

German Accreditation Council (GAC)

Self-Assessment Report for the External Review by ENQA

5 Bonn, June 23, 2021

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Managing Editor: Katrin Mayer-Lantermann Bonn, June 2021

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Table of Contents

	Table of Contents.....	3
50	List of Slides	4
	List of Abbreviations.....	4
	1. Introduction	7
	2. Development of the Self-Assessment Report (SAR).....	7
	3. Higher education and quality assurance in higher education in the context of the agency	8
55	4. History, profile, and activities of the agency	10
	5. The agency's higher education quality assurance activities	24
	6. Processes and their methodologies.....	26
	7. The agency's internal quality assurance.....	35
	8. The Agency's international activities.....	39
60	9. Compliance with European Standards and Guidelines (Part 3)	42
	9.1 ESG Standard 3.1 Activities, policies, and processes for quality assurance	42
	9.2 ESG Standard 3.2 Official status.....	46
	9.3 ESG Standard 3.3 Independence	46
	9.4 ESG Standard 3.4 Thematic Analysis	49
65	9.5 ESG Standard 3.5 Resources	52
	9.6 ESG Standard 3.6 Internal Quality Assurance and Professional Conduct.....	54
	9.7 ESG Standard 3.7 Cyclical external review of agencies	54
	10. Compliance with European Standards and Guidelines (Part 2).....	55
	10.1 ESG Standard 2.1 Consideration of internal quality assurance	55
70	10.2 ESG Standard 2.2 Designing methodologies fit for purpose	57
	10.3 ESG Standard 2.3 Implementing processes	62
	10.4 ESG Standard 2.4 Peer-review experts	65
	10.5 ESG Standard 2.5: Criteria for Outcomes	70
	10.6 ESG Standard 2.6 Reporting.....	73
75	10.7 ESG Standard 2.7 Complaints and appeals	77
	11. Information and opinions of stakeholders	79
	12. Recommendations and main findings from previous review(s) and the agency's resulting follow-up.....	80

	13. SWOT analysis	85
80	14. Current challenges and areas for future development	86
	Glossary of terms	88
	List of annexes	93

List of Slides

85	Slide 01: Major changes in the German accreditation system Slide 02: Composition of the Accreditation Council
	Slide 03: GAC's bodies
	Slide 04: Program accreditation submissions per year
90	Slide 05: System accreditation submissions per year

List of Abbreviations

This list of abbreviations is sorted by acronym. The [Glossary of Terms](#) contains tables sorted by the full English or German term, respectively.

Acronym	German term	English equivalent
AAQ	Swiss Agency for Accreditation and Quality Assurance	Swiss Agency for Accreditation and Quality Assurance
ACQUIN	The Accreditation, Certification, and Quality Assurance Institute	The Accreditation, Certification, and Quality Assurance Institute
AKAST	Agency for Quality Assurance and Accreditation of Canonical Degree Programs in Germany	Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany
AQ Austria	Agency for Quality Assurance and Accreditation Austria	Agency for Quality Assurance and Accreditation Austria

Acronym	German term	English equivalent
AQAS	Agency for Quality Assurance through Accreditation of Study Programmes, Inc.	Agency for Quality Assurance through Accreditation of Study Programmes
ASIIN	Accreditation Agency for Study Programmes in Engineering, Informatics, Natural Sciences and Mathematics	Accreditation Agency for Study Programmes in Engineering, Informatics, Natural Sciences and Mathematics
BMBF	Federal Ministry of Education and Research Federal Ministry of Education and Research	Federal Ministry of Education and Research search
CHEA		Council for Higher Education Accreditation
CIQG		CHEA International Quality Group
DAAD	German Academic Exchange Service	German Academic Exchange Service
DEQAR		Database of External Quality Assurance Results
DFG	German Research Foundation	German Research Foundation
EHEA		European Higher Education Area
EKKA		Estonian Quality Agency for Higher and Vocational Education
ELIAS	Electronic Information and System	Electronic Information and Application System
ENQA		European Association for Quality Assurance in Higher Education
EQAR		European Quality Assurance Register for Higher Education
ESG		Standards and guidelines for quality assurance in the European Higher Education Area
FH/HAW	Universities of Applied Sciences/Colleges of Applied Universities of Applied Sciences	Universities of Applied Sciences
GAC	German Accreditation Council	German Accreditation Council
GJU		German Jordanian University
GNW	Trade Union Network of Experts	

Acronym	German term	English equivalent
HEI; HEIs		Higher education institution; higher education institutions
HRG	Higher Education Framework Act	Higher Education Framework Act
HRK	German Rectors' Conference	German Rectors' Conference
INQAAHE		International Network for Quality Assurance Agencies in Higher Education
KMK	Standing Conference of the Ministers of Education and Cultural Affairs	Standing Conference of the Ministers of Education and Cultural Affairs of the States in the Federal Republic of Germany
MRVO	Model Statute	Specimen Decree
NCEQE		National Center for Educational Quality Enhancement
NIAD-UE		National Institution for Academic Degrees and University Education
PDCA		Plan-Do-Check-Act
QA	Quality Assurance	Quality Assurance
QACHE		Project Quality Assurance of Cross-border Higher Education
RPAAP	Rules of Procedure for the Alternative Accreditation Procedures	Rules of Procedure for Alternative Accreditation Procedures
SAR	Self-Assessment Report	Self-Assessment Report
WR	German Council of Science and Humanities	German Council of Science and Humanities
ZEVA	Central Evaluation and Accreditation Agency	Central Evaluation and Accreditation Agency

1. Introduction

100 GAC hereby submits its self-assessment report for the external review regarding the correct and appropriate implementation and application of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Furthermore, the review serves as the basis for the application for GAC's inclusion in the European Quality Assurance Register for Higher Education (EQAR).

105 GAC is a foundation under public law. It was originally established by the North Rhine-Westphalian Act on the Establishment of a Foundation "Foundation for the Accreditation of Study Programs in Germany" of February 15, 2005. With the Interstate Study Accreditation Treaty, which came into force on January 1, 2018, the name of the foundation was changed to Foundation Accreditation Council. In international contexts and thus also in this self-assessment report, the foundation is referred to as the German Accreditation Council (GAC).

110 2. Development of the Self-Assessment Report (SAR)

The work on the SAR provided the agency with an opportunity to analyze its activities and policies over the past years, to identify challenges, and to implement initiatives that support the agency's further development. The SAR is a joint project involving the Board, the Accreditation Council, and the staff of the Head Office, thereby drawing on the expertise and knowledge of colleagues from all parts of the agency for feedback.

115 GAC's management, together with senior staff, prepared the first draft based on an analysis of the evidence and an assessment of the progress made since the last review. A working group of the Accreditation Council, with broad participation from stakeholder groups, supported the editorial work. A first draft of the SAR was sent to the working group, the entire Accreditation Council, and the staff members in April 2021. At the end of April 2021, the working group met to discuss and revise the draft. The final draft was debated and adopted by the Accreditation Council on June 23, 2021.

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How to read this report?

130 The structure of the SAR follows the framework outlined in Annex 1 of the Guidelines for ENQA Agency Reviews. The 2016 version of the guidelines applies to this review.¹ Consequently, the main headings in the SAR are based on these guidelines.

Furthermore, in chapters 9 and 10, the assessment of each ESG standard is preceded by the reproduction of the respective standard, marked in bold and on a gray background.

Quotations are marked with quotation marks and italics.

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

140 The German higher education system is primarily characterized by three structural elements:

Federal structure

145 Due to the federal system in Germany, responsibility for education, including higher education, lies for the most part with the sixteen states (Länder). The Länder are responsible for the basic funding and organization of institutions. Each Land has its own higher education legislation. The Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany (Kultusministerkonferenz – KMK) is an important coordinating body in that context.

Diversified higher education institutions offering diverse study programs

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The German Diploma Supplement template classifies German higher education institutions (HEIs) as follows:

“Higher education (HE) studies in Germany are offered at three types of higher education institutions (HEIs).

155 - *Universities, including various specialized institutions, offer the full range of academic disciplines. In the German tradition, universities place particular emphasis on basic research, so that advanced stages of study are primarily theory-based and include research-oriented components.*

- *Universities of Applied Sciences (FH)/Universities of Applied Sciences (HAW) (UAS) concentrate their study programs on engineering and other technical disciplines, business-related studies, social work, and design fields.*

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¹ See <https://www.enqa.eu/wp-content/uploads/Guidelines-for-ENQA-Agency-Reviews.pdf>

The common mission of applied research and development implies an application-oriented focus of studies, which includes integrated and supervised work assignments in industry, enterprises, or other relevant institutions.

- Universities of Art and Music offer programs for artistic careers in the fine arts, performing arts, and music; in fields such as directing, production, and writing for theater, film, and other media; and in a variety of design fields, architecture, media, and communication.

Higher education institutions are either state-run or state-recognized institutions. In their operations, including the organization of studies and the designation and awarding of degrees, they are both subject to higher education legislation.”²

In Germany, there are currently 423 higher education institutions (HEIs) with a total of approximately 2.9 million students. 108 are universities, 211 are universities of applied sciences, 52 are universities of art and music, and 52 belong to other categories (universities of public administration, universities of theology, and universities of education).³ 116 of the HEIs are private, state-recognized institutions.⁴ About 90 percent of all students are enrolled at public HEIs.⁵

The most common university-level academic qualifications are bachelor’s degrees and master’s degrees. In addition, there are programs that lead to state-certified exams in certain subject areas (e.g., medicine, law, and, in some states, teacher education). A few degree programs still lead to a Diplom qualification.

In total, there were over 20,000 degree programs at higher education institutions in Germany in the winter semester of 2020/2021. At that time, 1.6 million students were enrolled in bachelor’s degree programs.⁶

Furthermore, doctoral studies should be mentioned. The leading model in Germany is the individual, supervised doctorate.⁷

² Section 8.1 of the diploma supplement template; https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-11-Mitglieder/Diploma_Supplement_englisch_2018.pdf.

³ See <https://www.destatis.de/EN/Themes/Society-Environment/Education-Research-Culture/Institutions-Higher-Education/Tables/type-institution.html;jsessionid=0C2142169416475F4AAB424449DD0738.live742>.

⁴ See <https://www.destatis.de/EN/Themes/Society-Environment/Education-Research-Culture/Institutions-Higher-Education/Tables/private-institutions-of-higher-education-total.html>.

⁵ See <https://www.destatis.de/EN/Themes/Society-Environment/Education-Research-Culture/Institutions-Higher-Education/Tables/total-states-further-indicated-winter-term.html> and <https://www.destatis.de/EN/Themes/Society-Environment/Education-Research-Culture/Institutions-Higher-Education/Tables/students-private-institutions-of-higher-education.html>.

⁶ See <https://de.statista.com/statistik/daten/studie/2854/umfrage/bachelor-und-masterstudiengaenge-in-den-einzelnen-bundeslaendern/>; <https://de.statista.com/themen/1205/bachelor-und-master/> (in German only).

⁷ See <https://www.academics.de/ratgeber/promotion-statistik> (in German only).

Financing

190 The financing of the German higher education system is based on the responsibilities set forth in the Basic Law of the Federal Republic of Germany. Public higher education institutions (HEIs) receive the majority of their funding from the states, i.e., the Länder. The budgetary funds of the Länder generally cover personnel and material costs, as well as investments. Research and teaching at the HEIs are additionally funded through special programs financed by the federal government and the Länder. HEIs also apply for state and private funds (external funds), particularly to finance research projects.⁸

195 For quality assurance in the context of the agency, see Chapter [4: History, Profile, and Activities of the Agency](#).

200 4. History, profile, and activities of the agency

On terms

GAC itself is an agency as defined by the ESG. Due to the German two-tier accreditation system, which will be explained in greater detail later, responsibilities are shared between GAC and the agencies recognized by ENQA and EQAR (ACQUIN, AQAS, ZEvA, ASIIN, AAQ, to name a few). Therefore, in this self-assessment report, “the agency” mostly
205 refers to GAC, whereas “the agencies” or “the assessment agency/-ies” refers to the organizations mentioned above.

“GAC,” the German Accreditation Council, refers to the overall organization. At times in this report, reference is made to the Accreditation Council. This is because, pursuant to Article 8 of the Interstate Study Accreditation Treaty⁹, GAC has three bodies:

- The Board,
- the Foundation Council, and
- the Accreditation Council.

Article 9 states that the Accreditation Council resolves all GAC matters, so that in practice, GAC and the Accreditation Council are largely one and the same. Nevertheless, this report refers to

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⁸ For further information, see https://eacea.ec.europa.eu/national-policies/eurydice/content/higher-edu-cation-funding-31_en.
⁹ See the explanation later in this chapter for details on the Interstate Study Accreditation Treaty.

“Accreditation Council” only when this specific body is intended, for example, when discussing its composition and actions.

In this document, “state” and “Land” (singular), as well as “states” and “Länder” (plural), are used synonymously.¹⁰

Development of a decentralized accreditation system

The essential foundations for accreditation were laid in 1998: The Bundestag and Bundesrat passed the fourth amendment to the Higher Education Framework Act (HRG) and abolished the mandatory development of framework examination regulations. In the same year, the KMK and the German Rectors’ Conference (Hochschulrektorenkonferenz – HRK) adopted fundamental resolutions on the introduction of an accreditation system.

Following a pilot phase, the basic structure of a decentralized system was established in 2002, valid for the next 15 years, under which GAC defined basic requirements for the accreditation process and certified and monitored agencies, while the agencies in turn conducted accreditation procedures and accredited study programs. In 2005, GAC acquired legal capacity under the North Rhine-Westphalian Law on the Establishment of a Foundation titled “Foundation for the Accreditation of Study Programs in Germany.”

Reorganization of the accreditation system since 2016

Following a decision by the German Federal Constitutional Court in February 2016,¹¹ the German accreditation system has recently been reformed. The Federal Constitutional Court upheld the approach of mandatory external quality assurance of teaching through accreditation, which is not limited to academic subject-related criteria but also evaluates the organization of studies, the academic requirements, and student success. The court criticized, however, that the legislature had “[...] *de facto handed over the standardization of academic, procedural, and organizational requirements for accreditation* [...]”¹² without making the essential decisions itself, and demanded a stronger legal basis for the German accreditation system.

This legal foundation is now available with the Interstate Treaty on the Organization of a Joint Accreditation System to Ensure the Quality of Teaching and Learning at German Higher Education

¹⁰ In official documents from Germany or the EU, the translation “state(s)” is also used; see <https://www.tatsachen-ueber-deutschland.de/en/politics-germany/political-system>, https://europa.eu/european-union/about-eu/countries/member-countries/germany_en. By contrast, the “federal state” refers only to the federal government of Germany as a whole.

¹¹ See the order of the First Senate dated February 17, 2016 – 1 BvL 8/10; https://www.bundesverfassungsgericht.de/SharedDocs/Entscheidungen/EN/2016/02/ls20160217_1bvl000810en.html;jsessionid=04E6CF9A53F3E1EB37505B7DD8928828_2_cid377.

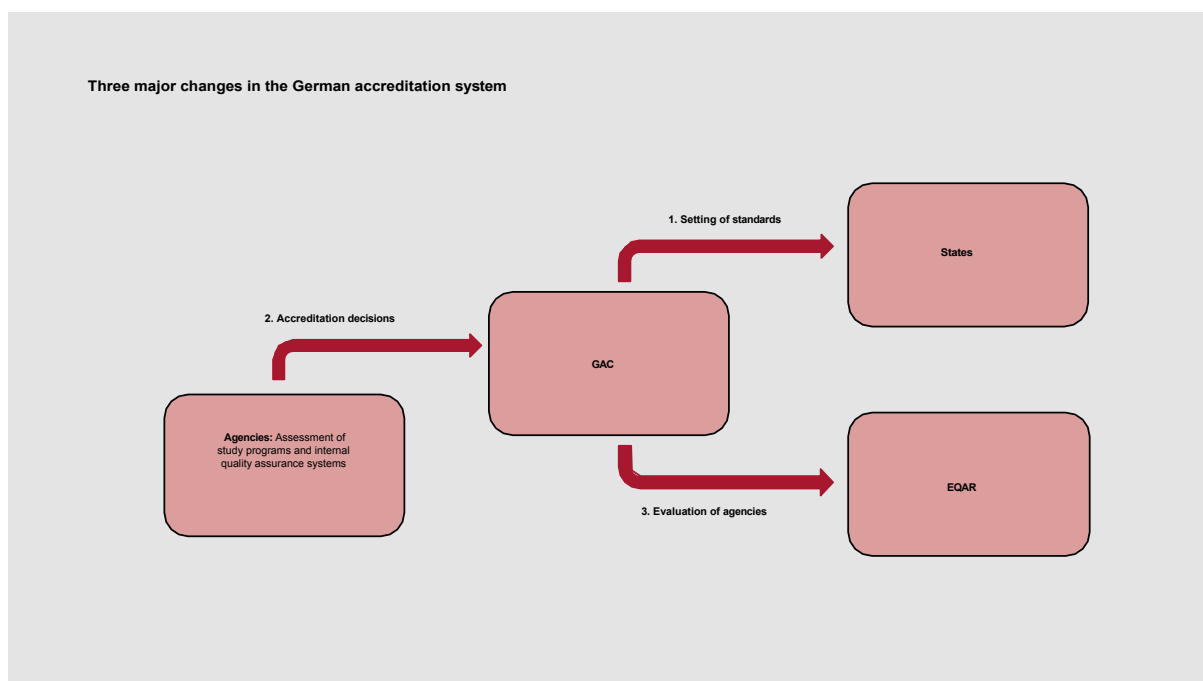
¹² Order of the First Senate (see footnote 10), para. 80

institutions (Interstate Study Accreditation Treaty) by all 16 states, which came into effect on January 1, 2018¹³ and on state decrees based on this treaty.¹⁴

Major shifts in the accreditation system

- 250
1. The authority to establish regulations, which was previously held in part by the GAC, has been transferred to the Länder (see Article 5 (3) no. 6 of the Interstate Study Accreditation Treaty).
 2. The authority to make accreditation decisions has been transferred from agencies to GAC (see Article 5 (3) no. 1 of the Interstate Study Accreditation Treaty).
 3. The evaluation of agencies, which was previously carried out by GAC, has been transferred to EQAR (see Article 5(3)(5) of the Interstate Study Accreditation Treaty).
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Slide 01: Three major changes in the German accreditation system



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1. Shift regarding the setting of standards

To address the main criticism of the Federal Constitutional Court, criteria and procedural rules have been laid down in the Interstate Study Accreditation Treaty and in legal decrees of the Länder. In this way, democratic legitimacy is guaranteed. However, GAC has adopted a series of supplementary resolutions to ensure consistency in the application of criteria and

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¹³ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begrueundung_Englisch.pdf.

¹⁴ See <https://www.akkreditierungsrat.de/en/accreditation-system-legal-basis/laws-and-regulations/laws-and-decrees>

procedural rules.¹⁵ Furthermore, Article 5 (3) no. 6 of the Interstate Study Accreditation Treaty grants GAC the authority to submit proposals for decrees.

2. *Shift in responsibility for accreditation decisions*

270 In the past, the German accreditation system provided for a division of tasks between GAC and agencies approved by
GAC, such that GAC accredited the agencies based on an assessment procedure. The agencies then made the
accreditation decisions. Now, GAC makes the accreditation decisions itself. The agencies remain responsible for the
assessment. This measure promotes a more consistent decision-making practice based on the specified criteria. The
legal nature of the agencies' actions, which had not been clarified until then, was another key factor in the transfer of
decision-making authority to GAC. Accreditation decisions are administrative acts that the agencies, as private-law
275 entities, could not issue as easily as GAC, which is a foundation under public law.

3. *Shift regarding the evaluation of agencies*

280 As a rule, GAC no longer evaluates agencies, as EQAR, an established, neutral European inspection body, is now
available. All EQAR-registered agencies may operate in Germany. To ensure compliance with the German legal
framework, based on the agency's registration with EQAR, GAC issues a formal authorization to them. This
authorization, however, consists solely of
285 an exchange of notes.¹⁶

Legal basis

The Interstate Study Accreditation Treaty of 2018 regulates the accreditation system.

290 Decrees of the Länder based on this treaty contain the details regarding accreditation criteria and
procedural rules. They are based on a model decree adopted by the KMK.¹⁷

Please note

- that the decrees of the Länder are nearly identical to the Specimen Decree, so that in the following only the Specimen Decree is mentioned when citing the legal basis.

¹⁵ For details, see, for example, Chapter [10.2 ESG Standard 2.2 Designing Methodologies Fit for Purpose](#).

¹⁶ See the corresponding resolutions of the Accreditation Council at <https://www.akkreditierungs-rat.de/en/accreditation-system/agencies/agencies>.

¹⁷ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsver-ordnung_Englisch.pdf.

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- that the formal and academic criteria as well as the main procedural rules for the accreditation processes are outlined in general terms in the Interstate Study Accreditation Treaty. Since they are specified in the Model Decree, only the Model Decree will be referred to in the following in this regard as well.

300 With regard to GAC as an institution, the Interstate Study Accreditation Treaty must be supplemented by a law enacted by the state in which the organization is located. This state has always been North Rhine-Westphalia. This special law is the Act Establishing the Foundation Accreditation Council (Accreditation Council Act).¹⁸ Together with the Interstate Study Accreditation Treaty, it bindingly defines the tasks, responsibilities, and powers of GAC. The provisions of the Accreditation Council Act are, apart from some transitional provisions, largely identical in content to Articles 5 to 14 of the Interstate Study Accreditation Treaty. For this reason, as a rule, only the Interstate Study Accreditation Treaty is referred to in this report in connection with the description of the legal tasks of GAC.

305 The new legal framework, in conjunction with GAC's new responsibilities, made it necessary to revise its Statutes¹⁹ and the Rules of Procedure of the Accreditation Council²⁰ and the Foundation Council²¹. The Statutes and Rules of Procedure entered into force at the end of 2018.

