

Annexes

2026 Self-Assessment Report for the External Review by ENQA

German Accreditation Council (GAC)

July 2026

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Annex 01 Quality assurance processes

I. Higher education quality assurance activities of the agency

The subject of all quality assurance activities of GAC is Bachelor's and master's study programmes of German state or private, state-recognised HEIs, either directly in programme accreditation or indirectly in system accreditation, where it is examined whether the HEI in question is itself able to ensure compliance with the standards for its study programmes. The focus is therefore on the quality of teaching and learning.

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

GAC is only responsible for academic accreditation, Additional conditions apply for teacher education programmes and theological programmes; for these, the fulfilment of the professional requirements is compulsorily checked in the accreditation procedures carried out by GAC (see § 22 (5) and § 25 (1) sentences 3 to 5 Specimen Decree). Besides, professional certification can be integrated into academic accreditation (for example, in the fields of social work, psychology or master mariner's certificate).

Fulfilment of the requirements under professional regulations is relevant for the (academic) accreditation decision if the HEI promises that graduates can gain access to a regulated profession upon completion of the study programme, i.e., the practice of this profession is part of the qualification objective according to § 11 (1) Sentence 1 Specimen Decree.

§ 35 Specimen Decree offers the possibility of an organisational connection of the procedures of academic and professional accreditation.

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

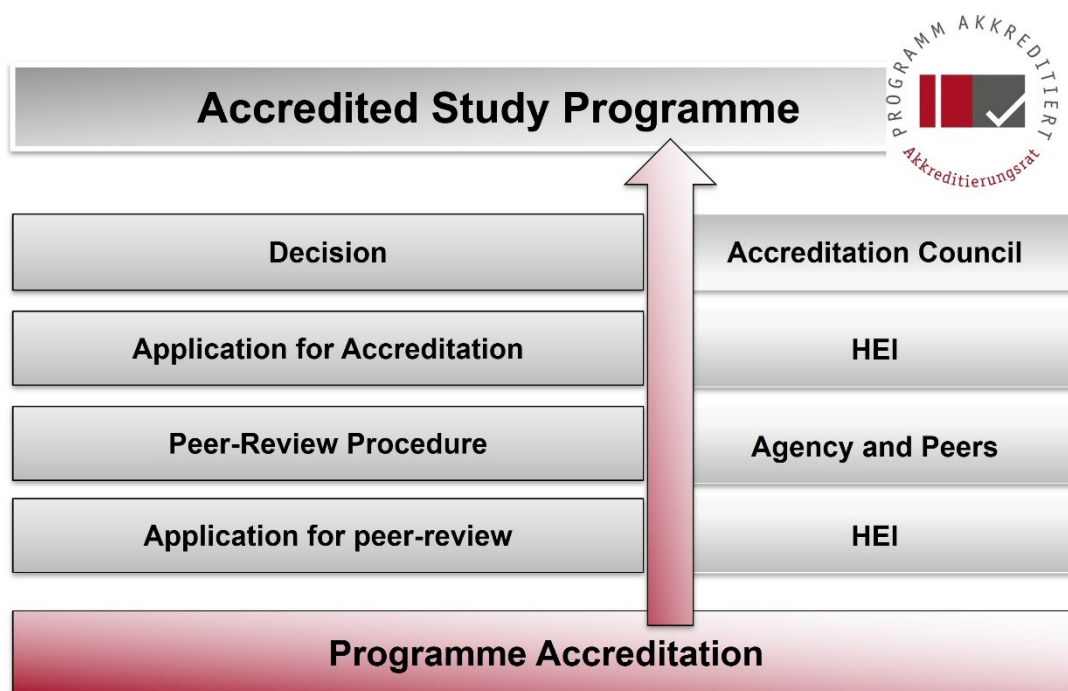
- *programme accreditation*
- *system accreditation*
- *accreditation of alternative procedures*

There is another procedure, which is also mentioned in the ToR: the equivalency assessment for the German Jordanian University. This is not a standalone, standard procedure, but rather a special procedure organised solely for the German Jordanian University to verify that its degree programmes meet the criteria of Germany's specimen decree.

The accreditation of joint degree programmes by way of recognition of assessments carried out according to the European Approach for Quality for Quality Assurance of Joint Programmes according to the Terms of Reference is not considered as a separate quality assurance activity as it falls under the activity programme accreditation. Special characteristics of these accreditation procedures are nevertheless transparently identified in the sections on the fulfilment of the ESG standards.

II. Programme accreditation

The objects of programme accreditation are Bachelor's and master's programmes, offered by state or state-recognised HEIs in Germany (see Article 1, Article 2 (1) and Article 3 (1) no. 2 of the Interstate Study Accreditation Treaty). Within the accreditation, it must be demonstrated that the study programme complies with the formal criteria according to part 2 and the academic criteria according to part 3 of the Specimen Decree (see § 22 (1) Specimen Decree). If a study programme has successfully undergone an accreditation procedure, it receives an accreditation with or without conditions (see § 22 (1) Specimen Decree) and bears GAC's seal of quality for the period of its accreditation, which is eight years (see § 22 (4) Specimen Decree). If study programmes *"have a high affinity on subject level that goes beyond the mere affiliation to a disciplinary culture"*, accreditation can also be carried out as part of a cluster procedure (see § 30 (1) and (2) Specimen Decree); nevertheless, the accreditation decision always refers to the individual study programmes.



Slide 03: Process of the programme accreditation

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

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

Fulfilment of the formal criteria from 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 programme by the review panel is based on the criteria laid down 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 at the HEI (see § 24 (5) Specimen Decree). During this site visit, the review panel holds talks with representatives from the status groups of the HEI (see substantiation of § 24 (5) Specimen Decree).

In cases of a concept accreditation of a programme not yet begun and in case of a re-accreditation of a study programme, the review panel can decide to dispense with the site-visit and will then assess the programme in a desk-top validation (see § 24 (5) Specimen Decree). The explanatory memorandum to the Specimen Decree states that the possibility of waiving the site-visit only exists if it has 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.

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

The Accreditation Council decides on the accreditation of the study programme on application by the HEI. Its decision is based on the formal report and the review report (see § 22 (1) Specimen Decree). If the Accreditation Council intends to deviate significantly from the experts' proposal, the HEI can comment before the Accreditation Council's decision (see § 22 (3) Specimen Decree).

After completion of the procedure, GAC according to § 29 Specimen Decree publishes its decision and the review 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) and § 27 Specimen Decree). In case of a positive accreditation decision, the study programme will bear GAC's quality seal (see § 22 (4) Specimen Decree). Accreditation is granted for a period of eight years (see § 26 Specimen Decree).

In case of an accreditation with conditions, the HEIs usually have a deadline of twelve months to prove their fulfilment to GAC (see § 27 Specimen Decree).

In order to ensure quality assurance in the programme accreditation process, the Accreditation Council has further developed its procedures in the following areas since the last ENQA review in order to achieve improvements:

- Questions and issues in accreditation procedures that were addressed in the accreditation decision are provided in the form of FAQs on formal and academic criteria on the GAC website. The FAQs are available to applicant HEIs, agencies and peers.
- Regular, topic-specific exchange meetings are held between employees of the GAC Head Office and the agencies. These exchange meetings differ from the meetings of the agencies' management and the GAC Board in that they aim to discuss everyday operational problems and create a common understanding of formal and academic criteria.
- Within the limits of its capabilities, the Programme Accreditation Department has increased its efforts to implement regular knowledge management and, despite limited resources, has produced selected internal guidelines on the interpretation of both formal and academic criteria in the Specimen Decree. These documents ensure consistent decision-making practices and also facilitate the onboarding of new employees.
- By means of a Shiny Web App, a comprehensive survey was created of all conditions imposed by the GAC in programme accreditation procedures since the introduction of the new accreditation legislation in 2018. The reasons for each condition as stated in the notifications of decision are also rendered in the app.
- Since the organisational reform in 2022, the department, as the largest organisational unit, has had a schedule of responsibilities. This includes responsibility for certain formal and academic criteria, as well as subject-specific responsibilities for the requirements of degree programmes for regulated professions with special legal conditions (teaching, theology, psychology).
- There is a fortnightly meeting to discuss operational issues and problems, as well as an aftermath of each GAC meeting to update knowledge and, if necessary, discuss new GAC decision-making practices.

II.1 Programme accreditation of joint programmes according to § 33 Specimen Decree

For joint programmes, the Specimen Decree and the decrees of the Länder provides for the application of the European Approach for Quality Assurance of Joint Programmes (European Approach).

§ 10 (1) of the Specimen Decree states:

“(1) A joint degree programme is either a Bachelor’s or a master’s study programme that is coordinated and offered by a domestic higher education institution together with one or more higher education institutions from a foreign state or states in the European Higher Education Area that leads to a joint degree and that has the following features:

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

§§ 10, 16 and 33 of the Specimen Decree contain the criteria for joint programmes. Those stipulations transpose the European Approach into German law; for legal reasons, the European Approach itself is only mentioned in the explanatory memorandum to the decree.

The formal and academic criteria for joint programmes according to § 10 (2) and § 16 (1) Specimen Decree correspond to the criteria of the European Approach.

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

GAC according to § 33 only checks whether an assessment has taken place according to the European Approach by an agency listed in EQAR, i.e., whether the study programme has been assessed according to the criteria and procedural rules of the European Approach. It does not carry out a second assessment of the study programme. For recognition, however, it requires a review report from which the application of the European Approach is clear; if not, the application must be rejected/the review report must be improved.

If an assessment has taken place according to the European Approach with a positive outcome, GAC makes an accreditation decision by way of recognition of this assessment. This accreditation has the same legal consequences as the "normal" accreditation 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 Specimen Decree that any conditions which the experts/the assessment agency have stipulated 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 ELIAS.

The new Specimen Decree from November 2024, as well as the correspondingly amended state regulations, now provide for full implementation of the European Approach; unlike before, joint programmes leading to double or multiple degrees now also fall within its scope.

III. System accreditation

The object of system accreditation is the internal quality assurance system of state or state-recognised HEIs in Germany (see Article 1, Article 2 (1) and Article 3 (1) no. 1 of the Interstate Study Accreditation Treaty). With system accreditation, a HEI receives the right to award the seal of GAC for its self-assessed study programmes (see § 22 (4) Specimen Decree). During system accreditation, a HEI must demonstrate that it systematically implements the formal and academic criteria laid down in the Specimen Decree (see § 17 (1) Specimen Decree). To this end, the quality management system must provide for regular evaluations of the study programmes 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) Specimen Decree). A positive system accreditation certifies that the HEI's quality management system in the field of teaching and learning is suitable for ensuring that the qualification goals and quality standards of its study programmes are achieved.

The accreditation procedure is a multi-stage process based on the principle of peer review. If a HEI according to § 24 Specimen Decree commissions an assessment agency to carry out a peer review procedure, the agency in question appoints a review panel (§ 25 Specimen Decree).

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

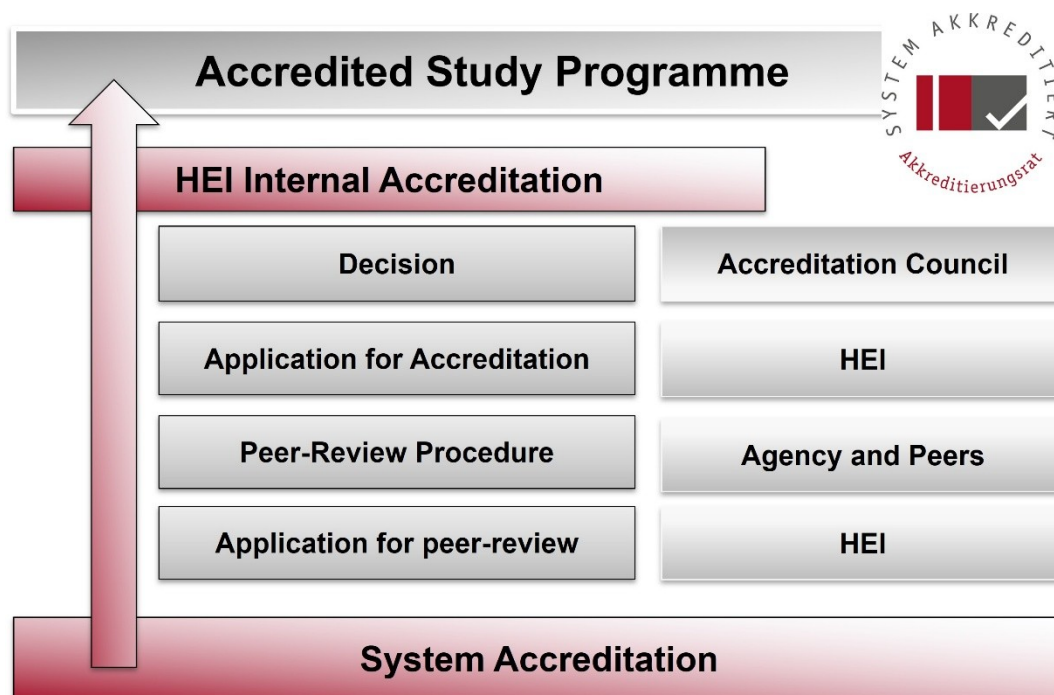
The assessment of the quality management system by the review panel is carried out based on the criteria for quality management systems laid down in part 3 of the Specimen Decree (see § 24 (4) Specimen Decree) and usually includes two site visits at the HEI in which the review panel will hold discussions with representatives from the status groups of the institution (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).

The evaluation procedure also provides for a random sample. *“During random sampling, it is checked whether the effects intended by the quality management system under assessment occur on the level of the study programme.”* (see for details on the random sample § 31 Specimen Decree).

The Accreditation Council decides on the accreditation of the quality management system on application by the HEI. The process is similar to the one used in programme accreditation: The basis for the decision is the review report submitted by the review panel as well as the formal report drawn up by the assessment agency (see § 22 (1) Specimen Decree). The formal report

shall state in the initial system accreditation that at least one study programme has passed through the quality management system at the time of application. In the case of system re-accreditation, it must be shown that all Bachelor's and master's study programmes have passed through the institution's internal quality management system at least once (see § 23 (1) no. 2 to 4 Specimen Decree). If the Accreditation Council intends to deviate significantly from the proposal of the peers, the HEI can comment before the Accreditation Council's decision (see § 22 (3) Specimen Decree).



Slide 04: Process of the system accreditation

After completion of the procedure, GAC according to § 29 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 Specimen Decree). In the event of a positive accreditation decision, the quality management system bears the quality seal of GAC, and the HEI receives the right to award GAC's seal for the study programmes it has assessed itself (see § 22 (4) Specimen Decree). Accreditation is granted for a period of eight years (see § 26 Specimen Decree).

In case of an accreditation with conditions, the HEIs usually have a period of twelve months to prove their fulfilment to GAC (§ 27 Specimen Decree).

In concurrence with the revision of the regulatory framework, the following measures were taken to optimize internal workflows and to improve knowledge management in system accreditation:

- Following each meeting of the Accreditation Council, all system accreditation decisions taken are documented in a separate Excel chart. The chart lists all conditions and remarks formulated by the GAC, linking them to the criteria of the Specimen Decree and to additional keywords to enable a targeted search. For statistical purposes the chart also shows for each HEI how many conditions had been proposed by the expert group and how many were maintained, withdrawn or added by the council.
- By means of a Shiny Web App, a comprehensive survey was created of all conditions imposed by the GAC in system accreditation procedures since the introduction of the new accreditation legislation in 2018. The reasons for each condition as stated in the notifications of decision are also rendered in the app. Like the Excel chart, the tool is meant to provide a knowledge pool for staff and council members to draw on and to facilitate consistent decision-taking. There are plans to make the app accessible to agencies, too. Two agencies have already tested the app and gave very positive feedback.
- The Shiny app also provided the database for a thematic analysis on the topic of conditions in system accreditation, which was conducted in 2025. In the context of this project the GAC established the practice of assigning conditions to different pre-defined categories. This helped to increase transparency as regards different types of conditions and their frequency.

Since the last ENQA review, the system accreditation team at the GAC Head Office has remained in constant dialogue with stakeholders, particularly in the following ways:

- Regular online meetings (ca. 90 minutes) with staff members of all agencies to discuss selected topics and recurrent challenges in system accreditation (1-2 times a year)
- Talks with HEIs or agency staff on selected system accreditation procedures. These meetings are initiated by the GAC Head Office upon decision-taking as an occasion for mutual feedback. Topics may include, for instance, the quality of central documents like self-reports and accreditation reports, challenges that occurred during the assessment or the decision-taking process, or the satisfaction of the stakeholders with the final outcomes. Participants may also discuss lessons learned and possible measures for improvement. Feedback talks took place on an irregular basis and had to be temporarily paused in 2025 but will be taken up again shortly.
- Three online events as part of the series “The Accreditation Council in Dialogue” presentations by external experts, panel discussions and open exchange among participants. They are open to a wide audience (HEIs, agencies, general public). Most

recently, the quality dialogue focused on the efficiency of internal quality assurance systems, attracting about 200 participants in total.

- Regular active participation of the head office staff in the Exchange Forum for System-Accredited HEIs organized two times a year by FH Münster (Münster University of Applied Sciences).

In order to further improve processes and procedures in system accreditation, the following projects are planned for 2026:

- Developing procedural rules for dealing with different types of complaints in system accreditation. This applies particularly to complaints concerning internal accreditation procedures and decisions at system-accredited HEIs or the general functionality of internal quality management systems. The head office is receiving such complaints with increasing frequency and thus sees the need for clear guidelines in this realm.
- Developing a manual to support agencies in writing accreditation reports. The document is meant to increase transparency as regards what kind of information is expected in each chapter. It also aims at promoting a shared understanding of the accreditation criteria across all stakeholder groups and thus at raising the overall quality of accreditation reports in the medium term.

IV. Accreditation of alternative procedures

Process and methodology

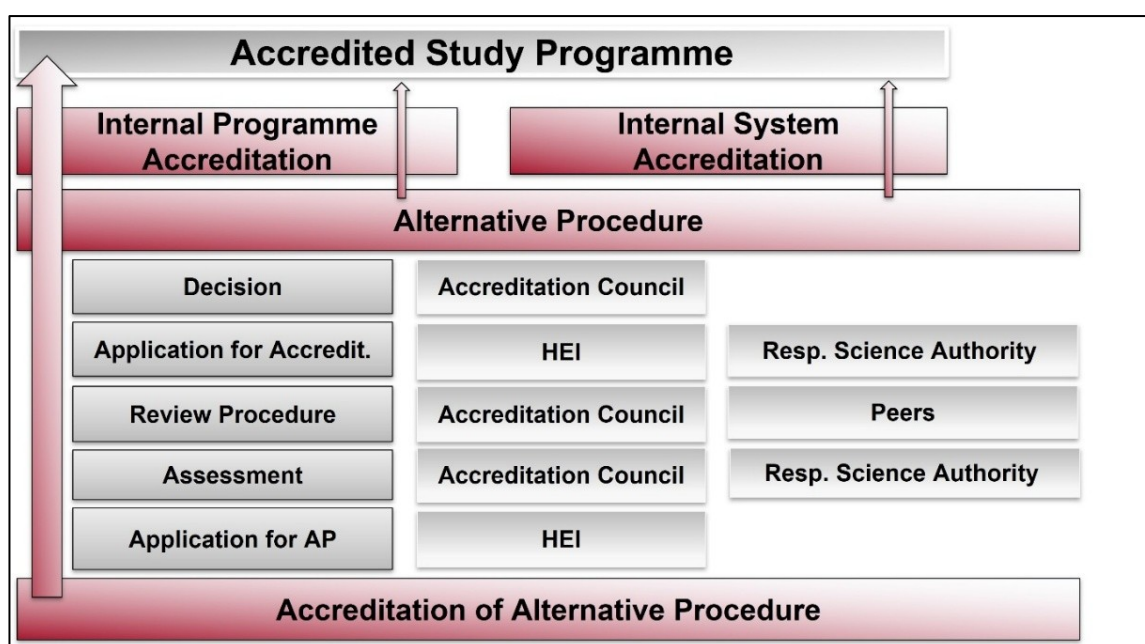
With the ratification of the Interstate Study Accreditation Treaty, the Länder established the accreditation of alternative procedures as a third procedural line. (see Article 3 (1) no 3 Interstate Study Accreditation Treaty).

“The alternative procedure should be suitable to gain fundamental knowledge of alternative approaches to external quality assurance beyond the procedures named in Article 3 paragraph 1 numbers 1 and 2 of the interstate study accreditation treaty” (§ 34 (3) sentence 4 Specimen Decree).

Object of accreditation is the HEI’s Alternative Procedure. During the accreditation of the alternative procedure, a HEI must demonstrate that it, with the help of the alternative procedure, systematically implements the formal and academic criteria laid down in the Specimen Decree (see § 34 (2) 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)). The accreditation procedure of an

Alternative Procedure therefore assesses whether the Alternative Procedure it is designed in such a way as to ensure this. Where calls for improvements are necessary, they address the level of the alternative procedure itself – neither the level of the quality management system nor the level of the study programme. With successful accreditation, the HEI receives the self-accreditation rights for the study programmes assessed within the alternative procedure (see section 6 (2) RPAAP).

The framework for these procedures is to be found in § 34 Specimen Decree and in the RPAAP which the Accreditation Council adopted based on § 34 (4) Specimen Decree.



