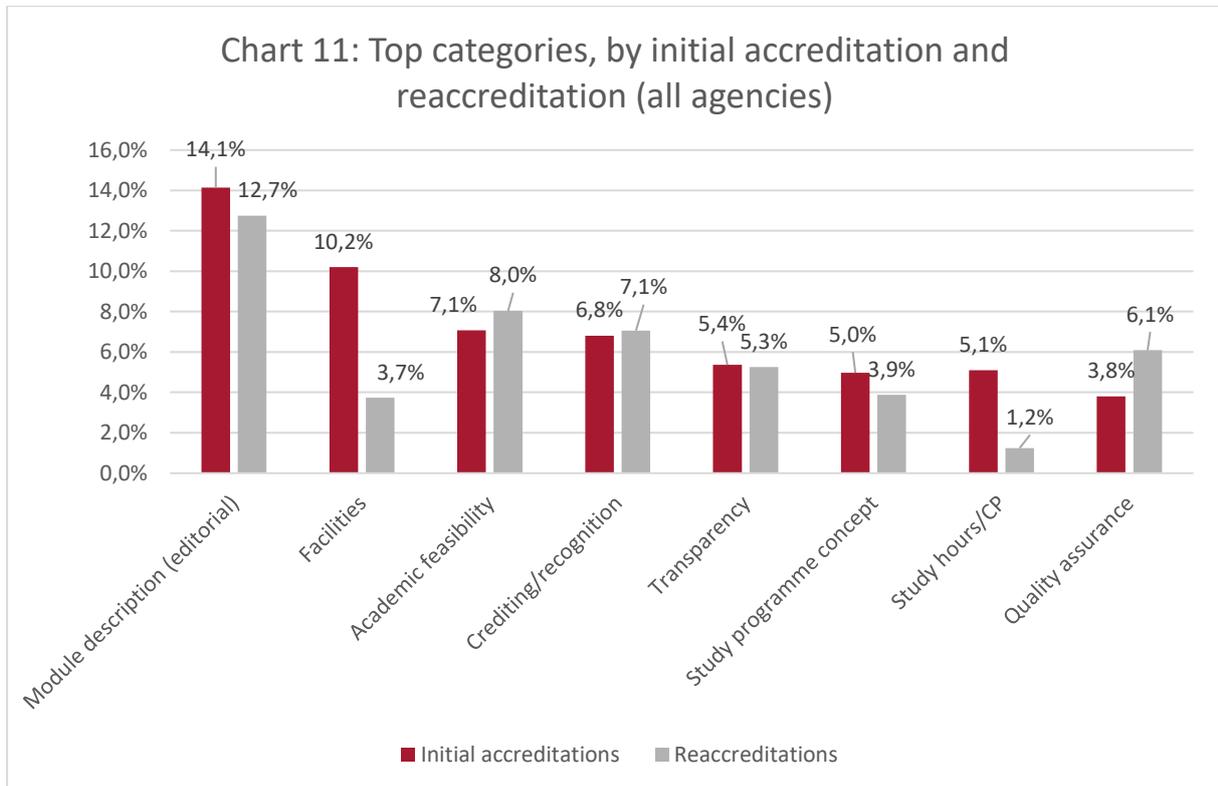
<sup>30</sup> See *Rules*, p. 13.

<sup>31</sup> Steinhardt et al. (INCHER), p. 27.

category (for workload) appears in the list for initial accreditations and a ‘Quality assurance’ category for reaccreditations.

The ‘Facilities’ and ‘Study hours/CP’ categories occur significantly more frequently for initial accreditations than for reaccreditations; the reverse is true for the ‘Quality assurance’ category<sup>32</sup>.

5



Looking then at the percentages of initial accreditations and reaccreditations within each category (see Table 5), it is seen that they only differ significantly for the ‘Facilities’ and ‘Quality assurance’ categories.

<sup>32</sup> The findings of the INCHER study and this study also confirm each other on this point.

Category/concern	Initial	Reaccreditations
<b>Total</b>	<b>51.1%</b>	<b>48.3<sup>33%</sup></b>
1) Module description (editorial)	50.7%	49.3%
2) Academic feasibility	42.9%	56.3%
3) Facilities	70.3%	27.9%
4) Crediting/recognition	48.6%	51.4%
5) Transparency	47.1%	52.9%
6) Quality assurance	37.2%	62.8%
7) Study programme concept	55.9%	44.1%

Table 5: Percentages for initial accreditations and reaccreditations

The fact that defects relating to facilities are found more frequently in initial accreditations than in reaccreditations stands to reason.

The explanation for the greater frequency of quality assurance-related defects found in reaccreditations may be that “Results of quality management internal to the Higher Education Institution are taken into consideration in the further developments of the study programme” (Rules, criterion 2.9). In most cases, results of internal quality management are not yet available at the time of initial accreditation. The frequency figure for related conditions is nevertheless non-zero. This is because not all initial accreditations are performed before a study programme begins. Some are done after a study programme has been up and running for a period of time, so it is quite possible for conditions to be imposed in this regard.

### 6.2.3 Frequency of categories among agencies

Comparing among agencies, the top five categories at the various agencies are almost all found in the top seven categories overall (shown in Chart 9).

The charts showing the top five<sup>34</sup> categories for each agency (relative to the number of concerns raised by the agency) are presented in the [Annex](#) (Charts 12-19).

There are clear differences with regard to the top five categories as a percentage of the total number of concerns raised. This ranges from 41.5% (Agency A) to 60.9% (Agency H). Given the high level of diversity between agencies, further subdivision is not worthwhile for the purpose of this analysis with over 50% ‘other’ categories.

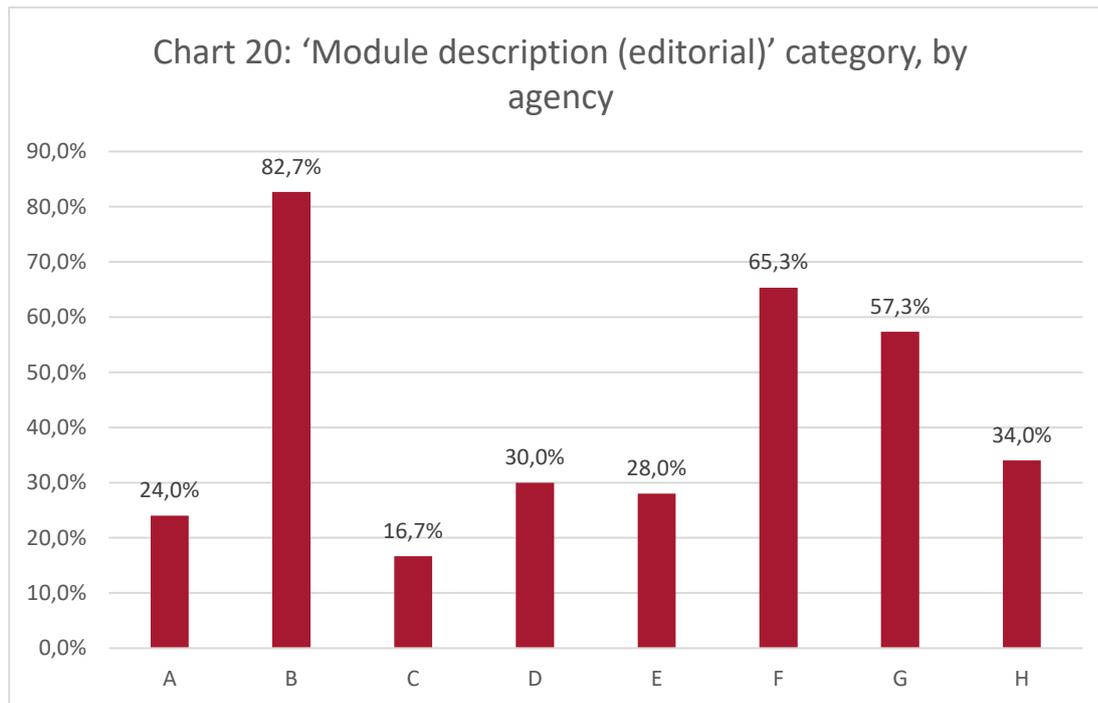
It is unsurprising that many agencies’ top five categories overlap with the top seven overall (see Section 6.2.1). Other categories among agencies’ top five include ‘Study hours/CP’ (A),

<sup>33</sup> Percentages failing to add up to 100% result from study programmes for which it is not known whether they were undergoing initial accreditation or reaccreditation. See Footnote 18.