310 August 2018 saw the entry into force of the fee schedule adopted by GAC to implement the provision in Article 3(6) of the Interstate Study Accreditation Treaty regarding the charging of fees for the conduct of accreditations.²²

315 **GAC as part of an accreditation system**

The Terms of Reference for this review summarize: “[...] *the review should consider that GAC is integrated into an ‘accreditation system,’ consisting also of the 16 German states (“Länder”) that establish the criteria for accreditation, and of the agencies that provide the reports on which GAC bases its decisions.*”²³

¹⁸ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Akkreditierungs-ratsgesetz_eng.pdf; Due to the Interstate Study Accreditation Treaty, the name of the Act on the Establishment of a Foundation “Foundation for the Accreditation of Study Programs in Germany” was changed to the Act Establishing the Foundation Accreditation Council (Accreditation Council Act).

¹⁹ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Satzung%20Stiftung%20Akkreditierungsrat_eng.pdf

²⁰ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Geschaeftsordnung_Stiftung_Akkreditierungsrat_2018.pdf (in German only).

²¹ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/SR_Geschaeftsordnung_2018.pdf (in German only).

²² See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Geb%C3%BChrenordnung%20Stiftung%20Akkreditierungsrat_2021.pdf (in German only).

²³ See the Terms of Reference for this review.

320 Thus, GAC will be assessed as an agency, but the framework in which it operates—the accreditation system—will also be considered.

Accordingly, Article 15 of the Interstate Study Accreditation Treaty provides as follows:

325 *“The accreditation system shall be evaluated on behalf of the Standing Conference of the Ministers of Education and Cultural Affairs and the German Rectors’ Conference, in particular with respect to the foundation’s organizational structure and operations as well as its other rules of procedure, on a regular basis and at appropriate intervals, beginning five years after this interstate treaty enters into force.”*

330 In the German accreditation system, the agencies act as partners of GAC within the meaning of Interpretation 23 of the EQAR document *“Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies”*.²⁴ EQAR specifies that an agency which *“only implements parts of the process and relies on input/preparatory work carried out by other agencies should ensure that such input/preparatory work is carried out in line with the ESG. For partners or subcontractors that are also EQAR-registered agencies, it can be assumed that their external QA activity is ESG-compliant.”*

Since the agencies authorized by GAC are listed in EQAR, their ESG compliance can be assumed.

There is only one assessment agency authorized in Germany that is not currently registered in EQAR: AKAST, the Agency for Quality Assurance and Accreditation of Canonical Programs of Study in Germany. It was authorized by GAC pursuant to § 24 (1) sentence 2 of the Specimen Decree.²⁵

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AKAST applied to join EQAR based on the review report from the 2018 re-accreditation conducted by GAC. On June 17, 2019, the Register Committee rejected the application because Standard 3.3 was assessed as not being met.

345 After completing the revision and adaptation of the Statutes and other basic documents, the application for a Focused Review was submitted to EQAR by AKAST in the spring of 2021. This review will evaluate Standard 3.3 as well as Standards 2.7 and 3.4, which had previously been assessed as partially fulfilled. GAC will again serve as the coordinator of the review. It is planned

²⁴ See https://www.eqar.eu/assets/uploads/2020/09/RC_12_1_UseAndInterpretation-OfTheESG_v3_0.pdf

²⁵ Here, § 24 (1) sentence 2 of the Model Decree in connection with (7) of the resolution of the Accreditation Council of February 20, 2018, on the “Authorization of Agencies in the German System,” see <https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Authorization%20of%20Agencies%20in%20the%20German%20System.pdf>, applies. (7) of the resolution states: *“The authorization of agencies not listed in EQAR is exceptionally permissible in justified individual cases if compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) is periodically demonstrated by an external evaluation.”*

to submit the report to EQAR by the end of September so that the EQAR Committee can make a decision regarding AKAST in November 2021.

350 Should GAC, within the framework of the accreditation of an alternative procedure, delegate the implementation of the assessment procedure to a third party, that third party would also be required to comply with the Rules of Procedure for Alternative Accreditation Procedures (RPAAP) and thus to comply with the ESG.²⁶

Statutory Tasks

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Article 3 of the Interstate Study Accreditation Treaty sets forth the tasks of GAC as follows:

“1. The accreditation and re-accreditation of study programs and internal quality assurance systems, as well as other quality assurance procedures agreed upon with the Accreditation Council and the respective state on the basis of the criteria of Article 2, through the award of the foundation’s seal.

360 *2. It determines the requirements for the recognition of accreditations by foreign institutions, taking into account developments in Europe.*

3. It promotes international cooperation in the field of accreditation and quality assurance.

4. It reports to the states regularly on the development of the two-cycle study system and quality enhancement within the scope of accreditation.

365 *5. It authorizes the agencies within the meaning of Article 3 (2), sentence 2. As a requirement for authorization, the agency must demonstrate that it is reliably capable of performing the tasks of assessment and preparing the review report; this is presumed, subject to rebuttal, for agencies listed in the EQAR.*

6. It supports the federal states in the further development of the German quality assurance system and makes recommendations for the decrees to be enacted pursuant to Article 4.”

370 First and foremost, the GAC is responsible for accrediting study programs, quality management systems, and alternative procedures. Therefore, external quality assurance, as defined within the German system, is at the core of the GAC’s activities.²⁷ Its other statutory responsibilities include, on the one hand, the authorization of agencies, and on the other hand, other important tasks such as cooperation with the federal states and international cooperation.²⁸

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²⁶ See the RPAAP at <https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Rules%20of%20Procedure%20for%20Alternative%20Accreditation%20Procedures.pdf>; for details on the accreditation of alternative procedures, see Chapter 6. [Processes and their methodologies](#).

²⁷ See Chapter 5. [Higher Education Quality Assurance Activities of the Agency](#)

²⁸ For international cooperation, see Chapter 8. [Agency’s international activities](#).

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Mission Statement and Interim Review

Mission Statement

The Mission Statement, fundamentally revised in 2019, summarizes the self-image and basic principles of GAC and formulates the mission, the strategic goals, and the manner of their intended implementation:

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- *“The German Accreditation Council is a joint institution of the federal states for external quality assurance of teaching and learning in Germany. It fulfills the tasks assigned to it in the Interstate Study Accreditation Treaty and actively participates in the design and further development of goals and requirements of the accreditation system in Germany.*
- *The German Accreditation Council is committed to academic freedom and the autonomy of higher education institutions and views these institutions as primarily responsible for the quality of teaching and learning.*
- *It views accreditation as a regular, external quality assurance process, conducted as a scientifically guided procedure involving peer review and the participation of relevant stakeholders.*
- *It ensures that accreditation procedures are carried out quickly, reliably, on time, and transparently from the application to the Accreditation Council’s decision. In particular, the administrative burden associated with submitting applications should be kept to a minimum for higher education institutions and agencies.*
- *It acts in accordance with the European Standards and Guidelines (ESG) and the Interstate Study Accreditation Treaty, as well as their implementation through corresponding decrees of the federal states.*
- *It ensures that accreditation decisions are made independently of third parties and that potential conflicts of interest are prevented through appropriate measures.*
- *It promotes dialogue among all actors involved in the accreditation system and works toward a cooperative and trusting relationship among all stakeholders represented.*
- *“It reflects on the implementation of its tasks and regularly evaluates feedback from higher education institutions and agencies in order to use the results for the experience-based further development of the quality assurance system and application procedures in accordance with its legal mandate.”²⁹*

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Interim Review

The main strategic and planning document of GAC is its Interim Review, published in 2020.³⁰

Here, the Accreditation Council has set out three priorities for the remainder of its term

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until the end of 2021:

- Handling the expected large “wave” of applications.
- Systematic reflection on GAC’s work.

²⁹ See <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/mission-statement/mission-statement>.

³⁰ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf

- Evaluation of GAC in the European context.

See Chapter [9.1, ESG Standard 3.1: Activities, Policies, and Processes for Quality Assurance](#) for more details.

Accreditation procedures must be science-led

To better understand the German accreditation system, it is important to note that, according to Article 5 (3) of the German Basic Law, *“Arts and sciences, research, and teaching shall be free.”*³¹ The Federal Constitutional Court ruled: *“The requirement to obtain accreditation for study programs restricts a higher education institution’s freedom to decide on the content, organization, and methodological approach of the study program and courses taught. The prerequisite that accreditation be obtained also interferes with the rights of teaching staff, and of faculties or departments.”*³² *“Quality assurance measures that interfere with the freedom of research and teaching require an adequate statutory basis.”*³³ What is needed is an overall structure of quality assurance *“in which decision-making powers and rights of participation, influence, information, and control are structured in such a way that threats to the freedom of teaching are avoided.”*³⁴

Based on this, the federal states have proposed the following changes to the current system:

- A majority³⁵ and double votes for professors on the Accreditation Council regarding the fulfillment of academic criteria in accreditation decisions³⁶
- A majority of professors on the review panels³⁷
- Binding guidelines issued by the HRK for the appointment of professorial experts³⁸

Organizational structure

According to Article 8 of the Interstate Study Accreditation Treaty, GAC has three bodies: the Accreditation Council, the Foundation Council, and the Board.

³¹ https://www.gesetze-im-internet.de/englisch_gg/englisch_gg.html#p0034.

³² Order of the First Senate (see footnote 10), para. 52

³³ Order of the First Senate (see footnote 10), para. 59

³⁴ Order of the First Senate (see footnote 10), para. 60

³⁵ See Article 9(2)(1) of the Interstate Study Accreditation Treaty.

³⁶ See Article 9(4) of the Interstate Study Accreditation Treaty.

³⁷ See § 25(3) of the Specimen Decree.

³⁸ See Article 3(3) of the Interstate Study Accreditation Treaty and Annex 07, as well as Chapter [10.4 of the ESG Standard 2.4 Peer-Review Experts](#).

445 *Accreditation Council (Article 9 Interstate Study Accreditation Treaty)*

The Accreditation Council is the central decision-making body of GAC. It decides on the accreditation and re-accreditation of study programs, internal quality assurance systems of HEIs, alternative procedures, and equivalency assessments. The Accreditation Council has 23 members.

450 "[...] (2) *Members of the Accreditation Council are:*

1. Eight professors from state or state-recognized higher education institutions in the Federal Republic of Germany who must represent at least four subject areas from the humanities, social sciences, natural sciences, and engineering sciences,

2. One representative of the German Rectors' Conference,

455 *3. Four representatives of the states in the Federal Republic of Germany,*

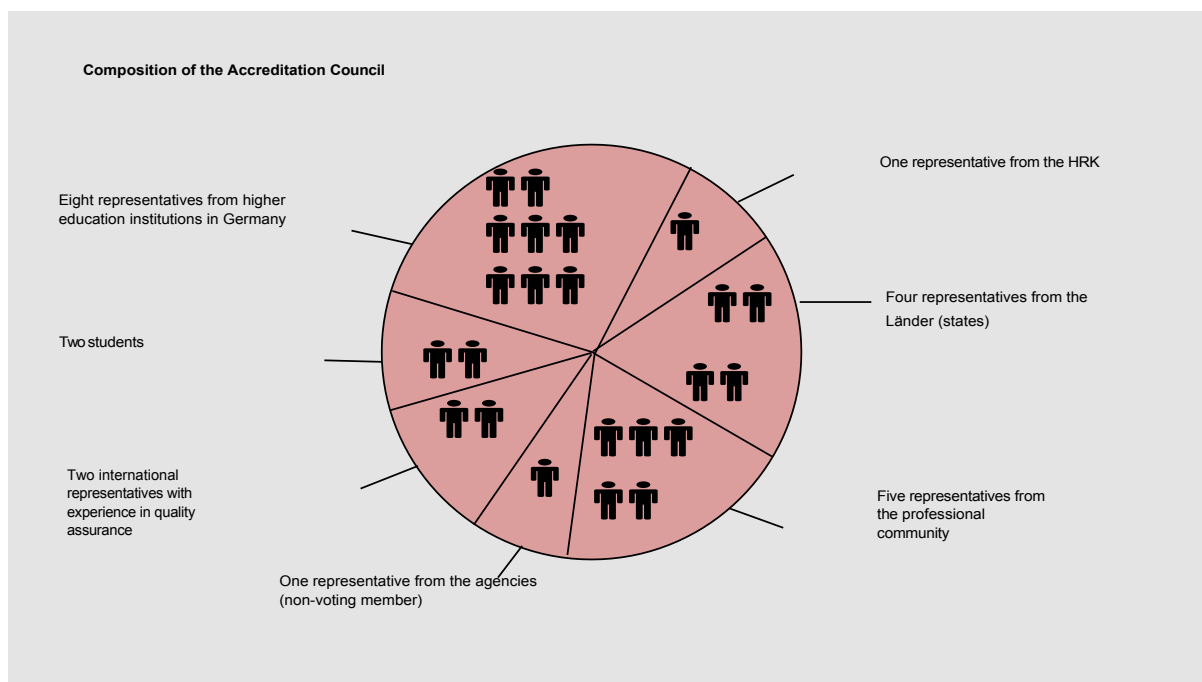
4. Five representatives from professional practice, one of whom is a representative of the state ministries responsible for labor and collective bargaining law,

5. Two students,

6. Two foreign representatives with accreditation experience,

460 *7. One representative of the agencies in an advisory capacity."³⁹*

Slide 02: Composition of the Accreditation Council



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³⁹ Article 9 (2) sentence 1 of the Interstate Study Accreditation Treaty

The members of the Accreditation Council are supplemented by alternate members⁴⁰ and permanent guests.⁴¹

Foundation Council (Article 11 of the Interstate Study Accreditation Treaty)

470 *“(1) The Foundation Council monitors the legality and economic efficiency of the management of the Foundation’s affairs by the Accreditation Council and the Board.*

(2) The Foundation Council consists of:

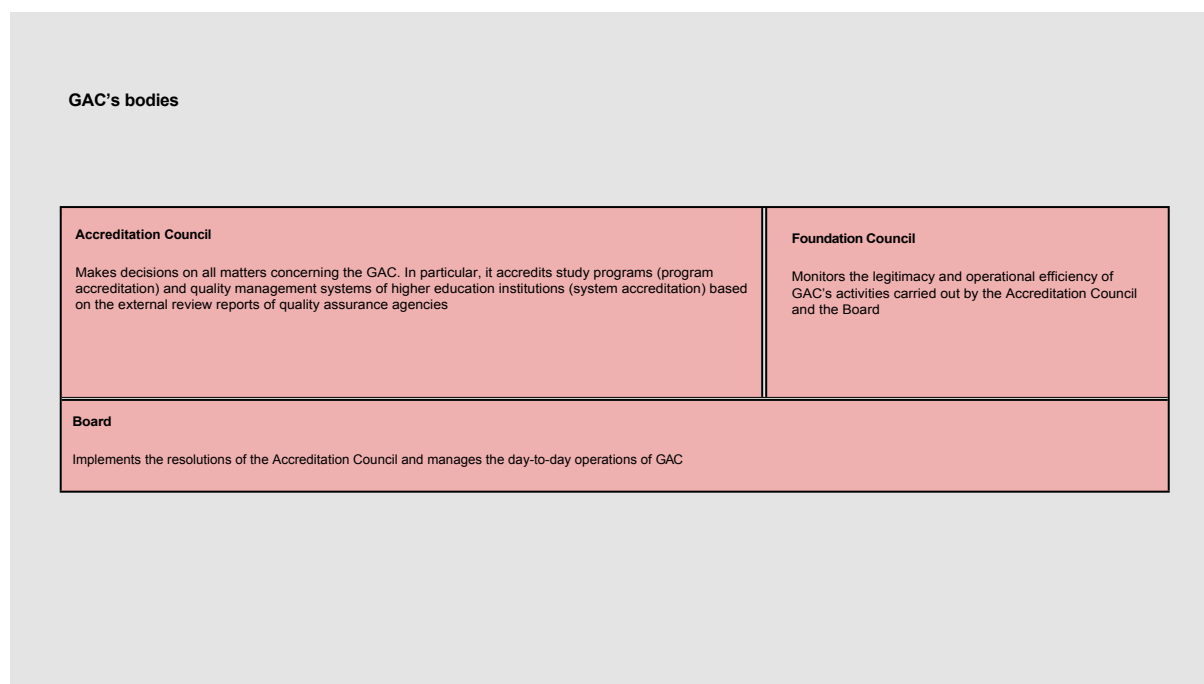
1. Six representatives of the states,

2. Five representatives of the German Rectors’ Conference.”⁴²

475 *Board (Article 10 Interstate Study Accreditation Treaty)*

The Board implements the resolutions of the Accreditation Council and conducts the day-to-day business of GAC, unless the Accreditation Council has reserved tasks for itself. Its members are the chairperson of the Accreditation Council, the deputy chairperson of the Accreditation Council, and the managing director of GAC.

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Slide 03: GAC’s governing bodies



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⁴⁰ See section 8 (4) of the Statutes.
⁴¹ See section 8 (7) of the Statutes.
⁴² Article 11(1) and (2) of the Interstate Study Accreditation Treaty

Head Office

490 Furthermore, Article 12 of the Interstate Study Accreditation Treaty stipulates that GAC maintains a Head Office. The Head Office is located in Bonn. It is managed by the managing director. The Head Office “[...] supports the execution of the foundation’s business and is subject to instruction from the chairperson of the Board.”⁴³ who, according to Article 10 of the Interstate Study Accreditation Treaty, is the chairperson of the Accreditation Council.

Complaints and Appeals Commission

Furthermore, on February 26, 2019, the Accreditation Council adopted a complaints procedure and established an external commission to address complaints and appeals.

495 *“This commission consists of three external members: a professor, a student member, and a member proposed by the agencies. It discusses appeals and complaints and submits a recommendation to the Accreditation Council for a final decision.”*⁴⁴

500 Electronic Information and Application System (ELIAS)

When it became clear at the end of 2016 that GAC would be responsible for deciding on applications for accreditation, the Board and the Accreditation Council immediately launched a project to establish a fully digital system to handle this task. In 2017 and 2018, an electronic, web-based application processing system (called ELIAS) was developed and launched in January 2019.

The system consists of two main elements:

- a platform for the application process,
- the database for accredited study programs and HEIs.⁴⁵

ELIAS maps the entire process of program and system accreditations in accordance with the new requirements:

- The application system enables HEIs to select the study programs to be accredited from the data pool and apply online.
- The responsible program managers at the GAC headquarters process the applications in ELIAS and post the draft accreditation decisions as meeting documents.

⁴³ Article 12(1), sentence 2 of the Interstate Study Accreditation Treaty

⁴⁴ Excerpt from the resolution of the Accreditation Council of February 26, 2019; see <https://www.akkred-itierungsrat.de/en/foundation-accreditation-council/complaints-and-appeals/complaints-and-appeals>.

⁴⁵ See Annex 01 for a graphical presentation of the system architecture of ELIAS and its various web portals.

- The draft accreditation decisions and miscellaneous meeting documents are made available to the members of the Accreditation Council via the platform.
- After the Accreditation Council has made the final accreditation decision, the official accreditation notices are generated in ELIAS and sent electronically to the institution.
- For accreditation with conditions, a follow-up process is implemented in the system.
- The decisions of the Accreditation Council and the accreditation reports are automatically published in the external ELIAS database.

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However, some functionalities have not yet been fully completed in the initial programming phase. For example, the application procedures for alternative accreditation procedures, as well as for joint degree programs and for substantial changes to the subject of accreditation during the accreditation's period of validity, have not yet been released. The decisions are currently prepared outside the system and manually entered/published in the database. The same applies to the equivalency assessment, as this is a standalone project, at least as of the time of reporting.⁴⁶

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ELIAS also offers evaluation and documentation options.⁴⁷

The system also interfaces with two external databases: Higher Education Compass (German database of all study programs)⁴⁸ and DEQAR (Database of External Quality Assurance Results).⁴⁹

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Internal meetings are typically held every week for about two hours to coordinate the technical or functional components to be implemented. In addition, the Head Office receives daily feedback from the higher education institutions (HEIs) and agencies, as well as from the members of the Accreditation Council, which helps GAC further develop ELIAS and make it even more user-friendly.

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Program and system accreditation submissions per year

All German HEIs can submit accreditation applications to GAC. This is reflected in the high number of program accreditation submissions per year (see slide 04). Yearly variations may

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occur due to differences in the end dates of accreditation cycles, new study programs, new system accreditations, and accreditation extensions.⁵⁰

⁴⁶ For information on the different types of procedures offered by GAC, see Chapter [6: Processes and Their Methodologies](#).

⁴⁷ However, the questionnaire tool in ELIAS is not yet in place at the time of reporting. It is expected to be operational by summer 2021; see Chapter [7. Agency's internal quality assurance](#).

⁴⁸ See <https://www.hochschulkompass.de/en/study-in-germany.html>.

⁴⁹ See <https://www.eqar.eu/qa-results/search/by-institution/>.

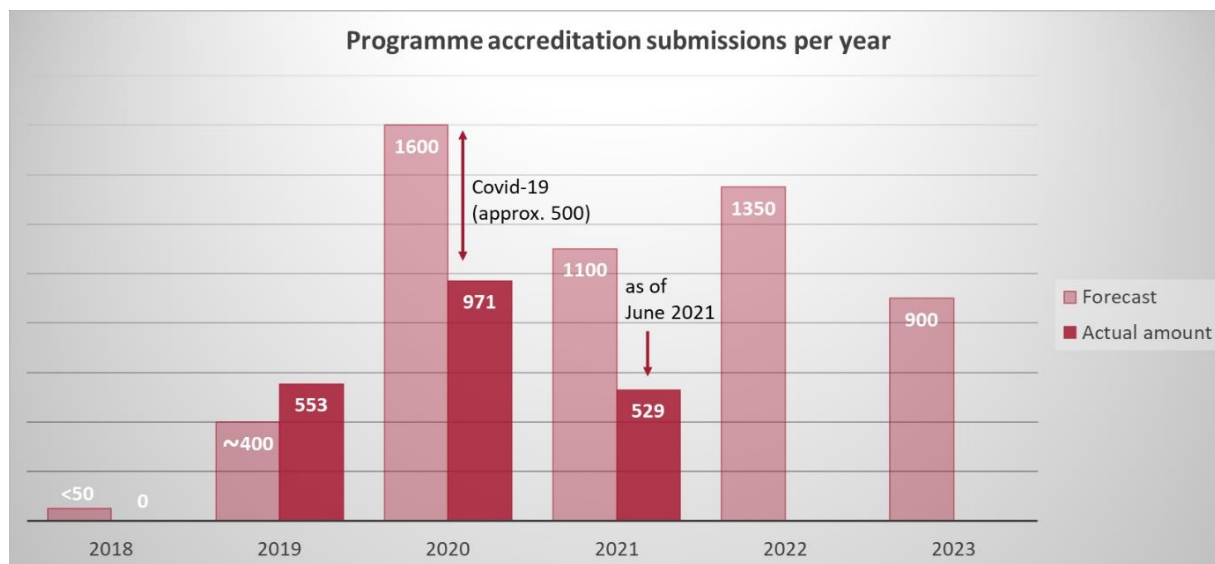
⁵⁰ See § 26 of the Model Decree for accreditation extensions.