Slide 05: Process of the alternative procedures

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

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

The HEI subsequently submits a self-evaluation report based on the previous application (see section 5 (2) RPAAP). The assessment is carried out by external independent experts (see section 5 (2) RPAAP). GAC may carry out the procedure itself or delegate it to third parties (see section 5 (4) RPAAP). The result of the assessment procedure is a review report with assessment proposals (see section 6 (1) RPAAP). Throughout the entire process, the

procedure is continuously accompanied by at least one member of the Accreditation Council (see section 5 RPAAP), who holds an observational role.

“The Accreditation Council decides on the accreditation, on application by the higher education institution, by determining the equivalence of the alternative accreditation procedure to the procedures under article 3 sentence 1 no. 1 and 2 of the Interstate Treaty.” (section 6 (1) RPAAP).

Upon completion of the accreditation process, GAC according to section 6 (6) of the RPAAP 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 section 6 (3) RPAAP). Upon accreditation, GAC awards its seal to the Alternative Procedure, which gives the HEI the right to award the seal for its study programmes if they have undergone the assessment procedure for study programmes 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 Specimen Decree and section 6 (2) RPAAP).

As a rule, two years before the accreditation period expires, the alternative procedure is evaluated by an independent, science-related institution which reports to the Accreditation Council. The Accreditation Council makes a recommendation on whether the Alternative Procedure should be carried on 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). The establishment of a working group by the Accreditation Council is planned for early 2026, consisting of internal and external members. This working group will focus on the procedural step of this evaluation. Its task is to further specify how the evaluation is to be conducted.

By involving external members (such as representatives from HEIs currently conducting an Alternative Procedure, experts who have already participated in the accreditation of such a procedure, as well as other persons familiar with Alternative procedures) the aim is also to strengthen collaboration and communication among all relevant stakeholders.

Further details on each individual step in the accreditation of an Alternative Procedure can be found in the [complementing handbook](#).

Continuous follow-up in the context of alternative procedures

The introduction of alternative procedures serves two key objectives: granting HEIs greater autonomy in quality assurance and fostering the further development of the accreditation system. Depending on how they are designed by the HEIs, alternative procedures may

complement existing approaches or establish entirely new forms of accreditation. The impetus to conduct an Alternative Procedure always stems from the HEIs themselves. Once positively accredited, the Accreditation Council follows up on the progressing alternative Procedure. In this way, the Accreditation Council tries to find out whether some elements of the Alternative Procedure could beneficially be implemented by other HEIs as well, thus contributing to an overall improvement of the German accreditation system.

Alternative procedures are seen as dialogical in nature: HEI and the Accreditation Council engage in a close and continuous exchange. For this purpose, the Council appoints at least one person to follow up on the Alternative Procedure. They observe the execution of the Alternative Procedure closely but do not carry out any review. The form and scope of the involvement depend on the specific Alternative Procedure. This continuous exchange facilitates regular follow-ups that go beyond verifying the mere fulfilment of conditions and recommendations.

One example of this is the cooperative alternative procedure of Hochschule der Medien Stuttgart, Furtwangen University, and Nuertingen-Geislingen University, which a representative of the Accreditation Council supervised based on documentation in the second half of 2025. This resulted in a report in which the HEIs had the opportunity to submit their insights and discussions concerning their alternative procedure and the overall accreditation system thereby generating an exchange between the respective HEI and the Accreditation Council. Each report on an alternative procedure is submitted to the Accreditation Council for discussion. This shall ensure that the HEIs' experiences and findings can be used for the continuous improvement of the accreditation system.

Beyond the exchange between institutions and the Accreditation Council, communication with agencies is also being intensified. For example, in the accreditation of the currently planned alternative procedure at the University of Siegen, planned for 2026, a member of an agency will participate as an observer with the aim to deepen collaboration and knowledge exchange between the two parties.

Development of knowledge management

Knowledge management concerning alternative procedures has been further strengthened. For this an internal handbook has been drafted, covering all aspects of handling alternative procedures and ensuring transparency within the department. Alongside descriptions of Alternative procedures and the process for their accreditation, the handbook documents the decision-making practice of the Accreditation Council in this field. As a "living" document, it is continuously updated and shall thus serve as part of the institutional memory of the Accreditation Council. A section of the internal handbook, specifically the part that outlines the

procedural steps for accrediting an alternative procedure, has been adapted into a [guide for external stakeholders](#). This was done to provide a more transparent presentation and clearer communication of the necessary steps involved in the accreditation of alternative procedures.

Currently ongoing accreditation procedures regarding alternative procedures

Since the RPAAP were only adopted in 2019 and the first accreditations of Alternative procedures took place in 2020, there is no experience yet with completed accreditation procedure cycles of alternative procedures (i.e. the whole accreditation period of eight years). In total, two alternative procedures have been accredited. Additionally, two alternative procedures are currently improved upon by the HEI after the expert groups suggested revisions of the procedures during the on-site visits. They are expected to be accredited in the first half of 2026. Furthermore, one accreditation process of an alternative Procedure is scheduled to start in 2026. The assessment in all current procedures is carried out by GAC. The two alternative procedures that already have been accredited show exemplarily the scope of alternative procedures:

- **Alternative procedure of the Harz University of Applied Sciences:** The Harz University of Applied Sciences carries out a programme-related Alternative Procedure. The core element is the regular internal workshops on programme development with the participation of students and professors, which are complemented every eight years by the participation of external experts. The institution has also created its own accreditation committee, the majority of which is made up of external members from the areas of university management, student body and professional practice. A representative of an assessment agency is an advisory member. It is expected that the Alternative Procedure will provide insights into how teachers and students can be more involved in accreditation procedures and how external expertise can be strengthened in accreditation committees.
- **alternative Procedure of the Hochschule der Medien Stuttgart, Furtwangen University, and Nuertingen-Geislingen University:** The procedure of the three HEIs in Baden-Württemberg is system-oriented. The HEIs work together to continuously evaluate and further develop their quality assurance systems in, partly joint, annual quality conferences. This also includes the institutions' own internal procedures for the accreditation of study programmes. In addition to the cooperation of three HEIs in quality assurance, the outstanding feature of this alternative procedure is the continuous evaluation. GAC will therefore monitor this procedure particularly closely throughout the entire accreditation period.

The [guide](#) provides a comprehensive overview of all alternative procedures currently in progress.

Annex 02 Electronic Information and Application System (ELIAS)

I. Introduction

At the end of 2016, when it became clear that GAC would be responsible for deciding on accreditation applications, the Board and the Accreditation Council promptly initiated a project to develop a fully digital system to support this task. Over the course of 2017 and 2018, a web-based electronic application processing system and a database for accredited study programmes and higher education institutions (ELIAS) were developed. The system was officially launched in January 2019.

The system consists of the following elements:

- a module for the application process for the programme and system accreditation (as well as alternative procedures – being programmed currently),
- the database for accredited study programmes and higher education institutions,
- three interfaces to the databases: Higher Education Compass (the largest database of study programmes in Germany), Database of External Quality Assurance Results – DEQAR and financial accounting – DATEV,
- A module for the accredited higher education institutions and agencies to update the information about the accredited study programmes,
- A module for uploading and organizing the meetings of the Accreditation Council,
- A section for export CSV that are regularly created in ELIAS, downloaded, and analysed outside of the system.

ELIAS is an online application system and database to support the efficient and transparent management of accreditation processes. It enables higher education institutions to submit applications, while also facilitating internal review and decision-making workflows within the GAC.

The system is web-based and accessible to all relevant stakeholders, including HEIs (applicants), Programme managers of GAC, Accreditation agencies and members of the Accreditation Council. It provides structured forms for data entry, document upload, and communication, ensuring consistency and completeness of submitted information.

In addition to supporting the internal review process, the system includes a reporting tool that allows members of the Accreditation Council to provide individual assessments of applications. The platform is designed in compliance with current data protection regulations. Uploaded documents are stored securely and are only accessible within the context of the specific

application. Accreditation reports and corresponding decisions of the Accreditation Council are the only documents published in the database at the end of the procedure.

Overall, the system contributes to the standardization, traceability, and quality assurance of accreditation procedures, while also improving communication between all parties involved.

II. User Roles and Access Rights

The online application system is structured around clearly defined user roles, each with specific access rights and responsibilities to ensure a secure and efficient accreditation process.

The system distinguishes between several key roles:

- Applicants (typically representatives of higher education institutions) who submit accreditation applications and upload relevant documentation (additionally accredited HEIs can update/publish the information about the accredited study programmes in the database).
- Programme managers from the Head office who conduct the initial evaluation of submitted applications.
- Programme managers who provide an independent counter-assessment to ensure objectivity and consistency.
- Members of the Accreditation Council, who access applications and provide individual assessments through an integrated reporting tool (rapporteurs).
- Employees of the Accreditation agencies in Germany, who can access the database and enter the accreditation information according to the former legal framework.

Access to the system is role-based and strictly regulated. Each user can only view and interact with the data relevant to their role. For example, applicants can only access their own applications, while reviewers and council members have access to all applications submitted. Internal documents are stored securely and are only visible within the context of the specific application.

III. Accreditation Procedure in ELIAS

ELIAS maps the entire accreditation procedure submitting the application until the publication of the decision:

- it enables HEIs to apply for different types of procedures, e.g. (re)accreditation, substantial changes, extensions, recognition of joint programmes within the German accreditation system.
- When applying for accreditation, HEIs must upload full documentation, including self-evaluation report, accreditation report and other relevant documents. The responsible

programme manager from the Head Office of GAC handles the application in ELIAS and prepares a draft accreditation decision for the Accreditation Council.

- Each accreditation application is checked and cross-checked by Programme managers. This ensures that every application is assessed by two employees of the Head office. In addition, ELIAS has a reporting tool that allows individual members of the Accreditation Council (rapporteurs) to provide their assessment of the accreditation applications prior to the accreditation council meetings.
- The full documentation and draft accreditation decisions (including the assessment of an accreditation council member), are made available to the members of the Council Visalia.
- After the Accreditation Council has taken the accreditation decision, the official accreditation notices are generated in ELIAS and are available for the download to the respective HEIs.
- The delivery of accreditation notices to HEIs is carried out through the publication of database entries. However, this process is programmed in such a way that the HEIs (as applicants) are informed first, can download the corresponding documents from the database, and the entries are only made visible in the public database five days later.
- For accreditation with conditions, there is a workflow for a follow-up process implemented in the system.

IV. Quality Assurance and further development of ELIAS

Nearly all the features planned during the initial development of ELIAS have now been implemented. The only exception is the application process for alternative procedures, which is being currently developed. However, decisions on the accreditation of higher education institutions using alternative procedures are already being published and recorded in the database.

ELIAS also offers evaluation and documentation options. Using a questionnaire tool, HEIs have the opportunity to regularly fill out a form with a total of 5 questions and provide the Head office with feedback via text field. Furthermore, the ELIAS Team offers the HEIs ELIAS workshops on a regular basis. The workshops are used as a feedback tool as well, to improve the system and enhance the usability, as well as correct the existing mistakes in the database. In the last two years the accreditation agencies have also joined the series of workshops, organised by the ELIAS-Team. Direct contact with the main target groups helps GAC to identify the issues and problems they have when working with the system. ELIAS-Team maintains a list of tasks that need to be implemented and prioritizes them depending on the urgency and available budget. Working in an agile project environment, individual tasks are discussed and

programmed in so-called sprints. Each year, approximately 3-4 such milestones (sprints) are planned and implemented.

Internal staff meetings for ELIAS-Team usually take place every week for about an hour to coordinate the technical or functional components to be implemented.

V. Progress in the development of ELIAS since the previous evaluation

The ELIAS system continues to evolve rapidly. Since the last evaluation, additional processes have been implemented in ELIAS—for example, those related to the recognition of accreditation decisions for joint programmes, as well as for substantial changes within programme accreditation.

Higher education institutions now also have the option to enter cooperative study programmes directly in ELIAS. The database of accredited study programmes and institutions is continuously being developed. In addition to regular data reviews and error corrections, functionalities for downloading data via CSV and filtering have been improved.

The ELIAS database serves as a foundation for extensive data-driven and thematic analyses. Alongside improvements in data quality, the representation and documentation of processes are also being refined to meet the needs of different target groups: higher education institutions, the Accreditation Council, the head office, and the agencies. The ELIAS FAQs on the website are regularly updated and expanded.

VI. Challenges and Improvements

One of the biggest challenges is collaborating with around 400 higher education institutions, each with its own expectations and requirements for how study programmes should be represented in the database, as well as for the accreditation/publication processes and access rights. To address these issues effectively, the ELIAS team works closely, among others, with the departments responsible for programme accreditation, system accreditation, and alternative procedures to improve application workflows. It helps the team, to also actively bring ELIAS topics into various exchange and dialogue formats with HEIs and agencies.

Another challenge is the concept of communication with publicity. The information on the website is usually kept up to date; however, ELIAS Team has so far only made limited use of other channels of communication (such as social media). Nevertheless, improvements in this area are planned. GAC is already active on social media, and the ELIAS team is also being trained to become part of it. A new communication concept is also being developed in that context. As the website is currently being redesigned, topics that may be of interest to the

public will also be presented in a more diversified, prominent and visually improved manner on the new website.

Annex 03 Evaluations and Quality Reports 2021-2025

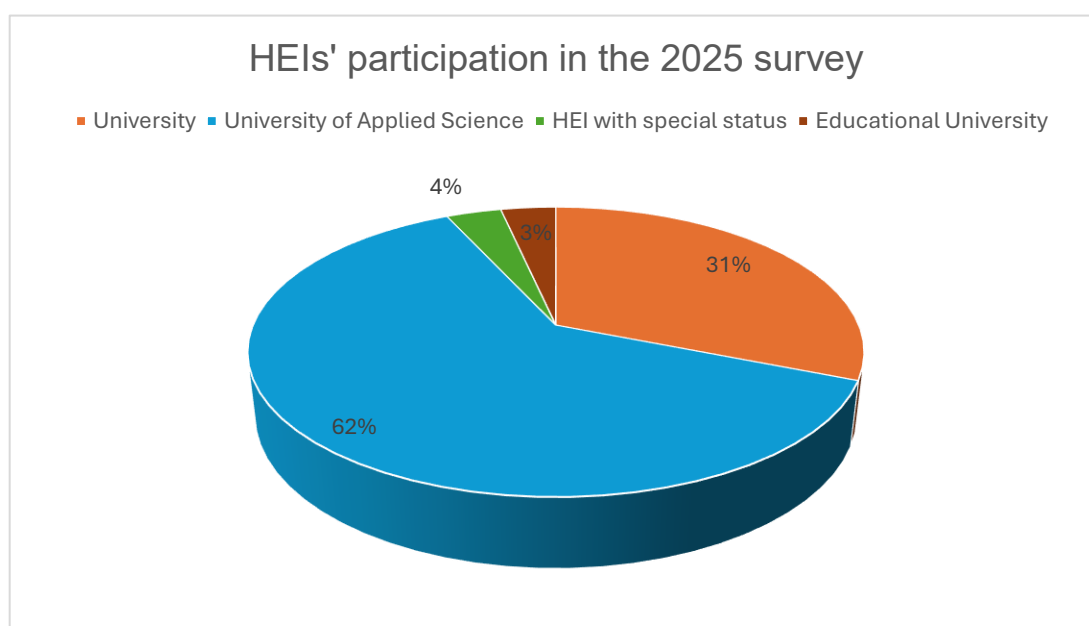
Since 2021, a questionnaire tool has been available in ELIAS that is used for evaluation at least once a year. It gives HEIs the opportunity to provide feedback on the evaluating key objectives of the mission statement – conducting swift, reliable, timely and transparent procedures – after the accreditation procedure.

The results are also presented in cumulative form in the annual quality report to the Council and thus form the basis for the further development of operational processes and conceptual framework conditions.

The current feedback was collected anonymously between 15 January and 28 February 2026 for procedures in 2025 and is documented in aggregated form by the Head Office.

A total of 29 HEIs with varying numbers of applications, so some of the feedback refers to several application procedures. This represents a significant drop in the number of participants; in the same period in 2024, 72 HEIs took part.

The participating HEIs include 9 universities, 18 universities of applied sciences, one HEI with a special status and one Educational College.



Slide 01 HEIs' participation in the 2025 survey

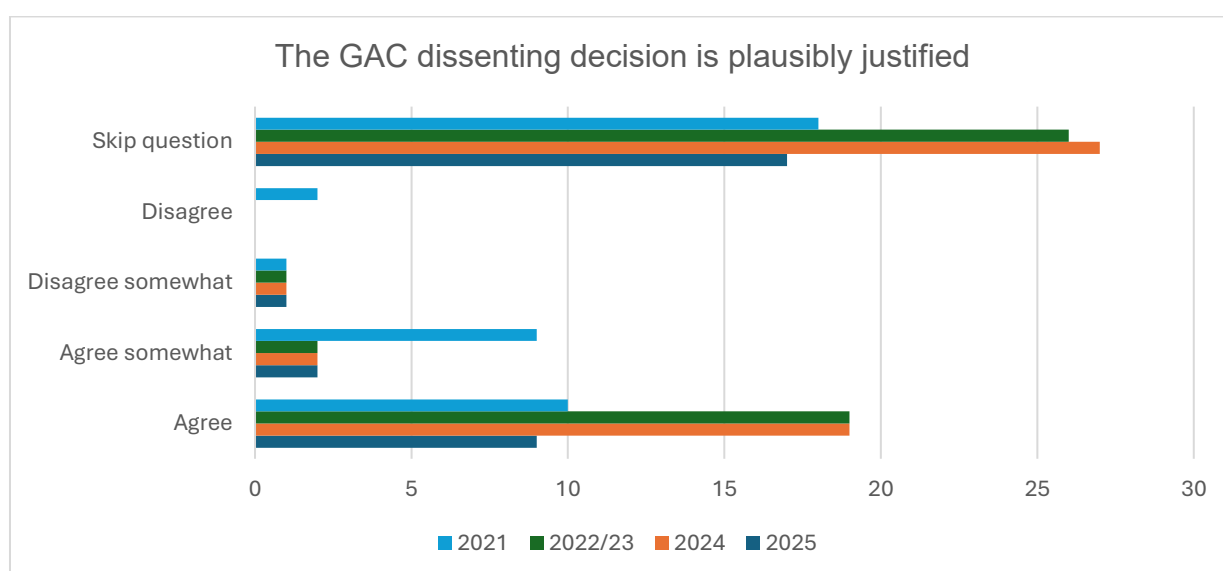
The majority of the applications processed by these universities were programme accreditation applications (29 applications).

I. Comparison of the 2021-2025 survey results

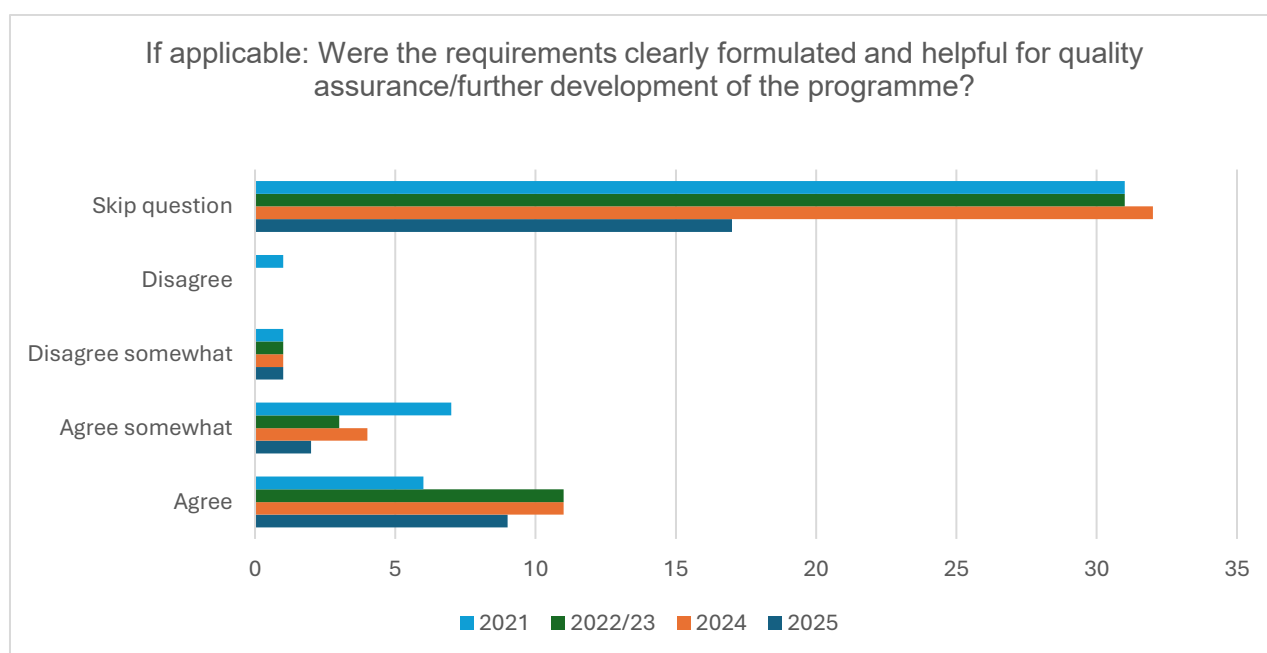
Compared to previous surveys of higher education institutions, which were presented in the quality reports [2021 – 2024](#), there has been an decrease in participation. In 2021, 46 higher education institutions took part in the survey, while in the following survey for the years 2022 and 2023, the number rose to 49. In 2024, the participants included 72 higher education institutions. This means that the number of participants was rising in the last four years and decreased significantly in the survey 2025.

The reasons for this may lie in a general aversion to evaluation – a phenomenon that higher education institutions themselves face when conducting student surveys as part of their quality assurance processes.