<sup>34</sup> In two cases (Agency A and Agency D), the top five should strictly take in six categories as Agency A had a tie for fifth place and Agency D a tie for fourth place. The two categories concerned were not included to avoid statistical distortion.

'Publication' and 'Type of examination' (B), 'Thesis duration' (C), 'Modularisation' (D), 'Examination system (legal verification)' (E), 'ECTS grade' (E and F), 'Diploma supplement' (F) and 'One examination per module' (G).

5 For some categories, the agencies differ considerably in terms of the percentage of study programmes to which the category applies. By way of example, this is illustrated in Chart 20 for the 'Module description (editorial)' category.



On average, Agency B raised a concern involving editorial revision of the module description for 82.7% of study programmes. The equivalent figure for Agency C is just 16.7%.

10 The causes for this are manifold and cannot be conclusively identified at this point: It could be related to differences in practice between agencies with regard to the imposition of conditions; other causes could also relate to the size of the higher education institution, the academic discipline<sup>35</sup>, etc. Analysis of additional structure variables could be helpful here. It would also be interesting to see how the agencies differ as to which concerns result in conditions and which ones result in recommendations. One thing that stands out on cursory inspection of how recommendations are worded is that similar wording (in this case in the 'Module description (editorial)' category) is formulated as a condition by one agency and as a recommendation by another. In some cases, this even applies to conditions and recommendations from one and the same agency.

15

<sup>35</sup> Suchanek et al. concluded in their study that these structure variables (size of higher education institution and academic discipline) have an effect (see pp. 38 ff.).

This section having provided an overview of the frequency of concerns raised in a comparison among agencies, the next section shows how identified concerns could be categorised on the basis of the new legal framework and the Specimen Decree.

#### **6.2.4 Formal versus academic concerns under the Specimen Decree**

5 The Specimen Decree adopted by the Standing Conference on 7 December 2017 divides accreditation requirements into formal and academic criteria (see Part 2, sections 3-10 and Part 3, sections 11-21 of the Specimen Decree). The formal criteria essentially correspond to the Common Guidelines and will in future be assessed by agencies and summarised in a 'formal report'. "This discharges the experts on the review panel from assessing purely  
10 formal criteria"<sup>36</sup>. The reviewers are responsible for assessing academic criteria, although "the formal report is not binding for the review panel"<sup>37</sup>. Conditions should "only come into question in future in exceptional cases"<sup>38</sup>.

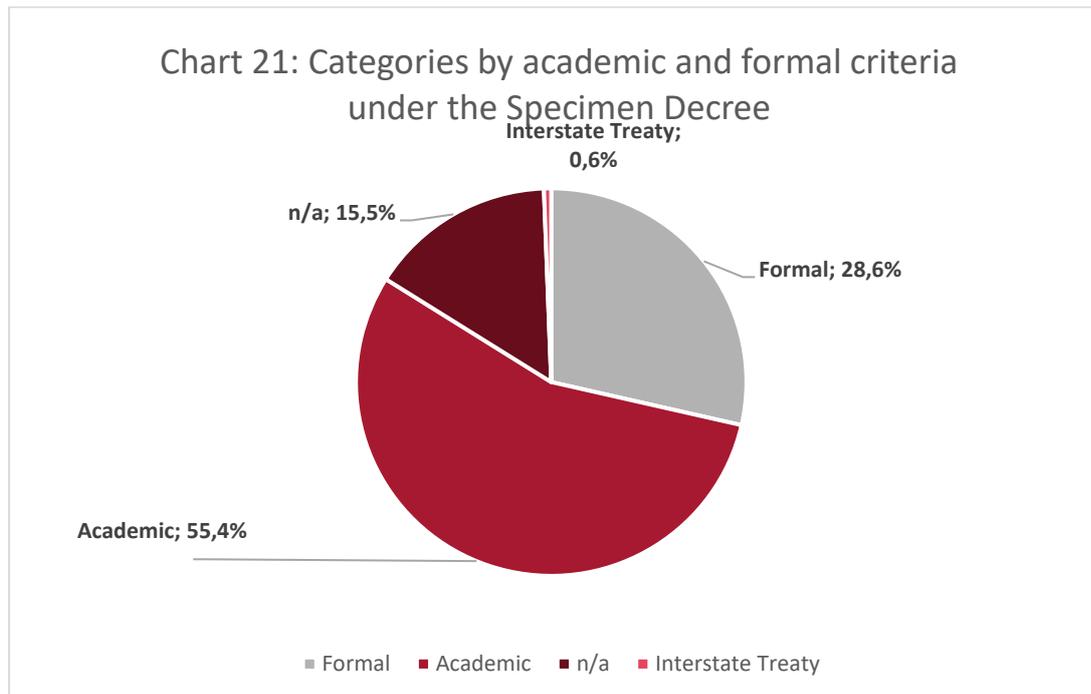
These stipulations did not yet apply to the accreditations included in the analysis here. A question of relevance to future accreditation practice, however, is whether or not conditions  
15 like those covered in this study can be dispensed with. To this end, the selected categories were assigned to the formal and academic criteria under the Specimen Decree (see Table 8 in the Annex). A few criteria relate to requirements that are no longer explicitly mentioned in the Specimen Decree, as they are already contained in the Interstate Treaty ('Competence for qualified employment'; 'Competence for involvement in society'). The fourth (and the third  
20 most frequent) subset comprises categories that no longer have a counterpart in the Specimen Decree/Interstate Treaty (such as 'Transparency', 'Publication' and 'Examination system (legal verification)').

---

<sup>36</sup> Explanatory memorandum to the Specimen Decree, p. 33.

<sup>37</sup> Ibid., p. 33.

<sup>38</sup> Ibid., p. 34.



As shown in Chart 21, over half (55.4%) of concerns raised relate to academic criteria and somewhat more than a quarter (28.6%) to formal criteria. Just under one-sixth (15.5%) of concerns have no equivalent in the Specimen Decree and 0.6% relate to the Interstate Treaty without also being expressly referred to in the Specimen Decree. As the categories that relate to the Interstate Treaty are also academic in nature, they increase the total percentage of concerns relating to academic criteria to 56%. It should be emphasised, however, that only 1.4% of all concerns raised relate to the academic domain in a narrower sense or to academic frames of reference (see Table 6)<sup>39</sup>; most relate to academic feasibility (8.4%), facilities (7.4%), recognition/crediting<sup>40</sup> (7.2%), quality assurance (5.2%) and study programme concept (4.5%), as described in Section 6.2.1. The study programme concept can be characterised as belonging to the 'academic domain in a broader sense'.

The one noteworthy aspect here is the placement of conditions in this study in the 'Modularisation' category (total frequency: 3%), which applied when a condition related to the academic design of a module. This category, too, was therefore grouped with the academic criteria and not – as in section 7 of the Specimen Decree (Modularisation) – with the formal criteria. This demonstrates how it is not always possible to maintain a strict division between formal and academic criteria.