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The data presented in slides 04 and 05 is subject to several limiting factors, most importantly: During the planning and development of the ELIAS database in 2018/2019, applications were not processed—or were not fully processed—through the database and are therefore not included—or are not fully included. The forecasts, particularly for 2022/2023, are and will be affected by planning decisions within the higher education institutions through 2025. Therefore, reliability is limited, and errors of a few hundred program accreditation submissions are possible.

Slide 04: Program accreditation submissions per year

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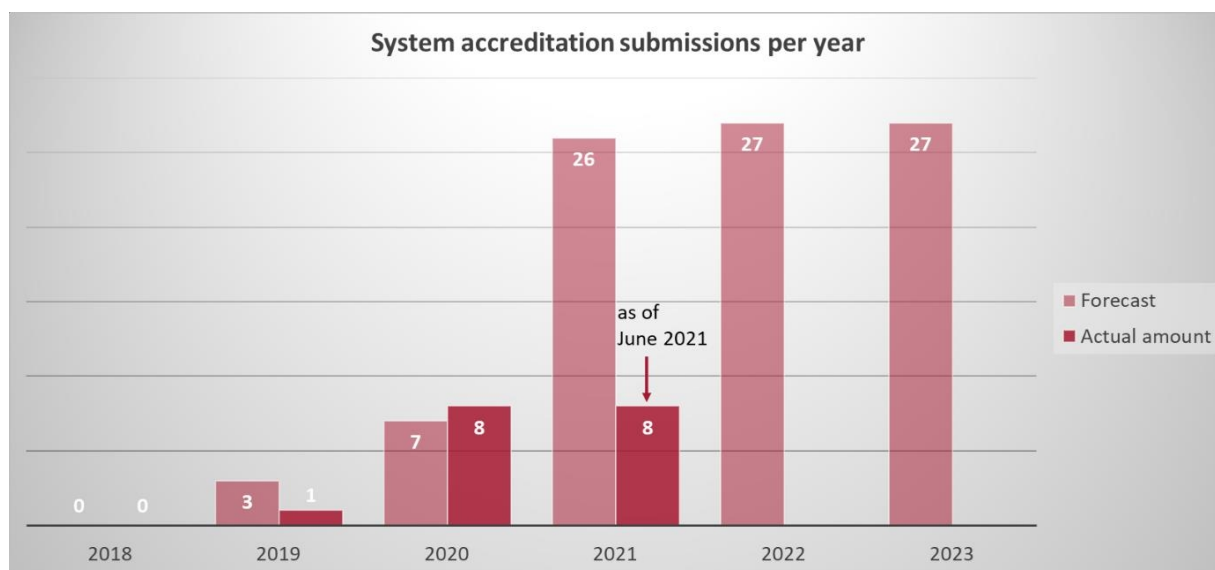


Program accreditation submissions per year (source for actual figures: ELIAS database). The numbers represent individual programs, although programs may be submitted in a cluster. Variations in accreditation cycle end dates, existing system accreditations, accreditation extensions, and forecasts for new program/system accreditations are included in the calculation to the extent available as of June 2021. The forecast for 2021 already includes some COVID-19-related extensions and forecasts thereof.

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Slide 05: System accreditation submissions per year

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System accreditation submissions per year (including partial and full system accreditations; source for actual figures: ELIAS database). Variations in accreditation cycle end dates, existing system accreditations, and forecasts for new system accreditations are included in the calculation to the extent available as of June 2021. The forecast for 2021/2022 already includes some Covid-19-related extensions.

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5. Higher education quality assurance activities of the agency

Subject of the quality assurance activities of GAC

575 The subject of all quality assurance activities conducted by the GAC are bachelor's and master's degree programs offered by German public or private, state-recognized higher education institutions (HEIs), either through direct program accreditation or indirect system accreditation, in which it is assessed whether the HEI in question is capable of ensuring compliance with the standards for its degree programs. The focus is therefore on the quality of teaching and learning.⁵¹

A distinction must be made between this and the quality assurance of research, where a system of peer reviews for externally funded research projects has been established. Doctoral studies are not included in the scope of GAC.⁵²

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However, HEIs are free to develop holistic quality management systems that also include research.

⁵¹ See Article 1(1) and Article 2(1) of the Interstate Study Accreditation Treaty for the emphasis on the quality of teaching and learning, particularly in bachelor's and master's degree programs.

⁵² See Chapter 12 for details. [Recommendations and main findings from previous reviews and the agency's resulting follow-up.](#)

585 In addition, academic and professional accreditation are separate. GAC is only responsible for
academic accreditation. There are three exceptions to this principle:

- For teacher education programs and theological programs, compliance with professional requirements is mandatorily verified during the accreditation procedures conducted by GAC (see § 22 (5) and § 25 (1), sentences 3 to 5 of the Model Decree).
- Fulfilment of the requirements under professional regulations is also relevant for the (academic) accreditation decision in other disciplines if the HEI promises that graduates can gain access to a regulated profession upon completion of the study program, i.e., the practice of this profession is part of the qualification objective according to § 11 (1) sentence 1 of the Model Decree.
- § 35 of the Model Decree provides for the possibility of coordinating the procedures for academic and professional accreditation.⁵³

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Quality assurance activities within the scope of ESG

The German accreditation system provides four different types of quality assurance processes within the scope of the ESG:

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- Program accreditation,
- system accreditation,
- accreditation of alternative procedures,
- equivalency assessment.

605 See Chapter [6, "Processes and Their Methodologies,"](#) for a detailed description of the various quality assurance activities of the GAC.

Accreditation of joint degree programs

610 The accreditation of joint degree programs through the recognition of assessments conducted in accordance with the European Approach to Quality Assurance for Joint Programs⁵⁴ as specified in the Terms of Reference is not considered a separate quality assurance activity, as it falls under the program accreditation activity. Special characteristics

⁵³ An example of this are degree programs in the field of auditing. If, at the request of the higher education institution, it is to be determined as part of the accreditation process whether a master's degree program is "*particularly suitable for the training of auditors within the meaning of the Auditing Examination Ordinance,*" representatives or commissioners from the professional bodies participate in the accreditation process as representatives of professional practice; see resolution of the KMK of November 17, 2005, at https://www.kmk.org/fileadmin/veroeffentlichungen_beschluesse/2005/2005_11_17-Wirtschaftspruefer-Akkreditierung.pdf.

⁵⁴ See https://www.eqar.eu/assets/uploads/2018/04/02_European_Approach_QA_of_Joint_Programmes_v1_0.pdf

Nevertheless, these accreditation procedures are transparently identified in the sections on compliance with the ESG standards.

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Activities outside the scope of the ESG

GAC makes a clear distinction between quality assurance activities and activities that fall outside the scope of the ESG. Cooperation agreements with foreign quality assurance agencies, as well as international projects such as Twinning, are aimed at capacity building and the exchange of information and expertise.⁵⁵ They do not involve any assessment or evaluation of a higher education institution (HEI) or study program. Therefore, they have nothing in common with GAC's quality assurance activities. Furthermore, these activities are clearly distinguished on the GAC website.⁵⁶

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6. Processes and their methodologies

Program accreditation

The subjects of program accreditation are bachelor's and master's programs offered by state or state-recognized higher education institutions in Germany (see Article 1, Article 2(1), and Article 3(1)(2) of the Interstate Study Accreditation Treaty). During the accreditation process, it must be demonstrated that the study program complies with the formal criteria set forth in Part 2 and the academic criteria set forth in Part 3 of the Model Decree (see § 22 (1) of the Model Decree). If a study program has successfully undergone an accreditation procedure, it receives accreditation with or without conditions (see § 22 (1) Model Decree) and bears GAC's seal of quality for the duration of its accreditation, which is eight years (see § 22 (4) Model Decree). If study programs *"have a high degree of affinity at the subject level that goes beyond mere affiliation to a disciplinary culture"*⁵⁷, accreditation may also be conducted as part of a cluster procedure (see § 30 (1) and (2) Specimen Decree); nevertheless, the accreditation decision always pertains to the individual study programs.

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The accreditation procedure is a multi-stage process based on the principle of peer review. If a higher education institution (HEI) pursuant to § 24 of the Model Decree commissions an assessment agency authorized by the GAC to carry out the procedure, the agency in question appoints a review panel (see § 25 of the Model Decree⁵⁸).

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⁵⁵ See Chapter 8. [Agency's international activities](#).

⁵⁶ See <https://www.akkreditierungsrat.de/en/international-affairs/international-affairs>.

⁵⁷ § 30 (1) sentence 1 Specimen Decree

⁵⁸ See chapter [10.4 ESG Standard 2.4 Peer-review experts](#).

The HEI submits a self-evaluation report to the assessment agency (see § 24 (2) Specimen Decree).

645 Compliance with the formal criteria set forth in Part 2 of the Specimen Decree is assessed by the assessment agency. The assessment agency documents the results in a formal report, which is made available to the experts (see § 24 (3) and (4) Specimen Decree).

The academic assessment of the study program by the review panel is based on the criteria set forth in Part 3 of the Specimen Decree (see § 24 (4) Specimen Decree) and, in addition to the analysis of the application documents, includes a site visit to the HEI (see § 24 (5) Specimen Decree). During this site visit, the review panel holds discussions with representatives from the status groups of the HEI (see justification of § 24 (5) Specimen Decree).
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In cases of initial accreditation of a program that has not yet begun and in cases of reaccreditation of a study program, the review panel may decide to waive the site visit and will then evaluate the program through a desk-based assessment (see § 24 (5) of the Model Decree). The explanatory memorandum to the Specimen Decree states that the possibility of waiving the site visit exists only if it offers no added value compared to the assessment of the academic criteria based on documents. In the agencies' practice, the waiver has not played a major role.

655 In line with EQAR's statements,⁵⁹ GAC also considers a site visit conducted online due to the COVID-19 pandemic to be permissible.

660 Subsequently, the experts prepare a review report with a proposal for a decision on the accreditation of the study program (see § 24 (4) Specimen Decree).

The agencies give the higher education institutions the opportunity to comment on the review report. On the one hand, this allows any factual errors in the report to be corrected; on the other hand, the higher education institution can
665 also comment on the findings of the review panel.

The Accreditation Council decides on the accreditation of the study program upon application by the HEI. Its decision is based on the formal report and the review report (see § 22 (1) Model Decree). Pursuant to Article 3 (4) of the Interstate Study Accreditation Treaty, the HEIs may also attach a statement to their application for accreditation. If the Accreditation
670 s Council intends to deviate significantly from the experts' proposal, the HEI may submit a further statement before the Accreditation Council issues its decision (see § 22 (3) of the Specimen Decree).

After completion of the procedure, the GAC, in accordance with § 29 of the Specimen Decree, publishes its decision and the review report, including the names of the experts, in ELIAS.

⁵⁹ <https://www.eqar.eu/covid-19/#can-our-agency-review-be-organised-with-an-online-site-visit>

675 Possible decisions are: Accreditation without conditions, accreditation with conditions, and rejection of accreditation (see § 22 (1) and § 27 Specimen Decree). In the event of a positive accreditation decision, the study program will bear the GAC's quality seal (see § 22 (4) Specimen Decree). Accreditation is granted for a period of eight years (see § 26 of the Model Decree).

680 In the case of accreditation with conditions, pursuant to § 27 of the Specimen Decree, higher education institutions (HEIs) "usually" have a deadline of twelve months to demonstrate to the Accreditation Council (GAC) that they have met the conditions. Although this deadline may be longer or shorter in special cases, the Accreditation Council generally grants the twelve-month deadline to ensure equal treatment. The option provided for in § 27 (2) of the Specimen Decree to subsequently extend the deadline is, on the other hand, used by the Accreditation Council in cases where the HEI has submitted documents demonstrating compliance with the conditions in a timely manner, but these documents are insufficient.

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Program accreditation of joint degree programs pursuant to § 33 of the Model Decree

For joint degree programs, the Model Decree and the decrees of the Länder permit the application of the European Approach for Quality Assurance of Joint Programs (European Approach).

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Section 10 (1) of the Model Decree states:

"(1) A joint degree program is either a bachelor's or a master's program that is coordinated and offered by a domestic institution of higher education in collaboration with one or more institutions of higher education from a foreign country or countries within the European Higher Education Area, leading to a joint degree, and that has the following characteristics:

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1. *an integrated curriculum,*
2. *usually at least 25 percent of the study program completed at one or more foreign higher education institutions,*
3. *contractually governed cooperation,*
4. *a coordinated admissions and examination system, and*
5. *joint quality assurance."*

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Sections 10, 16, and 33 of the Model Decree contain the criteria for joint degree programs. These provisions transpose the European Approach into German law; for legal reasons, the European Approach itself is only mentioned in the explanatory memorandum to the decree.

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The formal and academic criteria for joint degree programs pursuant to § 10 (2) and § 16 (1) The Specimen Decree complies with the criteria of the European Approach.

The procedural rules of the European Approach were implemented in § 33 of the Specimen Decree.

710 Under Section 33, the GAC only verifies whether an assessment has been conducted in accordance with the European Approach by an agency listed in EQAR, i.e., whether the study program has been assessed in accordance with the criteria and procedural rules of the European Approach. It does not conduct a second assessment of the study program. For recognition, however, it requires a review report that clearly demonstrates the application of the European Approach; if not, the application must be rejected or the review report must be improved.

715 If an assessment has been conducted in accordance with the European Approach and has yielded a positive result, GAC issues an accreditation decision in recognition of this assessment. This accreditation has the same legal consequences as the “standard” accreditation issued by the Accreditation Council. However, the accreditation period is six years, as provided for in the European Approach. It also follows from § 33 (1) sentence 2 no. 6 of the Specimen Decree that any conditions stipulated by the experts or the assessment agency must be fulfilled before the recognition decision can be made by GAC.

After completion of the procedure, GAC publishes the decision, as well as the review report including the names of the experts and, if applicable, the decision of the (foreign) assessment agency in German and English in ELIAS.

720 At the time of reporting, GAC had made seven accreditation decisions pursuant to § 33 of the Specimen Decree. This activity is delegated to the Board.⁶⁰ There would likely be more cases if the European Approach were applied in Germany not only to study programs leading to a joint degree, but also to integrated double and multiple degree programs.

System accreditation

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735 The purpose of system accreditation is the internal quality assurance system of state or state-recognized higher education institutions (HEIs) in Germany (see Article 1, Article 2(1), and Article 3(1)(1) of the Interstate Study Accreditation Treaty). Through system accreditation, a HEI is granted the right to use the GAC seal for its self-assessed study programs (see § 22 (4) of the Model Decree). During the system accreditation process, a HEI must demonstrate that it systematically implements the formal and academic criteria set forth in the Model Decree (see § 17 (1) of the Model Decree). To this end, the quality management system must provide for regular evaluations of the study programs and the areas of performance relevant to teaching and learning, involving internal and external students, external academic experts, representatives of professional practice, and graduates (see § 18 (1) Model Decree). A positive system accreditation certifies that the

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⁶⁰ Based on Section 12 of the Statutes.

The higher education institution's quality management system in the area of teaching and learning is designed to ensure that the learning outcomes and quality standards of its degree programs are achieved.

745 The accreditation procedure is a multi-stage process based on the principle of peer review. If a HEI, in accordance with § 24 of the Model Decree, commissions an assessment agency to carry out an peer review procedure, the agency in question appoints a review panel (§ 25 Model Decree; see chapter [10.4 ESG Standard 2.4 Peer-review experts](#) for details).

The HEI submits a self-evaluation report to the assessment agency (see § 24 (2) Model Decree).

750 The review panel's assessment of the quality management system is conducted based on the criteria for quality management systems set forth in Part 3 of the Specimen Decree (see § 24 (4) Specimen Decree) and typically includes two site visits to the HEI, during which the review panel holds discussions with representatives from the institution's stakeholder groups (see substantiation of § 24 (5) Specimen Decree).

Subsequently, the experts prepare a review report with a proposal for the accreditation of the HEI's internal quality management system (see § 24 (4) Specimen Decree).

755 The agencies give the higher education institutions the opportunity to comment on the review report. On the one hand, this allows any factual errors in the report to be corrected; on the other hand, the higher education institution can also comment on the review panel's findings.

760 The evaluation procedure also provides for a random sample. *"During random sampling, it is verified whether the intended effects of the quality management system under assessment are realized at the level of the study program."*⁶¹ (see § 31 of the Specimen Decree for details on the random sample).

765 The Accreditation Council decides on the accreditation of the quality management system upon application by the higher education institution. The process is similar to that used in program accreditation: The basis for the decision is the review report submitted by the review panel as well as the formal report prepared by the assessment agency (see § 22 (1) Model Decree). The formal report shall state in the initial system accreditation that at least one study program has been evaluated through the quality management system at the time of application. In the case of system re-accreditation, it must be demonstrated that all Bachelor's and Master's study programs have been evaluated through the institution's internal quality management system at least once (see § 23 (1) nos. 2–4 of the Specimen Decree). Pursuant to Article 3(4) of the Interstate Study Accreditation Treaty, higher education institutions may attach a statement to their application for accreditation. If the Accreditation Council intends to deviate significantly from the peers' proposal, the higher education institution may submit

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⁶¹ § 31 (1) sentence 2 Model Decree

a further statement before the Accreditation Council's decision (see § 22 (3) Specimen Decree Decree).

After completion of the procedure, GAC, in accordance with § 29 of the Specimen Decree, publishes its decision and the accreditation report—including the names of the experts—in ELIAS.

Possible decisions are: Accreditation without conditions, accreditation with conditions, and rejection of accreditation (see § 22 (1); § 27 Model Decree). In the event of a positive accreditation decision, the quality management system bears the GAC quality seal, and the HEI receives the right to award the GAC seal for the study programs it has assessed itself (see § 22 (4) Specimen Decree). Accreditation is granted for a period of eight years (see § 26 Specimen Decree).

In the case of accreditation with conditions, pursuant to § 27 of the Model Decree, the HEIs “usually” have a deadline of twelve months to demonstrate compliance to the GAC. In practice, the Accreditation Council generally grants the twelve-month deadline in such cases as well.

Accreditation of alternative procedures

Process and methodology

In 2012, the German Council of Science and Humanities proposed an experimental clause to “[...] *also allow particularly ambitious higher education institutions to use other procedures for external assessment—under the supervision of the Accreditation Council*”.⁶² The Accreditation Council adopted this recommendation and, in 2014, called on higher education institutions to test such alternative approaches within the framework of an experimental clause. Four experiments were approved by the Accreditation Council; their assessment procedures began in 2016 under the close supervision of the Accreditation Council and were completed in 2020.

The experiences with the procedures within the framework of the experimental clause were incorporated into the further development of the accreditation system in Germany. With the ratification of the Interstate Study Accreditation Treaty, the Länder subsequently established the accreditation of alternative procedures as a third procedural line. (see Article 3 (1) no. 3 Interstate Study Accreditation Treaty).

“The alternative procedure should be suitable for gaining fundamental knowledge of alternative approaches to external quality assurance beyond the procedures named in Article 3, paragraph

⁶² German Council of Science and Humanities: “Recommendations on Accreditation as an Instrument of Quality Assurance,” 2012, p. 11: http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/Son-stige/WR_2012_Akkreditierung.pdf (in German only)

805 *1 numbers 1 and 2 of the Interstate Study Accreditation Treaty” (§ 34 (3) sentence 4 Specimen Decree).*

The subject of accreditation is the alternative procedure. During the accreditation of the alternative procedure, a higher education institution must demonstrate that it systematically implements, through the use of the alternative procedure, the formal and academic criteria set forth in the Specimen Decree (see § 34 (2) of the Specimen Decree) and that the alternative procedure itself complies with the ESG (see preamble and section 3 (3), sentence 2 of the Rules of Procedure for Alternative Accreditation Procedures (RPAAP)).

810 Upon successful accreditation, the HEI receives the self-accreditation rights for the study programs assessed within the alternative procedure (see section 6 (2) RPAAP).

The framework for these procedures is set forth in § 34 of the Specimen Decree and in the RPAAP, which the Accreditation Council adopted pursuant to § 34 (4) of the Specimen Decree.

815 The procedure for the accreditation of an alternative procedure is a multi-stage peer review. Before an alternative procedure is carried out, approval must be obtained from the competent scientific authority of the respective state and the Accreditation Council (see § 34 (3) sentence 1 of the Specimen Decree; section 3 of the RPAAP).

820 Once approval has been granted, the details of the review shall be specified in an agreement to be concluded between the GAC and the HEI submitting the application (see section 4 RPAAP).

825 The HEI subsequently submits a self-evaluation report based on the previous application (see section 5 (2) RPAAP). The assessment is conducted by external independent experts (see section 5 (2) RPAAP). GAC may conduct the procedure itself or delegate it to third parties (see section 5 (4) RPAAP). The result of the assessment procedure is a review report containing assessment recommendations (see Section 6(1) RPAAP). According to Section 6(1) RPAAP, the HEIs are given the opportunity to comment on the report; factual errors may be pointed out in this manner, as may the HEI's differing opinions regarding the review panel's findings.

“The Accreditation Council decides on accreditation, upon application by the higher education institution, by determining the equivalence of the alternative accreditation procedure to the procedures under Article 3, sentence 1, nos. 1 and 2 of the Interstate Treaty.” (Section 6(1) RPAAP).

830 After completion of the procedure, GAC publishes its decision and the accreditation report—including the names of the experts—in ELIAS, in accordance with section 6 (6) of the RPAAP.

Possible decisions are: Accreditation without conditions, accreditation with conditions, and rejection of accreditation (see Section 6(3) of the RPAAP). Upon accreditation, GAC awards its seal to

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the alternative procedure, which grants the HEI the right to award the seal for its study programs if they have undergone the assessment procedure for study programs provided for in the accredited procedure (see section 6 (2) RPAAP). Accreditation of an alternative accreditation procedure is limited to a maximum of eight years (see § 34 (5) sentence 1 Model Decree and section 6 (2) RPAAP).