It is noticeable that approval of a decision by the GAC that deviates from the accreditation report has risen slightly, or that HEIs are skipping the question.



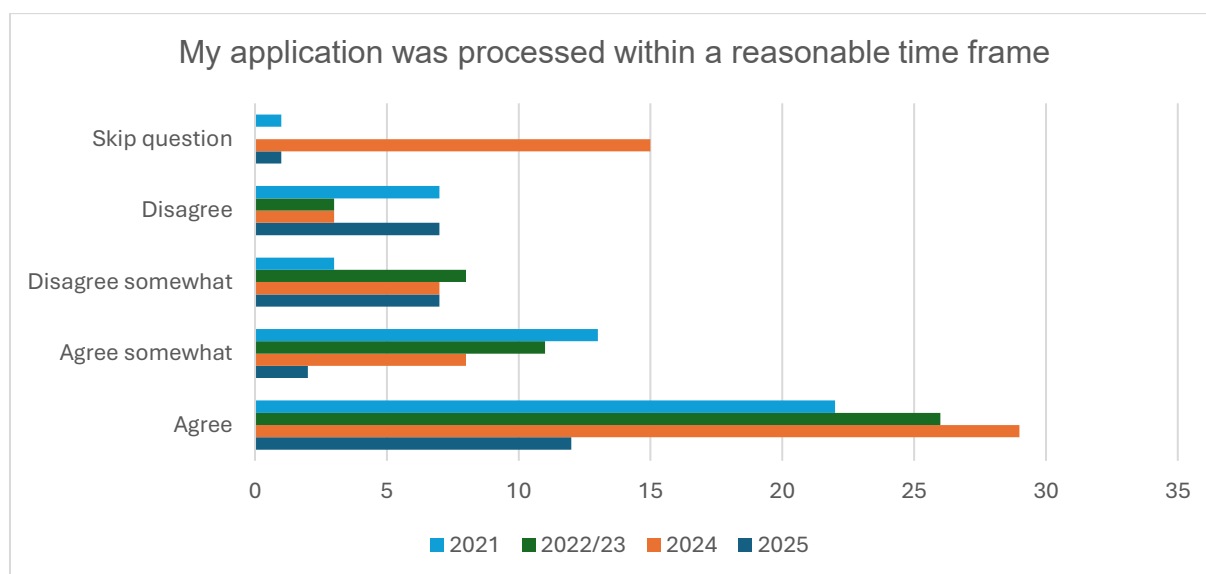
Slide 02 Dissenting Decisions



Slide 03 Quality assurance and further development

Approval for the imposition of conditions by the GAC has also risen slightly since 2021.

It is also striking that the assessment of application processing times has fallen slightly from a comparable level: in 2021, a quarter of the HEIs surveyed stated that the processing time for their application was not reasonable. In the survey for 2024, satisfaction with the processing period was significantly higher.

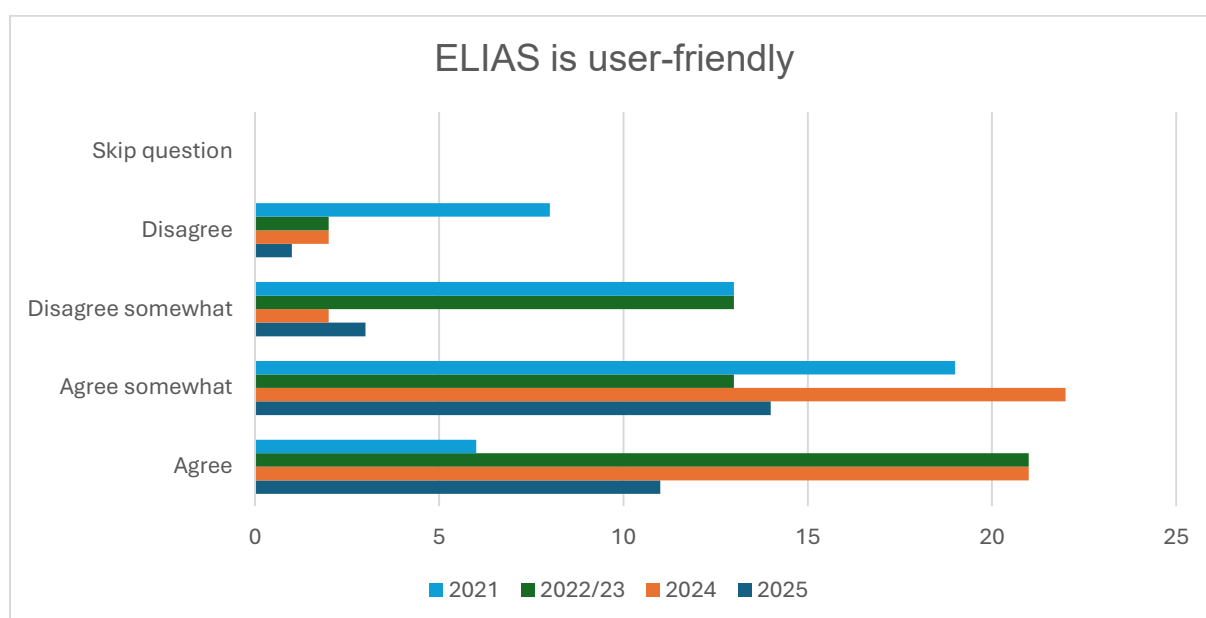


Slide 04 Processing time

However, in the latest survey from 2025, satisfaction has fallen significantly, a trend that cannot be attributed solely to the lower response rate. In fact, dissatisfaction with processing times has increased in the current survey. This corresponds to the volume of applications and the processing time, which has risen significantly again since the start of 2025. At the present time (July 2025), there are applications with a processing time of up to 12 months.

The departments responsible for programme and system accreditation have also begun to analyse and optimise their existing work processes (see SAR Chapter 10).

The increased rating of the user-friendliness of the ELIAS electronic application processing system is also worth highlighting. In 2021, only slightly more than half of the HEIs surveyed were satisfied with the ELIAS portal. In the current survey, however, more than 90% consider ELIAS to be user-friendly.



Slide 04 User-friendly

This has resulted in a huge increase in the positive assessment of ELIAS' usability.

The conclusion is that the surveys are very well suited to evaluating key objectives of the mission statement – conducting swift, reliable, timely and transparent procedures – and documenting the impact of process optimization of the last years.

Annex 04 GAC appointment process

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 at the suggestion of the HRK.

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,
- the representatives of the Länder are nominated by the KMK,
- the representative of the state ministries responsible for service 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 students,
- the foreign experts are nominated jointly by the KMK and the HRK and
- the representative of the agencies is nominated by the agencies.

Those members (all members apart from the professors) are then, according to Article 9 (2) sentence 4, appointed unanimously by the KMK and the HRK for a period of four years; with exception of the students which are according to section 8 (3) of the Statutes appointed for two years.

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.

The nomination criteria are set out transparently. For the professors, Article 9 (2) sentence 3 of the Interstate Study Accreditation Treaty applies, according to which that the HRK ensures *“[...] that the different types of higher education institutions and the diversity of subjects are taken into appropriate account and that the professors are not university executives”*. Besides, the resolution of the 22nd general meeting of the HRK of 22 May 2017 and the statement of the HRK, which was adopted by the HRK Board on 26 April 2021, clearly describe the selection process with regard to professorial members and the other members nominated by the HRK. After that, the HRK also selects the international (professorial) members of the Accreditation Council. The student members are proposed by the student accreditation pool¹. The

¹ The student accreditation pool is the nationally legitimised student interest group that sends students to the accreditation system and promotes their participation in it. See <https://www.studentischer-pool.de/studierendeeoffentlichkeit/>.

representatives of professional practice are proposed jointly by the employers' associations and the trade unions, respectively.

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.

After the appointment by the KMK, the Head Office starts its onboarding process:

- ⇓ Appointment (external)
- ⇓ Invitation from chairperson/secretariat
- ⇓ Introduction to ELIAS
- ⇓ Introduction to the work of the Accreditation Council (all members)
- ⇓ Internal procedures (process descriptions, responsibilities)

The Accreditation Council has been purposely designed as a representative body where the interests of the various stakeholders are expressed. According to Article 9 (4) Interstate Study Accreditation Treaty, the professors have a double vote in accreditation decisions. The background for this rule is the Federal Constitutional Court's resolution of 2016 on accreditation which demanded an overall structure *"in which decision-making powers and participation rights, influence, information and control are structured in such a way that dangers to the freedom of teaching are avoided."*² 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. It has been experienced that in the case of controversially discussed applications; the professors regularly argue from their own experience and subject perspective and thus also represent quite different views.

² [Order of the First Senate of the Federal Constitutional Court of 17 February 2016.](#)

Annex 05 Thematic Analysis

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

GAC’s electronic database and application submission tool ELIAS is the backbone of any general qualitative and quantitative analysis concerning external quality assurance activities. New application submissions are filed and processed within ELIAS. Older data³ has been imported into the database and consolidated in a dedicated project in 2023. The database is reviewed yearly to maintain the highest possible standard concerning data accuracy and completeness. Data from the Higher Education Compass is used to add to and in parts update the master data of study programmes in ELIAS. Current accreditation decisions, reports and historical data are available to the public.

The most recent activities regarding ESG 3.4 were concerned with conditions imposed in system accreditations. Conditions are the main instrument of the Accreditation Council to ensure that the criteria for study programmes as well as for quality management systems are fully met. They reveal issues in form and/or content of the object under accreditation and allow for countermeasures from the HEIs. Simultaneously, they indicate to points of interest within the accreditation process, particularly for the GAC itself, but also, e. g. for report preparation of the agencies.

Within the thematic analysis on conditions in system accreditations, 81 HEI’s were examined. Around half of these (46%) were accredited without conditions. No dependency on the number of the accreditation cycle (first or subsequent) was found. Where applicable, conditions were categorised into 10 specific topics. The two most prominent categories were

- Decision processes, responsibility and accountability (“Entscheidungsprozesse, Zuständigkeiten und Verantwortlichkeiten”)
- Regular evaluation with external reviewers (“Regelmäßige Bewertung der Studiengänge und Einbeziehung Externer”)

So far, there have been no cases of unfulfilled conditions within the regularly one year after the accreditation decision of the GAC. The two most prominent categories for conditions are therefore also the two most prominent categories in already accomplished or as of time of reporting ongoing development in the sector of accredited HEI’s.

³ I.e. accreditation decisions as well as general information on study programmes and/or HEIs, which have as of yet not filed a new application for re-accreditation.

The categories found during thematic analysis of conditions in system accreditation were implemented into the ELIAS database, so that future conditions may be categorised directly and evaluated on a fast track.

See the [GAC Homepage](#) for the findings of the thematic analyses and other related publications, reports and dashboards.

These findings are regularly discussed with agencies and HEIs. The published analyses are designed to enable other stakeholders, e.g. HEI's and agencies, to use them as a reference or conduct their own thematic analysis:

- All thematic analyses, reports and dashboards contain searchable tables for names of HEI's (for system accreditations) or study programmes and conditions.
- The thematic analyses on conditions contain a downloadable table of the data base for the analysis.

Furthermore, the GAC has broadened its scope in data analysis, related/adjacent or directly leading to (future) thematic analyses, significantly:

- Under the Label ARDA ([AkkreditierungsRat DatenAnalyse – GAC data analysis](#)) the GAC provides
 - o Customized
 - data exports from the ELIAS database to support further external data analyses and
 - reports/dashboards based on these exportsfor the Länder, HEI's, agencies and projects in the area of higher education research.
 - o Password-secured web applications ("shiny-app") with published data from the ELIAS database for advanced research for the Länder and (since 2025) the agencies.⁴
- The GAC has conducted a survey on joint thematic analyses by the Accreditation Council and agencies. Participants from HEI's (students and teaching personnel), agencies and professional practice took part in the survey.
- Subsequent and parallel to the aforementioned survey, the GAC is conducting workshops on the ELIAS database with the agencies.⁵ One agency has already

⁴ A test for a web application with use cases for HEI's is currently running. All web applications are evaluated by relevant stakeholders on a voluntary basis beforehand.

⁵ Similar workshops or training sessions with HEI's are already conducted on a regular basis.

conducted a follow-up workshop on an area of their expertise with members of the head office of the GAC, thereby improving relations among stakeholders.

GAC will continue to

- provide yearly thematic analyses on a topic of interest based – when possible – on direct stakeholder feedback,
- publish and update reports and dashboards for specific areas of the higher education system, including searchable tables for study programmes and conditions for further research
- provide and improve on advanced research tools for experts within the German accreditation system
- stay in close correspondence with stakeholder to react to current trends, questions and problems through workshops and direct contact via dialogue formats of the GAC.

The following table gives an overview of past and future activities concerning thematic analysis and published reports/dashboards.

Year	Topic
2015	Sample analysis on joint programmes
2016	Sample analysis on franchise cooperations in higher education
2018	Sample analysis on system accreditation
2017/18	Thematic analysis concerning the conditions imposed in accreditations based on the “old” accreditation system
2020	Interim Review with update on the 2017/18 thematic analysis and comparison
2023	• Thematic analysis on conditions in programme accreditations • Publication on new regulations, requirements and limits of quality assurance in the context of accreditations in the "Sozialmagazin" (social magazine) • Report on study programmes in midwifery • Report on study programmes in psychology • Report on study programmes in the nursing sector
2024	• The analysis on the topic of academic success was prepared as part of the master's thesis of a programme manager of GAC. It was feed into the quality dialogue in 2024. • Publication on the path of application by the accreditation council in the circular of the Union Reviewer Network • Nine reports on study programmes in specific subject groups • Report on study programmes in sports management • Report on study programmes in mechanical engineering • Länder-Dashboard for new programme accreditation 2022-2024 • Länder-Dashboard for accredited HEI's

	• Support for the Federal Institute for Vocational Education and Training (BIBB) for analysis of study programmes in the nursing sector (published 2025)
2025	• Thematic analysis on conditions in system accreditations • Publication on accreditation as quality assurance and development of degree programmes in “Public Health Forum” • Report on study programmes in the sector of architecture and planning • Report on Bachelor study programmes in the nursing sector (planned) • Update on selected existing reports (overview of study programmes and all subject group related) and dashboards • Support for the Federal Institute for Vocational Education and Training (BIBB) for analysis of study programmes in the nursing sector (not yet published)
2026	• Planned: • Thematic analysis on significant changes during accreditation cycles of study programmes • Report on study programmes in the mechatronics sector • Reports on 1-3 additional topics depending on demand • Update on selected existing reports (overview of study programmes and all subject group related) and dashboards • Support for the Federal Institute for Vocational Education and Training (BIBB) for analysis of study programmes in the nursing sector

Annex 06 Joint analysis for future Thematic analysis

I. Introduction

Background to the evaluation

At the 116th meeting of the GAC, the GAC discussed the preparation and implementation of joint thematic analyses with representatives of the agencies.

The background to this is ESG 3.4, which provides for thematic analyses as part of the standards and guidelines for quality assurance agencies. Accordingly, through their work, agencies gain insights into degree programmes and higher education institutions that are useful beyond the scope of individual procedures and can serve as a basis for structured analyses of the entire higher education system. These insights can contribute to the reflection on and improvement of quality assurance strategies and procedures in institutional, national and international contexts.

Consequently, agencies such as the GAC, which are listed together as agencies in *the European Quality Assurance Register (EQAR)*, face the shared challenge of conducting thematic analyses of the insights gained from their activities.

To prepare a joint analysis by the agencies and the GAC, which could serve to identify requirements and objectives for future thematic analyses, the GAC, together with the agencies, had decided to establish a working group.

The working group comprised Dr Hinsken from evalag and Dr Petersen from AQ Austria, as well as Dr Neuhaus and Dr Grünes from the Foundation's secretariat. Following the presentation of the working group's findings, the GAC, together with the accreditation agencies, commissioned the GAC's secretariat at its 120th meeting on 13/14 March 2024, the GAC, together with the accreditation agencies, commissioned the Secretariat of the GAC to conduct a survey among the committee members of the agencies and the GAC in preparation for the possible implementation of joint thematic analyses.

Implementation and duration of the survey

The survey was designed as an online questionnaire using LimeSurvey with free-text fields and was aimed at the members of the committees of the GAC and the accreditation agencies (such as accreditation commissions and specialist committees) as well as the management teams. The aim was to generate as broad a range of opinions as possible from the stakeholders and status groups within the accreditation system, which would provide insights for joint thematic analyses.

The survey was launched on 29 October 2024 and ran until 31 December 2024. Participation in the survey was voluntary.

II. Analysis of participation

II.1 Participants by stakeholder group (total)

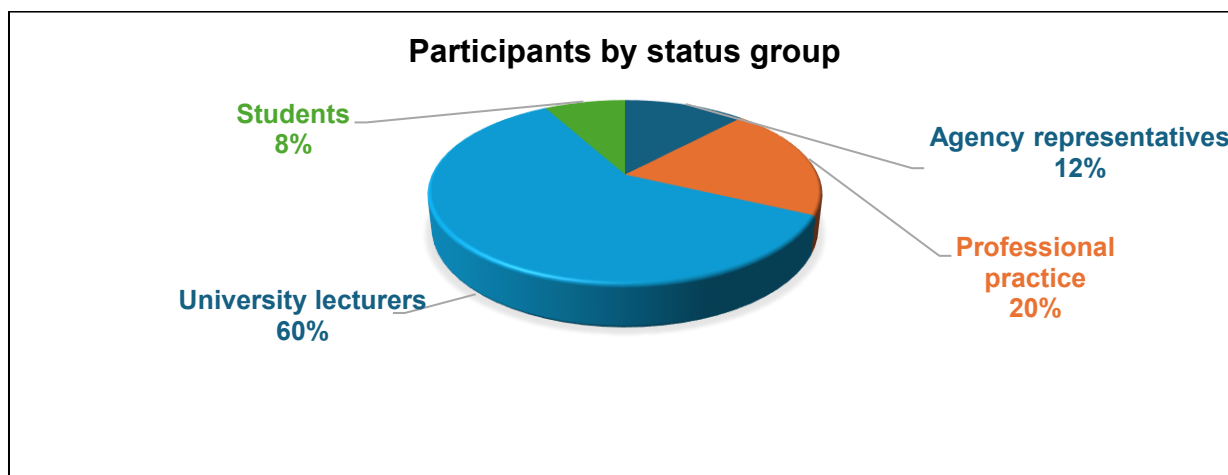
Participants could choose from the following status groups: agency representatives; professional practitioners; state representatives; professors; QM universities; students; and other.

Under 'Other', further details were provided, for example, regarding university management or membership of the university council. A total of 75 people took part in the survey; however, unlike the total number of participants, only 25 people completed the survey in full and provided details in the text fields.

The distribution among the 25 respondents was as follows:

Agency representatives	Professional practice	State representatives	University lecturers	QM universities	Students
3	5	0	15	0	2

University lecturers make up the largest group of participants at 60%, followed by professionals from the field at 20%, agency representatives at 12% and students at 8%.



Slide 1 Participants by status group

III. Analysis by status group

The evaluation of the feedback is initially carried out by participant group. Only those participant groups that provided feedback are taken into account (see Figure 2: Participants by status group (with responses)). It should be noted that for small groups or groups with a low response rate, the available feedback does not allow conclusions to be drawn about the status group as a whole. Consequently, no statistically reliable statements about the status groups are possible.

Furthermore, due to the survey's heavily text-based nature, categorisation of the responses is only possible to a limited extent. The responses regarding strengths and weaknesses are summarised in aggregated form, depending on the question type.

III.1 Agency representatives

Question: *How do you perceive the role and significance of the accreditation system for university lecturers? What are the strengths for university lecturers? What are the weaknesses for university lecturers?*

Strength: The responses highlight as a positive aspect the encouragement of self-critical reflection on one's own practice, particularly in teaching, and the joint reflection process within the faculty.

Weakness: Among other things, it is criticised that the benchmark for accreditation is often not academic quality, but rather the fulfilment of formal criteria (module structure, examination systems, etc.). Furthermore, accreditation is associated with a significant investment of time and money and ties up considerable staff resources.

Question: *How do you perceive the role and significance of the accreditation system for students? What are the strengths for students? What are the weaknesses for students?*

Strength: It is emphasised that, thanks to the guidelines, students are less subject to the whims of lecturers, as compliance with the guidelines is continuously evaluated.

Weakness: The risk of excessive formalisation of procedures and a bureaucratic 'schoolification' of the curriculum is highlighted here.

Question: *How do you perceive the role and significance of the accreditation system for prospective students? What are the strengths for prospective students? What are the weaknesses for prospective students?*

Strength: Praise is given to the clarity regarding study processes, which is also taken into account in accreditation through programme profiles, qualification objectives and career prospects.

Weakness: -

Question: *How do you perceive the accreditation system at the level of the entire university for academic staff (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for academic staff? What are the weaknesses for academic staff?*

Strength: -

Weakness: As a result of accreditation being perceived as excessively regimented and bureaucratic, the procedures are sometimes simply ‘endured like waves of flu’ without generating significant input for quality assurance and development.

Question: *How do you perceive the accreditation system at the level of the entire higher education institution for students (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for students? What are the weaknesses for students?*

Strength / Weakness: It is considered positive that students are involved in accreditation procedures. At the same time, however, this often takes place only in the form of representatives, some of whom are already among the most engaged students. The question is raised as to whether the impact on the entire student body actually yields a measurable result.

Question: *How do you perceive the accreditation system at the level of the entire university for prospective students (covering both programme and institutional accreditation as well as alternative procedures)? What are the strengths for prospective students? What are the weaknesses for prospective students?*

Strength: -

Weakness: The actual benefit of accreditation procedures for prospective students is called into question. The only relevant information is whether a degree programme is accredited.