The 'Crediting/recognition' category is also not clear-cut under the Specimen Decree. As the explanatory memorandum states that recognition ('Lisbon') comes under section 12 of the

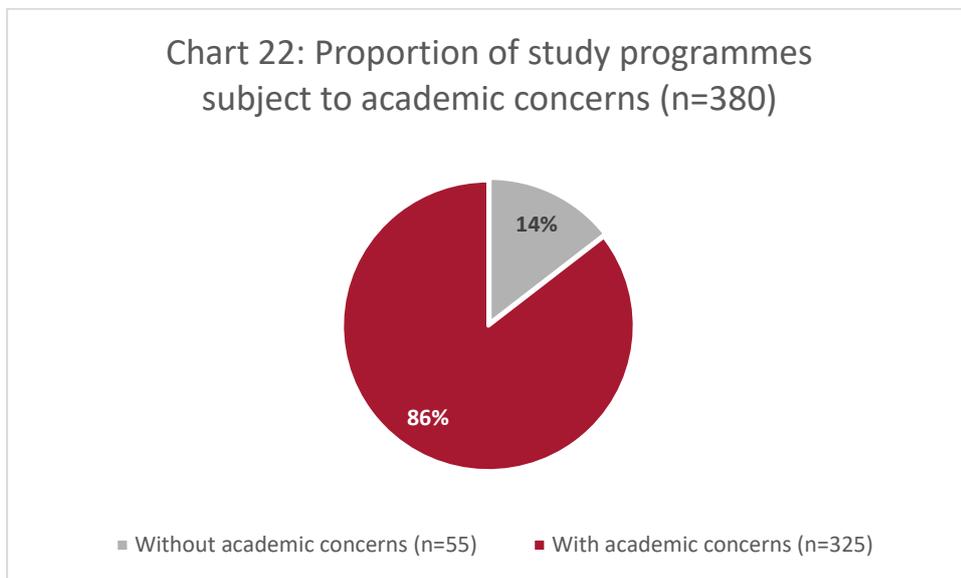
<sup>39</sup> Steinhardt et al. come to a similar conclusion; op. cit., p. 26-27.

<sup>40</sup> See footnote 45 re categorisation.

Specimen Decree (making it an academic criterion), the entire 'Recognition/crediting' category is assigned to academic concerns – in the knowledge that crediting of prior learning is not covered by the Specimen Decree. Retroactively splitting the category made little sense: In many cases, a single condition addresses both aspects (crediting and recognition).

- 5 The assignment of categories to provisions of the Specimen Decree and of the Interstate Treaty is shown in the [Annex](#), Table 8.

Finally, it was assessed what proportion of study programmes were subject to academic concerns. As Chart 22 shows, just 14% of study programmes were subject exclusively to formal concerns.



## 7 Summary and discussion

For all agencies, the proportion of (partial) study programmes accredited without conditions has been found to be 16%. The proportion for reaccreditations is 64%. The fact that more study programmes are accredited without conditions upon reaccreditation could be evidence of successful implementation of requirements (whether originating from the Accreditation Council or the Standing Conference) prior to reaccreditation. This could result in increasing numbers of study programmes being accredited without conditions in the years ahead.

For study programmes where concerns were raised, an average of 3.3 conditions were imposed per study programme; there was no difference here between initial accreditations and reaccreditations. In fact, just over half of all conditions were imposed in reaccreditations (50.2%, see Chart 7).

Comparing among agencies, six of the eight agencies have been shown to issue the majority of reaccreditations without conditions. Just two agencies displayed different results (each with over 70% initial accreditations among study programmes accredited without conditions). With regard to the average number of conditions per study programme, there were large differences between agencies and also between initial accreditations and reaccreditations within individual agencies. As was the case with most inter-agency comparison findings that revealed large variations, analysis of additional structure variables could point towards explanatory factors here (such as agency subject specialisation, private/public higher education institution, special form of study programme, etc.). It nevertheless appears plausible that much of the variance is due to differences in agency decision-making practices which evolved independently of each other over the years and which the Accreditation Council's monitoring activities, limited as they were to small samples, evidently did not or were unable to diagnose.

It is true that these figures indicate a trend in quality; as reaccreditations increase as a percentage of all accreditations, it is to be expected that the percentage of study programmes accredited without conditions will continue to rise. However, it has also become clear that (looking solely at accreditations where conditions were imposed) reaccreditations and initial accreditations do not differ in terms of the average number of conditions (3.3 conditions per study programme in either case). (Partial) study programmes with the greatest numbers of conditions were exceedingly rare; almost 90% of accreditations have a maximum of five conditions, with an absolute maximum of 11 for initial accreditations and nine for reaccreditations. Only in less than 7% of accreditations of (partial) study programmes were seven or more conditions imposed.

To obtain specific conclusions with regard to defects, an analysis was made of the defects identified (concerns raised). It became clear that some of the conditions included several concerns. *Comparing among agencies*, marked differences in practice emerged regarding the wording of conditions; whereas one agency never combined multiple concerns in a single condition, another averaged 1.47 concerns per condition imposed.

The review reports were also found to differ significantly in structure (see p. 7), making them difficult to compare (for example for members of the public or laypersons). Future review reports will no longer differ in structure, however, as section 24 (3) sentence 4 and section 24 (4) sentence 5 of the Specimen Decree require the formal report and the review report to be prepared on the basis of a structure specified by the Accreditation Council and the Accreditation Council has already adopted and published a report structure for programme accreditation.<sup>41</sup> The report structure was prepared taking into account agencies' established 'good practice' and with the agencies involved in its compilation.

The study has highlighted the great amount of effort required from agencies to keep data up to date in the database of accredited study programmes: For example, if review reports (and hence their file names) change when resolutions are added on the fulfilment of conditions, the link also has to be updated in the Accreditation Council's database. The Accreditation Council will bear this in mind itself when publishing future review reports with resolutions.

With regard to conclusions on defects/concerns, it can be noted *for all agencies* that (editorial) revision of a module description is by far the most frequent concern raised (14.2%). The next most frequent concerns related to academic feasibility (8.4%), facilities (7.4%), crediting/recognition (7.2%), transparency (5.8%), quality assurance (5.2%) and study programme concept (4.5%). These seven categories account for over half of concerns raised (52.9%).

It was seen that facilities were raised as a concern with above-average frequency in initial accreditations (very rarely, among other things, in relation to staffing issues), while quality assurance (or the quality assurance policies) tended more to be raised as a concern in reaccreditations.

*Comparing among agencies*, the top five categories at the various agencies are almost all found in the top seven categories *for all agencies*. Here, too, however, there were a number of agency-specific differences. A particularly striking difference was in the percentage of concerns per agency accounted for by the top five categories.

---

<sup>41</sup> The report structures ('Raster') are published at [www.akkreditierungsrat.de/de/antragstellung/antragstellung](http://www.akkreditierungsrat.de/de/antragstellung/antragstellung)

In departure from what was originally planned as part of the monitoring portfolio, the study did not include an analysis of recommendations; as a result, there was also no comparison of agencies' practice with regard to which defects they classified as conditions and which ones as recommendations. In addition to comparative figures for recommendations per study programme or conditions per study programme, it would doubtless also have been interesting to see which agencies 'only' gave a recommendation where others expressed a concern with regard to the same (or at least a similar) defect. How the Accreditation Council decides on this in future and where this boundary lies will have to be determined in the course of its administrative practice.

10 The new legal framework relegated the question of applicability of the Rules to the background. With publication of the Specimen Decree, the focus shifted to the division made in it between formal and academic criteria, and the concerns analysed in this study were categorised according to that division. It was seen that just over half of concerns (55.4% or 56%) could be assigned to academic criteria and just under 30% of concerns related to  
15 formal criteria. Just 14% of study programmes accredited with conditions exclusively had defects of a formal nature.

It should be emphasised here that about one-sixth of concerns related to matters that no longer constitute defects under the new legal basis (→ transparency). While accreditation reports (formal reports plus review reports) are to be published in the Accreditation Council  
20 database, there are no longer any requirements on transparency and publication of relevant documents within a study programme.

A further interesting aspect is raised by Steinhardt et al. in EIQSL (INCHER). If reviewers can more readily agree on formal criteria<sup>42</sup> (and more formal defects consequently result in conditions being imposed) but not, or not easily, on substantive requirements (and no  
25 conditions are consequently imposed as a result), it remains to be seen what effect this will have in the new system. Will reviewers – with their workload lessened on account of the formal report to be prepared by the agency – have more time for discussion regarding academic criteria? That would be to be expected. According to Steinhardt et al., it remains an open question whether this will lead to more agreement (and hence possibly more conditions  
30 being imposed).