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As a rule, two years before the accreditation period expires, the alternative procedure is evaluated by an independent, scientifically oriented institution that reports to the Accreditation Council. The Accreditation Council makes a recommendation on whether the alternative procedure should be continued based on the evaluation results and the results of the monitoring of the procedure (see § 34 (5) sentence 3 Specimen Decree and section 9 RPAAP on the evaluation).

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Currently ongoing accreditation procedures regarding alternative procedures

Since the RPAAP were only adopted in 2019, there is no experience yet with completed accreditation procedures involving alternative approaches. However, two accreditation procedures were initiated in 2020. The assessment in both procedures is carried out by GAC. The two alternative procedures submitted for accreditation will be briefly presented, as they exemplify the range of possible approaches:

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- Alternative procedure of the Harz University of Applied Sciences: The Harz University of Applied Sciences implements a program-related alternative procedure. The core element consists of regular internal workshops on program development involving students and faculty, which are supplemented every eight years by the participation of external experts. The institution has also established its own accreditation committee, the majority of which comprises external members from the fields of university administration, the student body, and professional practice. A representative of an assessment agency serves as an advisory member. It is anticipated that the alternative procedure will provide insights into how faculty and students can be more actively involved in accreditation processes and how external expertise can be strengthened within accreditation committees. The accreditation process under this alternative procedure is expected to be completed in November 2021. At the time of this report, the expert training has taken place and the first on-site visit is imminent.

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- Alternative procedure of the University of Media, Furtwangen University, and the University of Applied Sciences for Business and the Environment Nürtingen-Geislingen: The procedure adopted by these three higher education institutions in Baden-Württemberg is system-oriented. The institutions collaborate to continuously evaluate and further develop their quality assurance systems at, in some cases joint, annual quality conferences. This also includes the institutions' own internal procedures

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875 for the accreditation of study programs. In addition to the cooperation of the three HEIs in quality assurance,
the outstanding feature of this alternative procedure is the contin-
evaluation. GAC will therefore monitor this procedure particularly closely throughout the entire accreditation
period. At the time of reporting, the Accreditation Council has, in principle, decided on the agreement for the
implementation of the accreditation procedure with the three HEIs but has not yet signed a contract.
880 Accreditation is expected to take place in November 2021.

Equivalency assessment (GJU)

885 Higher education institutions abroad with a clear connection to Germany (German-backed universities) are interested in
demonstrating that they meet German quality standards. This is particularly important for the recognition of the degrees
awarded by such HEIs. The German Jordanian University (GJU) approached GAC to obtain a certificate of equivalence
for its study programs, provided that it demonstrates compliance with the formal and academic criteria set forth in the
Model Decree through assessment procedures conducted by an assessment agency authorized by GAC in accordance
with Part 4 of the Model Decree. These requirements were set forth in a contract between GJU and GAC.⁶³ This is, at
least as of the time of reporting, a unique project. Similar projects with other universities are not planned.

890 In the event of success, the Accreditation Council will certify the GJU's fulfillment of the criteria in the respective study
program by means of a certificate of equivalence. No legal consequences are associated with this. In case of
deficiencies, GAC may make recommendations. Conditions will not be imposed, as no accreditation decisions with legal
consequences will be

895 taken. After completion of the procedure, GAC will publish the decision and the review report, including the names of the
experts, in ELIAS. At the time of reporting, only the contract has been concluded.

⁶³ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/20200211_Vereinbarung_Gleichwertigkeitsfeststellung.pdf (in German only)

7. Agency's internal quality assurance

Fundamentals of GAC's quality management

905 GAC's quality management concept, adopted by the Accreditation Council in 2019,⁶⁴ contains GAC's quality goals and its basic quality management framework. It specifies the implementation of GAC's quality assurance and development in terms of processes and responsibilities.

Likewise, the quality management concept stipulates that the Head Office compiles an annual quality report in which evaluations from the structured evaluation in ELIAS as well as results from the feedback formats are documented.

910 Quality management is intended to meaningfully link GAC's existing goals, concepts, and processes through a quality cycle, thereby providing impetus for sustainable further development. The quality cycle is based on a continuous, cyclical process that is generally recognized in the context of quality management concepts: the PDCA cycle (Plan-Do-Check-Act) according to Walter Deming.⁶⁵

GAC's PDCA cycle

The PDCA cycle was described in the 2020 quality report, which was adopted by the Accreditation Council at its 108th meeting⁶⁶ as follows:

920 *"1. Process step "Plan": What are the quality goals and concepts of GAC?*

The Accreditation Council has adopted the following quality objectives and concepts in its mission statement (publication AR 51/2019) and in its quality management concept (publication AR 67/2019). These include:

- 925 • *The German Accreditation Council ensures that accreditation procedures are carried out quickly, reliably, on time, and transparently from the application to the Accreditation Council's decision. In particular, the administrative burden associated with submitting applications should be kept to a minimum for higher education institutions and agencies.*
- *It acts in accordance with the European Standards and Guidelines (ESG) and the Interstate Study Accreditation Treaty, as well as their implementation through corresponding decrees of the Länder.*
- *It ensures that accreditation decisions are made independently of third parties and that potential conflicts of interest are prevented through appropriate measures.*
- 930 • *It promotes dialogue among all actors involved in the accreditation system and works toward a trusting cooperation among all stakeholders represented.*

2. Process step "Do": How do the Accreditation Council and Head Office implement the individual quality goals operationally?

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⁶⁴ See <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/quality-management/qual-ity-management-german-accreditation-council>.

⁶⁵ See Annex 03 for a graphical representation of the PDCA cycle.

⁶⁶ See Annex 02, pages 2–4 (in German only).

The quality objectives are implemented operationally at the Head Office through the regular processing of accreditation applications, in the preparation and follow-up of accreditation decisions, in the preparation and implementation of resolutions, and in the other tasks of GAC.

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Core operational processes include:

- the introduction, use, and further development of ELIAS for application processing (including process descriptions),
- communication with all stakeholders in the accreditation system,
- creation of internal process descriptions and orientation guides (subject allocation, business distribution plan, office organization, program accreditation handbook),
- preparation of external orientation aids (resolutions, FAQs).

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3. Process step "Check": How do structured evaluation and feedback formats work?

The implementation of the quality objectives through the operational core processes is subject to both regular and ad hoc reviews. On the one hand, this is ensured by structured evaluations in ELIAS following application procedures (questionnaire tool), which are regularly evaluated. A further regular external evaluation will be carried out by an ENQA review.

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On the other hand, various feedback mechanisms are available to all stakeholders in the accreditation system (universities, students, agencies, federal states, etc.), which can trigger a review of core operational processes on an ad hoc basis.

Examples of feedback mechanisms include:

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- The members of the Accreditation Council serve as important communicative interfaces between their respective stakeholder groups and the Accreditation Council.
- GAC invites the management of all agencies annually to a joint conference, thereby ensuring a regular exchange with the agencies.
- Through the Quality Dialogue, GAC offers an annual forum for discussion on topics related to accreditation.
- The Board and the program managers participate in working groups, associations of the scientific faculties at German universities, conferences, etc., thereby facilitating direct exchange with all stakeholders in the accreditation system.
- The Head Office conducts feedback sessions on program accreditation with the agencies.
- The Head Office offers ELIAS training sessions for user groups as needed.
- The Head Office ensures regular and transparent communication with various target groups through the publication of resolutions and results letters, FAQs, a newsletter, and the use of social media.

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All these feedback channels provide stakeholders in the accreditation system with the opportunity to provide feedback on GAC's core operational processes on a regular and/or ad hoc basis.

4. Process step "Act": How are operational or conceptual consequences derived from the review?

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The handling of structured and ad hoc feedback is differentiated based on its scope and relevance:

- Feedback that affects core operational processes within the Head Office is addressed in office meetings and regular meetings. This may lead to consequences that can be implemented, for example, in the form of further development of ELIAS processes, further development of internal orientation aids, or the creation of external orientation aids.

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- *Feedback regarding ongoing business in accordance with § 12 (2) of the Statutes is handled by the Board. This may result in Board resolutions or draft resolutions, which are submitted to the Accreditation Council for a decision.*
 - *Feedback relevant to the accreditation system as a whole shall be addressed by the Accreditation Council. This may result in resolutions as well as adjustments to the quality objectives.*

990 *All three levels represent closed yet complementary control cycles and form the basis of GAC's quality management. The Head Office also compiles an annual activity report that documents the evaluations from the structured assessment in ELIAS as well as the results from the feedback mechanisms.*

995 See <https://www.akkreditierungsrat.de/en/news-and-publications/news-and-publications> for the activity reports from recent years.

Status of the implementation of the quality management

1000 Contrary to the original plans of the 101st meeting of the Accreditation Council, not all described instruments and processes could be fully implemented by the end of 2020. The main reasons for the delay are the COVID-19 pandemic, the changed prioritization in the further development of the ELIAS portal, and the large volume of accreditation applications. The following instruments and processes have already been implemented or are in the process of implementation:

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Structured evaluation of accreditation procedures

1010 A questionnaire tool in ELIAS is expected to be operational by the end of 2021. It will give higher education institutions the opportunity to provide feedback following accreditation procedures. This feedback can address organizational, content-related, and technical aspects of the accreditation process. The feedback is collected anonymously and compiled by the Head Office once a year. The results are also published in summary form in the quality report and thus serve as the basis for the further development of operational processes and conceptual framework conditions.

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Feedback formats

- *New website and communication concept*

In 2018/2019, the Accreditation Council's website underwent a visual and technical overhaul. All information on the current accreditation system can be found there, including in English. The public database (ELIAS) is also linked there.⁶⁷

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In March 2020, the Accreditation Council adopted a communication concept in which, in addition to the information provided on the GAC website and the established forms of communication—such as press releases, result letters to stakeholders, and FAQs—further proactive communication formats were introduced in the form of a Twitter account and a newly designed newsletter (with a subscriber list of over 1,000 addresses).

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The website and the communication concept provide an essential basis for the various feedback formats by ensuring a regular and transparent flow of information from GAC to all stakeholders in the accreditation system.

- *Quality Dialogue*

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In September 2019, the first annual GAC Quality Dialogue took place in Frankfurt in cooperation with the University of Oldenburg. The topic of the Quality Dialogue was quality standards and quality assurance in continuing academic education. The next Quality Dialogue, on the topic of "dual study programs," in cooperation with Osnabrück University of Applied Sciences, was originally scheduled to take place in June 2020. Due to the COVID-19 pandemic, it took place in June 2021

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- *Feedback discussions with agencies*

The expanded meeting of the Accreditation Council, held together with all agencies authorized by GAC at the beginning of each year, provides an opportunity for exchange with the agencies' representatives. At the 103rd meeting in March 2020, the Interim Review ⁶⁸was presented and discussed with the agencies. At the 108th meeting in March 2021, the agencies and GAC held a dialogue on the quality of assessment reports.

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To optimize cooperation at the operational level, several feedback sessions between the Head Office and the agencies were held from 2019 to 2021. Such feedback sessions take place on a regular basis, approximately four times a year.

- *Exchange Forum of System-Accredited Higher Education Institutions*

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⁶⁷ <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/tasks-german-accreditation-council>

⁶⁸ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf.

Members of the Board and/or the Head Office regularly participate in the Exchange Forum of System-Accredited Higher Education Institutions initiated by Münster University of Applied Sciences, in which about 100 members of system-accredited HEIs participate.

- *ELIAS training sessions for user groups*

1060 The Head Office conducted ELIAS training for employees of higher education institutions in November 2019, March, and May 2020. The members of the Accreditation Council also receive regular training, most recently in April 2021.

Internal instruments

1065 To ensure quality assurance in the processing of applications, the review of applications and the decision on accreditations follow a multi-stage process. A system of "checks and balances" has been established through the defined process steps of examining and cross-checking applications at the Head Office, a rapporteur system⁽⁶⁹⁾, and decision-making within the Accreditation Council.

To ensure consistent application of criteria, work began in 2020 on the creation of a Handbook on Program Accreditation. The aim of the handbook is to systematically document the Accreditation Council's decision-making practices regarding issues that regularly arise in the assessment process and thus to create a central repository of knowledge for the Head Office.

1070 In addition, an internal regular meeting on program accreditation is held on a regular basis, at least before each meeting of the Accreditation Council, which offers program managers the opportunity to exchange views on the interpretation of accreditation criteria and to discuss procedural issues.

Furthermore, process descriptions ensure the consistent handling of accreditation applications.

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8. The Agency's international activities

1085 The promotion of international cooperation in the field of accreditation and quality assurance is explicitly identified as one of the six statutory tasks of GAC in the Interstate Study Accreditation Treaty, which underscores the importance of these tasks for GAC.

⁶⁹ See Chapter [10.2, ESG Standard 2.2: Designing Methodologies Fit for Purpose](#).

International Networks

GAC is a long-standing active member of leading European and international quality assurance networks such as ENQA (membership 2000–2018, affiliate of ENQA since 2018) and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). It regularly participates in international working groups, meetings, and conferences.

Through the involvement of its members and speakers in commissions, review panels, or quality assurance agencies abroad, GAC can contribute its expertise internationally and at the same time learn from the experience of its foreign partners.

International Agreements

GAC has established the following international agreements with quality assurance agencies in Japan, the USA, and Chile, which aim to facilitate the exchange of information and expertise:

- Agreement with the Japanese quality assurance agency NIAD-UE (National Institution for Academic Degrees and University Education),⁷⁰
- Agreement with the U.S. quality assurance agency CHEA International Quality Group (CIQG)⁷¹ and
- Agreement with the Chilean quality assurance agency Comisión Nacional de Acreditación⁷²

International projects

QACHE

GAC was a partner in the QACHE project—Quality Assurance of Cross-border Higher Education—which focused on the quality of transnational study programs. The project was co-financed by the European Union’s Erasmus+ program. The aim was to create a common European quality assurance approach for cross-border higher education. The project ran until March 2016.

As a further project outcome, a country report was prepared by GAC’s Head Office, which contains an inventory of the programs offered by German higher education institutions abroad and their quality assurance.⁷³

⁷⁰ [https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/NIAD-UE
Memorandum_of_Understanding.pdf](https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/NIAD-UE_Memorandum_of_Understanding.pdf) GAC

⁷¹ https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/CIQG_GAC_MoA.pdf

⁷² https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/CNA-AR-Memorandum_of_Understanding_unterzeichnet.pdf

⁷³ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/AR_Qache_Laenderbericht_BRD_en.pdf.

EHEA Peer Support

At the Ministerial Conference held in Paris in 2018, the ministers of higher education of the EHEA agreed that full implementation of three key commitments—ensuring that all countries fully implement the three-cycle system, the smooth recognition of qualifications and periods of study, and quality assurance—is crucial for the success of the Bologna Process.

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The ministers adopted a structured peer support approach to promote the implementation of the three key commitments. The peer support approach was to be facilitated by the establishment of three Thematic Peer Groups, each focusing on one of the three key commitments. Thematic Peer Group C on Quality Assurance was established with the aim of fostering peer support among countries. Accordingly, a European project was launched to facilitate and finance a system of staff mobility across Europe with the aim of sharing expertise in this field.

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GAC participated in Thematic Peer Group C on Quality Assurance. Due to the COVID-19 pandemic, of several planned staff exchanges, only one, with AQ Austria, could be carried out.

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Twinning Project Georgia

GAC is a partner in the two-year Twinning project “Strengthening capacities for quality assurance and governance of qualifications in Georgia.” It runs until June 2021 and focuses on the following three components:

- Strengthening quality assurance in education and training from a lifelong learning perspective,
- Contributing to the implementation of the new national qualifications framework,
- Contributing to an improved model of governance, monitoring, and dissemination of the outputs of the Georgian quality assurance agency, the National Center for Educational Quality Enhancement (NCEQE).

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The project partners are Germany (DAAD, BMBF, and the Accreditation Council) and Estonia (the Estonian accreditation agency EKKA). Various expert missions are planned for each individual component during the project period.

Two activities have already been carried out with the participation of GAC.

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- Development of an NCEQE concept proposal for a quality assurance framework for formal and non-formal education
- Development and dissemination of handbooks and toolkits

Twinning project in North Macedonia

1150 Currently, GAC is participating with a leading Polish partner and the German partner DAAD in a Twinning project grant call. The overall objective of the proposed 30-month Twinning project is to strengthen and operationalize the national qualifications framework of North Macedonia, with the aim of increasing the employability, mobility, and social integration of workers and learners.

1155 GAC can contribute in particular to reviewing the institutional quality assurance framework and to developing efficient and applicable quality assurance methodologies and procedures in North Macedonia. By participating in further Twinning projects, GAC strives to expand its international network, to strengthen European cooperation in quality assurance in higher education, and to contribute to European integration.

Details of the North Macedonia Twinning Project are currently being negotiated with the project partners. If the project is approved, it is expected to begin in the second half of 2021.

International quality assurance activities

1160 International quality assurance activities, such as the accreditation of joint degree programs and equivalency assessments, are explained in Chapter [5: Higher Education Quality Assurance Activities of the Agency](#).

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

9.1 ESG Standard 3.1 Activities, policies, and processes for quality assurance

1170 **Agencies should regularly conduct external quality assurance activities as defined in Part 2 of the ESG. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should be reflected in the agency's daily work. Agencies should ensure the involvement of stakeholders in their governance and work.**

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External quality assurance activities

1180 GAC regularly conducts external quality assurance activities as defined in Part 2 of the ESG. As clarified in the tripartite Terms of Reference for this evaluation procedure, this ESG evaluation takes into account that, within the German system, agencies and the Accreditation Council operate under a division of labor and responsibility.

Strategic planning

1185 GAC has a published Mission Statement.⁷⁴ It summarizes GAC's self-image and basic principles and sets forth the mission, the strategic goals, and the manner of their intended implementation.

1190 As mentioned in Chapter 4, "[History, Profile, and Activities of the Agency](#)," GAC operates within a legal framework that comprises six tasks. First and foremost is the task of accrediting study programs, quality management systems, and alternative procedures. Therefore, external quality assurance, as defined within the German system, lies at the center of GAC's activities. The five other tasks, which generally already existed in the old system, are less prominent in comparison. The Mission Statement therefore begins with the commitment that GAC "*fulfills the tasks assigned to it in the Interstate Study Accreditation Treaty*" and focuses primarily on the accreditation function.

It is noteworthy that the Accreditation Council finally adopted its Mission Statement in June 2019, one and a half years after the launch of Germany's current accreditation system. This was due to an early strategic choice: At its inaugural meeting on February 20, 2018, the Accreditation Council made the policy decision not to produce comprehensive policy and planning documents, but to develop its strategy in a modular manner based on the realities of administrative practice.⁷⁵

1195 The Interim Review, adopted by the Accreditation Council in March 2020,⁷⁶ explains in detail in its second chapter how this "piecemeal engineering" approach to strategy and planning, based on the Mission Statement, has unfolded since then and how a series of individual decisions helped shape the proceedings.

1200 Based on GAC's commitment in its Mission Statement to ensure the swift, reliable, and transparent execution of accreditation procedures, components of this modular strategic approach include an increase in staff and office space at the Head Office, the adaptation of GAC's internal working procedures to its new legal responsibilities, the implementation of tools to streamline the processing of accreditation applications, and measures to ensure the consistent application of accreditation criteria.⁷⁷

In pursuit of the goal outlined in the Mission Statement to improve process efficiency within GAC and to promote "[...] *dialogue among all stakeholders involved in the accreditation system*

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⁷⁴ <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/mission-statement/mission-statement>

⁷⁵ See Interim Review, page 1.

⁷⁶ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf

⁷⁷ See Interim Review and, for details on these measures, also [10.2 ESG Standard 2.2 Designing methodologies fit for purpose](#).

and works toward a trusting cooperation among all represented stakeholders,” the Interim Review refers to a number of additional resolutions by the Accreditation Council, e.g., on what is expected from an accreditation report, on the reporting obligations for system-accredited HEIs, and on the size of the expert panel in cluster accreditation procedures.⁷⁸

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Another component already implemented is the GAC’s quality management concept.⁷⁹ At the center of this concept is the GAC’s objective, as stated in its Mission Statement, to reflect “on the implementation of its tasks and regularly evaluate feedback from higher education institutions and agencies in order to use the results for an experience-based further development of the quality assurance system and the application procedures [...]”. To implement the GAC’s objective, also stated in the Mission Statement, to ensure “[...] that accreditation decisions are made independently of third parties and that potential conflicts of interest are prevented [...]”, the code of conduct for members, alternate members, and permanent guests of the Accreditation Council was adopted.⁸⁰

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GAC further states in its Mission Statement that it is “[...] committed to academic freedom and the autonomy of higher education institutions [...]”. Higher education institutions bear primary responsibility for the quality of teaching and learning. Accreditation can be understood as supporting HEIs in reflecting on their activities and initiating a continuous process of quality development. Consequently, GAC has implemented several quality development measures as key components of its incremental approach, namely the Quality Development Award, the Quality Dialogue, and the section on quality development in accreditation reports.⁸¹

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For the remainder of its term of office until the end of 2021, GAC, in its Interim Review, has established three priorities (see Chapter 4: [History, Profile, and Activities of the Agency](#)):

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- 1) Handling the expected large “wave” of applications,
- 2) Systematic reflection on GAC’s work
- 3) Evaluation of GAC in the European context.

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As of spring 2021, the priority under 1) has been addressed, and measures to improve the efficiency of application processing have been continued. Since internal calculations based on the data in the accreditation database indicated that a high number of applications would be received in

⁷⁸ See Interim Review, page 13, for details on those resolutions.

⁷⁹ See Interim Review, page 14 and Chapter 7. [Agency's internal quality assurance](#).

⁸⁰ See page 15 of the Interim Review and <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/code-conduct/code-conduct>.

⁸¹ See page 15 of the Interim Review and chapter 10.2 of the ESG Standard for details on quality development measures: “[Designing methodologies fit for purpose](#).”

program accreditation in the course of 2020,⁸² further process optimization was necessary. This concerned, for example, the organization of meetings as well as the further development of ELIAS.⁸³

1245 Item 2) on the list has been severely impacted by the pandemic. The reflection congress, originally scheduled for 2021 and intended to serve as a key component in achieving the goal outlined in the Mission Statement of regularly reflecting on the performance of GAC's tasks, had to be postponed due to the additional workload caused by the pandemic and uncertainty regarding whether an in-person event would be feasible. Instead, the Quality Dialogue on dual study programs, which was canceled in 2020, was held in June 2021.