Question: *How do you perceive the accreditation system at the level of the federal state for the university (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for the universities? What are the weaknesses for the universities?*

Strength: -

Weakness: On this point too, attention is drawn to the risk of over-formalisation and increasing bureaucratisation.

Question: *How do you view the accreditation system within the German higher education system (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for the higher education system? What are the weaknesses for the higher education system?*

Strength: In many cases, there is a high level of commitment among those involved.

Weakness: The accreditation system has reached its institutional limits and should not be expanded further.

Summary of the group of agency representatives

The strengths of accreditation cited include the encouragement of self-reflection in teaching, the creation of comprehensible and transparent structures, and the involvement of students. The weaknesses noted include a perceived risk of over-formalisation and bureaucratisation, as well as the low level of awareness among students overall and the barely discernible benefits for prospective students.

III.2 Professional practice

Question: *How do you perceive the role and significance of the accreditation system for university lecturers? What are the strengths for university lecturers? What are the weaknesses for university lecturers?*

Strength: Respondents view positively the contribution the accreditation system makes to quality assurance and development of degree programmes, particularly in ensuring that the programmes offered meet current academic standards and the requirements of the labour market. This strengthens confidence in the higher education institution. The accreditation system also enables the comparability of the targeted levels of competence.

Weakness: The restriction of autonomy is viewed critically, as the preparation of accreditation procedures requires a considerable investment of time and resources in addition to regular teaching and research duties. The formalities and documentation can be perceived as bureaucratic and obstructive, and in some cases the benefits of accreditation remain unclear.

Question: *How do you perceive the role and significance of the accreditation system for students? What are the benefits for students? What are the drawbacks for students?*

Strength: As accredited degree programmes meet defined quality standards, students are guaranteed a high-quality and sound education. Transparency and comparability contribute to this, as do recognition and mobility. Opportunities for student involvement within the accreditation process are also highlighted positively.

Weakness: Standardisation and a loss of flexibility are seen as risks posed by accreditation standards, for instance if excessive standardisation is enforced. Criticism is also levelled at the indirect cost burden if the costs associated with accreditation procedures lead to financial strain on the higher education institution; the same applies to excessive administrative burdens. In particular, an excessive focus on formal criteria could push the actual quality of teaching or the needs of students into the background.

Question: *How do you perceive the role and significance of the accreditation system for prospective students? What are the strengths for prospective students? What are the weaknesses for prospective students?*

Strength: -

Weakness: Most students are largely unaware of the accreditation system, even though quality assurance is of central importance and students rely on university programmes being of high quality. Accreditation does not necessarily provide any indication of the programme's relevance to professional practice.

Question: *How do you perceive the accreditation system at the level of the entire university for academic staff (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for academic staff? What are the weaknesses for academic staff?*

Strength: The regular review of degree programmes encourages university lecturers to continuously reflect on and optimise their teaching content and methods. Participation in accreditation procedures thus promotes the development of professional competencies in the field of higher education pedagogy and quality assurance. With regard to institutional accreditation, reference is also made to the strengthening of autonomy: "University lecturers have greater freedom to shape their work and can respond more quickly to changes in their subject area without having to accredit each degree programme individually."

Weakness: The heavy workload involved in preparing for and carrying out accreditation processes, as well as a perceived increase in bureaucracy. These factors lead to a restriction of academic freedom when criteria are perceived as too restrictive, particularly in programme accreditation. In contrast, a lack of transparency is seen as a risk in system accreditation. For instance, not all academic staff are sufficiently informed about internal processes and responsibilities. Variations in the quality of implementation are also problematic. The effectiveness of the quality assurance system depends heavily on the institutional culture. In some cases, academic staff feel insufficiently involved or supported. Strengths and weaknesses for academic staff depend on the extent to which they are involved in the procedures.

Question: *How do you perceive the accreditation system at the level of the entire higher education institution for students (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for students? What are the weaknesses for students?*

Strength: -

Weakness: The complexity of the accreditation system is viewed critically: the various types of accreditation can be confusing, making it difficult to navigate and potentially leading to uncertainty. Furthermore, a lack of information leads to confusion regarding the significance and status of accreditations. For prospective students, the accreditation system plays a very minor role.

Question: *How do you perceive the accreditation system at the level of the entire institution for prospective students (including both programme and system accreditation as well as alternative procedures)? What are the strengths for prospective students? What are the weaknesses for prospective students?*

Strength: Students see programme accreditation as confirmation of the quality of their specific degree programme. It gives them assurance that the content and structure of their programme meet the standards. If the institution is accredited as a whole (system accreditation), this signals to students that the institution has a functioning quality management system that applies to all degree programmes. This can strengthen confidence in the institution's quality. Alternative procedures may be perceived by students as a sign that the university is pursuing innovative approaches to quality assurance and responding flexibly to new requirements.

Weakness: Strict accreditation standards can make it difficult to introduce new or experimental teaching methods. The institution's resources could be tied up in time-consuming accreditation processes, which may lead to reduced investment in direct teaching or student services. Delays in innovation: Lengthy accreditation procedures can delay necessary adjustments or updates to degree programmes, which may compromise the relevance of the education.

Question: *How do you perceive the accreditation system at the state level for the university (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for the universities? What are the weaknesses for the universities?*

Strength / Weakness: By harmonising accreditation procedures and strengthening cooperation between the federal states, weaknesses can be reduced and the strengths of the system utilised more effectively. This would benefit not only the higher education institutions, but also the students and the entire educational landscape in Germany. The federal states' approach to the accreditation system varies, and this also has negative effects on the system. It is bloated and costly due to differing legal requirements and responsibilities. Universities may benefit from shorter decision-making processes and local proximity.

Question: *How do you perceive the accreditation system within the German higher education system (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for the higher education system? What are the weaknesses for the higher education system?*

Strength: The accreditation system makes a significant contribution to safeguarding and further developing quality within the German higher education system. It promotes transparency, comparability and the international recognition of degrees. Through the various accreditation procedures, higher education institutions can develop their individual strengths and contribute to shaping their profiles.

Weakness: There is a risk that the focus will be placed on formal criteria, whilst the actual quality of teaching receives less attention. 'Tick-the-box mentality': Higher education institutions could meet accreditation requirements without this leading to a genuine improvement in quality.

This weakness stems from the risk that the accreditation process may be too bureaucratic, too detached from university practice, students or the labour market, as well as from the federal structure, which can lead to differing standards within Germany. Stakeholder involvement: In some cases, relevant groups are not sufficiently involved in decision-making processes.

The differences in the laws governing the recognition of social professions lead to differing perspectives on the scope and regulatory possibilities offered by accreditation. Accreditation generally provides little insight into the relevance of the degree programme for professional practice and career prospects. From the perspective of professional practice, greater scope for input on content would be desirable here.

Summary of the Professional Practice Group

The strengths of accreditation cited include ensuring and further developing the quality of study programmes, promoting transparency, comparability and international recognition of degrees, and encouraging reflection on teaching.

Weaknesses cited include excessive formalisation and bureaucratisation of procedures, which can lead to a 'tick-the-box mentality'. Furthermore, accreditation does not necessarily ensure a good fit with professional fields. The barely discernible benefits for prospective students are also viewed critically.

III.3 University lecturers

Question: *How do you perceive the role and significance of the accreditation system for university lecturers? What are the benefits for university lecturers? What are the drawbacks for university lecturers?*

Strength: Processes of reflection on teaching quality and teaching development are initiated. Scrutinising the course offering and one's own teaching becomes routine. Accreditation acts as a key driver for the further development of degree programmes, but also for teachers' self-reflection.

Weakness: An immense workload for individual lecturers; not all lecturers recognise the value of the accreditation process; instead, many lecturers perceive the process as being too formalised and bureaucratic, yet at the same time not sufficiently content-oriented.

Question: *How do you perceive the role and significance of the accreditation system for students? What are the strengths for students? What are the weaknesses for students?*

Strength: Student involvement ensures the quality of studies, particularly in terms of guaranteeing the feasibility of the programme, upholding equality principles, and incorporating the student perspective into quality development. The student perspective must not be overlooked.

Weakness: Weaknesses: The vast majority of students are unaware of the role and effectiveness of the accreditation system. Unfortunately, the vast majority of students have little contact with it, and those involved in the procedures are often 'professionalised' and not truly representative. Students only experience the consequences of the accreditation system. In this respect, it has no significance for them.

Question: *How do you perceive the role and significance of the accreditation system for prospective students? What are the strengths for prospective students? What are the weaknesses for prospective students?*

Strength: -

Weakness: The answers largely refer to the responses to the previous question. The accreditation system and its role in quality assurance for degree programmes or the quality

management systems of higher education institutions is unknown. It is noted, however, that private higher education institutions advertise the accreditations they have received, which is intended to signal the high quality of their study programmes.

Question: *How do you perceive the accreditation system at the level of the university as a whole for academic staff (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for academic staff? What are the weaknesses for academic staff?*

Strength: Few strengths are identified. Accreditation drives the competence-oriented further development of the curriculum in the interests of student-centred learning.

Weakness: At the level of university lecturers, the accreditation system is perceived as a burden. Accreditation and re-accreditation are very time-consuming; furthermore, the requirements set by the framework allow for little creative and student-oriented design. Whilst the university as a whole requires specialists in quality management, these resources are lacking elsewhere.

Question: *How do you perceive the accreditation system at the level of the university as a whole from a student perspective (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for students? What are the weaknesses for students?*

Strength: Participation ensures transparency and credibility in the development of degree programmes.

Weakness: The systemic level is scarcely visible. It would be of central importance to encourage students even more to participate in accreditation systems, whilst taking particular account of the views of students outside student representative bodies.

Question: *How do you perceive the accreditation system at the level of the entire university for prospective students (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for prospective students? What are the weaknesses for prospective students?*

Strength: -

Weakness: Prospective students are not familiar with the accreditation system.

Question: *How do you perceive the accreditation system at the level of the federal state for the university (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for the universities? What are the weaknesses for the universities?*

Strength: -

Weakness: -

Question: *How do you perceive the accreditation system within the German higher education system (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for the higher education system? What are the weaknesses for the higher education system?*

Strength: The accreditation system plays a central role in the higher education system, but is often still seen as a burden rather than a tool for quality development. The equal treatment of higher education institutions of the most diverse types and characteristics is also viewed positively. Private and state higher education institutions of the most diverse types are treated equally.

Weakness: Accreditation is viewed as excessive formalism and bureaucracy. Furthermore, the criteria for interpreting the MRVO regulations do not appear to be sufficiently transparent and clear across higher education institutions, agencies, expert panels and the GAC. The final decisions of the GAC are not always predictable for higher education institutions. Transparent guidelines that go beyond FAQ answers and support communication would be helpful – “entirely in line with the GAC’s mission statement for a trusting and efficient collaboration with all stakeholder groups in the field of accreditation.”

Summary: University lecturers

The strengths of accreditation cited include the encouragement of self-reflection in teaching, the creation of clear and transparent structures, and the involvement of students.

Weaknesses cited include the high workload for teaching staff; furthermore, the risk of over-formalisation and inefficiency is criticised, as are strong tendencies towards bureaucratisation. Finally, the low level of awareness and interest among students is also criticised. It is also noted that prospective students are unaware of the accreditation and that its demonstrable benefits are called into question.

III.4 Students

Question: *How do you perceive the role and significance of the accreditation system for university lecturers? What are the strengths for university lecturers? What are the weaknesses for university lecturers?*

Strength: -

Weakness: A critical view is taken of the fact that lecturers often complain about the effort and costs involved in accreditation procedures and portray accreditation as a restriction on academic freedom.

Question: *How do you perceive the role and significance of the accreditation system for students? What are the strengths for students? What are the weaknesses for students?*

Strength: -

Weakness: Students are often unaware of the system or the opportunities for participation. Once they familiarise themselves with the system, they can generally use the procedures to drive forward the quality development of degree programmes. There are also complaints that conflicts of interest persist (including within the GAC). Dependence on KASAP is also viewed critically; students should be 'as free as the agencies'.

Question: *How do you perceive the role and significance of the accreditation system for prospective students? What are the strengths for prospective students? What are the weaknesses for prospective students?*

Strength: -

Weakness: Prospective students are unaware of the system.

Question: *How do you perceive the accreditation system at the level of the entire university for academic staff (covering both programme and institutional accreditation as well as alternative procedures)? What are the strengths for academic staff? What are the weaknesses for academic staff?*

Strength / Weakness: Programme procedures place a heavy burden on faculties, but also offer the opportunity for effective quality development. Quality systems create internal accountability, which can promote quality development. Alternative procedures only work if all stakeholders participate and contribute: “Generally speaking, quality development and accreditation can only function if underpinned by an attitude that seeks to promote development and open-minded thinking.”

Question: *How do you perceive the accreditation system at the level of the entire university for students (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for students? What are the weaknesses for students?*

Strength: -

Weakness: Irrelevant to students.

Question: *How do you perceive the accreditation system at the level of the entire university for prospective students (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for prospective students? What are the weaknesses for prospective students?*

Strength: -

Weakness: Irrelevant to students.

Question: *How do you perceive the accreditation system at the level of the federal state for the university (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for the universities? What are the weaknesses for the universities?*

Strength: In those federal states where accreditation and programme approval go hand in hand, the benefits are significant.

Weakness: The interpretation of key elements of the MRVO, such as dual study programmes and modularisation at state level, is problematic.

Question: *How do you perceive the accreditation system within the German higher education system (including both programme and institutional accreditation as well as alternative procedures)? What are the strengths for the higher education system? What are the weaknesses for the higher education system?*

Strength: The accreditation system ensures compliance with the ESG at national level and thus represents a constitutive aspect of the alignment of German degree programmes with the European Higher Education Area.

Weakness: -

Summary: Students

Strengths cited include the guarantee of standards and guidelines for quality assurance within the European Higher Education Area (ESG) and a strengthening of quality assurance and development overall.

Weaknesses cited include the low level of awareness and interest among students. It is also noted that prospective students have little knowledge of the accreditation system and that its tangible benefits are questionable.

Conclusion

The respondents' answers have revealed differing perspectives on the accreditation system, its implementation in higher education institutions and how it is perceived. Although the participant groups bring different approaches and aspects to the table, a number of common points can nevertheless be drawn as a conclusion.

1. All participant groups view accreditation as an additional task that ties up significant staff and time resources.
2. Attention is drawn to the risk of over-formalised procedures; this also applies to the application of the MRVO criteria.
3. At the same time, accreditation remains a key driver for the quality development of degree programmes – but also for the self-reflection of teaching staff.
4. Accreditation does not in itself guarantee employability.
5. All participant groups surveyed consistently noted that student involvement in accreditation procedures is very limited and, due to the inclusion of individuals from student self-governing bodies or committees, is not necessarily representative.
6. It was generally noted that prospective students have no knowledge of the accreditation system and that, as a result, accreditation status has little influence on their choice of degree programme.

Annex 07 Implementation of the ESG in the specimen decree

ESG Standard 2.1 Consideration of internal quality assurance

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

In all types of procedures, the HEIs must prove that the study programmes in question fulfil the formal and academic criteria for study programmes included in parts 2 and 3 of the Specimen Decree. In system accreditation procedures and accreditation procedures concerning alternative procedures, the assessment is multi-level.

The following table shows how the criteria in all types of procedures correspond to the standards of ESG part 1. The passages highlighted in yellow indicate changes to the Specimen Decree since 2024.⁶

ESG 1.1:	<i>Institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders</i>		
<i>Implementation in the three procedures of the Specimen Decree by the following sections</i>	Programme accreditation	System accreditation	Alternative procedures
	<u>§ 14</u>	<u>§ 14</u> <u>§ 17</u>	<u>§ 14</u> <u>§ 17</u> ESG 1.1 ⁷
ESG 1.2	<i>Institutions should have processes for the design and approval of their programmes. The programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly specified and communicated and refer to the correct level of the</i>		

⁶ https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen_beschluesse/2024/2024_11_21-Musterrechtsverordnung-engl.pdf

⁷ The ESG from part 1 are mentioned here because they are directly part of the accreditation criteria in alternative accreditation procedures.

	<i>national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area.</i>		
<i>Implementation in the three procedures of the Specimen Decree by the following sections</i>	Programme accreditation	System accreditation	Alternative procedures
	<u>§ 6 (4)</u> <u>§ 8</u> <u>§ 11</u> <u>§ 12 (1)</u> <u>§ 12 (4)</u> <u>§ 12 (5)</u> <u>§ 13</u>	<u>§ 6 (4)</u> <u>§ 8</u> <u>§ 11</u> <u>§ 12 (1)</u> <u>§ 12 (4)</u> <u>§ 12 (5)</u> <u>§ 13</u> <u>§ 17</u>	<u>§ 6 (4)</u> <u>§ 8</u> <u>§ 11</u> <u>§ 12 (1)</u> <u>§ 12 (4)</u> <u>§ 12 (5)</u> <u>§ 13</u> <u>§ 17</u> ESG 1.2
ESG 1.3	<i>Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach</i>		
<i>Implementation in the three procedures of the Specimen Decree by the following sections</i>	Programme accreditation	System accreditation	Alternative procedures
	<u>§ 12 (1)</u> <u>§ 12 (4)</u> <u>§ 12 (5)</u> <u>§ 12 (6)</u> <u>§ 12 (7)</u> <u>§ 15</u>	<u>§ 12 (1)</u> <u>§ 12 (4)</u> <u>§ 12 (5)</u> <u>§ 12 (6)</u> <u>§ 12 (7)</u> <u>§ 15</u> <u>§ 17</u>	<u>§ 12 (1)</u> <u>§ 12 (4)</u> <u>§ 12 (5)</u> <u>§ 12 (6)</u> <u>§ 12 (7)</u> <u>§ 15</u> <u>§ 17</u> ESG 1.3
ESG 1.4	<i>Institutions should consistently apply pre-defined and published regulations covering all phases of the student “life cycle”, e.g. student admission, progression, recognition and certification</i>		
<i>Implementation in the three procedures of the Specimen Decree by the following sections</i>	Programme accreditation	System accreditation	Alternative procedures
	<u>§ 3 (4)</u> <u>§ 5</u> <u>§ 6 (1)-(3)</u> <u>§ 6 (4)</u>	<u>§ 3 (4)</u> <u>§ 5</u> <u>§ 6 (1)-(3)</u> <u>§ 6 (4)</u>	<u>§ 3 (4)</u> <u>§ 5</u> <u>§ 6 (1)-(3)</u> <u>§ 6 (4)</u>

following sections	§ 12 (1) § 14	§ 12 (1) § 14 § 17	§ 12 (1) § 14 § 17 ESG 1.4
ESG 1.5	<i>Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff</i>		
Implementation in the three procedures of the Specimen Decree by the following sections	Programme accreditation	System accreditation	Alternative procedures
	§ 12 (2)	§ 12 (2) § 17	§ 12 (2) § 17 ESG 1.5
ESG 1.6	<i>Institutions should have appropriate funding for learning and teaching activities and ensure that adequate and readily accessible learning resources and student support are provided</i>		
Implementation in the three procedures of the Specimen Decree by the following sections	Programme accreditation	System accreditation	Alternative procedures
	§ 12 (3) § 15	§ 12 (3) § 15 § 17	§ 12 (3) § 15 § 17 ESG 1.6
ESG 1.7	<i>Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities</i>		
Implementation in the three procedures of the Specimen Decree by the following sections	Programme accreditation	System accreditation	Alternative procedures
	§ 14	§ 14 § 18	§ 14 § 18 ESG 1.7
ESG 1.8	<i>Institutions should publish information about their activities, including programmes, which is clear, accurate, objective, up-to date and readily accessible</i>		

Implementation in the three procedures of the Specimen Decree by the following sections	Programme accreditation	System accreditation	Alternative procedures
	§ 12 (1) § 12 (5)	§ 12 (1) § 12 (5) § 18	§ 12 (1) § 12 (5) § 18 ESG 1.8
ESG 1.9	<i>Institutions should monitor and periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. These reviews should lead to continuous improvement of the programme. Any action planned or taken as a result should be communicated to all those concerned</i>		
Implementation in the three procedures of the Specimen Decree by the following sections	Programme accreditation	System accreditation	Alternative procedures
	§ 14	§ 14 § 17 § 18	§ 14 § 17 § 18 ESG 1.9
ESG 1.10	<i>Institutions should undergo external quality assurance in line with the ESG on a cyclical basis</i>		
Implementation in the three procedures of the Specimen Decree by the following sections	Programme accreditation	System accreditation	Alternative procedures
	§ 26	§ 26	§ 34 Abs. 5

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§ 3 Programme structure and duration, recognition

(4) The higher education institution implements the national and state regulations on the recognition of competences, qualifications and achievements acquired at a higher education institution, as well as on the recognition of prior learning

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§ 5 Admission requirements and transitions between different courses

(1) ¹ Admission requirement for a Master's study programme is a first professional qualification at a higher education level. ²With Master's study programmes providing further education and those of an artistic nature, the professional qualification at a higher education level can be replaced by an entrance examination, wherever stipulated by state legislation. ³Master's study programmes providing further education usually assume qualified professional experience of no less than one year.

(2) ¹Admission requirement for artistic Master's study programmes is proof of the special artistic aptitude that is necessary for this. ²On admission to artistic Master's study programmes providing further education, professional activities that were completed during the study programme can also be taken into account if allowed by state legislation. The requirement of professional experience does not apply to colleges of art for study programmes that serve to consolidate fine arts skills, wherever stipulated by state legislation.

(3) Further requirements for admission to Master's study programmes can be stipulated according to state legislation.