There is debate about whether it is unrealistic for the states to call in the Specimen Decree for conditions to be imposed in future “only [...] in exceptional cases”. It remains to be observed how this is put into action; it is not possible to make a prediction from the material

---

<sup>42</sup> See Steinhardt et al. (INCHER), p. 27.

available. The new system is intended to bring with it a change in thinking: “The Standing Conference of the Ministers of Education and Cultural Affairs assumes that the higher education institutions independently and nation-wide focus on the quality of the study programme when designing their study programmes.”<sup>43</sup> The agencies have an important role to play in supporting higher education institutions on the way to designing study programmes that meet the requirements of the Specimen Decree (a ‘feedback loop’ for defect elimination or, perhaps better, quality improvement). Clarification of the rules and criteria can also help ensure more consistent decision-making.

One of the tasks and major challenges faced by the Accreditation Council will be to develop a body of ‘decision-making practice’ over the months ahead that formulates requirements, among other things in the form of conditions imposed in accreditation. It is expected that the Accreditation Council will initially be confronted with the task of taking a range of variously worded (being from different agencies) proposals for conditions and developing from them its own practice regarding the wording of conditions, which will assuredly measure up to the administrative law precepts of certainty and verifiability.

Whether the objective of “doing away with the agency standards which were often very different in the past”<sup>44</sup> is achieved (and the present study, too, finds major differences between agencies) will remain to be seen with a view to the process of preparing the accreditation reports that are coming up for decision. The Accreditation Council should also bear this in mind in developing its ‘decision-making practice’, checking for inter-agency differences in such submissions pending decision and whether any such differences make it more difficult to maintain consistency between decisions.

Be that as it may, it remains to be seen whether accreditations (or most accreditations) can be issued without conditions as envisaged by the states as the architects of the Specimen Decree. This will depend not least on how the working relationship between higher education institutions and agencies develops through to the point when the accreditation reports are finalised (with a view to the quality improvement or defect elimination ‘feedback loop’ mentioned above).

Where any suggested wording for conditions is submitted to the Accreditation Council in future, it will have to be borne in mind that accreditations are administrative acts and any conditions must be sufficiently certain, verifiable and supported with reasons. In light of this, the most frequent concern raised in the past – editorial revision of the module description –

---

<sup>43</sup> Explanatory memorandum to the Specimen Decree, p. 2.

<sup>44</sup> Explanatory memorandum to the Interstate Treaty, p. 7.

appears too ill-defined. Accreditation reports should clearly show what specific defect such a condition relates to and in what way the imposed condition provides a means of remedying it.

On a general level, the working relationship between agencies, higher education institutions and the Accreditation Council must first become established with a view to the new division of responsibilities.

5

## 8 Annex (tables, additional charts and references)

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

	Categories: analysis by individual category	AC criterion	Total	Percent
1.	Module description (editorial)	AC 2.2	213	14.3%
2.	Academic feasibility	AC 2.4	126	8.4%
3.	Facilities	AC 2.7	111	7.4%
4.	Crediting/recognition	AC 2.3	107	7.2%
5.	Transparency	AC 2.8	87	5.8%
6.	Quality assurance	AC 2.9	78	5.2%
7.	Study programme concept	AC 2.3	68	4.6%
8.	Publication	AC 2.8	58	3.9%
9.	Examination system (legal verification)	AC 2.5	52	3.5%
10.	Qualification goals (general)	AC 2.1	49	3.3%
11.	One examination per module	AC 2.5	49	3.3%
12.	Study hours/CP	AC 2.2	48	3.2%
13.	Modularisation	AC 2.2	45	3.0%
14.	ECTS grade	AC 2.2	42	2.8%
15.	Entry/admission	AC 2.3	41	2.7%
16.	Examinations competence-oriented	AC 2.5	38	2.5%
17.	Examination regulations entered into force	AC 2.5	33	2.2%
18.	Diploma supplement	AC 2.2	32	2.1%
19.	Types of examination	AC 2.5	29	1.9%
20.	Expertise/subject-specific reference framework	AC 2.1	21	1.4%
21.	Qualifications Framework	AC 2.2	18	1.2%
22.	Examination system	AC 2.5	18	1.2%
23.	Cooperation	AC 2.6	18	1.2%
24.	Minimum module size 5 ECTS	AC 2.2	17	1.1%
25.	Equal opportunities/gender equity	AC 2.11	12	0.8%
26.	Entry/admission (continuing education)	AC 2.3	11	0.7%
27.	Examination regulations (general)	AC 2.5	11	0.7%
28.	Competence for qualified employment/employability	AC 2.1	7	0.5%
29.	Thesis duration	AC 2.2	7	0.5%
30.	Thesis ECTS	AC 2.2	7	0.5%
31.	ECTS	AC 2.2	6	0.4%
32.	Standard period of study	AC 2.2	6	0.4%
33.	Equal opportunities for students with disabilities	AC 2.3	6	0.4%
34.	Name of degree/indication of study programme type	AC 2.2	5	0.3%
35.	Requirements for award of ECTS credits	AC 2.2	4	0.3%
36.	Qualifications Framework (BA vs. MA)	AC 2.2	3	0.2%
37.	Certificate	AC 2.2	3	0.2%
38.	Selection procedure	AC 2.3	3	0.2%
39.	Competence for involvement in society	AC 2.1	2	0.1%

40.	Mobility (window)	AC 2.3	2	0.1%
41.	Practical components	AC 2.3	2	0.1%
42.	states-specific requirements	AC 2.2	1	0.1%

**Table 7: Overview of categories, sorted by AC criteria 2.1-2.11**

AC criterion	Categories	Total	Percent
AC 2.1	Qualification goals (general)	49	3.3%
AC 2.1	Competence for involvement in society	2	0.1%
AC 2.1	Competence for qualified employment/employability	7	0.5%
AC 2.1	Expertise/subject-specific reference framework	21	1.4%
<b>AC 2.1</b>	<b>Total</b>	<b>79</b>	<b>5.2%</b>
AC 2.2	Name of degree/indication of study programme type	5	0.3%
AC 2.2	Study hours/CP	48	3.2%
AC 2.2	Thesis duration	7	0.5%
AC 2.2	Diploma supplement	32	2.1%
AC 2.2	ECTS	6	0.4%
AC 2.2	Thesis ECTS	7	0.5%
AC 2.2	ECTS grade	42	2.8%
AC 2.2	Qualifications Framework	18	1.2%
AC 2.2	Qualifications Framework (BA vs. MA)	3	0.2%
AC 2.2	states-specific requirements	1	0.1%
AC 2.2	Minimum module size 5 ECTS	17	1.1%
AC 2.2	Modularisation	45	3.0%
AC 2.2	Module description (editorial)	213	14.3%
AC 2.2	Standard period of study	6	0.4%
AC 2.2	Requirements for award of ECTS credits	4	0.3%
AC 2.2	Certificate	3	0.2%
<b>AC 2.2</b>	<b>Total</b>	<b>457</b>	<b>30.6%</b>
AC 2.3	Crediting/recognition	107	7.2%
AC 2.3	Selection procedure	3	0.2%
AC 2.3	Mobility (window)	2	0.1%
AC 2.3	Equal opportunities for students with disabilities	6	0.4%
AC 2.3	Practical components	2	0.1%
AC 2.3	Study programme concept	68	4.6%
AC 2.3	Entry/admission (continuing education)	11	0.7%
AC 2.3	Entry/admission requirements	41	2.7%
<b>AC 2.3</b>	<b>Total</b>	<b>239</b>	<b>16.0%</b>

<b>AC 2.4</b>	<b>Academic feasibility</b>	<b>126</b>	<b>8.4%</b>
AC 2.5	One examination per module	49	3.3%
AC 2.5	Examinations competence-oriented	38	2.5%
AC 2.5	Types of examination	29	1.9%
AC 2.5	Examination regulations (general)	11	0.7%
AC 2.5	Examination regulations entered into force	33	2.2%
AC 2.5	Examination system (legal verification)	52	3.5%
AC 2.5	Examination system	18	1.2%
<b>AC 2.5</b>	<b>Total</b>	<b>230</b>	<b>15.4%</b>
<b>AC 2.6</b>	<b>Cooperation</b>	<b>18</b>	<b>1.2%</b>
<b>AC 2.7</b>	<b>Facilities</b>	<b>111</b>	<b>7.4%</b>
AC 2.8	Transparency	87	5.8%
AC 2.8	Publication	54	3.6%
<b>AC 2.8</b>	<b>Total</b>	<b>145</b>	<b>9.7%</b>
<b>AC 2.9</b>	<b>Quality assurance</b>	<b>78</b>	<b>5.2%</b>
<b>AC 2.11</b>	<b>Equal opportunities/gender equity</b>	<b>12</b>	<b>0.8%</b>