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Regarding point 3), the preparatory work for the international evaluation also proceeded as planned.

Stakeholder involvement

1255 The strategic and planning approach described makes it clear that GAC engages closely with its stakeholders through various feedback and communication channels. In addition to the planned structured evaluation via ELIAS, these channels include communication via FAQs, the newsletter, and Twitter; the Quality Dialogue; feedback discussions with agencies; and regular participation in the exchange forum for system-accredited higher education institutions.⁸⁴

1260 With regard to the governance of GAC, the Accreditation Council, as the main decision-making body, consists of students, professors, representatives of professional practice and the cantons, two international members, and a representative of the agencies (in an advisory capacity). As such, it is the main forum where stakeholders collaborate to ensure sound accreditation decisions and the continuous improvement of the accreditation system. Stakeholders also participate as experts in accreditation procedures. In the case of accreditation of alternative procedures, GAC selects them if it conducts the review of the alternative procedure itself. In all other procedures, they are selected by the agencies.⁸⁵

1265 Separation of activities within the scope of the ESG and other tasks

See Chapter [5. Higher education quality assurance activities of the agency](#) for the distinction between activities within the scope of the ESG and activities outside the scope of the ESG.

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⁸² See Chapter [4. History, profile, and activities of the agency](#).

⁸³ See the Interim Review for details.

⁸⁴ See chapter [7](#) for details. [Agency's internal quality assurance](#).

⁸⁵ See Chapter [10.4, ESG Standard 2.4: Peer-review experts](#).

9.2 ESG Standard 3.2 Official status

1275 **Agencies should have an established legal basis and should be formally recognized as quality assurance agencies by competent public authorities.**

1280 GAC, as defined in Section 1 of the Accreditation Council Act, is a foundation under public law with legal capacity that the federal states have established for accreditation and quality assurance in teaching and learning at German higher education institutions.

9.3 ESG Standard 3.3 Independence

1285 **Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third-party influence.**

Organizational independence

Legal framework

1290 As described in [the previous chapter](#), GAC is a separate, independent legal entity. GAC is fully responsible for its actions.

The composition of the Accreditation Council

1295 The Accreditation Council is the sole body responsible for the quality assurance procedures of the GAC. The Foundation Council, which “[...] *monitors the legality and economic efficiency of the management of the GAC’s operations [...]*”⁸⁶ and consists of six representatives of the federal states and five representatives of the HRK, does not interfere with the quality assurance procedures. See Chapter [4. History, Profile, and Activities of the Agency](#) for information on the composition of the Accreditation Council.

According to Article 9 (2) sentence 2 of the Interstate Study Accreditation Treaty, the professors are appointed for a period of four years by the KMK upon the recommendation of the HRK.

1300 For the other member groups of the Accreditation Council, Article 9 (2), sentence 4, provides for the following nomination rules:

- The representative of the HRK and the students are nominated by the HRK,

⁸⁶ Article 11 (1) Interstate Study Accreditation Treaty

- 1305
- the representatives of the Länder are nominated by the KMK,
 - the representative of the state ministries responsible for labor and collective bargaining law is nominated by the KMK in agreement with the Standing Conference of Ministers and Senators of the Interior of the Länder,
 - the representatives of the professional practice and
 - The foreign experts are nominated jointly by the KMK and the HRK, and
 - the representative of the agencies is nominated by the agencies.

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Those members (all members except the professors) are then, pursuant to Article 9 (2), sentence 4, appointed unanimously by the KMK and the HRK for a term of four years; with the exception of the students, who are appointed for two years pursuant to Section 8 (3) of the Statutes.

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According to Article 9 (2), sentence 8 of the Interstate Study Accreditation Treaty, members of the Accreditation Council may be dismissed by the Foundation Council for good cause. This provision has not yet been applied in practice.

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The nomination criteria are clearly defined. For professors, Article 9(2), sentence 3 of the Interstate Study Accreditation Treaty applies, according to which the HRK ensures “[...] *that the different types of higher education institutions and the diversity of disciplines are taken into appropriate account and that the professors are not university executives.*” In addition, the resolution of the 22nd general meeting of the HRK on May 22, 2017, and the statement of the HRK, which was adopted by the HRK Board on April 26, 2021,⁸⁷ clearly describe the selection process with regard to professorial members and the other members nominated by the HRK. Following that, the HRK also selects the international (professorial) members of the Accreditation Council. The student members are proposed by the student accreditation pool⁸⁸. The representatives of professional practice are proposed jointly by the employers’ associations and the trade unions, respectively.

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The appointment by the KMK (regarding professors) or the KMK and the HRK jointly (regarding the other member groups) is a purely formal procedural step. Within this step, there is no interference in the selection process.

The Accreditation Council has been specifically designed as a representative body where the interests of the various stakeholders are represented. According to Article 9(4) of the Interstate Study Accreditation Treaty, professors have a double vote in accreditation decisions. The

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⁸⁷ For details, see the HRK statement in Annex 04 and the resolution included as an attachment to the statement.

⁸⁸ The Student Accreditation Pool is the nationally recognized student interest group that appoints student representatives to the accreditation system and promotes their participation in it. See <https://www.studentischer-pool.de/studierendeoeffentlichkeit/>.

1335 The basis for this rule is the Federal Constitutional Court's 2016 ruling on accreditation, which called for an overall
structure *"in which decision-making powers and participation rights, influence, information, and oversight are structured
in such a way as to avoid threats to academic freedom."*⁸⁹ Nonetheless, all groups work together in the Accreditation
Council on an equal footing. Each member brings his or her expertise to the table and accordingly sees himself or
herself primarily as an expert and not as a member of a stakeholder group. Experience has shown that in the case of
1340 controversially discussed applications, the professors regularly argue from their own experience and subject perspective
and thus also represent quite different views.

Code of Conduct

1345 Furthermore, the code of conduct for members, deputy members, and permanent guests of the Accreditation Council
stipulates that the members of the Accreditation Council act as experts and not as delegates.⁹⁰

The code of conduct declares that "[...] *the members*⁹¹ *of the Accreditation Council observe the following principles:*

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- *Members of the Accreditation Council act and make decisions as experts in the field of quality assurance at higher education institutions (HEIs) solely on the basis of quality considerations and are not bound by the instructions of third parties.*
 - *Members of the Accreditation Council act and make decisions in good faith and to the best of their knowledge and belief in the interest of the Foundation.*

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 - *Members of the Accreditation Council shall maintain confidentiality toward third parties.*
 - *Members of the Accreditation Council shall not use their membership to advance their own interests or the interests of third parties and shall prevent any misuse of information obtained during their activities.*
 - *Members of the Accreditation Council and alternate members must promptly declare any conflict of interest or bias regarding an agenda item to the chairperson, at the latest, however, after the meeting has begun. In such cases, they shall not participate in the Accreditation Council's decisions on the matter. Members representing the federal states do not vote on decisions concerning higher education institutions in their own federal states.*

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 - *Membership in the Accreditation Council is incompatible with concurrent employment*
 - *in agencies approved by the Accreditation Council, or for an organization that is legally, institutionally, organizationally, financially, or in terms of personnel related to one of the aforementioned agencies, as far as quality assessments in the German accreditation system are concerned*

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⁸⁹ Order of the First Senate (see footnote 10), para. 60; see also Chapter [4. History, Profile, and Activities of the Agency](#).

⁹⁰ See <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/code-conduct/code-con-duct>.

⁹¹ *Unless otherwise specified, members, alternate members, and permanent guests are included.*

- 1370
- *in or for organizations that conduct quality assessments of higher education institutions (HEIs) within the German accreditation system, such as in the context of alternative procedures. Participation in internal assessments at system-accredited HEIs is compatible with membership in the Accreditation Council.*
- *Since permanent guests participate in the meetings in a purely advisory capacity, i.e., without voting rights, it is not excluded that this group of persons may also work in agencies at the same time.*
- 1375
- *Members of the Accreditation Council may only accept gifts or hospitality from third parties if they are appropriate to the occasion in terms of reason, type, and scope, and if neither the parties involved nor third parties can be given the impression of being influenced or expected to reciprocate. The corresponding regulations for officials of the state of North Rhine-Westphalia, where the GAC is headquartered, shall apply analogously.*

1380 **Operational independence and independence of formal outcomes**

GAC is solely responsible for all personnel matters, including the appointment and dismissal of staff. According to Article 12 (2) of the Interstate Study Accreditation Treaty, “[...] the superior of GAC’s employees is the chairperson of the Board.”

1385 All decisions, such as accreditation decisions and decisions regarding equivalency assessments, are made by GAC, independently of the ministry or other third parties.

The experts are appointed independently by the agencies or by GAC (in the case of accreditation of alternative procedures, if GAC conducts the procedure).⁹²

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9.4 ESG Standard 3.4 Thematic Analysis

1395 **Agencies should regularly publish reports that describe and analyze the general findings of their external quality assurance activities.**

Within the current accreditation framework, GAC remains, as in the “old” system, committed to conducting thematic analyses for its external quality assurance activities.

1400 GAC’s electronic database and application submission tool, ELIAS, serves as the backbone for all general qualitative and quantitative analyses related to external quality assurance activities. New application submissions are filed and processed within ELIAS. Older data ⁹³has been imported into the database and is being consolidated or newly collected in a dedicated, ongoing project scheduled for completion by the end of 2021 (Project Database 2021). Data from the Higher Education Compass is used to supplement and, in some cases, update the master data of the study

⁹² For details, see Chapter [10.4 of the ESG Standard 2.4: Peer-review experts](#).

⁹³ That is, accreditation decisions as well as general information on study programs and/or higher education institutions that have not yet submitted a new application for reaccreditation.

1405 programs in ELIAS. Current accreditation decisions, reports, and historical data are available to the public.

The most recent activities regarding ESG 3.4 focused on conditions imposed in accreditations. Conditions have been an important part of accreditations in Germany since their inception around 2000.

1410 Although, in the explanatory memorandum to the Model Decree regarding Section 24, the federal states committed to the goal of reducing the number of conditions imposed, stating that they “*should only be considered in exceptional cases in the future.*” conditions remain the main tool used by the Accreditation Council to ensure that the criteria for study programs as well as for quality management systems are fully met. They highlight issues in the form and/or content of the subject of accreditation and allow for corrective actions by the HEIs. At the same time, they point to areas of interest within the accreditation process, particularly for the GAC itself, but also, for example, for the agencies’ report preparation.

1415 Furthermore, an accreditation decision is an administrative act. It is governed by the Administrative Procedure Act of North Rhine-Westphalia, section 36 of which permits administrative acts to be made subject to conditions—granting accreditation subject to conditions is always preferable to denying accreditation when the concerns raised can be resolved.

1420 The focus of the thematic analysis on conditions is on study program accreditations, since they provide data from a large cohort that allows for reasonable comparability of individual programs. This was already clear in 2017. Thus, in 2017/2018, the GAC conducted a retrospective thematic analysis regarding the conditions imposed in accreditations based on the “old” accreditation system.⁹⁴ This was updated and compared with new findings in the 2020 Interim Review⁹⁵

See Annex 05 for the findings of the thematic analyses. These findings are regularly discussed with agencies and higher education institutions. However, they also lead to temporary increases in certain types of conditions.

1425 The thematic analysis of external quality assurance activities is a work in progress, as no study program or internal quality management system has yet completed an accreditation cycle (8 years starting in 2018) under the auspices of the GAC, and thus potential learning effects at HEIs cannot yet be fully investigated.

GAC will continue its annual monitoring of accreditation requirements in the post-pandemic era, building on a more robust database starting in 2022. In parallel, a meta-analysis will assess the validity and functionality of the categorization of accreditation requirements within the first

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⁹⁴ https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Bericht_Auflagenstichprobe_fi-nal.pdf

⁹⁵ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf

thematic analyses will be reflected upon. With improvements to the database in place, it is possible to expand the scope of thematic analysis, for example to

- identify points of interest in the overall study program system (by using the master data of study programs available in ELIAS to track, e.g., new trends in study program structures) or to
- select subsets (e.g., specific programs such as joint degree programs or part-time programs, regional programs, specific types of higher education institutions, new vs. reaccreditations, specific accreditation agencies).

Other areas of focus have been identified, particularly in the implementation of thematic analysis for system accreditation and the accreditation of alternative procedures. Applications for system accreditation have steadily increased in recent years, and a substantial number of institutions are expected to submit their first reaccreditation applications in the coming years. Thematic analysis in this field may be used, for example, to identify the advantages and/or disadvantages of centralized versus decentralized quality management systems.

The following table provides an overview of past and future activities related to thematic analysis and published reports.

Year	Topic
Annual	Thematic analysis of conditions imposed in accreditations (after consolidation of the database)
2015	Sample analysis of joint programs ⁹⁶
2016	Sample analysis of franchise partnerships in higher education ⁹⁷
2018	Sample analysis of system accreditation ⁹⁸
2017/18	Thematic analysis of the conditions imposed in accreditations based on the “old” accreditation system
2020	Interim Review with an update on the 2017/18 thematic analysis and comparison
2022, onward	annually Thematic analysis of conditions following the consolidation of the database within the current accreditation system

⁹⁶ http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Berichte/AR_Bericht_Stichprobe_JointProgrammes.pdf (in German only)

⁹⁷ http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Beschluss_Franchise_Auswertung_2016.03.17_Drs.21-2016.pdf

⁹⁸ https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Bericht_themenbezogene_Stichprobe_Systemakkreditierung_2017_01.pdf (in German only)

2026 onward First study programs completing a full accreditation cycle in the current accreditation system and re-entering the application process; thematic analysis possible for recurring phenomena in individual study programs level

9.5 ESG Standard 3.5 Resources

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

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Compared to the situation at the time of the last ENQA assessment in 2013, staffing has improved significantly during the transition to the current accreditation system.

In accordance with Article 6(1) of the Interstate Study Accreditation Treaty, funding for the GAC is a shared responsibility of the 16 states.

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Under Article 6(4) of the Interstate Study Accreditation Treaty, GAC may charge fees, as specified in its fee schedule, to cover its administrative expenses; it implemented this in the fee schedule adopted on July 11, 2018, and amended on March 19, 2020.

This provides for an annual basic fee tiered according to the size of the HEI and procedure fees for each accreditation decision. The basic fee is paid by each HEI that has at least one currently accredited study program.

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When the current accreditation system was established, the federal states and the HRK agreed that 55 percent of the budget would come from grants from the federal states and 45 percent from fees. For the 2021 fiscal year (FY identical with calendar year), the annual budget for GAC is 1,462,600 euros.⁹⁹

A total annual budget of 1,000 euros is available for employee training. If necessary, this amount can be supplemented from other budget lines. In addition, employees have numerous informal opportunities for professional development, for example through participation in conferences and projects, particularly international projects such as Twinning.

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In accordance with the official staffing plan, the human resources at GAC's Head Office consist of a managing director (full-time), ten program managers (8.0 full-time equivalents), three administrative assistants (2.75 full-time equivalents), and a secretary (full-time), all employed on a permanent basis.

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⁹⁹ A table summarizing the annual budget for the years 2016 to 2021 can be found in Annex 10.

Because a higher workload and fee revenue are expected in 2021 due to an alternative accreditation procedure and a projected increase in program accreditation cases, two additional program managers were hired on a temporary basis until December 31, 2021.

1485 GAC also employs an academic assistant for 20 hours per month. Employees are compensated in accordance with the framework collective wage agreement for civil service employees in the states (Tarifvertrag für den Öffentlichen Dienst der Länder (TV-L)).

At its headquarters, located at Adenauerallee 73, Bonn, GAC has rented office space comprising 12 separate offices—since January 2019 spread across three floors—with a total of 17 workspaces and a meeting room, and a total floor area of approximately 360 square meters.

1490 The workstations are equipped with laptops, monitors, and keyboards, which are replaced every four years. During the COVID-19 pandemic, staff can flexibly choose between working at the office or from home. New software has been procured that enables telephone calls to be made via laptops, thereby improving accessibility.

Information about GAC's personnel and the staff members' responsibilities can be found on GAC's website.¹⁰⁰

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1500 With the temporary hiring of staff, GAC should be able to process the projected high number of accreditation applications for program accreditation in 2021, as well as the upcoming system accreditations and accreditations of alternative procedures, with the required diligence. It has been found, however, that the processing time per application exceeds the estimates made in 2018. In the medium term, the situation will likely ease, as more and more higher education institutions (HEIs) are seeking system accreditation, which is less resource-intensive for GAC than program accreditation. Currently, however, the focus is clearly on handling program accreditation applications, and GAC can fulfill its other legal tasks only to a barely sufficient extent.

Beginning in June 2021, GAC will initiate discussions on sustainable funding that will last for approximately one year. As of now, increases in staffing appear to be necessary for both program managers and specialized staff responsible for maintaining the database.

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¹⁰⁰ <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/head-office/head-office>

9.6 ESG Standard 3.6 Internal quality assurance and professional conduct

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

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GAC has an effective internal quality management system that incorporates stakeholder feedback, as described in detail in Chapter [7: Agency's Internal Quality Assurance](#).

GAC opposes intolerance or discrimination of any kind. The code of conduct for members, deputy members, and permanent guests of the Accreditation Council¹⁰¹ ensures that all persons involved in its activities are competent and act professionally and ethically.

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New employees must complete an introductory program within the first six months and also receive mentoring from a senior staff member. Office meetings and the Jour Fixe Program on Accreditation provide staff with the opportunity to discuss recent developments in quality assurance. Annual performance reviews are conducted to identify personal goals and professional development needs. All staff members are encouraged to attend (international) conferences and participate in professional networks.

New members of the Accreditation Council receive an individual introduction from the Head Office as well as training on the ELIAS system.

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The agencies act as partners of GAC within the German accreditation system in accordance with Interpretation 23 of the EQAR document Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies; see Chapter [4](#) for details: [History, Profile, and Activities of the Agency](#).

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9.7 ESG Standard 3.7: Cyclical external review of agencies

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

GAC has been a full member of ENQA since 2000 and has renewed its membership regularly. External evaluation procedures were carried out in 2001, 2008, and 2013. However, due to the parallel restructuring of the current system, GAC did not apply for renewal of its membership, which

¹⁰¹ See <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/code-conduct/code-con-duct> and Chapter [9.3 ESG Standard 3.3 Independence](#).

1540 had expired in September 2018. GAC became an affiliate of ENQA instead. As the current German accreditation system is now established, GAC decided to apply for full membership in ENQA again. In addition, it will, for the first time, also submit an application to be listed in EQAR.

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

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10.1 ESG Standard 2.1 Consideration of Internal Quality Assurance

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

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The preliminary remarks of the explanatory memorandum to the Specimen Decree, as well as the introduction to the explanatory memorandum to the Interstate Study Accreditation Treaty, explicitly state that one of the guiding principles for the current German accreditation system is its compatibility with the ESG.

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In all types of procedures, higher education institutions must demonstrate that the study programs in question meet the formal and academic criteria for study programs set forth in Parts 2 and 3 of the Model Decree. In system accreditation procedures and accreditation procedures concerning alternative approaches, the assessment is multi-level. For details, see Chapter [10.5, ESG Standard 2.5: Criteria for Outcomes](#).

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The following table shows how the criteria in all types of procedures correspond to the standards of ESG Part 1. The detailed version of this grid can be found in Annex 06.

	Program Accreditation and Equivalency assessments	System accreditation	Accreditation of alternative procedures
ESG 1.1	§ 14	§ 14; § 17	§ 14; § 17; ESG 1.1 ¹⁰²
ESG 1.2	Sections 6, 8, 11, 12, 13	§§ 6, 8, 11, 12, 13; § 17	§§ 6, 8, 11, 12, 13; § 17; ESG 1.2
ESG 1.3	§§ 12, 15	Sections 12, 15; Section 17	Sections 12, 15; Section 17; ESG 1.3
ESG 1.4	Sections 5, 6, 12, 14	§§ 5, 6, 12, 14; § 17	Sections 5, 6, 12, 14; Section 17; ESG 1.4
ESG 1.5	§ 12	§ 12; § 17	§ 12; § 17; ESG 1.5
ESG 1.6	Sections 12, 15	Sections 12, 15; Section 17	Sections 12, 15; Section 17; ESG 1.6
ESG 1.7	§ 14	§ 14; § 18	§ 14; § 18; ESG 1.7
ESG 1.8	Publication of examination regulations containing information on study programs is mandatory under the higher education laws of the German states	The publication of examination regulations containing information on study programs is mandatory under the higher education laws of the German states; § 18	Publication of examination regulations containing information on study programs is mandatory under the higher education laws of the German states; § 18; ESG 1.8
ESG 1.9	§ 14	§ 14; §§ 17 and 18	§ 14, §§ 17 and 18; ESG 1.9
ESG 1.10	§ 26: Validity period validity for the accreditation	§ 26: Period of validity of the accreditation	§ 34(5): Period of validity for the accreditation

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The symbol “§” refers to the sections of the Specimen Decree.

¹⁰² The ESG criteria from Part 1 are mentioned here because they are directly included in the accreditation criteria for alternative accreditation procedures.

10.2 ESG Standard 2.2 Designing methodologies fit for purpose

1570 External quality assurance should be defined and designed specifically to ensure its ability to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

1575 Due to the Federal Constitutional Court's ruling that the criteria and procedural rules for accreditation must be set forth in legal regulations, the criteria and procedural rules in the current accreditation system have been established in the Interstate Study Accreditation Treaty and in state decrees based on the Model Decree.

Guiding Principles

1580 The Interstate Study Accreditation Treaty and GAC's Mission Statement are, among other things, based on the guiding principles of the primary responsibility of higher education institutions (HEIs) for quality assurance and enhancement in teaching and learning, accreditation as an external, science-led quality assurance system for teaching and learning, and compatibility with the ESG.¹⁰³

These guiding principles are implemented in all types of procedures, in program and system accreditation, and in the accreditation of alternative procedures.