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§ 6 Qualifications and qualification designations

§ 6 (1)-(3)

(1) ¹On successful completion of a Bachelor's or Master's study programme, only one degree, the Bachelor's or Master's degree, will be awarded, unless this is a multiple-degree qualification. ²No differentiation is made between the degrees based on the duration of the standard period of study.

(2) ¹The following designations shall be used for Bachelor's and consecutive Master's degrees:

1. Bachelor of Arts (B.A.) and Master of Arts (M.A.) in the subject groups linguistics and cultural studies, sport, sport science, social sciences, science of art, performing arts and, with

a corresponding content focus, in the subject groups economic sciences as well as in applied arts study programmes,

2. Bachelor of Science (B.Sc.) and Master of Science (M.Sc.) in the subject groups mathematics, natural sciences, medicine, agricultural, forestry and food sciences, in the subject groups engineering sciences and economic sciences with a corresponding content focus,

3. Bachelor of Engineering (B.Eng.) and Master of Engineering (M.Eng.) in the subject group engineering sciences with a corresponding content focus,

4. Bachelor of Laws (LL.B.) and Master of Laws (LL.M.) in the subject group law,

5. Bachelor of Fine Arts (B.F.A.) and Master of Fine Arts (M.F.A.) in the subject group fine art,

6. Bachelor of Music (B.Mus.) and Master of Music (M.Mus.) in the subject group music,

7. ¹Bachelor of Education (B.Ed.) and Master of Education (M.Ed.) for study programmes that teach the educational requirements for a teacher training qualification. ² According to the content focus of the study programmes a designation according to numbers 1 to 7 can be stipulated for a polyvalent study programme.

²Subject additions to the qualification designations and mixed-language qualification designations are excluded. ³Bachelor degrees with the supplement “honours” (“B.A. hon.”) are excluded. ⁴In the case of interdisciplinary and combined study programmes, the qualification designation depends on the most important subject area on the study programme. ⁵Master’s degrees that differ from the designations shown above may also be used for further education study programmes. ⁶Different designations may also be used for study programmes in theology that qualify students for the office of pastor, priest or the profession of lay pastor (“full-time theology course”).

(3) The qualification documents may point out at a suitable point that the degree level of a Bachelor’s degree corresponds to a Diploma qualification at universities of applied science and/or that the degree level of a Master’s degree corresponds to a Diploma qualification at universities or equivalent higher education institutions.

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§ 6 (4)

(4) The Diploma supplement, which is an integral part of every degree certificate, provides information on the study programme on which the qualification is based.

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§ 8 Credit points system

(1) ¹Each module shall be assigned a certain number of ECTS credit points depending on the work involved for the students. ²30 credit points should usually be taken as a basis in each semester. ³One credit point corresponds to an overall performance by the student in class time and self-study of 25 to a maximum of 30 hours. ⁴ECTS credit points shall be awarded for a module if the achievements stipulated in the examination regulations are proven. ⁵ECTS credit points are not necessarily awarded on the basis of an examination but for successful completion of the respective module.

(2) ¹No fewer than 180 ECTS credit points must be proven for the Bachelor's degree. ²300 ECTS credit points are needed for the Master's degree, including the previous study programme up to the first professional qualification. ³Deviations from this rule are possible in individual cases with an appropriate qualification of the student, even if 300 ECTS credit points are not reached at the end of a Master's study programme. ⁴In the case of consecutive Bachelor's and Master's study programmes in the core artistic subjects at colleges of art and music with a total standard period of study of six years, the Master's level is reached with 360 ECTS credit points.

(3) ¹The scope of work is 6 to 12 ECTS credit points for the Bachelor's thesis and 15 to 30 ECTS credit points for the Master's thesis. ²In study programmes in fine arts, the scope of work can be up to 20 ECTS credit points for the Bachelor's thesis and up to 40 ECTS credit points for the Master's thesis in duly substantiated exceptional cases.

(4) ¹In duly substantiated exceptional cases, up to 75 ECTS credit points can be taken as a basis of each academic year for study programmes with special study-related organisational measures. ²The workload for one ECTS credit point is hereby calculated with 30 hours. ³Special study-related organisational measures may relate in particular to the learning environment and support, the structure of higher education studies, the planning of courses and livelihood measures.

(5) ¹In the case of teacher training programmes for primary schools or at primary level, for overarching teaching professions at primary level and at all or individual types of schools at secondary level, for teaching professions at all or individual types of schools at lower secondary level as well as for level I special needs teaching professions, a Master's degree can be awarded if a total of 300 ECTS credit points will be reached including the preparatory service, following at least 240 ECTS credit points at the higher education institution.

(6) ¹180 ECTS credit points usually have to be proven for a Bachelor's degree at colleges of cooperative education with training that lasts for three years. ²The theory-based elements of training may not be below 120 ECTS credit points, the practical elements of training not below 30 ECTS credit points.

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§ 11 (1)-(2) Qualification goals and qualification level

(1) ¹The qualification goals and the intended learning outcomes are clearly formulated and publicly available and comprehensibly take account of the goals of higher education named in Article 2 paragraph 3 number 1 of the study accreditation treaty. ²The dimension of personality development also covers the future political and cultural role of the graduates in a civil society. Following their qualification, the students should be able to help decisively shape social processes in a critical, well thought-out manner as well as responsibly and in a democratic public spirit.

(2) The professional and scientific/artistic requirements comprise the aspects knowledge and understanding (extension, consolidation and understanding of knowledge), use, application and generation of knowledge/art (use and transfer, scientific innovation), communication and cooperation as well as scientific/artistic self-concept / professionalism and are consistent with a view to the degree level that is taught.

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§ 12 (1) Coherent study programme concept and adequate implementation

(1) ¹The curriculum is adequately structured in consideration of the stipulated entry qualification and in view of the ability to achieve the qualification goals. ²The qualification goals, the name of the study programme, degree level and designation as well as the module concept are coherently interrelated. ³The programme concept covers a variety of different forms of teaching and learning, as well as practical parts where appropriate, that are adapted to the respective area of study and the study programme format. ⁴It creates a suitable framework to encourage student mobility, allowing students to attend other higher education institutions without losing time. ⁵It actively involves students in organising teaching and learning processes (student-based teaching and learning) and creates freedom for a self-organised study programme. The study programme, course of study, examination requirements, module descriptions and admission requirements, including arrangements for compensation for disadvantages of students with disabilities or chronic illnesses, are documented and have been published.

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§ 12 (2)

(2) ¹The curriculum is implemented by sufficient teaching staff with appropriate specialist and methodical-didactic qualifications. ²The combination of research and teaching is guaranteed in accordance with the profile of the type of higher education institution in particular through professors (main job) in both undergraduate and graduate study programmes. ³The higher education institution takes appropriate measures to select and qualify its staff.

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§ 12 (3)

(3) In addition, the study programme has suitable resources and equipment (in particular non-academic staff, rooms and material resources, including IT infrastructure, teaching and learning aids).

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§ 12 (4)

(4) ¹Examinations and types of examinations allow an informative validation of the learning results that have been achieved. ²They are module-related and competence-oriented.

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§ 12 (5)

(5) ¹The ability to complete the study programme within the standard period of study is guaranteed. ²This covers in particular

1. a predictable and reliable implementation of the study programme,
2. the, to a large extent, absence of overlaps of courses and examinations,
3. a plausible average workload that is appropriate for the examination load, whereby the learning results for a module are to be calculated so that they can normally be achieved within one semester or one year, to be validated in regular surveys, and
4. An adequate and workload-appropriate examination frequency and organisation, which is adequately justified in an examination concept, as well as regularly assessed in terms

of the appropriateness of the workload with involvement of students as part of the further development of the study programme within the meaning of § 14; modules shall have a scope of at least five ECTS credit points.

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§ 12 (6)

(6) Study programmes with a particular profile requirement have a self-contained programme concept that takes the particular characteristics of the profile into due account.

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§ 12 (7)

A study programme may be called and advertised as “dual” if the places of learning (at least higher education institution or college of cooperative education and a company) are systematically geared to each other in terms of content, and organisation and on contract-level.

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§ 13 Subject-content organisation of the study programmes

(1) ¹The up-to-dateness and adequacy of the subject-related and scientific requirements are guaranteed. ²The subject-content design and the methodical-didactic approaches taken by the curriculum are checked continuously and adapted to further professional and didactic developments. ³To this end, the professional discourse on a national and if necessary international level is taken into account systematically.

(2) In study programmes that teach the educational requirements for a teacher training qualification, the basis for the accreditation are both the assessment of the educational sciences and specialist sciences as well as their didactics according to professional requirements that are both common for all states and state-specific, as well as the structural specifications teacher training that are both common for all states and state-specific.

(3) ¹Within the scope of the accreditation of teacher training programmes it has to be assessed whether

1. it is an integrative study programme at universities or equated higher education institutions comprising at least two specialist sciences and educational sciences in the

Bachelor phase as well as the Master's phase (exceptions are allowed in the subjects art and music),

2. practical experience at schools are carried out during the Bachelor study programme, and

3 a differentiation is made in the study programme and the qualifications according to teacher posts.

²Exceptions are allowed in the case of teacher training qualifications for vocational schools.

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§ 14 Academic success

¹The study programme is subject to continuous monitoring that also involves students and graduates. ²Measures to ensure the academic success are derived on the basis of this monitoring. ³These are under constant review and the results are used for the further development of the study programme. ⁴The involved persons are informed of the results and any measures taken, in consideration of data protection issues.

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§ 15 Diversity, Gender equality and compensation of disadvantages

The higher education institution has concepts in place to promote diversity and gender equality and to encourage equal opportunities for students in special circumstances; these concepts are implemented on the level of the study programme.

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§ 17 Concept of the quality management system (goals, processes, instruments)

(1)¹The higher education institution has determined a set of central educational objectives for teaching, which are reflected in the institution's mission statement and in the curricula of the study programmes. ²The quality management system follows the values and standards of the general principles for teaching and aims to continuously improve the quality of studies. ³It guarantees the systematic implementation of the stipulations named in Part 2 and 3. ⁴The higher education institution has specified decision-making processes, responsibilities and accountabilities for the establishment, verification, further development and discontinuation of study programmes and the higher education institution's own procedures to accredit study programmes within the scope of its quality management system and published these

throughout the higher education institution. ⁵The higher education institution determines validity periods and deadlines in line with § 26 and § 27. ⁶The higher education institution may specify shorter validity periods and deadlines. ⁷If a quality management system provides for the formation of clusters, § 30 paragraph 1 shall apply accordingly with regard to such clusters.

(2) ¹The quality management system was drawn up with the participation of the member groups of the higher education institution and with the involvement of external expertise. ²It ensures the independence of quality assessments and contains procedures on dealing with internal conflicts as well as an internal complaints system. ³It is based on closed loops, covers all areas of the higher education institution that are directly relevant for teaching and learning and has appropriate and sustainable resources and equipment. ⁴The functionality and efficacy with respect to the quality of the study programme will be checked on a regular basis by the higher education institution and continuously developed.

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§ 18 Measures to implement the quality management concept

(1) ¹The quality management system includes regular assessments of the study programmes and those areas relevant for teaching and learning by students from inside and from outside the higher education institution, academic experts from outside the higher education institution, representatives from professional practice and graduates; the higher education institution may assess the formal criteria itself. ²If a need for action is discovered, the appropriate measures will be taken and implemented

(2) If assessments of teacher training programmes, teacher training programmes with the combination subject Protestant or Catholic theology/religion, Protestant-theological study programmes as a qualification for the office of pastor, and other Bachelor and Master's study programmes with the combination subject Protestant or Catholic theology are carried out on the basis of the higher education institution's quality management system, the cooperation and approval requirements apply accordingly pursuant to § 25 paragraph 1 clauses 3 to 5.

(3) The data necessary for the implementation of the quality management system is collected regularly throughout the entire higher education institution.

(4) ¹The higher education institution documents the assessment of the study programmes by the internal quality management system including the votes of the external parties involved and informs members of the higher education institution, the public, maintaining bodies and home state regularly of any measures taken. ²It informs the public about the accreditation decisions taken on the basis of the internal procedure and provides the accreditation council with the information necessary for publication pursuant to § 29.

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§ 26

Period of validity for the accreditation; extension

(1) ¹The initial accreditation is valid for a period of eight years from the beginning of the semester or trimester in which the accreditation decision is announced. ²If a study programme has not yet begun in the case of a programme accreditation, the accreditation becomes effective as of the beginning of the semester or trimester in which the study programme is offered for the first time, though at the latest at the beginning of the second semester or trimester following the announcement of the accreditation decision.

(2) ¹Renewal of accreditation (reaccreditation) must be applied for before expiry of the accreditation term, and shall seamlessly follow the previous accreditation, if reaccreditation is granted. ²If the corresponding application is submitted in time, the accreditation term shall be extended for the duration of the administrative procedure. ³Reaccreditation shall take effect no later than at the start of the second semester or term following announcement of the accreditation decision. ⁴Reaccreditations are valid for a period of eight years.

(3) ¹The accreditation term may be extended by up to two years in total if

1. In case of programme accreditation, the higher education institution prepares an application for cluster or system accreditation that includes the respective study programme, or

2. The higher education institution applies for a deadline extension in justified exceptional cases that are wholly or partly beyond the institution's control; where such extraordinary deadline extension is granted in an individual case, it is credited to the next accreditation term. ²When applying for a system accreditation, the accreditation term of study programmes whose accreditation comes to an end during the procedure can be extended for the period of the procedure plus one year. ³If an accredited study programme is not continued, the accreditation term can be extended for students who are still enrolled on expiry of the period of validity.

[Back to the mapping grid](#)

§ 34 Alternative accreditation procedures

(1) Apart from the two procedures regulated in Part 4, alternative procedures can also be applied to ensure and enhance the quality of teaching and learning pursuant to Article 3 paragraph 1 number 3 of the interstate study accreditation treaty.

(2) ¹The criteria pursuant to Part 2 and Part 3 of this decree must be observed in alternative procedures. ²The principles for the appropriate involvement of academia in Article 3 paragraph 2 clause 1 of the interstate study accreditation treaty and in the interstate study accreditation treaty and in this decree apply accordingly; similarly, the cooperation and approval requirements pursuant to § 18 paragraph 2 also apply accordingly.

(3) ¹The performance of alternative procedures requires the prior consent of the Accreditation Council and the responsible scientific authority of the respective state; the Accreditation Council can arrange for an external assessment. ²The application is to be presented to the Accreditation Council through the responsible scientific authority. ³The Accreditation Council can only refuse its consent in consultation with the state if the alternative procedure does not comply with the stipulations of Article 2 and the terms of Article 3 paragraph 2 clause 1 of the interstate study accreditation treaty as well as the principles for the appropriate involvement of academia as set out in the interstate study

accreditation treaty and this decree. ⁴The alternative procedure should be suitable to gain fundamental knowledge of alternative approaches to external quality assurance beyond the procedures named in Article 3 paragraph 1 numbers 1 and 2 of the interstate study accreditation treaty.

(4) The Accreditation Council develops rules of procedure that regulate the application requirements in particular.

(5) ¹The alternative procedure is limited to a maximum of eight years. ²§ 22 paragraph 4 clause 2 and § 26 paragraph 3 clause 2 apply accordingly. ³The procedure shall be supervised by the Accreditation Council and it is normally evaluated by an independent institution with close ties to science two years before expiry of the project period.

Annex 08 Results evaluation of the specimen decree

Final report on the evaluation of the specimen decree (MRVO) under the State Treaty on the Accreditation of Study Programmes

Results of the inter-state working group of the KMK Higher Education Committee on the “Evaluation of the Specimen Decree”

(translated from German with deepl)

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List of abbreviations

AR	Accreditation Council
BDA	Confederation of German Employers' Associations
BVerfG	Federal Constitutional Court
DGB	German Trade Union Confederation
ECTS	European Credit Transfer and Accumulation System
EQAR	European Quality Assurance Register for Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
HRK	German Rectors' Conference
KMK	Conference of Ministers of Education
MRVO	Specimen Decree pursuant to Article 4(1) to (4) State Treaty on Study Programme Accreditation
VPH	Association of Private Universities

1. Introduction

1.1 Reasons for a reorganisation of the accreditation system at the University of Applied Sciences ()

On 17 February 2016, the Federal Constitutional Court (BVerfG) handed down a landmark ruling on the legal requirements for the accreditation system (Ref. 1 BvL 8/10, BVerfGE 141, 143–182). In substance, it confirmed the approach of mandatory external quality assurance of study programmes and teaching through accreditation. However, it emphasised that the legislature must not largely leave key decisions on the accreditation of study programmes to other actors, but must take them itself, whilst respecting the autonomy of academia.

Against this background, the Standing Conference of the Ministers of Education and Cultural Affairs (KMK) has called for a joint approach aimed at finding a solution that transcends state boundaries. In its resolution of 17 June 2016¹, it endorsed accreditation as a form of external quality assurance, confirmed the need for action on the part of the federal states, and regarded the implementation of the necessary legal provisions in accordance with the requirements of the Federal Constitutional Court as a matter of urgency. Furthermore, it recognised the need for further optimisation of the accreditation system and agreed to examine, in addition to proposals for the legal implementation of the Supreme Court's decision, proposals for making the system more flexible, granting universities greater autonomy, streamlining procedures, and reducing the administrative burden and thus costs.

1.2 State Treaty on Study Programme Accreditation and the Specimen Decree on Study Programme Accreditation ()

With the State Treaty on Study Programme Accreditation adopted on 8 December 2016, the federal states have jointly further developed the existing cross-state system for quality assurance in study programmes and teaching and have complied with the legal requirements of the Federal Constitutional Court regarding accreditation procedures. Modifications were made in key areas:

- Redefinition of the roles of the Accreditation Council (AR) and agencies: Transfer of the accreditation decision to the AR on the basis of standardised reports containing recommendations for decisions and evaluations

¹ 354th Conference of Ministers of Education and Cultural Affairs, 16–17 June 2016, No. 7

- The scientific members of the AR shall have double the voting weight on matters of technical and substantive content, in order to ensure that decisions are guided by scientific principles, so that the scientific members hold a majority of votes on such matters
- Separation of the procedures for assessing formal criteria on the one hand and subject-specific criteria on the other
- Accreditation of agencies on the basis of registration in the European Quality Assurance Register for Higher Education (EQAR) as a substitute for the accreditation of agencies by the AR
- Openness to alternative accreditation instruments

To draft a specimen decree in accordance with Article 4(1)–(4) of the State Treaty on the Accreditation of Study Programmes (MRVO), the Higher Education Committee established an open working group at its 373rd meeting in September 2016, comprising representatives from 14 federal states. The aim of the MRVO is to set out the joint requirements of the federal states regarding the essential structural and qualitative standards for the accreditation of Bachelor's and Master's degree programmes, which are necessary to fulfil the obligation of the Länder arising from Article 1(2) of the State Treaty to ensure the equivalence of corresponding academic achievements and examinations, as well as degrees, and the possibility of transferring between higher education institutions.

The MRVO, as adopted by the KMK on 7 December 2017, is based on the relevant resolutions of the KMK concerning the Bachelor's and Master's degree systems and quality assurance through accreditation (in particular the joint structural guidelines of the federal states), the relevant resolutions of the Higher Education Committee (in particular regarding the European Approach), the existing rules for accreditation by the Accreditation Council and the proposals of its 'Rule Revision' working group, as well as the standards and guidelines for quality assurance in the European Higher Education Area (ESG). The results of the consultations conducted by the working group with representatives of the German Rectors' Conference (HRK), the AR, the agencies, the Association of Private Universities (VPH), students, employers and employees, as well as the churches, have also been incorporated. The requirements set out in the MRVO were subsequently implemented in a binding manner in state regulations.

1.3 Evaluation of the Specimen Decree (MRVO) on External Quality Assurance ()

Even following the adoption of the MRVO, the federal states continue to regard it as their responsibility to work on the ongoing development of the external quality assurance system. In doing so, they follow including Article 15 of the State Treaty on Study Programme Accreditation, which stipulates that the accreditation system is to be evaluated regularly and within a reasonable timeframe—for the first time five years after the State Treaty comes into force—particularly with regard to the organisational structure and activities of the Accreditation Council Foundation, as well as other procedural regulations. This evaluation is preceded by a review of the application and impact of the MRVO three years after its entry into force in accordance with Section 36 of the MRVO. The state regulations based on the MRVO came into force, for the most part (in some cases retroactively), on 1 January 2018. Accordingly, the Higher Education Committee of the KMK addressed this issue at its 388th meeting on 29 May 2020 and, at its 391st meeting on 25–26 February 2021, established the inter-state working group ‘Evaluation of the Model Legal Regulation’ (hereinafter referred to as the working group).

2. Structure and procedure of the ‘ ’ evaluation

2.1 Background

Section 36 of the MRVO stipulates that “three years after this Regulation enters into force [...] its application and effects shall be reviewed”. It was necessary to take into account that, although the state regulations based on the MRVO came into force almost without exception with retroactive effect from 1 January 2018, their enactment in some states extended into 2020. Consequently, comprehensive experience with the provisions of the MRVO is not yet available in all states or at all higher education institutions. The Higher Education Committee therefore set the objective of the evaluation as identifying any need for improvements to the MRVO regulations and potential for optimisation in relation to the processes, but not to redesign the underlying system.

The following federal states actively participated in the open working group on the “Evaluation of the Model Statutory Regulation” set up by the Higher Education Committee of the KMK: Baden-Württemberg, Bavaria, Berlin, Brandenburg, Hesse, North Rhine-Westphalia, Saxony-Anhalt, Schleswig-Holstein and Thuringia. All other federal states were also kept informed via regular reports to the Higher Education Committee on the status of the evaluation process, as well as on interim results following the federal state survey and the analysis of the survey of other relevant stakeholders.