**Table 8: Overview of the assignment of categories to the Specimen Decree/Interstate Treaty (IT)**

AC criterion	Specimen Decree	Academic/formal	Categories	Total	Per-cent
AC 2.1	Sec. 11 (1) 1	Academic	Qualification goals (general)	49	3.28%
AC 2.1	IT article 2 (3) sentence 1	Academic	Competence for involvement in society	2	0.13%
AC 2.1	IT article 2 (3) sentence 1	Academic	Competence for qualified employment/employability	7	0.47%
AC 2.1	Sec. 13 (1)	Academic	Expertise/subject-specific reference framework	21	1.40%
AC 2.2	Sec. 6	Formal	Name of degree/indication of study programme type	5	0.33%
AC 2.2	Sec. 8 (1) 3	Formal	Study hours/CP	48	3.21%
AC 2.2	Sec. 8 (3)	Formal	Thesis duration	7	0.47%
AC 2.2	Sec. 6 (4)	Formal	Diploma supplement	32	2.14%
AC 2.2	Sec. 8 [(2)]	Formal	ECTS	6	0.40%
AC 2.2	Sec. 8 (3)	Formal	Thesis ECTS	7	0.47%
AC 2.2	/	Formal	ECTS grade	42	2.81%
AC 2.2	Sec. 11 (2)	Academic	Qualifications Framework	18	1.20%

Cross-sectional sample survey on conditions imposed in accreditations

AC 2.2	Sec. 13 (explanatory memorandum)	Academic	Qualifications Framework (BA vs. MA)	3	0.20%
AC 2.2	Sec. 4	Formal	states-specific requirements	1	0.07%
AC 2.2	Sec. 12 (5) 4	Academic	Minimum module size 5 ECTS	17	1.14%
AC 2.2		Academic	Modularisation	45	3.01%
AC 2.2	Sec. 7 (2)	Formal	Module description (editorial)	213	14.25%
AC 2.2	Sec. 3 (2)	Formal	Standard period of study	6	0.40%
AC 2.2	Sec. 7 (3)	Formal	Requirements for award of ECTS credits	4	0.27%
AC 2.2	Implicit in sec. 6 (4)	Formal	Certificate	3	0.20%
AC 2.3	Explanatory memorandum re sec. 12 / IT article 2 (2) sentence 1	Academic <sup>45</sup>	Crediting/recognition	107	7.16%
AC 2.3	Sec. 10 and 16	Formal	Selection procedure	3	0.20%
AC 2.3	Sec. 12 (1) 4	Academic	Mobility (window)	2	0.13%
AC 2.3	Sec. 15	Academic	Equal opportunities for students with disabilities	6	0.40%
AC 2.3	Sec. 12 (1) 3	Academic	Practical components	2	0.13%
AC 2.3	Sec. 12	Academic	Study programme concept	68	4.55%
AC 2.3		Formal	Entry/admission (continuing education)	40	2.68%
AC 2.3		Formal	Entry/admission requirements*	11	0.74%
AC 2.4	Sec. 12 (5)	Academic	Academic feasibility	126	8.43%
AC 2.5	Sec. 12 (5) 4 and 12 (4)	Academic	One examination per module	49	3.28%
AC 2.5	Sec. 12 (5) 4	Academic	Examinations competence-oriented	38	2.54%
AC 2.5	Sec. 12 (4)	Academic	Types of examination	29	1.94%
AC 2.5	Based on sec. 12	Academic	Examination regulations (general)	11	0.74%
AC 2.5		n/a	Examination regulations entered into force	33	2.21%
AC 2.5		n/a	Examination system (legal verification)	52	3.48%
AC 2.5	Sec. 12 (5) 4	Academic	Examination system	18	1.20%
AC 2.6	section 20	Academic	Cooperation	18	1.20%

<sup>45</sup> Borderline case; assigned in line with Specimen Decree

Cross-sectional sample survey on conditions imposed in accreditations

AC 2.7	Sec. 12 (2) and (3)	Academic	Facilities	111	7.42%
AC 2.8		n/a	Transparency	87	5.82%
AC 2.8		n/a	Publication	54	3.61%
AC 2.9	Sec. 14, 17, 18 and 12 (5) 3	Academic	Quality assurance	78	5.22%
AC 2.11	Sec. 15	Academic	Equal opportunities/gender equity	12	0.80%

**Table 9: Explanation of the categories**

AC criterion	Categories	Explanation of the category (where necessary)	Example
AC 2.1	Qualification goals (general)		<p><i>“The profile of the study programme must be made more distinct. The areas of marketing and sales must be presented more clearly.”</i></p> <p><i>“The programme objectives and learning outcomes must describe where a qualification obtained in a degree programme is positioned from an academic, technical and professional perspective. The study programme objectives must also be published consistently.”</i></p>
AC 2.1	Competence for involvement in society		<p><i>“It must be ensured that the course of study enables students to become involved in society. This educational objective must be suitably reflected both in the overall qualification profile and in the curriculum.”</i></p>
AC 2.1	Competence for qualified employment/employability		<p><i>“It must be elaborated in a clear and robust manner how the fields of employment envisaged for graduates, as stated in the publicly accessible programme description, relate to the social system of developing and emerging countries and where applicable to the social system of industrialised countries.”</i></p>
AC 2.1	Expertise/subject-specific reference framework		<p><i>“The programme objectives and their implementation in the curriculum must be revised in order to bring across the interdisciplinary interplay between mechanical engineering, electrical engineering and computer science that is characteristic of mechatronics.”</i></p>
AC 2.2	Name of degree/indication of study programme type		<p><i>“In addition, the study programme must be marked as continuing education in the study regulations and the term ‘non-consecutive’ must be changed.”</i></p>

Cross-sectional sample survey on conditions imposed in accreditations

AC 2.2	Study hours/CP	Specifies the number of study hours per credit point and that this must be stated in the examination regulations.	<i>"It must be specified with binding effect what student workload is the basis for the award of one credit point."</i>
AC 2.2	Thesis duration		<i>"The Framework Guidelines for the Introduction of Credit Point Systems and the Modularisation of Study Courses in the Common Structural Guidelines of the states for the Accreditation of Bachelor's and Master's Study Courses must be adhered to with regard to the duration of Bachelor's and Master's theses."</i>
AC 2.2	Diploma supplement		<i>"The diploma supplements must provide information on the objectives, targeted learning outcomes and structure of the study programmes and must in particular address the specifics of dual study programmes."</i>
AC 2.2	ECTS		<i>"The number of ECTS credits awarded for the study programme must be clearly specified." "The module structure must be revised so that no more than 60 ECTS points are awarded per academic year."</i>
AC 2.2	Thesis ECTS		<i>"The maximum number of credits for the Bachelor's thesis is 12."</i>
AC 2.2	ECTS grade		<i>"In addition to the final grade, statistical data according to the ECTS Users' Guide must be stated in order to assess the individual degree qualification."</i>
AC 2.2	Qualifications Framework		<i>"The study programme must fully comply with the requirements of the Qualifications Framework for German Higher Education Qualifications in the areas of Consolidating Knowledge, Instrumental Competences and Systemic Competences".</i>
AC 2.2	Qualifications Framework (BA vs. MA)		<i>"When using Bachelor's modules in the Master's programme, it must be ensured that the qualification level specified for the respective degree level is maintained."</i>