1585 The same quality standards for study programs apply in all three procedures: the criteria set forth in Parts 2 and 3 of the Model Decree. These are based on the principle of "suitability and fitness for purpose." The higher education institution (HEI) has considerable discretion in selecting the learning outcomes for its study programs, provided those outcomes are consistent with the framework.¹⁰⁴ It is crucial that the study program design and its implementation align with these learning outcomes. The HEI must also regularly review its study programs with a view to achieving its goals and, if necessary, improve them. The criteria thus support the HEIs in continuously applying the PDCA cycle.

1590 In system accreditation, HEIs have even greater ownership of the processes than in program accreditation. They must demonstrate that they ensure compliance with the specified standards through their internal quality management system. To this end, the quality management

¹⁰³ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begrueendung_Englisch.pdf; <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/mission-statement/mission-statement>

¹⁰⁴ See https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-03-Studium/02-03-02-Qualifikationsrahmen/2017_Qualifikationsrahmen_HQR.pdf (in German only).

The system must provide for regular evaluations of the study programs. However, there are no detailed regulations on how the internal system must be structured.

Higher education institutions bear the primary responsibility for the accreditation of alternative procedures. Here, too, the criteria for study programs and quality management systems contained in the Model Decree must be met. However, the procedure by which compliance with these criteria is assessed is developed by the institution itself.

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Stakeholder involvement

In drafting the Model Decree, the federal states consulted with GAC, which includes all relevant stakeholders, as well as with representatives of the HRK, with agencies, with representatives of the professional community, and with student representatives.¹⁰⁵

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According to § 36 of the Model Decree, it will be evaluated three years after the decree takes effect. As the decree took effect on January 1, 2018, the evaluation will begin in 2021 and be completed in 2022. All relevant stakeholders will be involved in the evaluation, including the GAC, which, pursuant to Article 5(3) No. 6 of the Interstate Study Accreditation Treaty, is tasked with making proposals for amendments to the Model Decree.

Stakeholders are also closely involved in the ongoing development and improvement of processes through structured evaluations and various exchange formats.¹⁰⁶

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Measures by the Accreditation Council to ensure consistency and efficiency

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In implementing its modular strategy,¹⁰⁷ and with the aim of enhancing the consistent implementation of procedures and increasing the efficiency of its work processes, GAC took a series of measures that were, on the one hand, purely internal, and on the other hand, measures that (also) directly benefit the applicant HEIs and agencies.¹⁰⁸

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Internal measures

- In 2020, work began on creating a Handbook on Program Accreditation, which is currently for internal use only. The purpose of the handbook is to systematically document the Accreditation Council's

¹⁰⁵ See the list of consulted stakeholders in the Introduction to the explanatory memorandum to the Specimen Decree at https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf

¹⁰⁶ See chapters 7. [Agency's internal quality assurance](#) and 9.1 [ESG Standard 3.1 Activities, policy, and processes for quality assurance](#).

¹⁰⁷ See chapter 9.1 [ESG Standard 3.1 Activities, policy, and processes for quality assurance](#).

¹⁰⁸ For most of the measures mentioned here, see the Interim Review: https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf.

- 1625 decision-making practices regarding issues that regularly arise in the assessment process, thereby creating a central repository of knowledge for headquarters.
- In ELIAS, functionalities have been added that allow accreditation decisions that have already been issued with conditions to be sorted and searched by condition categories. ELIAS also contains text modules for conditions.
 - An internal regular meeting on program accreditation is held on a regular basis, offering program managers the opportunity to exchange views on the interpretation of accreditation criteria and to discuss procedural issues.
 - Process descriptions ensure the consistent processing of accreditation applications.
- 1630
- After a program manager has prepared a draft accreditation decision for the Accreditation Council, each application for accreditation is cross-checked by a colleague to ensure consistency of the drafts.
 - For each application, a rapporteur from the group of professors on the Accreditation Council with close ties to the relevant subject makes a preliminary assessment of the accreditation proposals submitted by the assessment agencies and the review panel and is available to answer questions from Accreditation Council members, the Board, and Head Office regarding the application.¹⁰⁹
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- Draft accreditation decisions on which the rapporteur and the responsible program manager agree and for which no further need for consultation has been raised are voted on “en bloc.” This allows the Accreditation Council sufficient time to discuss contentious cases or complex accreditations despite the large number of applications.¹¹⁰
 - The members of the Accreditation Council are asked to inform the Head Office in advance of meetings of any need for consultation so that the program managers can specifically prepare for questions on the matter.
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- Members of the Accreditation Council receive an executive summary, prepared by the Head Office, containing an overview of all applications.
 - Nevertheless, any issue concerning any application may be raised by all members during the regular meeting of the Accreditation Council.
 - The Accreditation Council appointed a supporting committee with representatives from all member groups to which the Accreditation Council can refer questions of principle or specific topics for preparation for the next Accreditation Council meeting.
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- Pursuant to Section 12 of the Statutes, the Accreditation Council has delegated decisions regarding extensions of accreditations, decisions regarding compliance with formal conditions,

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¹⁰⁹ See Interim Review, page 11.

¹¹⁰ See Interim Review, page 12.

decisions on substantial changes, approvals of the composition of clusters, and accreditations concerning joint degree programs to the Board.¹¹¹

1660 *External measures*

- With ELIAS, GAC has a powerful tool that not only makes the processing of applications at its headquarters and its bodies much more efficient, but also makes it much easier for higher education institutions to submit applications.¹¹²
- To ensure the efficient processing of accreditation reports from the current ten accreditation agencies, the Interstate Study Accreditation Treaty and the Specimen Decree tasked GAC with establishing a uniform structure for accreditation reports. This structure has been implemented through templates that serve as a guide for HEIs in preparing their self-evaluation reports and for agencies in their reporting.¹¹³
- The Accreditation Council adopted several resolutions to ensure consistent application of criteria and procedural rules, such as those regarding the content expected in an accreditation report, the reporting obligations for system-accredited HEIs, and the size of the expert panel in cluster accreditation procedures.¹¹⁴
- The GAC informs HEIs and agencies via FAQs, newsletters, and Twitter about new information regarding or changes to procedural requirements for applications and the Accreditation Council's decision-making practices.¹¹⁵

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Support for quality development at HEIs

In its Mission Statement, GAC emphasizes that it “[...] is committed to academic freedom and the autonomy of higher education institutions and sees the primary responsibility for the quality of teaching and learning at higher education institutions.”¹¹⁶ With this in mind, GAC has taken several measures to support quality development.

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Award for quality development

The Specimen Decree notes in the explanatory notes to § 24 that review reports may also contain recommendations regarding the quality development of the study program or the quality management system, which are intended to enhance quality beyond the standards on which

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¹¹¹ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Satzung%20Stiftung%20Akkreditierungsrat_eng.pdf

¹¹² See Chapter 4. [History, Profile, and Activities of the Agency](#) for details on ELIAS.

¹¹³ See Interim Review, page 11.

¹¹⁴ See Interim Review, page 13.

¹¹⁵ See Interim Review, page 14.

¹¹⁶ <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/mission-statement/mission-statement>

on which accreditation by the Accreditation Council is based. In addition, expert opinions may also identify best practice models for the study program. GAC has adopted this idea and introduced an award for quality development. The award is intended to recognize outstanding achievements in quality development in teaching and learning at the program level and in quality management systems, which can serve as inspiration for other HEIs.¹¹⁷

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Quality Dialogue

Based on the goal set forth in the Mission Statement to promote dialogue among all stakeholders involved in accreditation, GAC will discuss selected topics related to teaching and learning in dialogue with higher education institutions (HEIs) and other stakeholder groups, thereby both strengthening GAC's expertise and raising awareness of these issues among those involved in the evaluation procedures. The most recent Quality Dialogue took place in June 2021.

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Chapter on quality development in the accreditation report

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In the accreditation reports, the experts are asked, in accordance with the report template, to evaluate the further development of the study program during the accreditation period and, if necessary, the implementation of recommendations in a separate chapter. The initial experiences with this comprehensive chapter on quality development are viewed positively; the evaluation panel has the freedom to set priorities here and is supported in focusing its assessment on quality development.

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Costs of accreditation

Higher education institutions (HEIs) bear primary responsibility for the quality of their programs and for quality assurance. Consequently, the costs of quality assurance are primarily borne by the HEIs, and only a small portion relates to the costs incurred by the HEIs for the implementation of procedures at the agencies and the Accreditation Council. With regard to these costs, the explanatory notes to Article 3(8) of the Interstate Study Accreditation Treaty state that "[...] *it can be assumed that the costs for the higher education institutions as well as for the overall system will at least not rise, and that it is likely that when the aforementioned framework becomes effective, they could even fall.*" The most important factor here is certainly the extension of the accreditation period to eight years.¹¹⁸ It should just be mentioned that, as in the old system, costs of assessment can also

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¹¹⁷ See <https://www.akkreditierungsrat.de/de/aktuelles-und-veroeffentlichungen-veranstaltungen/preis-fuer-qualitaetsentwicklung/preis-fuer> for further information on the prize (in German only)

¹¹⁸ See § 26 Specimen Decree; https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf; in the "old" accreditation system, the accreditation term for program accreditation was five (initial accreditation) or seven years (re-

be reduced by cluster procedures.¹¹⁹ In addition, according to the Interstate Study Accreditation Treaty, the Länder have the possibility to “[...] *make regulations on the charges to be levied by the agencies [...]*” (Article 4 (5)). No use has been made of this option so far, however.

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10.3 ESG Standard 2.3 Implementing processes

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

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

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Procedural steps

The procedures for program accreditation, system accreditation, equivalency assessments, and accreditation of alternative procedures consist of the following procedural steps:

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- Compilation of a self-evaluation report,
- an external assessment including a site visit,
- completion of an accreditation report,
- submission of the application to the Accreditation Council,
- a decision by the Accreditation Council,
- publication of the decision and the accreditation report, and
- follow-up, particularly regarding conditions imposed by the Accreditation Council.

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With regard to program and system accreditation, these steps are set forth in Part 4 of the Model Decree; for equivalence assessment, the contract between GAC and GJU stipulates that the Model Decree applies accordingly.

For the accreditation of alternative procedures, the Specimen Decree defines only the basic features of the procedure. The procedural steps mentioned are regulated in detail in the RPAAP.

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For details, see Chapter [6. Processes and Their Methodologies](#).

accreditation). In system accreditation, the accreditation term was six (initial accreditation) or eight years (re-accreditation).

¹¹⁹ See § 30 Specimen Decree.

1750 **Division of labor**

In program and system accreditation procedures, as well as in equivalency assessments, there is a division of labor between the agencies and GAC: The agencies appoint the experts and are responsible for the accreditation report. GAC makes the accreditation decision, conducts the follow-up, and ensures the integrity of the accreditation process. Regarding the accreditation of alternative procedures, the Accreditation Council has stipulated in its RPAAP that GAC either conducts the procedure itself or may delegate it to third parties. However, GAC has decided to conduct the first accreditation procedures concerning alternative procedures itself.¹²⁰

1755 The agencies act as partners of GAC within the meaning of Interpretation 23 of the EQAR document *Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*.¹²¹ Since the agencies authorized by the Accreditation Council are listed in EQAR, their compliance with the ESG can be assumed.¹²² The experts regularly confirm that the agencies accredited by the Accreditation Council carry out their procedures in compliance with the ESG.¹²³

1760 The Accreditation Council ensures the integrity of the accreditation process, however. If an assessment agency does not conduct an assessment in accordance with the procedural rules, the Accreditation Council rejects the report. In some cases, for example, where the review panel was clearly not adequately composed, the Accreditation Council requested that the review panel be supplemented. Should an assessment agency repeatedly and systematically disregard the rules, the Accreditation Council could also withdraw its authorization.¹²⁴

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Challenges for GAC regarding its new role in assessment and decision-making

Three years after the Interstate Study Accreditation Treaty came into force, the accreditation system is now fully operational. The system has proven its effectiveness. However, the challenges associated with GAC's new role are now also becoming apparent.

1775 GAC is the only institution in the accreditation system that bears responsibility, directly or indirectly, for the accreditation of all Bachelor's and Master's degree programs in Germany.

¹²⁰ See Chapter 6. [Processes and Their Methodologies](#).

¹²¹ See Chapter 4. [History, Profile, and Activities of the Agency](#) for details.

¹²² See Chapter 4. [History, Profile, and Activities of the Agency](#) for AKAST.

¹²³ See, for example, the review of AQ Austria at <https://www.enqa.eu/wp-content/uploads/AQ-Austria-external-review-report.pdf>, evalag at <https://www.enqa.eu/wp-content/uploads/Evalag-external-review-report.pdf> and AHPGS at <https://www.enqa.eu/wp-content/uploads/AHPGS-external-review-report.pdf>

¹²⁴ See (6) of the resolution of the Accreditation Council of February 20, 2018, on the "Authorization of Agencies in the German System" at <https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Authorization%20of%20Agencies%20in%20the%20German%20System.pdf> regarding the possibility of revoking the authorization.

At the same time, however, its activity builds substantially on the preliminary work of the agencies. It is not permitted to act as a second expert, but essentially checks the plausibility of the expert proposals.

1780 GAC relies on high-quality input from the agencies. It does not conduct on-site visits but makes its decisions based on documentation. This ensures its independence. On the other hand, GAC depends on comprehensive and meaningful accreditation reports. There is still room for improvement in this regard.¹²⁵

1785 For GAC, there is also the challenge of making accreditation decisions quickly. In addition to GAC's limited staff, complying with administrative regulations takes time. While the opportunity for higher education institutions to provide feedback is essential, it makes the process more complex and time-consuming. The procedures for meeting requirements and assessing significant changes are also time-consuming.

With regard to the subjects of accreditation, it should be noted that study program models are highly diverse (for example, dual study programs, franchise models, international collaborations, or regulated study programs). Their proper assessment requires the development of specific expertise within GAC.

1790 In system accreditation, an open question is how the equivalence of procedures across system-accredited HEIs and with study programs accredited through external program accreditation can be guaranteed.

1795 Alternative procedures provide an opportunity for innovation in the accreditation system and reinforce the higher education institutions' own accountability. The accreditation procedures are very resource-intensive, especially if, as is currently the case, the GAC conducts the procedures itself. However, the fact that the Accreditation Council conducts the procedures itself also gives it the opportunity to build expertise in this area.

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Measures to ensure consistency

To enhance the consistent implementation of procedures, GAC took a series of measures; see [ESG Standard 2.2: Designing methodologies fit for purpose](#).

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¹²⁵ See chapter [10.6 ESG Standard 2.6 Reporting](#) for details.

10.4 ESG Standard 2.4 Peer-review experts

1810 **External quality assurance should be carried out by groups of external experts that include one or more student members.**

Composition of the review panels, selection criteria, and procedures

1815 The relevant regulations ensure that the review panels include all relevant stakeholders. The standards for peer-review experts are set forth in Article 3(3) of the Interstate Study Accreditation Treaty:

“The procedures pursuant to paragraph 1, items 1 and 2, are carried out [...] with the substantial participation of external, independent experts from fields of society relevant to quality assurance, in particular representatives of academia and professional practice as well as students.”

1820 According to Article 3 (1) no. 3 of the Interstate Study Accreditation Treaty, the same applies to the accreditation of alternative procedures.

1825 These rules are further specified as follows in the Specimen Decree (for program and system accreditation, as well as in equivalency assessments¹²⁶) in Binding Guidelines for the Nomination of University Teachers for Expert Groups according to Art. 3 Para. 3 State Treaty on Study Accreditation of the HRK¹²⁷ and the RPAAP.¹²⁸

¹²⁶ In equivalency assessments, the rules of the Specimen Decree for the selection of experts in program accreditation according to the contract between the GJU and the Accreditation Council apply accordingly.

¹²⁷ See Annex 07 and https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-04-Lehre/02-04-01-Qualitaetssicherung/Verfahrensleitfaden_Gutachterbenennung_gem_Akkreditierungsstaatsver-trag.pdf (publication in German only).

¹²⁸ See <https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Rules%20of%20Procedur%20for%20Alternative%20Accreditation%20Procedures.pdf>.

In study programs leading to regulated professions (see Chapter 5, “Higher Education Quality Assurance Activities of the Agency,” regarding professional accreditation), representatives of the body responsible for the respective regulated profession may be included in the expert groups, depending on the requirements of the relevant professional law. For teacher education programs and theological programs, this is regulated in § 25 (1), sentences 3 and 4, of the Model Decree.

According to a resolution of the Accreditation Council dated June 21, 2019 (document AR 35/2019), the Accreditation Council recommends that an expert from the school community (teacher or school administrator) also participate as an expert in the evaluation of teacher training programs; this is in addition to the participation of a representative of the competent state authority responsible for the school system, as prescribed in § 25 (3) of the Model Decree.

1830 *Program Accreditation and Equivalency Assessments*¹²⁹

The Specimen Decree stipulates in § 25 (1) sentence 2 that in program accreditation, the review panel *“is composed as follows:*

1. *at least two subject-related professors,*
2. *one subject-related representative with professional experience,*
- 1835 3. *one student from the relevant field.”*

According to § 25 (3), second sentence, the majority of experts on the review panel must have experience with program accreditation. § 25 (3), first sentence, states that professors must hold the majority of votes on the panel. This implements the Federal Constitutional Court’s requirement that the accreditation procedure must be science-led. However, in practice, all members of the review group have equal standing and fulfill their roles with confidence.

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System accreditation

In system accreditation procedures, the review panel, in accordance with § 25 (2) of the Model Decree, *is composed as follows:*

- 1845 1. *at least three professors with relevant experience in quality assurance of teaching and learning,*
2. *one representative with professional experience,*
3. *one student.”* According to § 25 (3) sentence 2, the majority of experts on the review panel must have experience with system accreditation. § 25 (3) sentence 1 states that, as in program accreditation, the professors must hold the majority of votes on the panel.

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Alternative procedures

According to Section 5(2) of the RPAAP, the assessment is conducted *“by external, independent experts from fields relevant to quality assurance, in particular representatives of the scientific community, professional practice, and students.”*

The size of the review panel depends on the requirements of the assessment, which may result from the design of the alternative procedure; however, § 25 (2) of the Specimen Decree on system accreditation will be applied analogously, so that at least three professors, one representative of professional practice, and one student are also required here. The requirement that

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¹²⁹ In equivalency assessments, the rules of the Specimen Decree for the selection of experts in program accreditation according to the contract between the GJU and the Accreditation Council apply accordingly.

professors must hold the majority of votes also applies here (see § 34 (2) sentence 2 Model Decree).

Involvement of international experts

1865 In accreditation procedures for joint degree programs pursuant to Section 33 of the Model Decree, Section 33(1), sentence 2, no. 5, the review panel must include peers from at least two countries involved in the program. This is in line with the European Approach. Furthermore, the Accreditation Council has two international members, ensuring that an “outside perspective” is incorporated into every accreditation decision.

1870 *Binding Guidelines for the Nomination of University Teachers for Expert Groups pursuant to Art. 3, Para. 3 of the State Treaty on Study Accreditation*

1875 Furthermore, for the selection of professors, the assessment agency is bound by the Binding Guidelines for the Nomination of University Teachers for Expert Groups pursuant to Art. 3 Para. 3 of the State Treaty on Study Accreditation of the HRK.¹³⁰ The rationale behind this is also that the Federal Constitutional Court had ruled that academia itself should steer the accreditation procedure. The guidelines establish criteria for the selection of professors on the review panels and describe the selection procedure. In terms of content, they essentially correspond to the regulations and practice for the selection of experts in the “old” accreditation system.

1880 The Binding Guidelines stipulate that, in *program accreditation*, professors must be actively involved in the academic community of their discipline and have experience in the development, organization, implementation, and monitoring of study programs. In *system accreditation*, they must have experience in higher education governance and internal quality assurance at higher education institutions.¹³¹

Regarding the *selection procedure*, the aforementioned guidelines reflect the agencies’ practice when they describe the procedure for *program and system accreditation* as follows:

- The HEI may propose a subject profile to the review panel,
 - the assessment agency proposes the review panel,
 - the HEI may disclose potential conflicts of interest,
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¹³⁰ See Annex 07 and https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-04-Lehre/02-04-01-Qualitaetssicherung/Verfahrensleitfaden_Gutachterbenennung_gem_Akkreditierungsstaatsver-trag.pdf (publication in German only).

¹³¹ The binding guidelines further specify the selection criteria for both types of procedure.

- The assessment agency verifies impartiality, proposes review panels, and assembles them.

In *equivalency assessments and alternative procedures*, the aforementioned selection criteria and the selection procedure are applied analogously (see footnotes 1 and 2 in the Binding Guidelines for alternative procedures).

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Division of labor between the agencies and GAC

Based on the regulations and guidelines mentioned in *program and system accreditation*, the experts are appointed by the assessment agency commissioned to prepare the accreditation report. The same applies to *alternative procedures* if an assessment agency conducts the procedure. The agency is responsible for ensuring an adequate, evidence-based selection of experts. The agencies possess extensive experience and expertise regarding the ESG-compliant selection of review panels. In the ENQA evaluations of the agencies authorized by GAC, the experts stated that the agencies exercise great care regarding the procedures and criteria for selecting experts.¹³²

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GAC, however, ensures the integrity of the accreditation process and can, for example, reject the report and request a new assessment with a revised review panel if the panel was not adequately composed. This occurred in some cases where the subject focus of the study program was not sufficiently reflected in the review panel.

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The agencies' practices regarding the selection of experts are well reflected in non-binding guidelines issued by the HRK¹³³ or the GNW¹³⁴ (association of expert representatives), both of which address the selection of student members and representatives from the professional community.

Mechanisms to prevent conflicts of interest

Section 25(5) of the Model Decree stipulates that the "[...] following persons are excluded as experts:

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1. anyone working or enrolled at the higher education institution applying for accreditation,

¹³² See, for example, the review of AQ Austria at <https://www.enqa.eu/wp-content/uploads/AQ-Austria-external-review-report.pdf>, evalag at <https://www.enqa.eu/wp-content/uploads/Evalag-external-review-report.pdf> and AHPGS at <https://www.enqa.eu/wp-content/uploads/AHPGS-external-review-report.pdf>.¹³³ See Annex 08 and https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-04-Lehre/02-04-01-Qualitaetssicherung/Leitlinien_Gutachter_1_2018_mit_Cover.pdf (publication in German only).