2.2 Evaluation process

The working group developed an evaluation procedure on behalf of the KMK’s Higher Education Committee and agreed it with the committee. The evaluation was carried out in a multi-stage process. As a first step, the federal states were asked for their comments in November and December 2021 (federal state survey). A questionnaire was drawn up for the survey (see Annex), which was based on the structure of the MRVO and divided into the following sections:

- formal criteria (Sections 3 to 10)
- Academic and content-related criteria (Sections 11 to 21)
- Procedures and processes (Sections 22 to 33)
- Composition of the committees and the overall system

The federal states were free to decide on the method of conducting the survey (e.g. involving state higher education conferences or higher education institutions).

Between April and May 2022, further key stakeholders in the accreditation system (the Confederation of German Employers' Associations (BDA), the German Trade Union Confederation (DGB), the German Rectors' Conference (HRK), the Association of Protestant Universities (VPH), the Academic Council (AR) and the Student Accreditation Pool, in collaboration with the "Free Association of Student Unions") were involved in the evaluation. These stakeholders had also been involved in the drafting of the MRVO 2017. In addition to the questionnaire used for the federal state survey, this second stage of the evaluation also sought comments on aspects that had emerged from the analysis of the federal state survey and on which the working group wished to gather the perspectives of other stakeholders to complete the picture. Specifically, assessments were sought regarding the regulations for international degree programme cooperation (scope of application of the European Approach), regulations for dual degree programmes, minimum module sizes and the specified number of examinations per module, the involvement of students from outside the higher education sector in the quality assurance of system-accredited higher education institutions, and the further development of programme and system accreditation procedures. Respondents were asked to focus their responses on key provisions and areas requiring amendment in the MRVO and to clearly prioritise the proposed changes (A – high priority, B – medium priority, C – low priority).

2.2.1 Participation in the “ ” consultation rounds

All federal states took part in the federal state survey and provided over 550 general and section-specific comments. These were mostly based on the experience of the higher education institutions. All other relevant stakeholders in the accreditation system surveyed in the second stage also submitted their comments without exception. Both the high response rate and the level of detail in the feedback demonstrate a strong interest among all parties involved in jointly developing the accreditation system further.

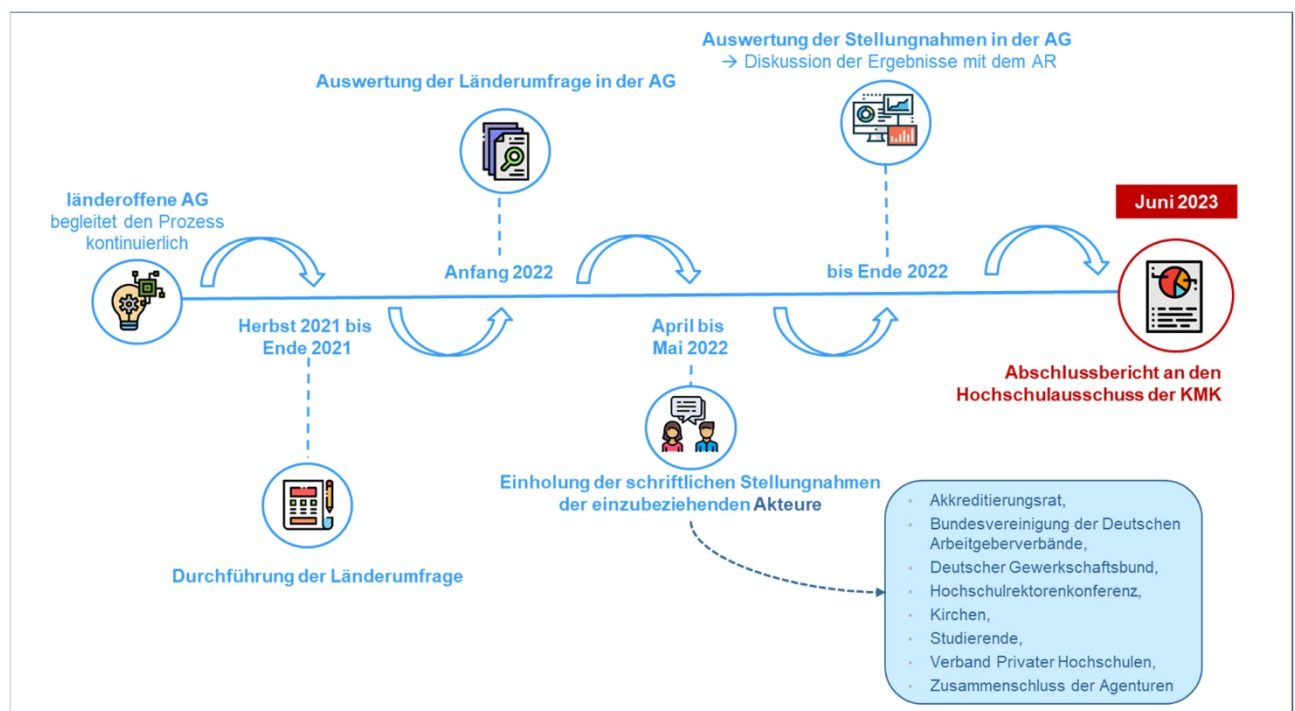


Figure 1: Process of evaluating the MRVO

2.2.2 Procedure of the Working Group on the “Evaluation of the MRVO ()”

In order to facilitate a thorough evaluation of the feedback and an appropriate discussion, the working group decided to form two sub-working groups. Sub-working group 1 dealt with the feedback on formal and technical criteria, whilst sub-working group 2 dealt with the feedback on procedures and processes, as well as on the understanding of the roles of the various stakeholders.

To evaluate the regional survey, four to five meetings were initially held in each of the sub-working groups. The full working group then held two meetings to discuss the feedback based on the interim findings of the sub-working groups. As part of the evaluation, the survey results were categorised according to their nature into ‘*significant changes*’, ‘*clarifications*’ and ‘*insignificant changes*’ (see Chapter 3). The second stage of the evaluation – the consultation with other relevant stakeholders – was also initially evaluated within the sub-working groups. In four to five meetings each, these groups compared the feedback from other relevant stakeholders in the accreditation system with the preliminary results from the regional survey. Subsequently, two meetings of the overall working group were held to discuss the results of the sub-working groups, to categorise

to categorise the findings and draw up recommendations for the further development of the accreditation system. In parallel with the evaluation of the results of the survey of other relevant stakeholders, the working group held a total of four rounds of discussions with the secretariat of the Accreditation Council. These discussions focused on overarching issues, including those beyond the specific provisions of the MRVO, which emerged from the survey. Among other things, these discussions covered the interpretation of the MRVO criteria and the associated decision-making practice of the Accreditation Council, the level of detail in the assessment during evaluation procedures, communication between stakeholders within the accreditation system, regulations on deadlines, the sometimes lengthy processing times for applications ('processing times'), and the scope for programme and system accreditation.

3. Results of the evaluation of the

As outlined in Chapter 2, assessments of the MRVO were gathered in two evaluation stages, both at the specific level of the regulations and their applicability, and at the level of the processes and the stakeholders involved. The results of these two evaluation stages and the working group's conclusions drawn from them are presented below.

3.1 Overall assessment of the MRVO ‘ ’

Overall, it is evident that the formal and subject-specific criteria, as well as the procedural regulations of the MRVO, are generally considered suitable for ensuring the quality of degree programmes. However, all respondents also identify specific areas where changes are needed to individual provisions of the MRVO. Furthermore, the analysis of the two survey stages points to potential for improvement at the process level, including, amongst other things, the interaction between the key stakeholders (higher education institutions, agencies and the AR) within the accreditation system.

Some of the feedback concerned the structure of the MRVO. It was noted that the MRVO did not always make it clear which provisions applied to *all higher education institutions*, to *those undergoing programme accreditation*, to *those undergoing system accreditation*, or to *those that had already completed system accreditation* (this also applies to alternative procedures under Section 34).

Furthermore, difficulties were highlighted in distinguishing between *formal criteria*, *subject-specific criteria* and *procedural regulations*. This applies in particular to more complex regulatory matters, such as the criteria for joint programmes, whose specific provisions are spread across all three sections of the MRVO mentioned above.

Finally, a smaller proportion – particularly system-accredited higher education institutions – perceive some criteria as a constraint on the design of their quality management systems; this also applies to the requirements regarding publication obligations.

3.2 Overview and categorisation of clause-specific feedback in the participation process

In addition to the general feedback (see section 3.1), the working group received and evaluated over 550 individual comments on specific sections. Figure 2 provides an overview of the number of comments per section.

The high number of responses to the survey of the federal states is attributable to the fact that the states involved their universities or state conferences of university rectors particularly closely in the evaluation. It is also clear that proposals for amendments and feedback were submitted particularly frequently in relation to certain sections. For instance, over twenty responses—some differing in content—were received for Sections 4 (degree programme profiles), 7 (modularisation), 8 (credit point system), 10 (special provisions for joint degree programmes), 12 (coherent degree programme concept and adequate implementation), 17 (concept of the quality management system (objectives, processes, instruments)), 18 (measures for implementing the quality management concept), 22 (Decision of the Accreditation Council; Award of the Seal), 24 (Appointment of an agency; Accreditation report; Site visit) and 25 (Composition of the panel of assessors; Requirements for assessors). It should be noted that similar changes were often proposed by different stakeholders; consequently, there are many duplicate mentions among the 550 responses.

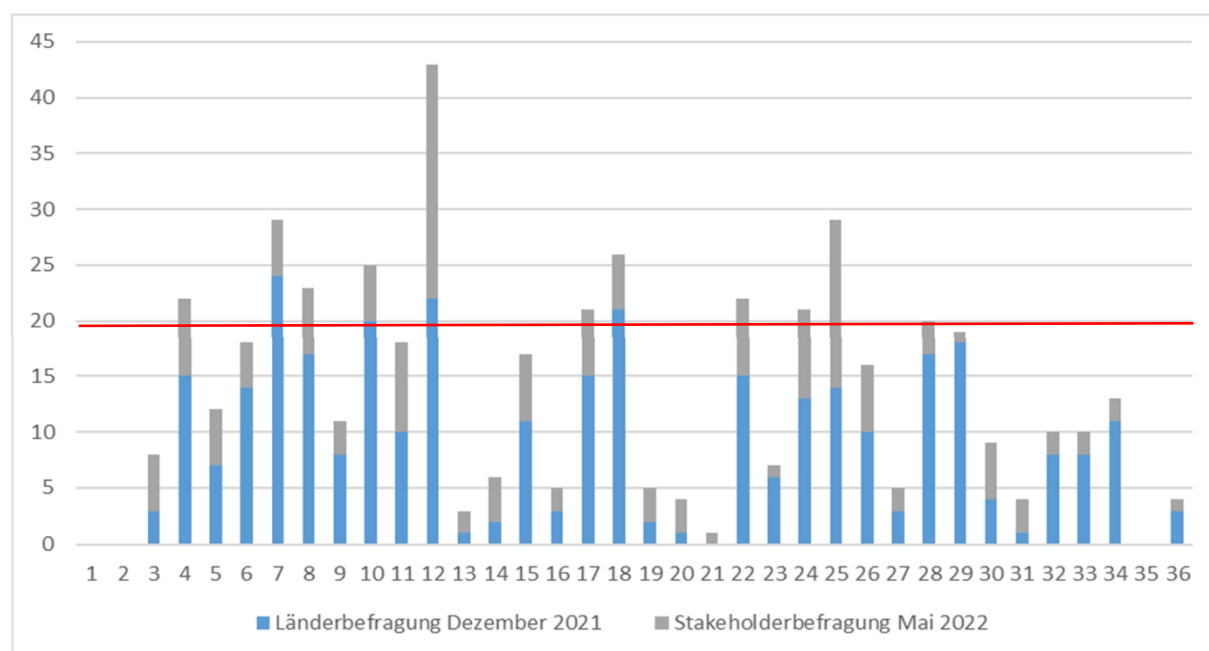


Figure 2: Number of responses from the federal states and other relevant stakeholders, by section

When analysing the results of the survey of the federal states, the responses were **categorised** as follows according to the **nature of the feedback received**: 51% of the responses were classified as *significant changes*, 43% as *clarifications* and 6% as *minor changes*. Significant changes refer to proposals that alter the regulatory content of the text of the Regulation and have an impact on the accreditation system. Insignificant changes, on the other hand, do alter the text of the regulation but, due to their limited scope, have no impact on the overall accreditation system. Clarifications specify how the regulator intends the regulation to be understood.

During the working group's discussion of the feedback, it became apparent that some of the comments stemmed from misunderstandings regarding the interpretation of the text of the regulation. Where, in the working group's view, the intention of the text of the regulation is not clearly discernible, amendments to the text are proposed, in particular regarding joint degree programmes and the scope of application of Sections 17 and 18 (for a complete overview of the proposed amendments, see the Annex).

Some of the suggestions raised in the feedback would have required amendments to the state higher education laws (e.g. the introduction of trimesters, regulations on the accreditation of continuing education Bachelor's programmes), so no changes to the MRVO were proposed on this basis. Only in the case of the recognition of higher education competences and the crediting of competences and qualifications acquired outside higher education did the working group take up the proposal to include these as an explicit assessment criterion, whilst leaving scope for the respective regulations under state law (see Chapter 4).

3.3 Changes required following an analysis of the results of the ' ' survey

The working group reviewed all the feedback and discussed it in detail. The results of the survey of the federal states gave rise to specific questions for the survey of other stakeholders, whose responses were in turn incorporated into the classification and processing of the feedback from the first evaluation stage. It should be noted that the majority of the feedback from the survey of other relevant stakeholders related to the same topics and sections as the survey of the federal states. The differences lie in the greater diversity of perspectives, e.g. from student, employee and employer representatives. In total, 235 pieces of feedback were taken up following the analyses of both evaluation stages, and these formed the basis for proposed amendments to the MRVO on the one hand (from 220

feedback) or recommendations and suggestions for the accreditation system in other countries (from 15 responses). These include, in particular, feedback that

- contribute to the clarity of the text of the Regulation,
- are intended to systematically ensure the quality of degree programmes,
- and promise to streamline quality assurance procedures (whilst maintaining the quality and rigour of the procedures).

Around 150 comments were not acted upon. Some of these were based on individual misunderstandings of the text of the regulation or the explanatory memorandum to the MRVO. In other cases, following careful consideration, the working group concluded that acting on the comment was unlikely to lead to any improvement in accreditation practice.

The following are examples of some of these misunderstandings:

- The scope of application of Sections 9 and 19, which applies to collaborations, e.g. in franchise models, but not to dual study programmes.
- Several countries have expressed a desire to make degree titles slightly more flexible. This concerns the allocation of specific subjects to degrees. The working group proposes that the wording of Section 6(2), fourth sentence (“In the case of interdisciplinary and combined degree programmes, the degree title shall be based on the subject area that predominates in the programme”) be interpreted accordingly and that, in the cases mentioned (e.g. sports science with a focus on medicine), interdisciplinarity be used as an argument. No amendment to the Regulation is envisaged; the Accreditation Council and the federal states are requested to take this into account.
- The workload for intensive degree programmes under Section 8(4), second sentence, is regulated in the Ordinance and its explanatory memorandum; however, there is some uncertainty regarding its interpretation. For so-called intensive degree programmes (up to 75 ECTS credits), the credits must be calculated at 30 hours. This could be clarified by an FAQ on the Accreditation Council’s website.

Finally, some of the feedback did not relate to the text of the regulation itself, but rather to the implementation of the MRVO provisions and the ‘accreditation culture’ within the overall system comprising the Accreditation Council, agencies and higher education institutions (see Chapter 3.4).

3.4 Areas for action beyond the text of the Higher Education Accreditation Ordinance ()

With the signing of the State Treaty on Study Programme Accreditation and the drafting of a MRVO by the federal states, the accreditation system in Germany—and the roles of the parties involved—has, in some respects, undergone profound changes. Whereas previously the agencies were responsible for the assessment process right through to the final accreditation decision, and the Accreditation Council acted as a supervisory body within the accreditation system, the Accreditation Council now makes the accreditation decision on the basis of the accreditation reports drawn up by the agencies, as well as the self-reports and, where applicable, supplementary documents provided by the higher education institutions².

Another change designed to streamline the process is the separation of the assessment of formal criteria from that of academic and content-related criteria. As the agencies assess the formal criteria as part of an assessment report, the assessors can focus on evaluating the academic and content-related criteria, thereby leaving more scope during the assessment for discussions on the quality development of the degree programmes and quality assurance systems.

The redistribution of tasks and responsibilities requires a clarification of the roles of the parties involved, a process which is not yet complete. According to feedback from almost all stakeholder groups, there is still room for improvement regarding the parties' understanding of their roles within the new system and in terms of how they interact with one another. These relate primarily to procedural practices and processes, as well as to communication between the parties involved (which still has room for improvement in some cases); they therefore lie beyond the scope of the text of the regulation, but are nonetheless crucial to a successful accreditation system. Recommendations on this matter can also be found in Chapter 4.

² The tasks and composition of the Accreditation Council are set out in Article 9 of the State Treaty on Study Programme Accreditation (https://www.kmk.org/fileadmin/Dateien/pdf/PresseUndAktuelles/2018/SO_170601_StaatsvertragAkkreditierung.pdf)

4. Recommendations

When overhauling the accreditation system, the KMK considered it important to examine proposals aimed at making the system more flexible, giving universities greater autonomy, and streamlining procedures. The working group therefore evaluated the feedback from the stakeholders involved, focusing in particular on whether the system changeover in 2017 had a positive impact in these areas.

Although the stakeholders surveyed generally regard the accreditation system as suitable for ensuring the quality of degree programmes, the large number of comments received – and the fact that these focus on specific clauses and particular aspects – suggests that, in some areas, it would be advisable to clarify and make moderate revisions to the MRVO. These clarifications and minor amendments to the MRVO could help to make procedures and processes more transparent and less prone to friction in future, as well as better supporting key objectives, such as the internationalisation of the higher education system. This, in turn, would help to increase the overall acceptance of the accreditation system.

For this reason, Working Group 34 has drawn up 34 recommendations for amendments to the text of the MRVO; it distinguishes between *clarifications* (20 recommendations), *substantial amendments* (eight recommendations) and *minor amendments* (six recommendations). In one case (Section 12, provision on dual study programmes), there is an alternative proposal to the clarifying proposal, which would constitute a substantial amendment.³ The following section addresses the sections mentioned most frequently, as well as the recommendations classified by the working group as substantial amendments. A complete overview of the proposed amendments, together with the reasons for them, can be found in the Annex.

However, as outlined in Chapter 3, the recommendations do not relate exclusively to the text of the regulation. The potential identified by the working group in relation to further areas of action beyond the text of the regulation (procedures, processes, stakeholders' understanding of their roles, etc.) is also highlighted below (see Chapter 4.2).

³ One of the proposed amendments falls into both the 'clarification' and 'substantial amendment' categories, which is why there is a discrepancy in the totals (34 vs. 35).

4.1 Proposed amendments to the MRVO

4.1.1 Formal criteria for degree programmes (Sections 3–10 of the MRVO)

Figure 3 shows the total number of responses from the two evaluation stages. More than 20 responses, some of which differed in content, were received regarding the regulations on degree programme profiles, modularisation, the credit point system and the special provisions for joint degree programmes. These responses and suggestions are discussed in more detail below.