Cross-sectional sample survey on conditions imposed in accreditations

AC 2.2	states-specific requirements		<i>"Section 2, 'Requirements', of the Enrolment Regulations must be revised in line with the current Land-specific stipulations on admission to higher education."</i>
AC 2.2	Minimum module size 5 ECTS*		<i>"The modularisation is to be revised so that modules are usually completed within a single semester or academic year and are usually worth five or more ECTS credits. Reasons must be given for any departures from this in each case."</i>
AC 2.2	Modularisation		<i>"The modularisation should be revised so that related teaching and learning units are usually combined as modules." "The concept for the 'thesis practical project' module must be revised. The module content and module title must match." "All modules must be thematically and chronologically complete, self-contained study units."</i>
AC 2.2	Module description (editorial)	Editorial revision of the module description not resulting in any change in the module itself.	<i>"The module manual must be revised to make visible the link between the modules." "The module manual must be revised to bring out the main areas of academic focus in the study programme." "The module manual must state the student workload and qualification goals for all sub-modules."</i>
AC 2.2	Standard period of study		<i>"The standard period of study must be corrected in each case in the examination regulations and the study regulations."</i>
AC 2.2	Requirements for award of ECTS credits		<i>"The department must describe the requirements for the award of credit points in the practical project."</i>
AC 2.2	Certificate		<i>"The degree certificate, diploma supplement and transcript of records must be produced and submitted."</i>

Cross-sectional sample survey on conditions imposed in accreditations

AC 2.3	Crediting/recognition*	Conditions governing the crediting of prior learning <b>and/or</b> study and examination credits obtained externally.	<i>“Recognition of externally obtained study and examination credits must be transparently incorporated in the study and examination regulations in accordance with the Lisbon Convention (competence-oriented recognition; reversal of the burden of proof). It must also be specified that competencies acquired outside of higher education can be recognised commensurate to a maximum of 50% of the study programme.”</i>
AC 2.3	Selection procedure*		<i>“The higher education institution must specify the form and content of the selection procedure in binding regulations.”</i>
AC 2.3	Mobility (window)		<i>“The higher education institution must ensure that it is possible to spend periods at other higher education institutions and in practice without loss of time.”</i>
AC 2.3	Equal opportunities for students with disabilities*		<i>“In the aptitude assessment procedure for applicants without a first degree, the higher education institution must stipulate on equal opportunities arrangements for students with disabilities.”</i>
AC 2.3	Practical components		<i>“A policy must be submitted for the implementation, regulation and supervision of practical course components.”</i>
AC 2.3	Study programme concept		<i>“The study programme name and curriculum must be made to match.” “The higher education institution must increase the proportion of international content.” “Qualification goals and curriculum content of the available Master’s courses (Master’s profiles) must be better coordinated with a view to the applicable set of mandatory and elective courses.”</i>
AC 2.3	Entry/admission (continuing education)*		<i>“Proof of at least one year’s professional experience must be made mandatory in the admission requirements.”</i>

Cross-sectional sample survey on conditions imposed in accreditations

AC 2.3	Entry/admission requirements*		<p><i>“The admission requirements for the study programme must be clarified with regard to the classification of prior knowledge in political science and law.”</i></p> <p><i>“Admission requirements that go beyond the legal requirements must be specified for the Bachelor’s programme and stated as mandatory.”</i></p>
AC 2.4	Academic feasibility		<p><i>“The structure of the study programme must be revised to make the workload attached to the study programme transparent and plausible.”</i></p> <p><i>“The higher education institution must develop an approach for measuring student workload.”</i></p> <p><i>“The final phase must be designed in such a way that the standard period of study is not exceeded for reasons of study organisation.”</i></p>
AC 2.5	One examination per module*		<p><i>“The Business Administration Fundamentals module must conclude with a module examination.”</i></p> <p><i>“The examination system must be revised. In doing so, it must be ensured that as a rule there is only one examination per module.”</i></p>
AC 2.5	Examinations competence-oriented	Examinations must be competence-oriented.	<i>“The module examinations must be designed to be competence-oriented, in particular to ensure the attainment of the Master’s level.”</i>
AC 2.5	Types of examination	Specification and variation of examination types; type of examination to be geared to learning outcomes	<p><i>“All types of examination used in the study programme must be specified in the study and examination regulations.”</i></p> <p><i>“The higher education institution must ensure that students in both the Bachelor’s and Master’s programmes experience variation in the types of examination.”</i></p>
AC 2.5	Examination regulations (general)*	Amendments to examination regulations not otherwise specified; stipulation of exceptions for examinations	<i>“The examination regulations must be published with the changes described in the statement of 29 May 2015.”</i>

Cross-sectional sample survey on conditions imposed in accreditations

AC 2.5	Examination regulations entered into force		<i>"The higher education institution must demonstrate that the examination regulations attached to the accreditation documents have entered into force."</i>
AC 2.5	Examination system (legal verification)		<i>"The study and examination regulations must be subjected to legal review." "Documentation must be presented for the legal review of the special examination regulations for the partial study programme."</i>
AC 2.5	Examination system	Further requirements for the examination system that could not be assigned to any of the above categories under AR 2.5 and that relate to examination arrangements.	<i>"The modularisation concept must be revised with a view to a cumulative examination system and <u>module examinations implemented throughout</u>." "Any special provision for examinations (such as bonus points) must be clearly [...] presented."</i>
AC 2.6	Cooperation*		<i>"Cooperation between the Dresden College of Music and Technische Universität Dresden must be established in a contractual agreement." "The higher education institution must establish collaborations with all hospitals involved in transfer phases in a contractual agreement."</i>
AC 2.7	Facilities	Resources, without distinguishing between human, material or spatial resources.	<i>"Notification must be given that the advertised 0.6 FTE professorship has been filled before the study programme commences."</i>
AC 2.8	Transparency	Something that does not need to be changed in substance nevertheless has to be made clearer or consistent. Provision of English-language documents.	<i>"All examinations to be completed in the study programme must be clearly stated." "Inconsistencies [...] must be corrected." "The study programme title must be made consistent in documents relating to it."</i>

AC 2.8	Publication	Information on the study programme must be published.	<i>"The qualification goals, module manuals and other programme-related information must be made available to all interested parties."</i>
AC 2.9	Quality assurance	A policy is to be developed for regular systematic analysis of data on the study programme.	<i>"Statistical data on academic success, student workload etc. must be provided and analysed for the further development of the study programme." "Student workload must be systematically analysed and included in the further development of the study programmes."</i>
AC 2.11	Equal opportunities/gender equity		<i>"A diversity policy must be developed and implemented to promote equal opportunities." "A gender equity and equal opportunities policy must be established."</i>

**Additional charts**

Additional charts for section 6.2.3:

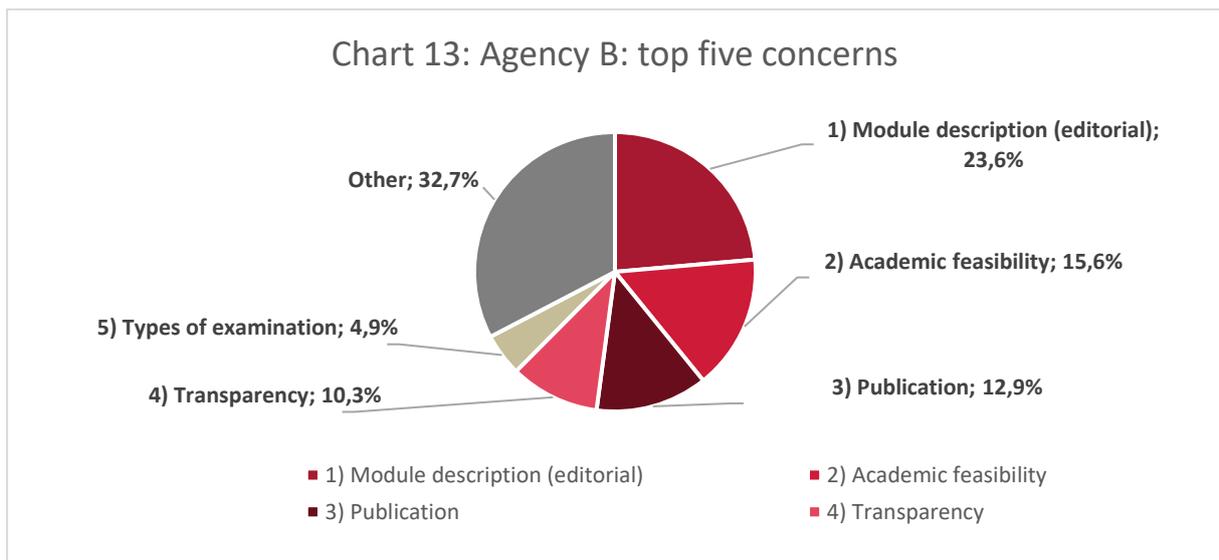
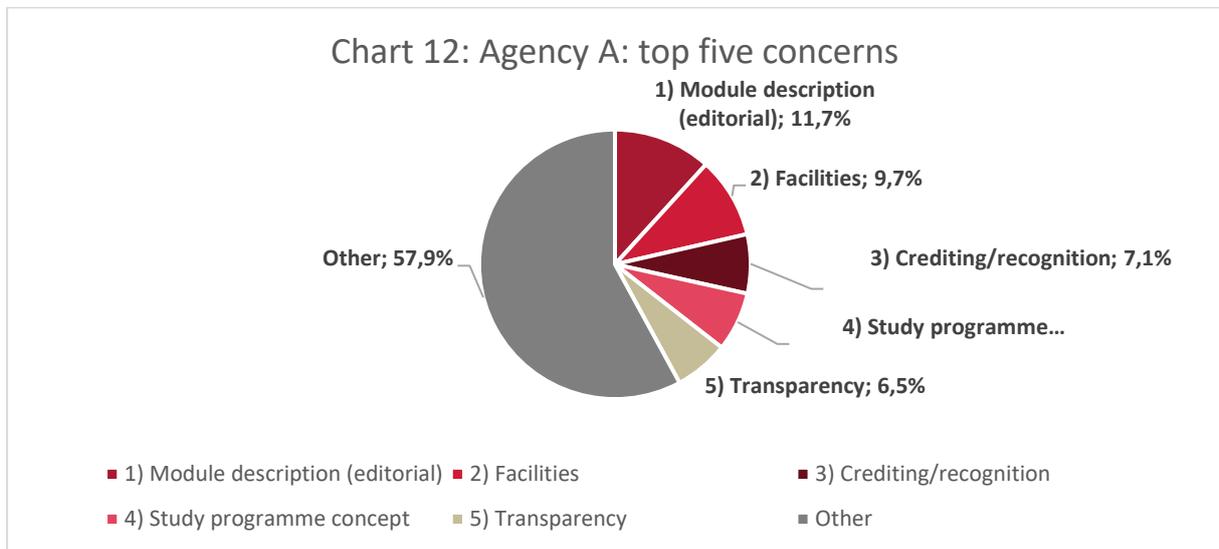