¹³⁴ See <https://www.gutachternetzwerk.de/veroeffentlichungen/handreichungen-beitraege-aus-dem-netzwerk/> for the GNW; the guidelines are available at https://www.gutachternetzwerk.de/fileadmin/user/Veroeffentlichungen/Beitraege_aus_dem_Netzwerk/GNW_Benennung_Gutachterin-nen_April2020.pdf (in German only).

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2. *anyone working or enrolled at one of the higher education institutions involved in the study program in the case of cooperative study programs or joint-degree programs, or*
 3. *anyone who is considered to be disadvantaged according to the standard rules applicable in academia.”*

This applies to program and system accreditation, as well as to equivalency assessments.¹³⁵ In alternative procedures pursuant to Article 3 (1) no. 3 of the Interstate Study Accreditation Treaty, Article 3 (2) sentence 1 of the Interstate Study Accreditation Treaty applies accordingly, according to which independent experts are to be appointed.

In addition, the aforementioned non-binding guidelines of the HRK and GNW may be consulted, which further specify possible grounds for bias.

1925 Both in the procedures carried out by the agencies and in those carried out by the GAC, all experts must confirm their impartiality by means of a declaration of independence.

1930 **Training and briefing of experts**

In *program accreditation procedures, equivalency assessments, system accreditation procedures*, and, if one of the agencies conducts the procedure, also in *alternative procedures*, the agencies are also responsible for the training and briefing of experts. The guidelines of the HRK and the GNW reflect the agencies' practice in this regard as well.

1935 The positive evaluations in the ENQA procedures recently conducted by agencies authorized by the Accreditation Council demonstrate that these agencies provide training and briefings for experts in accordance with the ESG.¹³⁶

In the accreditation of *alternative procedures* carried out by GAC, attention is paid to ensuring that experts are thoroughly prepared. In the accreditation procedure concerning the alternative procedure at Harz University of Applied Sciences, the experts underwent a two-hour training session in which they were familiarized with the requirements for the accreditation of alternative procedures; they were able to build on their experience in system and program accreditation. GAC appointed professional and student experts from the GNW and the student accreditation pool, where they had received prior training. In addition, they were provided with the State Decree, the ESG, and the RPAAP for preparation. Before the initial meeting with the

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¹³⁵ In equivalency assessments, the rules of the Specimen Decree for the selection of experts in program accreditation, as stipulated in the contract between the GJU and the Accreditation Council, apply accordingly.

¹³⁶ See, for example, the review of AQ Austria at <https://www.enqa.eu/wp-content/uploads/AQ-Austria-external-review-report.pdf>, evalag at <https://www.enqa.eu/wp-content/uploads/Evalag-external-review-report.pdf> and AHPGS at <https://www.enqa.eu/wp-content/uploads/AHPGS-external-review-report.pdf>.

HEI, there will be an internal preparatory meeting of the review panel based on the HEI's self-evaluation report. With regard to the experts' preparation for the procedures at the three Baden-Württemberg HEIs and for all other alternative accreditation procedures, GAC will proceed accordingly.

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10.5 ESG Standard 2.5 Criteria for Outcomes

1955 **Any outcomes or judgments made as a result of external quality assurance should be based on explicit and published criteria that are applied consistently, regardless of whether the process leads to a formal decision.**

All accreditation procedures are based on the criteria set forth in general terms in the Interstate Study Accreditation Treaty and in greater detail in Parts 2 and 3 of the Model Decree and the corresponding decrees of the Länder. The decrees are published on the GAC's website ¹³⁷

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Application of the same criteria for study programs in all procedures

In all types of procedures (program accreditation, system accreditation, alternative procedures, and equivalency assessments), the criteria that study programs must meet are the same: HEIs must demonstrate that the study programs meet the formal and academic criteria for study programs set forth in Parts 2 and 3 of the Model Decree.¹³⁸

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An exception is the accreditation of joint degree programs in accordance with the European Approach (§ 33 Specimen Decree). Here, only the formal and academic criteria stipulated in §§ 10 and 16 of the Specimen Decree must be met. These provisions transpose the criteria of the European Approach into German law; for legal reasons, the European Approach itself is only mentioned in the explanatory memorandum to the decree.

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In system accreditation procedures, the assessment is multi-level: It is assessed whether the internal quality management system of the HEI fulfills the criteria for such systems included in § 17 and § 18 of the Specimen Decree and can thus ensure that the formal and academic criteria for study programs are met.

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¹³⁷ <https://www.akkreditierungsrat.de/en/accreditation-system-legal-basis/laws-and-regulations/laws-and-decrees>

¹³⁸ See § 22 (1) of the Model Decree on program accreditation, § 1 (1) of the contract between GJU and GAC concerning equivalency assessments, § 17 (1) of the Model Decree on system accreditations, and § 34 (2) of the Model Decree, as well as section 5 (1) of the RPAAP.

Thus, the evaluation of an alternative procedure is a multi-level process:

- 1980 • In the accreditation of system-related alternative procedures, it is assessed whether the HEI, with the help of the alternative procedure, systematically assesses and thus guarantees the fulfillment of the requirements for quality management systems (see §§ 17 and 18) of the Model Decree and thereby also guarantees the fulfillment of the criteria for study programs in Parts 2 and 3 of the Model Decree.¹³⁹ The alternative procedure itself must comply with the ESG.¹⁴⁰
- 1985 • In the accreditation of program-related alternative procedures, it is assessed whether the HEI, with the help of the alternative procedure, systematically assesses and thus guarantees the fulfillment of the criteria for study programs under Parts 2 and 3 of the Model Decree.¹⁴¹ The alternative procedure itself must comply with the ESG.¹⁴²

Distinction between formal and academic criteria

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In the current accreditation system, a distinction is made between formal and academic criteria for study programs. The formal criteria according to Part 2 of the Specimen Decree contain framework requirements that were previously regulated in the KMK's joint structural requirements. Compliance with the formal criteria is verified by the agencies' offices without the participation of the experts; the result is documented in the formal report. The academic criteria according to Part 3 of the Model Decree contain the quality requirements to be examined by the experts, which were previously contained in the GAC's criteria; the result is documented in the review report. The explanatory memorandum to the Interstate Study Accreditation Treaty states that the division between formal and academic examination is intended primarily to serve procedural efficiency. The review panel is relieved of the examination of purely formal criteria.¹⁴³

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In system accreditation, and in the accreditation of alternative procedures if they are system-related, a distinction is made between formal and academic criteria at two levels: On the one hand, the HEI must demonstrate that it meets the formal and academic criteria for study programs at the program level. On the other hand, at the system level, the HEI must demonstrate that it meets the academic criteria set forth in Sections 17 and 18 of the Model Decree. These sections define the core requirements for a functional quality management system in teaching and learning. As a formal criterion at the system level, in an initial system accreditation procedure, the HEI must demonstrate that at least one study program has been evaluated through the quality management system; in the

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¹³⁹ See § 34 (2) of the Model Decree as well as section 5 (1) of the RPAAP.

¹⁴⁰ See section 3(3), second sentence, of the RPAAP.

¹⁴¹ See § 34(2) of the Specimen Decree as well as section 5(1) of the RPAAP.

¹⁴² See section 3(3), sentence 2 of the RPAAP.

¹⁴³ See the explanatory memorandum to the Interstate Study Accreditation Treaty, page 7.

2010 In the case of renewed system accreditation, it must prove that all Bachelor's and Master's study programs have undergone the quality assurance system at least once.¹⁴⁴

One of the challenges is to give equal weight to both formal and academic criteria. In its assessment of accreditation applications, GAC must avoid placing too much emphasis on formalities, as these may be easier to verify through a document-based review. However, compliance with formal criteria is a prerequisite for high program quality.

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Fitness of and fitness for purpose of the academic criteria for study programs

2020 The academic criteria for study programs are based on the "fitness of and fitness for purpose" principle: the HEI has considerable latitude in choosing the qualification goals for its study programs, provided those goals are consistent with the qualifications framework.¹⁴⁵ It is crucial that the study program design and its implementation align with these qualification goals. The HEI must also regularly review its study programs with a view to achieving its goals and, if necessary, improve them. The criteria thus support the HEI in continuously applying the PDCA cycle.

Some important new priorities have been established recently:

- The phenomenon of "franchising" or program-related cooperation with non-university institutions was comprehensively regulated in §§ 9 and 19 of the Model Decree.
- It was specified that full-time professors are the central reference point when assessing the staffing of a study program (see § 12 (2) Model Decree).
- The term "dual" was protected (see justification for § 12 (6) of the Model Decree).
- A reference to professional discourse was added (see § 13 (1) of the Model Decree).¹⁴⁶

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Measures to ensure consistent application of criteria

2030 The criteria for program and system accreditation represent the essential quality standards which—in the case of program accreditation—must be applicable to all study programs regardless of their specific profile and subject orientation and—in the case of system accreditation—to different quality management models. The necessity associated with this requirement to ensure a high degree of general validity when formulating the criteria leads

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¹⁴⁴ See § 23 (1) Specimen Decree for those formal criteria.

¹⁴⁵ See https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-03-Studium/02-03-02-Qualifikationsrahmen/2017_Qualifikationsrahmen_HQR.pdf (in German only).

¹⁴⁶ See also Chapter 12 regarding § 13. [Recommendations and main findings from previous review\(s\) and the agency's resulting follow-up.](#)

2040 almost inevitably leads to a comparatively broad scope of interpretation of the individual criteria. As has been demonstrated in recent years, there is a continuing need, on the one hand, for measures that ensure the consistent application of criteria and, on the other hand, for information on the Accreditation Council's decision-making practices to be shared with HEIs and agencies. Furthermore, when the number of applications is high, as is currently the case, ensuring consistent decisions is more difficult but also more important.

2045 See Chapter [10.2 of the ESG Standard 2.2, "Designing Methodologies Fit for Purpose,"](#) for the measures GAC has proposed to ensure consistent application of the criteria (condition categories and text modules for conditions in ELIAS, Handbook on Program Accreditation, regular meetings on program accreditation, process descriptions, cross-checking of applications at the Head Office, rapporteur system, supporting committee, and information via FAQs and Twitter).

2050 However, GAC would like to point out that these measures are not intended to serve as the development of additional criteria. The Länder have made it very clear that only the Interstate Study Accreditation Treaty and the Specimen Decree contain the relevant set of criteria; therefore, the criteria-related actions by GAC are explanations and interpretations.

2050 **10.6 ESG Standard 2.6 Reporting**

2055 **Full reports by the experts should be published, clear, and accessible to the academic community, external partners, and other interested individuals. If the agency makes any formal decision based on the reports, the decision should be published together with the report.**

2060 **Program accreditation, system accreditation, equivalency assessments**

2065 The HEI must attach the accreditation report to its application for accreditation to the GAC, which consists of the formal report and the review report (see § 23 (1) no. 2 of the Specimen Decree). The formal report and the review report each contain a recommendation to the Accreditation Council regarding whether or to what extent the criteria have been met (see § 24 (3) and (4) of the Specimen Decree).

Both the formal report and the review report must be prepared using the report templates specified by GAC (see § 24 (3) and (4) of the Specimen Decree). On the one hand, this is intended to create the conditions necessary for the prompt processing of applications by GAC. On the other hand, the report templates help improve the comparability of evaluation results and thus enhance procedural transparency for potential readers.

2070 The review report should not exceed 20 pages for program accreditation and 100 pages for system and cluster accreditation (see § 24 (4) of the Specimen Decree).

2075 Standardization should relate exclusively to the structure of the report, but under no circumstances to the evaluation of content. Overall, the reports should provide a clear picture of a study program or an HEI's internal quality management system—for the GAC as well as for the HEI and the interested public (students, ministries, potential employers, etc.). Schematic text modules should be avoided as far as possible; notable characteristics of the study program (both positive and critical) should be given more space in the presentation and evaluation.

The accreditation reports must fulfill the following functions:

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Readability

2085 The accreditation report must contain all information necessary for the aforementioned groups. This includes information on the course of the procedure and the legal basis, a description of the program, documentation of the assessment according to the criteria specified in the Model Decree, as well as data on the program.

The review panel's recommendations regarding the fulfillment of the academic criteria and the assessment agency's recommendations regarding the fulfillment of the formal criteria are assigned to each study program and can be found at the beginning of the accreditation report, along with brief information and a summary assessment.

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Completeness

2095 The structure must be organized according to the criteria defined in the Specimen Decree. For each academic criterion, a distinction is made between presentation, evaluation, and assessment proposal. Since documentation and evaluation often coincide in the case of the formal criteria, a distinction is not mandatory there. Completeness is to be understood as meaning that the assessment documented in the accreditation report contains an evaluative statement for each study program and for each criterion.

Focus on quality development

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2105 The aim of accreditation should be to place quality development in teaching and learning at the center of the process. For this reason, the report templates include a section titled "Focal Points / Focus of Quality Development," which will become increasingly important, particularly in reaccreditation processes. The evaluation of the individual criteria should also focus on strengths and potential areas for improvement, so the heading has been supplemented at this point with the phrase "strengths and areas for improvement."

2110 *Quality-related data/key figures*

As early as 2012, the Science Council highlighted the need for improved data in the accreditation system: "*The Accreditation Council and the federal states [should] ensure, in cooperation with other relevant bodies—including higher education institutions, statistical offices, and the HRK Hochschulkompass—that the data on study programs and accreditation status is further improved. In the future, consideration should be given to the possibility of maintaining and publishing a [...] core dataset of quality-related indicators (including, for example, success rates and grade distributions) for each study program in order to make progress in the documentation of study quality and its further development.*"¹⁴⁷

2115 The Model Decree contains several criteria and provisions that can only be adequately evaluated or implemented with the help of quantitative data (see, for example, § 12 (2) on staffing or § 14 on academic achievement).

That is why the accreditation reports are accompanied by a data sheet containing information on enrollment capacity, the average number of first-year students, the average number of graduates, the average duration of study, the graduation rate, the distribution of grades, and the ratio of female to male students (at the time of the evaluation).

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Room for improvement in accreditation reports

GAC requires evaluations that are plausible, comprehensible, and legible as the basis for its accreditation decisions and as a prerequisite for the rapid and consistent processing of applications for program and system accreditation. It published guidance notes for the preparation of accreditation reports in March 2019.¹⁴⁸ Nevertheless, the comprehensibility of the evaluations in the accreditation reports still needs to be improved. In some cases, the evaluations contained in the accreditation reports were incomplete or not comprehensible. In such cases, GAC did not accept the reports for decision and informed the HEI that the report must be revised. The quality of the accreditation reports was also discussed at the joint meeting of the Accreditation Council and the agencies in March 2021. There, it was decided to develop a handout on the drafting of accreditation reports.

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¹⁴⁷ "Accreditation as a Tool for Quality Assurance," Bremen 2012, p. 74, <http://www.wissen-schaftsrat.de/download/archiv/2259-12.pdf> (in German only).

¹⁴⁸ https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/AR_Beschluss_Vor-General_Guidelines_for_the_Preparation_of_Accreditation_Reports_2019-03-21_Drs_AR_36-2019.pdf (in German only).

Publication of reports

In all types of proceedings, GAC, in accordance with § 29 of the Specimen Decree, publishes full reports in its database (ELIAS), which is freely accessible at <https://antrag.akkreditierungsrat.de/>. This also applies to negative decisions. Thanks to ELIAS, the publication of the accreditation decision and the accreditation report is automated after the Accreditation Council has made its decision.

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Publication of quality reports by system-accredited HEIs

The obligation to publish the accreditation decision and the accreditation report also applies to study programs that have been accredited within the framework of the higher education institutions' internal accreditation procedures (see § 18 (4), sentence 2, and § 29 of the Model Decree). § 29 of the Model Decree also stipulates that the publication must be made on the GAC website, i.e., in ELIAS. The accreditation reports of internal accreditations by system-accredited HEIs are referred to as quality reports to distinguish them from accreditation reports in external program and system accreditation procedures. The quality reports of system-accredited HEIs do not necessarily have to strictly follow the report template for program accreditation specified by GAC. Given the different designs of their quality management systems, system-accredited HEIs may choose an appropriate reporting format. GAC has published guidelines for quality reports of system-accredited HEIs.¹⁴⁹ GAC is currently in the process of enforcing the obligation to publish quality reports, as not all HEIs are yet fulfilling this duty satisfactorily.

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Alternative procedures

Here, too, the review report required under Section 6(1) of the RPAAP must be attached to the application for accreditation to be submitted to the Accreditation Council. GAC provides a report template for preparing the review report, which may, however, be adapted to the specific circumstances of the respective alternative procedure by the institution conducting the assessment. The review report must provide evidence-based proof that the requirements for the accreditation of the alternative procedure are met. The accreditation decision and the accreditation report of the Accreditation Council pursuant to Section 6(6) of the

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¹⁴⁹https://www.akkreditierungsrat.de/sites/default/files/downloads/2020/AR_Beschluss_Hinweise%20f%C3%BCr%20Qualit%C3%A4tsberichte%20systemakkreditierter%20Hochschulen_2020-09-29_Drs.%20AR%2091-2020.pdf (in German only).

RPAAPs are published in ELIAS, as are the internal quality reports of HEIs accredited through alternative procedures (see § 18 Specimen Decree¹⁵⁰).

10.7 ESG Standard 2.7 Complaints and appeals

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

Opportunity to comment on the accreditation report

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Pursuant to Article 3 (4) of the Interstate Study Accreditation Treaty, higher education institutions (HEIs) may attach a statement to their application for accreditation, which they submit to the Accreditation Council. HEIs should use this opportunity to comment if they wish to raise objections to the proposals in the accreditation report.

It may happen that the Accreditation Council intends to make an accreditation decision that deviates significantly from the proposal included in the accreditation report, in a way that imposes additional burdens on the HEI, particularly by imposing an additional condition. In such cases, the HEI is given the opportunity to submit a (further) statement within one month in accordance with § 22 (3) of the Specimen Decree.

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Appeals and complaints to the Accreditation Council

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Both HEIs and third parties may appeal to GAC against its decisions or file a complaint with GAC regarding procedural errors.

In addition to internal HEI complaints, deficiencies in the internal accreditation procedures of system-accredited HEIs may be brought to the attention of GAC.

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GAC established a commission to handle appeals and complaints. The Complaints and Appeals Commission consists of three external members: a professor, a student representative, and a member nominated by the relevant agencies. They are appointed by the Accreditation Council upon recommendation from the respective member group. The commission reviews appeals and complaints and submits a recommendation to the Accreditation Council for a final decision on the appeal or complaint.

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GAC provides information on how it has decided the appeal or complaint.

Section 18 of the Specimen Decree applies to alternative accreditation procedures pursuant to Section 34(2) of the Specimen Decree, which stipulates that Part 3—and thus Section 18 of the Specimen Decree—must also be complied with in alternative accreditation procedures.

Information on the process is readily available at <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/complaints-and-appeals/complaints-and-appeals>.

2205 As of the time of this report, one appeal procedure has been completed. An expert had filed a complaint regarding the fact that the Accreditation Council had removed a condition in a system accreditation procedure based on a statement from the HEI. After the Complaints and Appeals Commission recommended in its meeting on April 16, 2021, that the complaint be dismissed, the Accreditation Council decided to follow this recommendation in its meeting on June 22–23, 2021. The appellant was notified of the decision.

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11. Information and opinions of stakeholders

HEIs are the main stakeholders in the accreditation system. The HRK, as the association of state and state-recognized HEIs in Germany, was asked by the GAC to provide a statement on

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- the nomination of members of the Accreditation Council by the HRK and
 - the changes in the accreditation system and the level of satisfaction with it.

The HRK Board adopted a corresponding statement on April 26, 2021.¹⁵¹

2220 For information on the nomination procedure and the HRK's explanations regarding this, see Chapter [9.3 of the ESG Standard 3.3 Independence](#). In this context, the HRK welcomes the appointment of alternate members and permanent guests to the Accreditation Council. Indeed, this broadens the Accreditation Council's expertise. In addition, the substitute members serve as rapporteurs, which distributes the associated workload among more individuals. To the extent that the HRK criticizes the fact that active HEI rectors, presidents, vice-rectors, and vice-presidents are not considered members of academia and thus cannot be members of the Accreditation Council, this is because, according to the requirements of the Federal Constitutional Court, academia itself should steer the accreditation procedures.¹⁵²

2225 Regarding the changes to the accreditation system, the HRK states that it welcomes the increased consistency as well as the stronger role of academia in accreditation. The HRK also views the "*broadening and differentiation of types of accreditation through alternative accreditation*"¹⁵³ as positive. The HRK's only criticism is that the Model Decree places a strong emphasis on program accreditation, which, in the HRK's view, could lead higher education institutions to replicate program accreditation in their internal quality management systems. Indeed, the criteria that study programs must meet are the same across all types of procedures: HEIs must demonstrate that the study programs satisfy the formal and academic criteria outlined in Parts 2 and 3 of the Model Decree.¹⁵⁴ This is due to the fact that the objective of accreditation in all procedures, including system accreditation, is ultimately quality at the study program level. However, 2230 higher education institutions have considerable freedom to design their quality management systems to achieve this program quality, as shown in Sections 17 and 18 of the Specimen Decree.¹⁵⁵

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¹⁵¹ See Annex 04.

¹⁵² See [Chapter 4. History, profile, and activities of the agency](#).

¹⁵³ See HRK statement, page 6.

¹⁵⁴ See [Chapter 10.5, ESG Standard 2.5: Criteria for Outcomes](#).

¹⁵⁵ See [chapter 10.2 ESG Standard 2.2 Designing methodologies fit for purpose](#).

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

2245 In the letter confirming GAC's ENQA membership dated November 28, 2013, the ENQA Board considered that it would be advisable to take the ENQA panel's recommendations into account. The Board emphasized that GAC's resources should be increased and that GAC's Mission Statement should be updated. The following section outlines the recommendations and the actions taken by GAC; it should be noted that the accreditation system has since undergone fundamental changes. Nevertheless, the recommendations provided at that time remain valuable for GAC.

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Recommendation of the ENQA Board

2255 *"In particular, the Agency's resources should be increased. The Board noted that resources appear to be sufficient to undertake GAC's core functions, but do not allow the Agency to adopt a stronger strategic and international position befitting such an important higher education system."*

Actions of GAC

2260 The Board's recommendation referred to the "old" accreditation system, in which GAC had different responsibilities. The staffing requirements in the current system are significantly higher due to GAC's new responsibilities, and staffing levels have also been substantially increased. For resources, see also Chapter [9.5, ESG Standard 3.5: Resources](#).