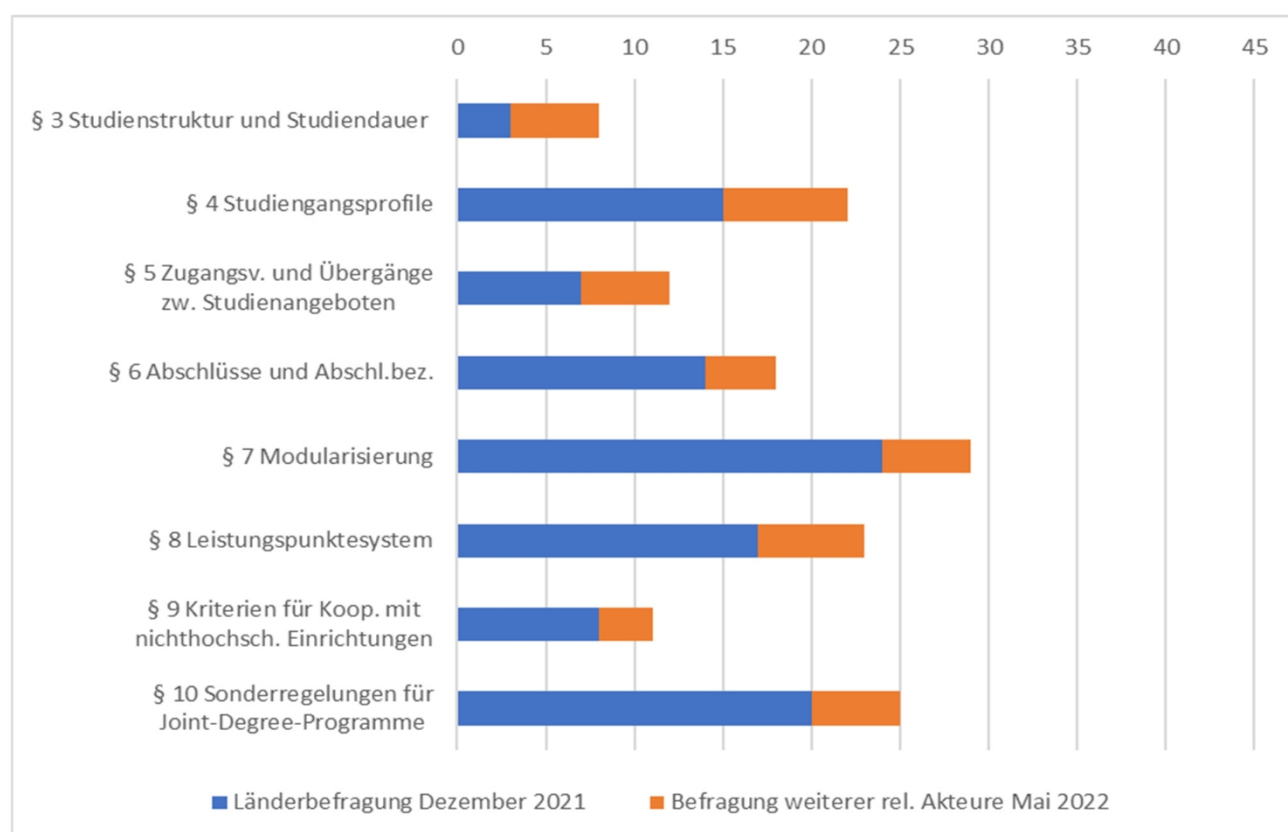


Figure 3: Feedback on formal criteria

According to the Accreditation Council, the **recognition** of skills, qualifications and academic achievements acquired at higher education institutions, as well as the **crediting of** skills and qualifications acquired outside higher education, is the subject of objections in around one third of the requirements set out in accreditation procedures. To date, the MRVO has not provided for any regulations in this regard. Various stakeholders in the accreditation system have therefore proposed incorporating the provisions set out in the respective state higher education laws into the MRVO. The working group has discussed this possibility at length in several meetings, taking into account the differences in the state higher education laws. In doing so

It became clear that standardising the requirements of the federal states as part of the process of specifying the MRVO is not realistic. Instead, it is proposed that provisions on recognition and credit transfer be required as a formal criterion in Section 3 (Course structure and duration). This clarifies that an assessment takes place as part of the accreditation process; at the same time, it leaves scope for the respective state-level requirements. Feedback on credit transfer and recognition was frequently formulated in relation to Section 8 (credit point system). However, the working group considers placement in Section 3 to be structurally more appropriate. → **Clarification**

The feedback on **Section 4 (Degree Programme Profiles)** relates in particular to the profile characteristics of 'practice-oriented' and 'research-oriented'. In practice, there appears to be some uncertainty as to whether it is mandatory to specify one of these profiles and whether a degree programme can also feature both profiles. The former is not the case; higher education institutions are not obliged to define a profile. However, if higher education institutions do opt for one of the two profiles, this will be assessed as part of the accreditation process. Assigning both **profiles** to a single degree programme is only possible if the programme comprises variants with different profiles. This does not, of course, preclude a degree programme from combining application-oriented and research-oriented **elements**. The working group proposes clarifying the optional nature of defining the degree programme profile (application- or research-oriented). → **Clarification**

There has been feedback on several aspects of **Section 7 (Modularisation)**. Firstly, the terminology used in Section 7 does not clearly reflect the section's intended purpose; this is highlighted in particular by the survey of the federal states and the feedback from the HRK. Section 7(1) places a very strong emphasis on the 'teaching of learning content'; here, in line with current approaches to higher education pedagogy, a clearer emphasis on **learning objectives** or the intended **learning outcomes** would be desirable. In the interests of clear and consistent wording, 'qualification objectives' should therefore also be replaced by 'intended learning outcomes' in Section 7(2), first sentence, no. 1. The term "qualification objectives" then remains relevant at the level of degree programmes in Section 11 (Qualification Objectives and Degree Level). → **Minor amendment**

In addition, Section 7(2) contains a nine-point list of requirements for module handbooks. The request to remove some of these points comes from the survey of the federal states, as well as from the HRK and the agencies (eligibility criteria, usability of the

(module, workload). However, the working group considers the entry requirements – not least for the sake of transparency and to keep students informed – and the workload to remain essential information that must be provided. However, the applicability of the module (description of how the module relates to other modules within the same degree programme and to what extent it is suitable for use in other degree programmes) should be removed as a **mandatory requirement** for **module handbooks**, as the benefit of this requirement is not proportionate to the effort involved. Higher education institutions have strongly criticised the fact that maintaining this information is time-consuming, not always technically feasible and of little practical use. On a voluntary basis, it will of course still be possible to provide this information for degree programmes where it is relevant.

→ **minor change**

There has been a great deal of feedback regarding **Section 8 (Credit Point System)**; however, following extensive discussion within the working group, this has not led to a proposed amendment. The introduction of **trimesters**, as desired by individual federal states and the HRK, is already feasible; the relevant regulations should continue to be implemented at the level of state higher education legislation. With regard to **intensive degree programmes** with 75 ECTS credits per academic year instead of 60, the question has been raised as to whether the number of contact hours per credit must be 30 (survey of federal states, DGB). A clarification⁴ on this point has already been provided in Chapter 3.

The student representatives believe that the feasibility of intensive degree programmes is at risk and are calling for stricter provisions in **Section 14 (academic success)**. However, in the working group's view, the feasibility of study programmes and the associated assessment of realistic workloads are already clearly regulated in Section 14; in accreditation procedures, particular attention must be paid to the feasibility of intensive study programmes. The working group therefore considers that no amendment to the text of the regulation is necessary.

The special provisions on **joint degree programmes** in **Section 10** are addressed by the federal states, the Accreditation Council, the VPH, the HRK and the agencies. The provisions of Section 10 must be considered in conjunction with Section 16 (special provisions for joint degree programmes) and Section 33 (joint degree programmes), which together govern the application

⁴ In the case of so-called intensive degree programmes (up to 75 ECTS credits), the credits must be calculated at 30 hours.

of the European Approach for Quality Assurance of Joint Programmes⁵. As the provisions on joint degree programmes appear in three different sections of the text of the Regulation, there are frequent calls for them to be consolidated. However, as this would contradict the basic structure of the MRVO (separation of formal criteria from subject-specific criteria and procedural provisions), the working group recommends not following this proposal.

Furthermore, the feedback indicates a clear need for clarification regarding the scope and optional nature of the application of the European Approach as a procedural simplification (Section 33). Furthermore, there appears to be a lack of clarity as to in which cases the criteria set out in Sections 10 and 16 apply and in which cases the criteria of the MRVO are to be applied for the accreditation of international cooperative degree programmes. In this regard, the working group proposes **clarifications** to increase transparency. It is therefore suggested that, in future, the special provisions regarding form and subject content set out in Sections 10 and 16 should always apply where degree programmes meet all the criteria listed in Section 10(1) (joint, double or multiple degree as well as an integrated curriculum, at least 25% of the programme taking place at foreign higher education institutions, contractually regulated cooperation, coordinated admission and examination procedures, and joint quality assurance).

If a cooperative degree programme does not meet the criteria set out in Section 10(1), the formal and academic criteria of the MRVO and Section 20 (University Cooperation) shall apply. It should also be noted that the European Approach is currently only applicable to joint degree programmes. Almost all stakeholders, with the exception of students, advocate an extension to double degrees and multiple degrees (see also the evaluation of the experiences of the Accreditation Council's secretariat from procedures already carried out in accordance with the European Approach in the appendix). This is in line with the intention of the European Approach and is already being implemented by most European countries. The Working Group proposes extending the European Approach to the aforementioned types of degree programmes, provided that the programmes meet the criteria set out in Section 10(1). → **significant amendment**

⁵ European Approach to Quality Assurance of Joint Programmes, October 2014: https://www.eqar.eu/assets/uploads/2018/04/02_European_Approach_QA_of_Joint_Programmes_v1_0.pdf

4.1.2 Academic and content-related criteria for degree programmes and quality management systems (Sections 11–21 of the MRVO [])

The feedback on Sections 12 (Coherent degree programme concept and adequate implementation), 17 (Concept of the quality management system [objectives, processes, instruments]) and 18 (Measures for implementing the quality management concept), for which over 20 responses were received in each case, is presented in more detail below.

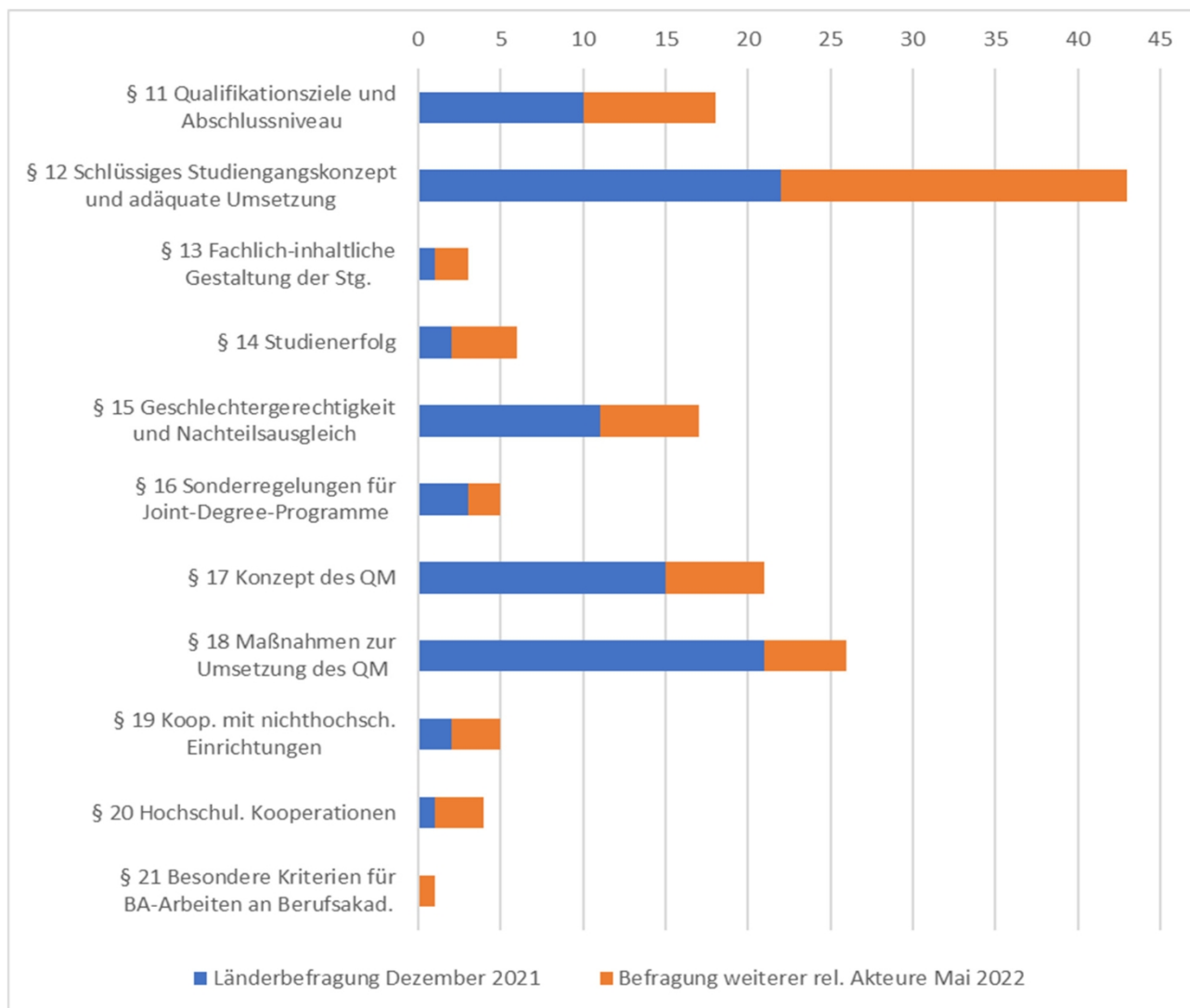


Figure 4: Feedback on subject-specific criteria

In **Section 12 (Coherent degree programme structure and appropriate implementation)**, the design of examinations is a key regulatory focus. In its feedback, the HRK makes it clear that the pedagogical principle of constructive alignment (designing the examination on the basis of the intended learning outcomes and subsequently designing the course)

is not made sufficiently clear. It is proposed that this reference to constructive alignment be included in paragraph 1 for the sake of clarity. → **Clarification**

The analysis of the regional survey indicates that there is a need for discussion regarding the **maximum number of examinations per semester and the minimum size of modules** (Section 12(5)(4)). After careful consideration, the working group concludes that the link between examinations and modules, as defined in Section 12(4), should be retained, as this constitutes a fundamental objective of the Bologna Process. However, introducing greater flexibility in Section 12(5) (removing the 5 ECTS credits as the minimum module size and/or the rule of one examination per module) is considered to be fundamentally practical. This could reduce pedagogical problems (e.g. implementing a suitable examination format for different competencies within a module, prior examination requirements).

However, the current regulations, which are designed to benefit students, also support the aim of conducting module-based assessments in order to reduce the examination workload. Introducing greater flexibility could lead to unintended consequences, such as a reduction in module-based assessment and a return to individual courses and fragmented modules (precisely because module-based assessment is not yet rigorously implemented everywhere). Therefore, as part of the second phase of the survey, the working group asked the relevant stakeholders in the accreditation system for their views on this issue. The feedback regarding module size is mixed, but a majority advocates retaining the current rule. However, with regard to the 'one examination per module' rule, many respondents believe that the advantages of greater flexibility outweigh the disadvantages, provided that particular attention is maintained to the feasibility of the programme – including in relation to the examination concept. The working group therefore proposes **revising the rule on the number of examinations and moving away from the previous stipulation of generally one examination per module in favour of an examination density appropriate to the workload.** → **significant change**

Another issue addressed in **Section 12** concerns the requirements for **dual study programmes**. These are not currently defined in the MRVO, but only in the explanatory memorandum. The Accreditation Council must therefore make accreditation decisions solely on the basis of the explanatory memorandum. The explanatory memorandum states: *"A degree programme may be designated and advertised as 'dual' if the learning*

locations (at least a university or vocational academy and a company) are systematically interlinked in terms of content, organisation and contractual arrangements

“are.” The working group proposes incorporating criteria for dual study programmes into the text of the regulation; however, due to differing positions among the federal states represented in the working group, the working group is currently unable to submit a specific proposal for regulation. As the systematic integration of learning environments is a central element of dual study programmes⁶, a majority in the working group proposes transferring the provision from the explanatory memorandum into the regulation with the same content. The alternative position favours a solution that allows for a less strictly defined connection between learning environments in justified exceptional cases. The aim should be to define quality criteria that are as uniform as possible across the country, thereby creating the greatest possible transparency for prospective students and companies. Depending on the outcome of the discussion within the KMK committees, this will constitute **either a clarification or a substantial amendment**.⁷

Section 17 (Concept of the quality management system [objectives, processes, tools]) sets out criteria for quality management systems and their (further) development for system-accredited higher education institutions. Feedback from several sources indicates that there is uncertainty as to whether Section 17 also applies to programme accreditation. The same applies to **Section 18 (Measures for implementing the quality management concept)**. The working group proposes clarifying in the headings that the **provisions apply to system-accredited higher education institutions**. → **Clarification**

Section 17(1) calls for a **mission statement for teaching**. In the feedback from the survey of the federal states, the HRK and the VPH, it is suggested that it should be clarified that this does not necessarily have to be a separate mission statement for teaching, but that it may also be integrated into a university-wide mission statement. As the creation of a separate mission statement for teaching involves a great deal of effort and the added value is not proportionate to that of an integrated institutional mission statement, the working group proposes a clarification on this point to the effect that a separate mission statement for teaching is not mandatory, provided that the content defined in the explanatory memorandum to Section 17(1) is covered. → **Clarification**

⁶ See Science Council of Germany, 2013, Recommendations on the Development of Dual Study Programmes – Position Paper, <https://www.wissenschaftsrat.de/download/archiv/3479-13.pdf?blob=publicationFile&v=4>

⁷ The 400th Higher Education Committee (1–2 June 2023, No. 13) adopted the final report subject to the following proposed wording for Section 12(7) of the MRVO: “A degree programme may be designated and

advertised as 'dual' if the learning locations (at least a university or vocational academy and a company) are systematically interlinked in terms of content, organisation and contractual arrangements. Exceptions are only possible in particularly justified cases."

A regulatory gap has been identified regarding the requirements for quality management systems at system-accredited higher education institutions. Some of the **procedural provisions** under Part 4 of the MRVO **also apply to system-accredited higher education institutions**, which must design their quality assurance systems accordingly. This applies in particular to provisions on time limits and rules on the compilation of portfolios. It is suggested that all requirements should now be consistently consolidated in Section 17. → **Clarification**

Section **18 (Measures for implementing the quality management concept)** sets out the specific requirements for the quality management system of system-accredited higher education institutions. One key issue concerns **the involvement of students from outside the institution in the evaluation of degree programmes**. The text of the Regulation refers only to 'external students', whilst the explanatory memorandum refers to 'students from outside the institution'. Some higher education institutions state that they are not always able to find (suitable) students from outside the institution, or that it proves difficult to fill long-term advisory board positions with students from outside the institution. They propose appointing students who are external to the degree programme but not to the institution. The Accreditation Council, the DGB and students, on the other hand, emphasise how important it is to involve students from outside the university.

The issue was discussed in detail by the working group, taking into account the statement from the Student Accreditation Pool, which the working group had specifically requested and which is attached to this report. The Student Accreditation Pool considers itself well-placed to meet the universities' requirements regarding the necessary assessor profiles. However, it acknowledges that the processes for filling long-term committee positions with students should be improved, both on the part of the universities and on the part of the Student Accreditation Pool. The Working Group reaffirms that the external student perspective is extremely important for quality assurance and should be strengthened. Only in this way can students – as is also the case with the involvement of external university lecturers – contribute an unbiased view and critical external experience of their own degree programme to the programme being accredited. For these reasons, the working group recommends clarifying that students from outside the university must be involved. It is recommended that universities create incentives for students to make use of the Student Accreditation Pool's services and, in the event of difficulties in filling student assessor positions, seek solutions jointly where necessary. Furthermore, the sometimes

The search for student reviewers should be narrowed down using fairly strict criteria (exactly the same degree programme, same level: BA/MA) in order to ensure an external perspective. → **Clarification**

System-accredited higher education institutions have expressed the view, with regard to **Section 18**, that they are being forced to replicate the programme accreditation process (this applies in particular to the processes of criteria assessment, the involvement of external assessors, and the obligation to publish quality reports). In the working group's view, this perception does not correspond to the intention of the MRVO or the introduction of system accreditation and alternative procedures. The **freedom to design quality management systems** should be strengthened. The Accreditation Council's secretariat also makes it clear in discussions that there is scope which should definitely be utilised and which is also eligible for accreditation. A clarification is proposed to the effect that only the subject-specific criteria need to be assessed by the assessors, whilst the formal criteria can be assessed by the higher education institutions themselves. → **Clarification**

Currently, the **publication requirements for system-accredited higher education institutions** are governed by a combination of Section 17 (Quality Management System Concept [objectives, processes, tools]), paragraph 1, sentence 4; Section 18, paragraph 4; and Section 29 (Publication). The Accreditation Council's interpretation of these publication requirements⁸ gives some system-accredited higher education institutions the impression that they must replicate programme accreditation within their own quality management systems. This is particularly evident in the requirements for reporting on internal programme evaluations, which stipulate an obligation to publish a quality report in the Accreditation Council's database. Although higher education institutions are not bound by the prescribed reporting template for programme accreditations, the aforementioned decision of the Accreditation Council nevertheless imposes high requirements that entail additional work for the institutions. The publication requirement for reports provided for in the ESG⁹

⁸ Requirements for the publication practices of system-accredited higher education institutions, Drs. AR 61/2022, Decision of the Accreditation Council of 10 June 2022 (https://www.akkreditierungsrat.de/sites/default/files/downloads/2022/AR_Dcision_Requirements%20for%20Publication%20Practices_2022-06-10_Drs.%20AR%2061-2022.pdf)

⁹ European Standards and Guidelines for Quality Assurance in the European Higher Education Area

(https://www.hrk.de/uploads/media/ESG_German_and_English_2015.pdf)

refers to the respective level of external quality assurance: in the case of system accreditation, this refers to the assessors' reports within the framework of system accreditation (Standard 2.6 refers to the various procedures set out in 1.10). The Working Group recommends creating **transparency and simplifying procedures** by **consolidating and clarifying the provisions in Section 18**. In doing so, the original intention of the provision – as set out in the explanatory notes to Section 18 – should be reinforced. These minimum standards ensure that the public continues to be informed and that the principle of transparency is upheld, without the need to generate additional reports. → **Clarification**

4.1.3 Procedural rules for programme and system accreditation (including special types of degree programmes and alternative accreditation procedures: Sections 22– 34)

The feedback on Sections 22, 24 and 25, for which over 20 responses were received in each case, is set out in more detail below; also included is the feedback on the basis of which the working group proposes significant amendments.