Chart 14: Agency C: top five concerns

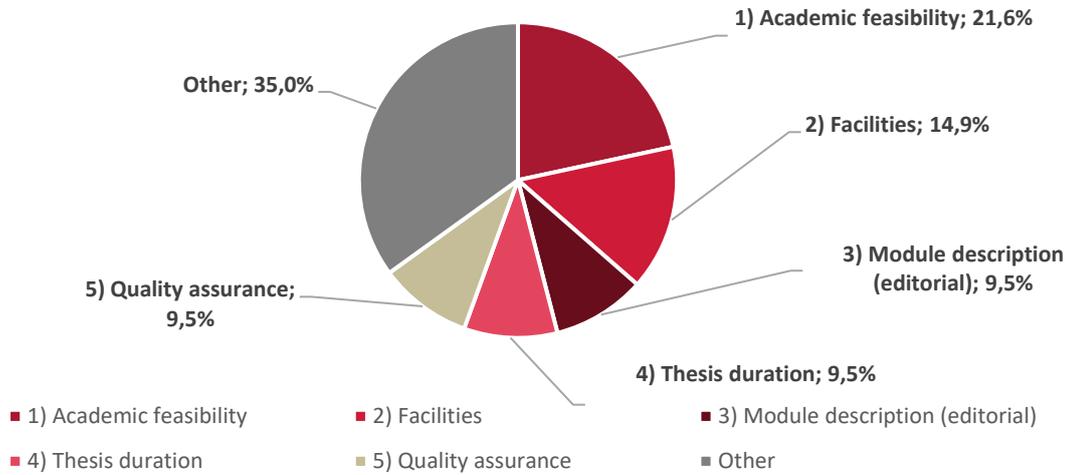


Chart 15: Agency D: top five concerns

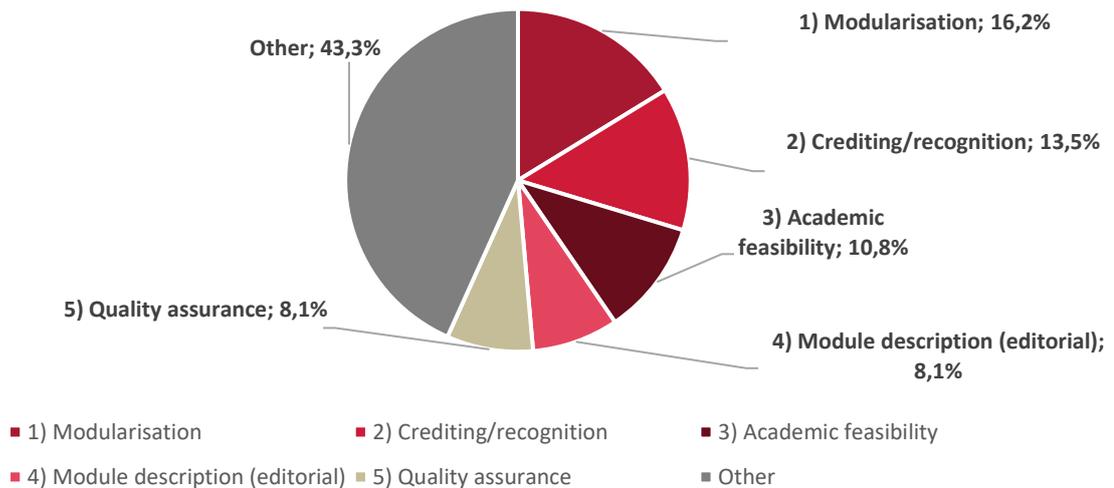


Chart 16: Agency E: top five concerns

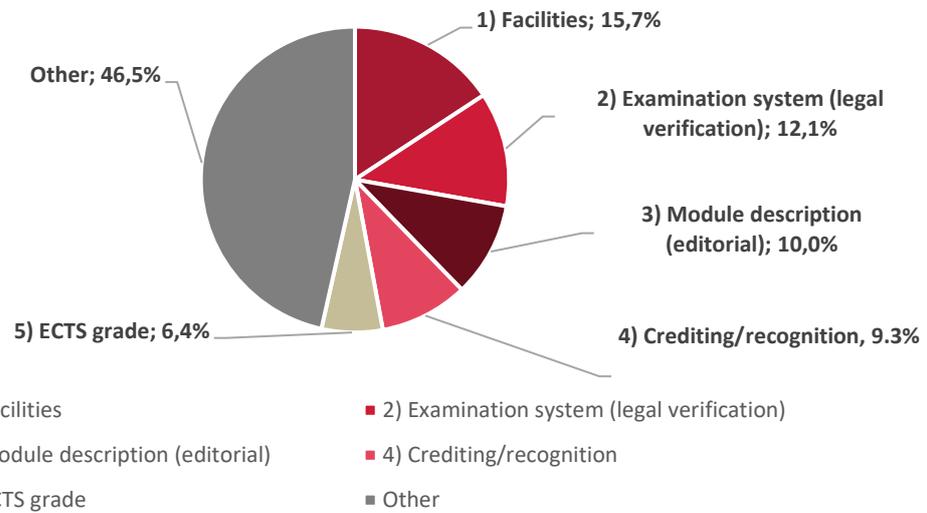


Chart 17: Agency F: top five concerns

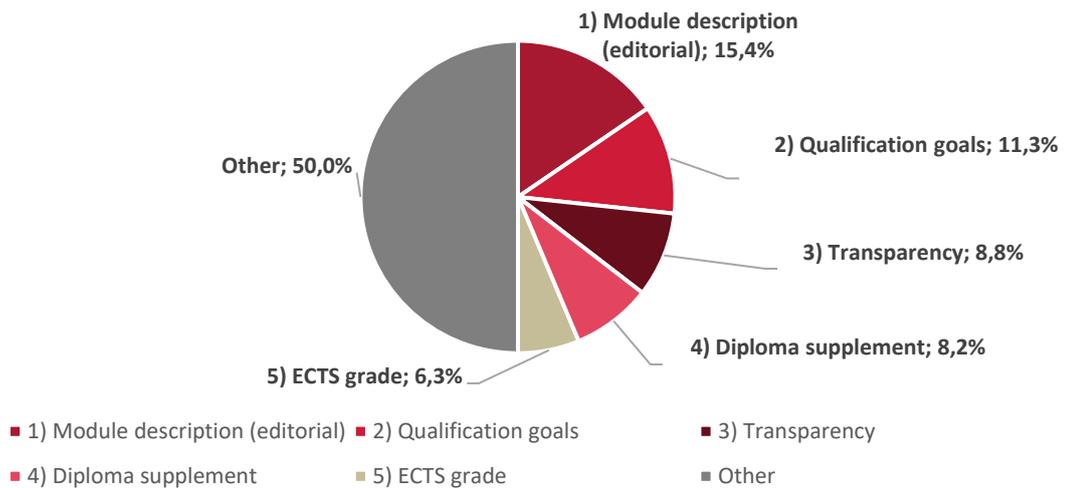


Chart 18: Agency G: top five concerns

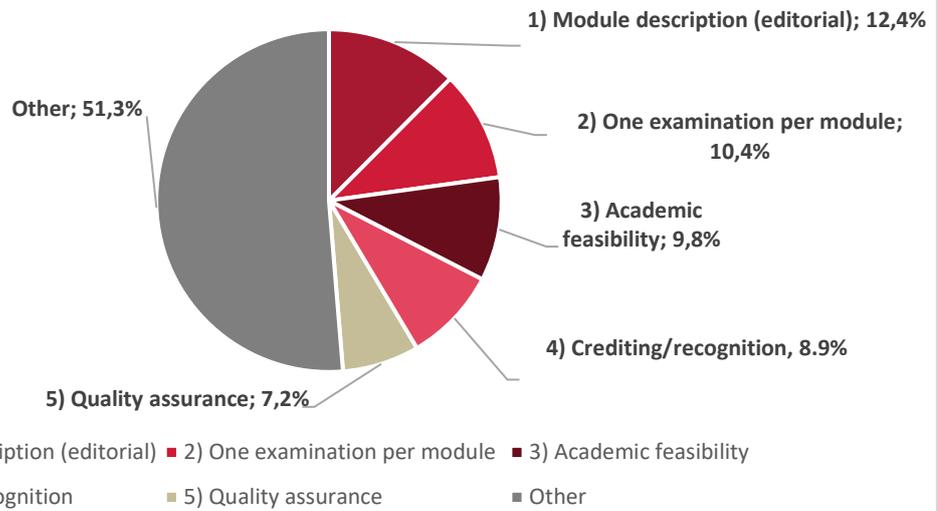
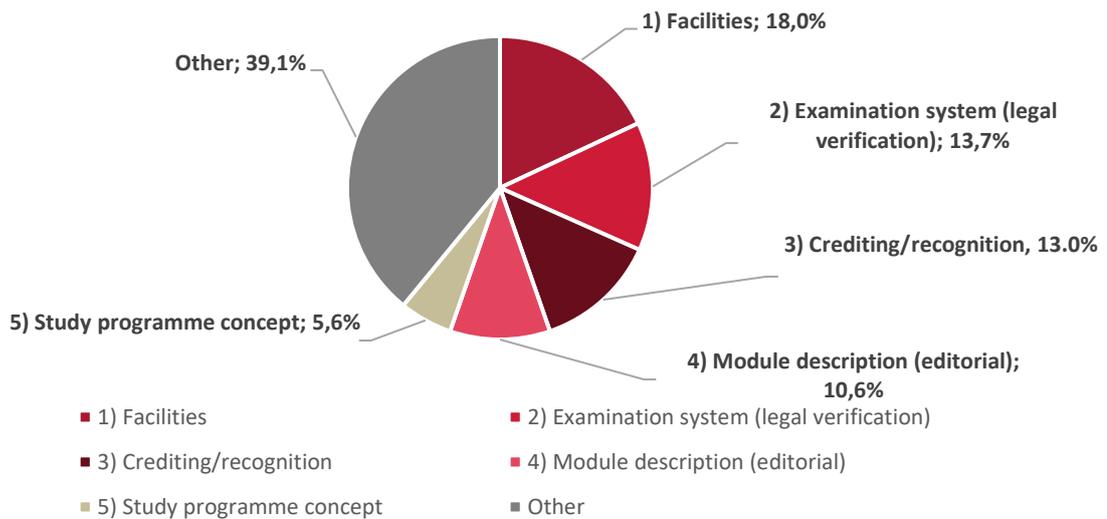


Chart 19: Agency H: top five concerns



## References

- Akkreditierungsrat (Accreditation Council) (2017): Evaluationsbericht. Selbstbericht zur externen Evaluation der Stiftung zur Akkreditierung von Studiengängen in Deutschland, 10 October 2007. Printed Matter AR 61/2007. Bonn: Accreditation Council.
- Akkreditierungsrat (2013): Regeln für die Akkreditierung von Studiengängen und für die Systemakkreditierung – Rules for the Accreditation of Study Programmes and for System Accreditation. Resolution of the Accreditation Council of 8 December 2009, amended 20 February 2013. Printed Matter AR 20/2013. Bonn: Accreditation Council.
- AQAS – Groeger, Dorothee: Eine Reflexion zur Beauftragung in der Programmakkreditierung. Thematische Analyse. AQAS, 2017.
- Kultusministerkonferenz (Standing Conference of the Ministers of Education and Cultural Affairs of the states in the Federal Republic of Germany) (2017): Musterrechtsverordnung gemäß Artikel 4 Absätze 1 - 4 Studienakkreditierungsstaatsvertrag – Specimen Decree Pursuant to Article 4, Paragraphs 1 – 4 of the Interstate Study Accreditation Treaty. Resolution of the Standing Conference of Germany of 7 December 2017.
- Kultusministerkonferenz (2016): Staatsvertrag über die Organisation eines gemeinsamen Akkreditierungssystems zur Qualitätssicherung in Studium und Lehre an deutschen Hochschulen (Studienakkreditierungsstaatsvertrag) – Interstate Treaty on the Organization of a Joint Accreditation System to Ensure the Quality of Teaching and Learning at German Higher Education Institutions (Interstate Study Accreditation Treaty). Resolution of the Standing Conference of 8 December 2016. Entry into force: 1 January 2018.
- Pietzonka, Manuel (2012): Der Patient Akkreditierung zwischen Hospital und Hospiz – Eine Evaluation des deutschen Akkreditierungssystems durch Analyse von Akkreditierungsaufgaben und Befragungen. In Benz, Winfried; Kohler, Jürgen & Landfried, Klaus: Handbuch für Qualität in Studium und Lehre. Berlin: Dr. Josef Raabe Verlags-GmbH.
- Pietzonka, Manuel (2013): Gestaltung von Studiengängen im Zeichen von Bologna – Die Umsetzung der Studienreform und die Wirksamkeit der Akkreditierung. Wiesbaden: Springer VS.
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). (2015). Brussels.
- Steinhardt, Isabel; Schneijderberg, Christian; Krücken, Georg & Baumann, Janosch (2018): “Externe und interne Qualitätssicherung von Studium und Lehre durch Akkreditierungs-

und Evaluationsverfahren (EIQSL) – Ergebnisbericht“. INCHER Working Paper No. 9. Kassel.

Suchanek, Justine; Pietzonka, Manuel; Künzel, Rainer & Futterer, Torsten (2012): Bologna (aus)gewertet – Eine empirische Analyse der Studienreform. Gesellschaft – Wirtschaft – Medien, Band 3. Göttingen: Vandenhoeck & Ruprecht (V&R unipress).