Recommendation of the ENQA Board

2265 *"In addition, the Board encourages the Agency to update its Mission Statement to reflect the shift to system accreditation."*

Actions of GAC

2270 GAC revised its Mission Statement in 2019. The changed legal situation and the changed responsibilities of GAC made it necessary to fundamentally revise the Mission Statement from 2007. The Interim Review of 2020 is based on the GAC's Mission Statement.¹⁵⁶

¹⁵⁶ See Chapter [9.1, ESG Standard 3.1, "Activities, Policy, and Processes for Quality Assurance,"](#) for details.

Recommendation of the panel

2275 *“Given the complex context in which the Council operates, it would greatly benefit from the development of a genuine strategic plan for the Accreditation Council, with particular emphasis on system development and internationalization.”*

Actions of GAC

2280 The main strategic and planning document of GAC is its 2020 Interim Review, based on GAC’s updated Mission Statement.¹⁵⁷ In the second chapter of the review, the “piecemeal engineering” approach to GAC’s strategy and planning is explained in detail.¹⁵⁸

Recommendation of the panel

2285 *“It will be of paramount importance for the overall development of the German quality assurance system and for the Council itself to carry out a careful evaluation of the development of system accreditation; such an evaluation should consider the multifaceted consequences of this development on the operations of the Council and the accreditation agencies, as well as on quality assurance and quality improvement at the various types of HEIs, with a view to striking a desirable balance between the two types of accreditation.”*

2290

Actions of the GAC

2295 In 2017, GAC conducted a sample analysis of system accreditations.¹⁵⁹ In addition to the analysis, an expert dialogue was organized that same year, to which the system-accredited higher education institutions and all relevant stakeholders were invited. A key finding of the sample analysis was that the agencies met GAC’s expectations regarding system accreditation procedures. Nevertheless, one finding was that the process for awarding or withdrawing the seal for internally assessed study programs should be evaluated in greater detail in the review reports.

The findings of GAC obtained during the sample analysis and within the System Accreditation Forum, a joint conference of HRK and GAC in 2015, have been incorporated into the design of the current legal framework. For example, the Model Decree, based on a suggestion by GAC, now stipulates that the quality standards for study programs are the same, regardless of whether they are assessed through program accreditation or by a system-accredited HEI via its internal quality

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¹⁵⁷ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf

¹⁵⁸ See chapter [9.1 ESG Standard 3.1 Activities, policy, and processes for quality assurance](#) for details.

¹⁵⁹ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Bericht_themenbezogene_Stichprobe_Systemakkreditierung_2017_01.pdf (in German only).

2305 assurance mechanisms. In addition, the process of internal accreditation of study programs by system-accredited HEIs was explicitly made a subject of assessment in system accreditation under the current legal framework (see § 17 Specimen Decree).

Furthermore, under the current accreditation system, the GAC makes the decisions regarding program and system accreditation itself, which ensures consistency in the interpretation of standards for study programs in both program accreditation and system accreditation, and thus consistency in the decisions. This also enables the GAC to identify and correct undesirable developments in a timely manner.

2310 However, the number of system accreditation cases decided by the Accreditation Council under the 2018 system is still small, so a large-scale evaluation of the experiences with this type of procedure is not yet possible. For the potential to conduct thematic analyses on this in the future, see Chapter [9.4 ESG Standard 3.4 Thematic Analysis](#).

2315

Recommendation of the panel

“The Council should consider the desirability of including doctoral studies in its portfolio and initiate a discussion with regulatory authorities on this matter.”

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Actions of GAC

As already outlined in the 2015 progress report, including doctoral studies in GAC’s portfolio would not be advisable for two reasons: *“First, doctoral studies in Germany are very closely linked to research, and doctoral candidates are viewed primarily as early-career researchers rather than as advanced students, whereas GAC has expertise in teaching and learning but not so much in research. This leads, secondly, to the fact that Germany is a country of shared responsibilities in higher education and therefore there are several reputable institutions here dealing with the research aspects of higher education. In particular, the Council of Science and Humanities and the DFG (German Research Foundation) address quality issues in doctoral studies.”*¹⁶⁰

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Recommendation of the panel

“The Council should pay significantly more attention to its role, performance, and impact beyond Germany’s borders, particularly with regard to the certification of non-German accreditation agencies, the international activities of German accreditation agencies, and the visibility and value of the official German quality seal worldwide.”

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¹⁶⁰ Progress report of September 3, 2015, page 2 (see Annex 09)

Actions of GAC

2340 According to Article 3 (2), sentence 2 of the Interstate Study Accreditation Treaty, all agencies listed in EQAR are permitted to conduct accreditation procedures in Germany. To date, the Accreditation Council has only authorized agencies that were already accredited under the old system in Germany, including the Swiss agency AAQ and the Austrian agency AQ Austria. Authorization by the Accreditation Council could be attractive for small agencies, however, that limit themselves to the quality assurance of certain disciplines or have special expertise in these. Such agencies often operate throughout Europe.

2345 Regarding the recommendation to enhance the international visibility and value of the GAC seal, it must be clarified that the primary task of the Accreditation Council is to ensure the quality of study programs at German HEIs and should focus on this, especially in times of capacity bottlenecks and high application rates.

2350 However, higher education institutions abroad with a clear connection to Germany (German-backed universities) have an interest in demonstrating that they meet German quality standards. The Accreditation Council decided to offer the GJU a certificate of equivalence provided that the university meets German accreditation standards.¹⁶¹ However, according to information from the North Rhine-Westphalian Ministry of Science (MKW), the GAC's legal supervisor, it is not possible for the GJU's study programs to be accredited with the GAC's seal, as the GAC has no state authority abroad and therefore cannot issue administrative acts with legal effect for foreign universities.

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Recommendation of the panel

"The Council should also consider reviewing a number of pending issues, in particular with respect to:

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- *the desirable balance between generic and subject-specific standards and the linkage (or separation) of generic (academic) and professional accreditation;*
- *the simplification and possible mainstreaming of the procedure for private HEIs and the guarantee of their equal treatment;*
- *the necessary updating and desirable upgrading of the Mission Statement;*
- *the adjustment of the Foundation's name following the introduction of system accreditation;*
- *"the further development of the Foundation's website and communications strategies in general."*

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¹⁶¹ See Chapter 6, "[Processes and Their Methodologies](#)," for details.

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Actions of, and related to GAC*Generic and subject-specific standards*

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In the Model Decree, a new criterion, § 13, titled “*Organization of the subject content of study programs*,” was introduced based on a suggestion by the GAC. § 13 defines the assessment of the subject content of study programs and the specific requirements for teacher education programs. According to § 13 (1) sentence 1, the “*up-to-dateness and adequacy of the subject-related and scientific requirements*” must be assessed by the experts. “*The subject-content design and the methodological-didactic approaches adopted by the curriculum are continuously reviewed and adapted to further professional and didactic developments. To this end, the professional discourse at the national and, if necessary, international level is systematically taken into account.*”¹⁶²

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With regard to Article 5(3) of the Basic Law, the regulation is limited to determining whether the institution of higher education has the necessary framework conditions to ensure that the subject-specific and scientific requirements are up-to-date and adequate.

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Academic and professional accreditation are separate; see Chapter [5. Higher education quality assurance activities of the agency](#).

Quality assurance procedures for private HEIs

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As already mentioned in the progress report, GAC is in regular contact with the German Council of Science and Humanities, which is responsible for the so-called institutional accreditation of private HEIs. GAC and the Science Council work together to keep the processes as simple as possible, but it is a fact that most higher education laws of the Länder require separate accreditation procedures for private HEIs.

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Mission Statement

See above in this chapter.

Name of GAC

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Article 5 of the Interstate Study Accreditation Treaty states: “*The Foundation for the Accreditation of Study Programs in Germany [...] bears the name ‘Foundation Accreditation Council.’*”

¹⁶² § 13 (1) sentences 2 and 3 Model Decree

Although the full name of GAC was also appropriate previously—since system accreditation leads to accredited programs—the foundation’s name is now more “neutral.” In international contexts and in this self-assessment report, the foundation is referred to as the German Accreditation Council (GAC).

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GAC’s website and communication strategies

In 2018/2019, the Accreditation Council’s website underwent a visual and technical overhaul. All information on the current accreditation system is now available there, including in English. The public database (ELIAS), with its various web portals for different user groups, is also linked there.¹⁶³

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In March 2020, the Accreditation Council adopted a communication strategy in which, in addition to the information provided on the GAC website and the established communication channels—such as press releases, letters to stakeholders, and FAQs—additional proactive communication formats were introduced in the form of a Twitter account and a newly designed newsletter (with a subscriber list of over 1,000 addresses).

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13. SWOT Analysis

The regular analysis of strengths and weaknesses as well as opportunities and risks is part of GAC’s internal quality management. Following a SWOT analysis in the fall of 2019 as part of the development of GAC’s communication strategy, staff members, the Chair of the Board, and the Executive Director met in the spring of 2021 for another SWOT session. The results are reproduced here unchanged as a “snapshot” of this meeting. The Accreditation Council will thoroughly discuss and expand upon this analysis over the next six months.

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¹⁶³ See Chapter 4, [History, Profile, and Activities of the Agency](#), Annex 01, and <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/tasks-german-accreditation-council>.

<p style="text-align: center;">Strengths</p> <ul style="list-style-type: none"> • Communication and exchange with all stakeholders • Digital system • Overview of all study programs and universities • Solid legal foundation • Strong teams • Good cooperation among member groups; no special interests • Critical reflection • Composition of the GAC; students are also consulted • Checks and balances • Alternative procedures present an opportunity for innovation • Consistency 	<p style="text-align: center;">Weaknesses</p> <ul style="list-style-type: none"> • Lack of information in the evaluation process • Resource issues in program accreditation, long processing times for accreditation applications • Only limited adaptation of internal structures to growth in size is possible • Risk of duplicate evaluation and tendency toward excessive detail • Processes outside the database • Full review or random sampling?
<p style="text-align: center;">Opportunities</p> <ul style="list-style-type: none"> • Market power • Design potential regarding the Specimen Decree • Potential for quality improvement • Direct influence on teaching and learning • Transition to system accreditation saves resources 	<p style="text-align: center;">Threats</p> <ul style="list-style-type: none"> • Less emphasis on teaching and learning due to system accreditation • Undesirable changes in the Specimen Decree • Growing resentment from universities and agencies • GAC is being used as a scapegoat • The federal system could drift apart • Routine as the enemy of quality development • Accreditation reports need to be improved • Diversification of study program models

14. Current challenges and areas for future development

2430 GAC has successfully completed a two- to three-year consolidation phase following the entry into force of the current legal framework. It has established the prerequisites and framework conditions for the implementation of these legal foundations. With the completion of this consolidation phase, GAC is now entering a "regular operation phase." In its 2020 Interim Review,¹⁶⁴ GAC took stock of the first two years. At the same time, it identified key priorities and challenges for the future. In

¹⁶⁴ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf.

2435 In addition to conducting the ENQA evaluation, it has identified managing the “wave” of applications and systematically reflecting on its own activities as priorities for the remainder of its term.

The measures taken by GAC are already having an impact on the processing of large numbers of applications. ELIAS works well and has become an indispensable tool in the daily work of GAC. With ELIAS, large numbers of applications can be handled efficiently. The COVID-19 pandemic has played a role in strengthening digital competence within the Accreditation Council and its Head Office. A series of other measures enhances the efficiency of GAC’s processes. This also includes the increased involvement of alternate members in the Accreditation Council. Staffing has improved significantly during the transition to the current accreditation system.

For the first time, all accreditation decisions are issued by a single institution, which enables consistent decisions and comparisons across higher education institutions.

2445 However, the timely and consistent application of the criteria is challenging, especially due to the high number of procedures and the dynamic evolution of the higher education landscape.

GAC will undertake the task of reflecting on its own activities and on the subjects to which its accreditation activities relate, namely study programs and quality management systems.

In the area of program accreditation, a diversification of study program models can be observed, which places higher demands on the expertise of the accreditors.

Regarding system accreditation, GAC’s experience is still in an initial phase due to the low number of applications. An open question is how the equivalence of the procedures across the system-accredited HEIs and to the study programs accredited through external program accreditation can be guaranteed.

Finally, alternative procedures offer opportunities for innovation in the accreditation system and strengthen the HEI’s own responsibility. However, they are very resource-intensive, especially if, as is currently the case, GAC carries out the procedures itself.

In summary, it can be stated that the change in legal mandates has altered GAC’s self-image: It is clearly more operationally oriented. However, it is now even more the task and responsibility of GAC to help ensure that accreditation strikes a balance between higher education autonomy, compliance with regulations, and quality development.

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Glossary of Terms

The following tables contain the information already included in the [List of Abbreviations](#), as well as terms for which there are no abbreviations and links, where available. The first table is sorted by English terms, the second by German terms.

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English term	German equivalent	Acronym	Link
Accreditation Agency for Study Programs in Engineering, Computer Science, Natural Sciences, and Mathematics	Accreditation Agency for Study Programs in Engineering, Computer Science, Natural Sciences, and Mathematics	ASIIN	https://www.asiin.de/en/about-asiin.html
Accreditation Council	Accreditation Council		
Act Establishing the Foundation Accreditation Council (Accreditation Council Act)	Act Establishing the Accreditation Council (Accreditation Council Act)		https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Akkreditierungsrats-gesetz_eng.pdf
Agency for Quality Assurance and Accreditation Austria	Agency for Quality Assurance and Accreditation Austria	AQ Austria	https://www.aq.ac.at/en/
Agency for Quality Assurance and Accreditation of Canonical Programs of Studies in Germany	Agency for Quality Assurance and Accreditation of Canonical Programs of Study in German Germany	AKAST	https://www.akast.info/?lang=en
Agency for Quality Assurance through Accreditation of Study Programs	Agency for Quality Assurance through Accreditation of Study Programs e.V.	AQAS	https://www.aqas.de/
Assessment agency; assessment agencies; agencies	Agency; agencies		
Basic Law	Basic Law		https://www.gesetze-im-internet.de/englisch_gg/
Board	Board of Directors of the Accreditation Council Foundation		
Central Evaluation and Accreditation Agency	Central Evaluation and Accreditation Agency	ZEvA	https://www.zeva.org/english-version
CHEA International Quality Group		CIQG	https://www.chea.org/
Cluster accreditation	Cluster accreditation		
Council for Higher Education Accreditation		CHEA	https://www.chea.org/
Database of External Quality Assurance Results		DEQAR	https://www.egar.eu/qa-results/search/by-institution/

English term	German equivalent	Acronym	Link
German Academic Exchange Service	German Academic Exchange Service	DAAD	https://www.daad.de/en/
Electronic Information and Application System	Electronic Information and Application System	ELIAS	https://antrag.akkreditierungs-rat.de/
Estonian Quality Agency for Higher and Vocational Education		EKKA	https://ekka.edu.ee/en/
European Association for Quality Assurance in Higher Education		ENQA	https://www.enqa.eu/
European Higher Education Area		EHEA	
European Quality Assurance Register for Higher Education		EQAR	https://www.eqar.eu/
Federal Ministry of Education and Research	Federal Ministry of Education and Research	BMBF	https://www.bmbf.de/en/in-dex.html
Foundation Council	Foundation Council of the Accreditation Council Foundation		
German Accreditation Council	Foundation Accreditation Council	GAC	https://www.akkreditierungs-rat.de/en/welcome-german-ac-creditation-council
German Council of Science and Humanities	Science Council	WR	https://www.wissenschafts-rat.de/DE/Home/home_node.html
German-Jordanian University		GJU	http://www.gju.edu.jo/
German Rectors' Conference	Conference of University Rectors	HRK	https://www.hrk.de/home/
German Research Foundation	German Research Foundation	DFG	https://www.dfg.de/en/index.jsp
Head Office	Office of the Accreditation Council Foundation		
Higher Education Compass	Higher Education Compass		https://www.hochschulkompass.de/en/study-in-ger-many.html
Higher Education Framework Act	Higher Education Framework Act	HRG	https://www.gesetze-im-inter-net.de/hrg/
Higher education institution; higher education institutions		HEI; HEIs	
International Network for Quality Assurance Agencies in Higher Education		INQAAHE	https://www.inqahe.org/

English term	German equivalent	Acronym	Link
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)	State Treaty on the Organization of a Joint Accreditation System for Quality Assurance in Higher Education and teaching at German universities (State Treaty on Study Program Accreditation)		https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begruendung_Eng-lisch.pdf
State; State; States	State, States		
National Center for Educational Quality Enhancement		NCEQE	https://eqe.ge/en
National Institution for Academic Degrees and University Education		NIAD-UE	https://www.niad.ac.jp/english/
Plan-Do-Check-Act		PDCA	
Project Quality Assurance of Cross-border Higher Education		QACHE	https://qache.wordpress.com/
Quality Assurance	Quality Assurance	QA	
Rules of Procedure for Alternative Accreditation Procedures	Rules of Procedure for Alternative Accreditation Procedures	RPAAP	https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf
Self-Assessment Report	Self-Report	SAR	
Specimen Decree	Model Regulation	MRVO	https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf
Standards and guidelines for quality assurance in the European Higher Education Area		ESG	
Standing Conference of the Ministers of Education and Cultural Affairs of the German States in the Federal Republic of Germany	Conference of Ministers of Education and Cultural Affairs	KMK	https://www.kmk.org/kmk/information-in-english.html
Swiss Agency for Accreditation and Quality Assurance	Swiss Agency for Accreditation and Quality Assurance	AAQ	https://aaq.ch/en/

The Accreditation, Certification and Quality Assurance Institute	The Accreditation, Certification, and	ACQUIN	https://www.acquin.org/en/
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English term	German equivalent	Acronym	Link
	Quality Assurance Institute		
Universities of Applied Sciences	Universities of Applied Sciences	FH/HAW	

German term	English equivalent	Acronym	Link
Agency for Quality Assurance through Accreditation of Degree Programs e.V.	Agency for Quality Assurance through Accreditation of Study Programs	AQAS	https://www.aqas.de/
Agency for Quality Assurance and Accreditation Austria	Agency for Quality Assurance and Accreditation Austria	AQ Austria	https://www.aq.ac.at/en/
Agency for Quality Assurance and Accreditation of Canonical Studies in Germany	Agency for Quality Assurance and Accreditation of Canonical programmes of Studies in Germany	AKAST	https://www.akast.info/?lang=en
Agency; Agencies	Assessment agency; assessment agencies; agencies		
Accreditation Agency for Degree Programs in Engineering, Computer Science, Natural Sciences and Mathematics	Accreditation Agency for Study Programs in Engineering, Computer Science, Natural Sciences, and Mathematics	ASIIN	https://www.asiin.de/en/about-asiin.html
Accreditation Council	Accreditation Council		
Cluster accreditation	Cluster accreditation		
Federal Ministry of Education and Research	Federal Ministry of Education and Research	BMBF	https://www.bmbf.de/en/in-dex.html
The Accreditation, Certification, and Quality Assurance Institute	The Accreditation, Certification and Quality Assurance Institute	ACQUIN	https://www.acquin.org/en/
German Research Foundation	German Research Foundation	DFG	https://www.dfg.de/en/index.jsp
German Academic Exchange Service	German Academic Exchange Service	DAAD	https://www.daad.de/en/
Electronic Information and Application System system	Electronic Information and Application System	ELIAS	https://antrag.akkreditierungs-rat.de/
Universities of Applied Sciences	Universities of Applied Sciences	FH/HAW	

German term	English equivalent	Acronym	Link
Office of the Accreditation Council Foundation	Head Office		
Act Establishing the Foundation Accreditation Council (Accreditation Council Act)	Act Establishing the Foundation Accreditation Council (Accreditation Council Act)		https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Akkreditierungsratsgesetz_eng.pdf
Trade Union Network of Experts Network		GNW	https://www.gutachternetzwerk.de/startseite/
Basic Law	Basic Law		https://www.gesetze-im-internet.de/englisch_gg/
Higher Education Compass	Higher Education Compass		https://www.hochschulkompass.de/en/study-in-germany.html
Higher Education Framework Act	Higher Education Framework Act	HRG	https://www.gesetze-im-internet.de/hrg/
Conference of University Rectors	German Rectors' Conference	HRK	https://www.hrk.de/home/
Conference of Ministers of Education	Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany	KMK	https://www.kmk.org/kmk/information-in-english.html
State, States	State; State; States; States		
Model Decree	Specimen Decree	MRVO	https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf
Quality Assurance	Quality Assurance	QA	
Swiss Agency for Accreditation and Quality Assurance	Swiss Agency for Accreditation and Quality Assurance	AAQ	https://aaq.ch/en/
Self-Report	Self-Assessment Report	SAR	
State Treaty on the Organization of a Joint Accreditation System for Quality Assurance in Higher Education and teaching at German universities (State Treaty on Study Accreditation)	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)		https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begrue ndung_Englisch.pdf
Foundation Accreditation Council	German Accreditation Council	GAC	https://www.akkreditierungsrat.de/en/welcome-german-ac-creditation-council
Foundation Council of the Accreditation Council Foundation	Foundation Council		

German term	English equivalent	Acronym	Link
Rules of Procedure for Alternative Accreditation Procedures	Rules of Procedure for Alternative Accreditation Procedures	RPAAP	https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Rules%20of%20Procedure%20for%20Alternative%20Accreditation%20Procedures.pdf
Board of Directors of the Accreditation Council Foundation	Board		
Science Council	German Council of Science and Humanities	WR	https://www.wissenschaftsrat.de/DE/Home/home_node.html
Central Evaluation and Accreditation Agency	Central Evaluation and Accreditation Agency	ZEVA	https://www.zeva.org/english-version

List of Annexes

2475

Annex 01: System architecture of ELIAS

Annex 02: 2020 Quality Report (in German only) Annex 03: PDCA

Cycle

Annex 04: Statement from the HRK Annex 05:

Results of thematic analyses

2480

Annex 06: Mapping grid ESG part 01

Annex 07: Binding Guidelines for the Nomination of University Faculty Members for Expert Groups pursuant to Art. 3, Para. 3 of the State Treaty on Study Accreditation

Annex 08: Guidelines on the Appointment of Experts and the Composition of Expert Groups for Accreditation Procedures

2485

Annex 09: Progress Report of the GAC to ENQA Annex 10:

Annual Budget for Recent Years