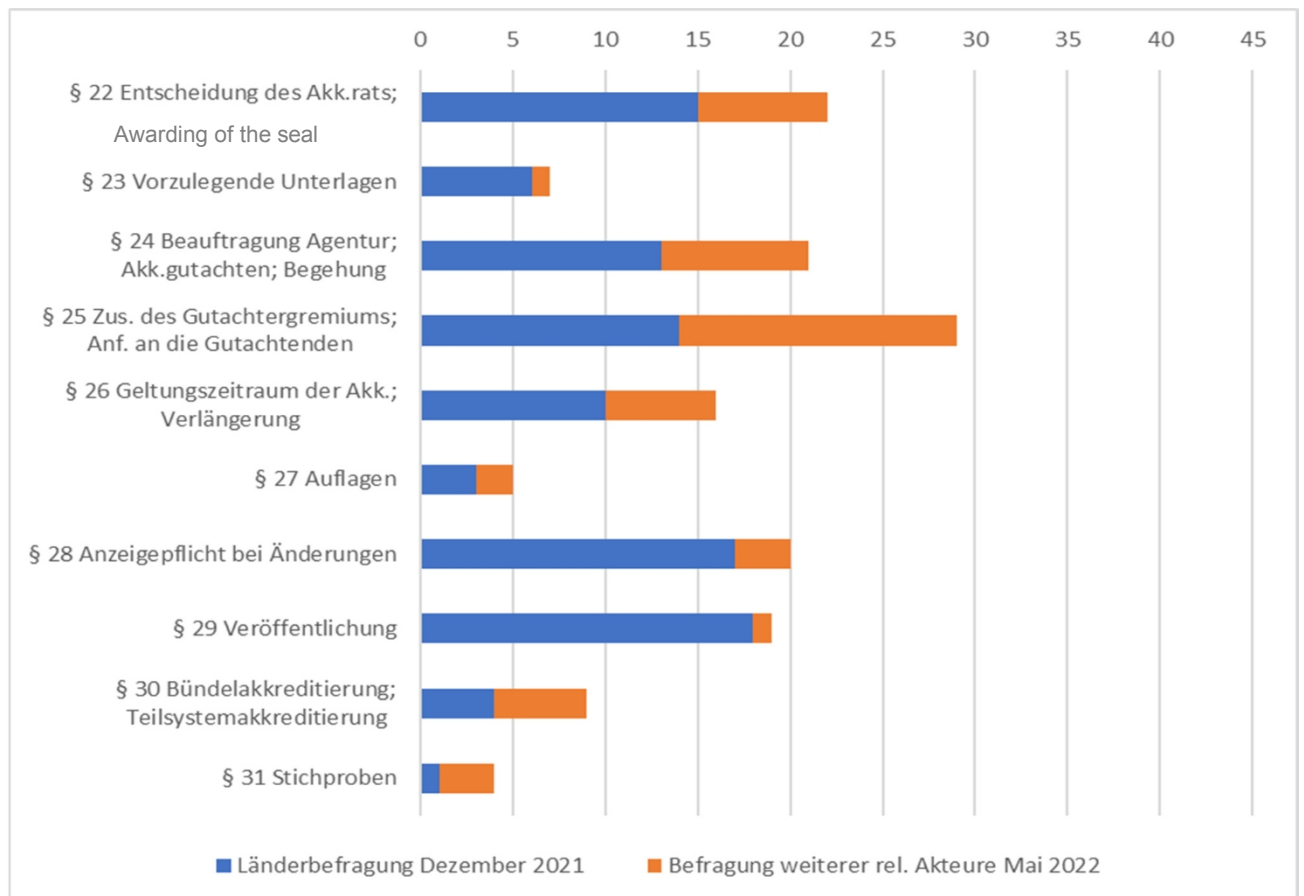


Figure 5: Feedback on the procedural rules for programme and system accreditation

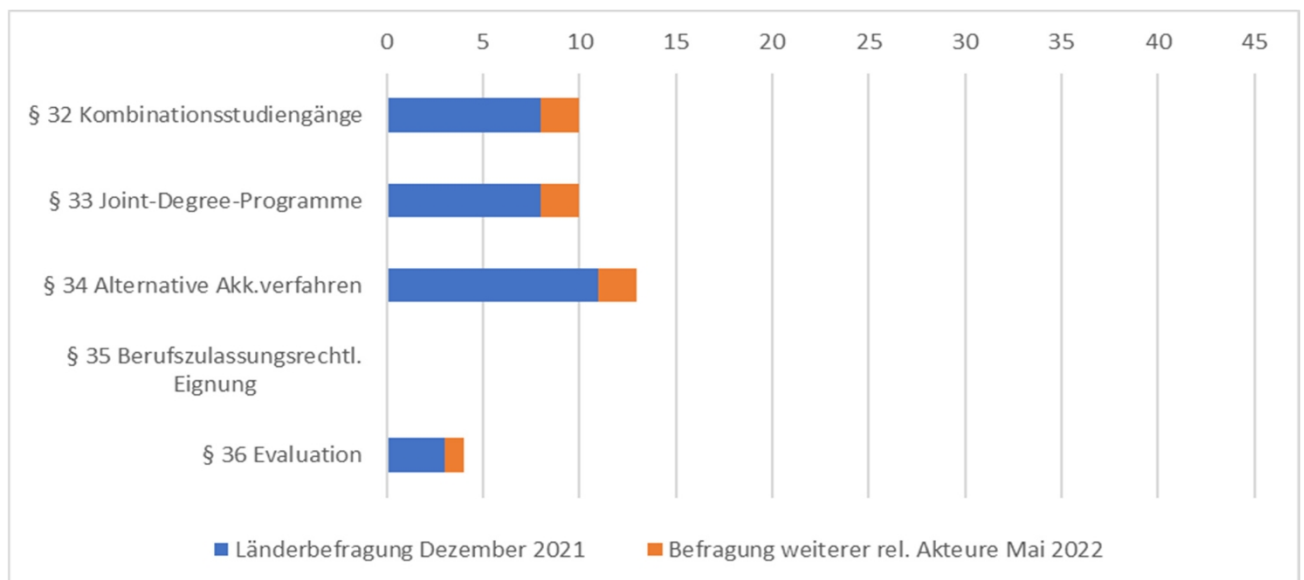


Figure 6: Feedback on the procedural rules for special degree programmes and Section 36 Evaluation

Most of the comments on **Section 22 (Decision of the Accreditation Council; Award of the Seal)** relate to paragraph 3, according to which higher education institutions are given the opportunity to **submit comments** within a **one-month period** prior to the Accreditation Council's decision, should the Council intend to deviate significantly from the experts' recommendation. Given that higher education institutions may need to consult with the agency responsible for the procedure or with the assessors in order to prepare their comments, it is questioned whether the deadline is sufficient. This was discussed in talks with the Accreditation Council's secretariat. The Secretariat stated that, based on discussions with the higher education institutions, no such problems were known to have arisen in practice. Furthermore, the deadline could be extended in individual cases. The Working Group therefore sees no need for change in this regard.

To streamline the **procedure**, it is proposed that **accreditation decisions** should in future also be able to be **issued** in electronic form. This is currently not possible due to the requirement for written form laid down in Section 22(2). An amendment also appears necessary in view of the implementation obligation under the Online Access Act. → **significant amendment**

With regard to **Section 24 (Commissioning of an agency; accreditation report; site visit)**, it is suggested that the **option of a digital site visit** or the **use of digital elements** be made available **in justified exceptional cases**, as this format has proven its worth as an alternative during the COVID-19 pandemic. The working group therefore recommends making Section 24 more flexible by stipulating that on-site inspections are the norm. When designing the assessment procedure, the quality of the assessment should be the clear priority. By establishing a standard procedure, there is no deviation from the principle of on-site inspections. However, this creates scope for the inspection to take place entirely or partially online, provided there is sound justification for doing so. The aim is to provide more options without altering the purpose of the assessment. → **significant change**

In particular, system-accredited higher education institutions point out, with regard to **Section 25 (Composition of the panel of experts; requirements for experts)** that it would add value if staff from the field of **higher education quality management** could be included in the panel of experts for system accreditation procedures **as representatives of professional practice**. This was possible under the previous legislation and, in the view of the

AG will also be possible in future, particularly as system accreditation involves an assessment of the quality management system and the relevant professional experience therefore lies in the field of quality assurance. → **minor change**

When the MRVO was drafted, **Section 26 (Period of validity of accreditation; extension)**, paragraph 3, provided for the possibility of **extending the deadline** for programme accreditation in certain cases (where a degree programme is due to be discontinued and where the higher education institution is preparing an application for cluster or system accreditation in which the degree programme in question is included). According to feedback from the Accreditation Council, the higher education institutions and the agencies, the current narrow scope of the exceptions to the deadlines is causing problems. The Working Group therefore proposes an explicit provision for further possibilities of deadline extensions in programme and system accreditation in justified exceptional cases. The amendment to the deadline regulations is of great importance for the acceptance and functionality of the accreditation system. In order to avoid gaps in accreditation for the protection of students, an automatic extension of the deadline should also be introduced for the duration of the administrative procedure if the application is submitted in good time (i.e. submission of the application before the expiry of the accreditation deadline) (Section 26(2)). The extension period should then be counted towards the validity period of the accreditation. → **Substantial amendment** (extension of the deadline in justified exceptional cases), **clarification** (extension of the deadline for the duration of the administrative procedure)

For **Section 29 (publication requirement for system-accredited higher education institutions)**, see the recommendations on subject-specific criteria.

The option of grouping several degree programmes with a high degree of subject-area similarity into a single **bundled accreditation** during programme accreditation is governed by **Section 30 (Bundled Accreditation; Sub-system Accreditation)**. However, to ensure practicality and maintain the quality of the procedures, no more than ten degree programmes should be assessed by a single panel (exceptions are possible in atypical circumstances, provided the quality of the assessment is maintained). Students in particular have expressed concerns as to whether adequate discussion at the level of individual degree programmes can be guaranteed in the case of larger bundles. The agencies request that the criteria for approving or rejecting the size and composition of bundles be made more transparent, so that the agencies and higher education institutions can adapt their time and budget planning for accreditation at an early stage. The Working

Group recommends implementing the proposal put forward by various stakeholders in the accreditation system to

...that bundles of a certain size (the working group's recommendation: more than four degree programmes) should be approved in advance by the Accreditation Council. This would help to avoid any necessary re-evaluations resulting from incorrectly compiled bundles and enable procedural costs to be calculated more accurately. At the same time, bundles of ten degree programmes would still be possible in order to keep the workload manageable, particularly for large universities and art colleges. → **significant change**

4.2 Procedures and processes

As explained in Chapter 3, the reorganisation of the accreditation system was accompanied by a fundamental shift in the roles of the stakeholders involved. For this reason, the survey also focused on this topic (see Appendix: Questionnaire, Part IV: Composition of the committees and the overall system). The recommendations derived from the feedback are set out below.

Understanding of the roles of the stakeholders: One of the key changes in the new system is the transfer of the accreditation decision to the Accreditation Council on the basis of standardised reports containing recommendations for decisions and assessments. According to feedback, this shift in roles does not yet appear to have been fully implemented, either on the part of the agencies or on the part of the Accreditation Council, nor in the interaction between the two bodies. Both higher education institutions and the agencies have expressed the impression that the Accreditation Council is carrying out a 'second assessment' based on the documentation.

An analysis of the data from the Accreditation Council's secretariat (covering the period from September 2021 to June 2022) reveals the following picture: In just under two-thirds of accreditation decisions, the Accreditation Council either does *not* deviate from the vote of the agency and the panel of experts (42 per cent) or does not impose the conditions recommended by the agency and the panel of experts (usually on the basis of subsequently submitted documentation) (22 per cent).

In one third of applications, the Accreditation Council deviates from the agency's and the expert panel's recommendations and imposes additional conditions. It should be noted, however, that an analysis of the categories of conditions carried out by the Accreditation Council's secretariat shows that the vast majority of conditions relate to just a few criteria, in particular the criteria of recognition and credit transfer, the dual-track programme feature, and the diploma—

loma Supplement and module descriptions. According to the Secretariat of the Accreditation Council, one reason why accreditation decisions vary or applications are returned is that the assessments in the expert reports are not documented in a sufficiently transparent manner. Furthermore, there appear to be instances of uncertainty regarding the interpretation of the MRVO at some agencies.

To ensure that critical issues are discussed, thereby improving the quality of advice provided to higher education institutions and making it more consistent, the Accreditation Council's secretariat and the agencies have established a regular exchange at the level of case officers. The working group regards this as an important step. From the perspective of the federal states, the Accreditation Council and the agencies (despite differing contractual relationships with the higher education institutions) share a joint responsibility to carry out the assessment of the quality criteria in a comprehensive, thorough, transparent and consistent manner. The agencies and the Accreditation Council are asked to fulfil this responsibility jointly within their respective roles in the accreditation system and to seek dialogue with one another in the event of any ambiguities.

Communication: Many stakeholders (universities, agencies, federal states, the Accreditation Council) feel that cooperation between the various players in the accreditation system does not always run smoothly. The working group believes that efforts are needed from all stakeholders to improve this situation. Various initiatives have already been undertaken to improve communication flows and thereby ensure greater transparency. In addition to the aforementioned regular exchange between the agencies and the Accreditation Council's secretariat, which has been in place since 2022, the Accreditation Council's secretariat wishes to engage in dialogue with the various stakeholders through formats such as 'The Accreditation Council in Dialogue' or 'Quality Dialogue'.

It is recommended that the Accreditation Council and the agencies also discuss how feedback processes within the triangle comprising higher education institutions, agencies and the Accreditation Council's secretariat can be systematised during the application processing stage. Should any questions or uncertainties arise regarding the interpretation of criteria, the Accreditation Council's secretariat is willing to discuss these matters. Agencies and higher education institutions are asked to make use of this opportunity to seek clarification and to actively approach the Accreditation Council and its secretariat. This can help to dispel the uncertainty expressed by agencies and higher education institutions regarding the interpretation of the MRVO criteria and prevent

misunderstandings in the interpretation of the MRVO. In this context, the Working Group considers it important that the MRVO

continues to cover all relevant accreditation criteria; the Accreditation Council's interpretation of the criteria should be as precise, concise and consistent as possible.

Duration of the process: Universities and agencies have noted that the duration of the process under the new system has increased, particularly in the case of reaccreditation. The sometimes longer processing times at the Accreditation Council's secretariat are due, among other things, to peaks in applications resulting from pandemic-related postponements of procedures and to limited staffing capacity within the secretariat. In order to shorten the duration of the process in future whilst maintaining the quality of the process, the Accreditation Council, the Foundation Board and the federal states approved an increase in staff numbers for the Accreditation Council's secretariat from 2023 onwards in 2022. It is therefore anticipated that the backlog of cases can be cleared once the posts are filled, likely from mid-2023 onwards. Furthermore, it is recommended that further opportunities to increase the transparency of procedures and their status vis-à-vis higher education institutions and agencies be explored, for example via the electronic application processing system ELIAS.

5. Outlook

A key element of quality assurance is reviewing the effectiveness of the system and its further development. This applies both to higher education institutions and to the accreditation system itself.

A key finding of the evaluation was that the stakeholders surveyed regard both the formal and subject-specific criteria of the MRVO, as well as its procedural rules, as fundamentally suitable for ensuring the quality of degree programmes.

Nevertheless, the feedback points to potential for improvement – both at the immediate level of the text of the Regulation and at the level of processes and the interaction between stakeholders. In the working group's view, the clarifications and amendments to the MRVO it has proposed can help to increase the consistency of the regulations, simplify their application, strengthen certainty regarding procedural requirements, and ensure that processes run more transparently and with less friction. Important objectives, such as competence-oriented programme design, the promotion of student mobility or the internationalisation of study programmes, are thus to be better supported. Increased procedural certainty and transparency – the working group is convinced – will in turn enhance the overall acceptance of the accreditation system.

The Working Group considers it essential for a functioning accreditation system that the Accreditation Council and the agencies (despite their differing contractual relationships with the higher education institutions) fulfil their respective roles, as redefined by the State Treaty and the MRVO, and thereby assume their shared responsibility for the comprehensive, meticulous, transparent and consistent application of the quality criteria. The working group therefore warmly welcomes the process of further clarifying roles initiated by the agencies and the Accreditation Council.

Clarity regarding interpretation and procedures, together with a consistent information policy on the part of the agencies and the Accreditation Council, provide higher education institutions with the basis for quality-oriented programme development within the framework of programme accreditation, system accreditation and alternative procedures. Further requirements include a willingness to engage in dialogue, an awareness of the dynamics of change in academia and society, and openness to the diversity of the higher education system. Higher education institutions should, if

We aim to support you in developing your own quality assurance system that meets your specific requirements. To achieve this, you must be willing to engage in institutional self-reflection and have the courage to make use of the flexibility offered by the accreditation system.

Higher education institutions, accreditation agencies and the Accreditation Council, as key players in the accreditation system, should work together to ensure the quality and development of degree programmes. This responsibility is all the more pressing at a time when students' individual educational backgrounds and life plans must be taken into account more than ever in the programmes on offer, and when societal transformation processes such as digitalisation and the spread of artificial intelligence are bringing about lasting changes to higher education. Students must be able to trust that, as graduates of these degree programmes, they have acquired comprehensive academic qualifications – whether for the non-academic labour market, for research work within the academic system, or for (repeated) transitions between the two.

Appendix

Appendix 1a: Questionnaire for the evaluation of the MRVO Part A (survey of Member States and other relevant stakeholders in the accreditation system)

Appendix 1b: Questionnaire for the evaluation of the MRVO Part B – Topics from the survey of federal states (survey of other relevant stakeholders in the accreditation system)

Appendix 2: Overview of the recommendations of the ‘Evaluation of the MRVO’ working group regarding amendments to the text of the regulation

Appendix 3: Analysis of the experiences of the Accreditation Council’s secretariat from procedures already carried out in accordance with the European Approach

Appendix 4: Statement by the Student Accreditation Pool on cooperation with universities

Survey of the Länder on the evaluation of the MRVO

The Model Legal Ordinance (MRVO), adopted by the Conference of Ministers of Education and Cultural Affairs on 17 December 2017, provides for an evaluation of the MRVO three years after its entry into force in order to review its application and effects (Section 36). The results of the evaluation are to be submitted to the Conference of Ministers of Education and Cultural Affairs.

The KMK has set up a working group on the 'Evaluation of the Model Statutory Regulation', which has developed a structured evaluation process involving all relevant stakeholders. As a first step, the KMK is asking the federal states to respond to the attached questionnaire by 31 December 2021. The KMK is aware that there is as yet no comprehensive, long-term experience with the MRVO. Although the state regulations based on the MRVO came into force, for the most part with retroactive effect from 1 January 2018, their enactment in some federal states extended into 2020. The states are free to decide how to conduct the survey (e.g. involving state higher education conferences, universities). The KMK asks the states to focus on key provisions and areas where changes to the MRVO are needed when responding to the survey. Following the state survey, other relevant stakeholders will be involved:

- Accreditation Council,
- Confederation of German Employers' Associations,
- German Trade Union Confederation,
- Conference of University Rectors,
- Churches,
- Students (Student Accreditation Pool in collaboration with the Free Association of Student Unions),
- Association of Private Universities,
- Association of Agencies

The **survey of the federal states** is divided into the following sections:

- I. formal criteria
- II. subject-specific criteria
- III. Procedures and processes
- IV. Composition of the committees and overall system

Part A:

I. Formal criteria (Sections 3 to 10)

1. Have the regulations as a whole proved to be suitable? If not, where is there a need for adjustment? (Please outline alternatives.)

II. Academic and content-related criteria for degree programmes and quality management systems (Sections 11 to 21)

2. Have the regulations proved suitable overall? If not, where is there a need for adjustment? (Please outline possible alternatives)
3. Are the framework provisions for (re-)system accreditations in the MRVO appropriate and helpful for developing and implementing higher education institutions' own QM systems?
4. Are the framework provisions for alternative procedures in the MRVO (or previously in the experimental clause) appropriate and helpful?

III. Procedures and procedural processes (Sections 22 to 33)

5. Have the regulations as a whole proved to be effective? If not, where is there a need for adjustment? (Please outline possible alternatives.)
6. What has been the impact of extending the accreditation period to eight years in accordance with Section 26(1) of the MRVO?

7. Do the procedural rules adequately address the conditions of the pandemic?

IV. Composition of the committees and the overall system

8. Have the committees and areas of responsibility generally proved to be effective (e.g. the Accreditation Council [decision based on the self-evaluation report compiled by the agencies]; agencies [assessment of formal criteria]; experts [assessment of academic content])? If not, what has not worked (please outline possible alternatives)?
9. Interaction and responsibilities between assessors (substantive review), agencies (review of formal criteria) and the Accreditation Council (decision based on the self-evaluation report and the accreditation report compiled by the agency): How do you assess the new system and the interaction between the stakeholders (e.g. with regard to the number of conditions imposed and the consistency of the assessments made by accreditation agencies and the Accreditation Council)?”

V. Miscellaneous

Part B: Topics from the survey of federal states

1. Several sections of the MRVO deal with **joint degree programmes**. In this context, some higher education institutions have highlighted, in the context of the survey of the federal states, a need for expansion and clarification at various levels. What is your view on the following questions:
 - a. In your view, does it make sense to expand the MRVO with regard to double/multiple degrees?
 - b. In your view, would it make sense to extend the scope of the European approach (e.g. to double and multiple degrees)? If so, in what form?
 - c. In your opinion, is it necessary to facilitate the establishment of joint degree programmes? If so, would this require amendments to the MRVO regulations (please specify which ones, if applicable)?

2. At present, the MRVO contains no provisions regarding **dual degree programmes**. However, the explanatory memorandum to the MRVO (p. 21ff) contains the following definition: "A degree programme may be designated and advertised as 'dual' if the learning locations (at least a university/vocational academy and a company) are systematically interlinked in terms of content, organisation and contractual arrangements." How do you interpret this wording?

3. Ensuring that the programme can be completed within the standard period of study is a key concern for all parties involved. This issue is addressed in various sections of the MRVO (e.g. Sections 7, 8, 12, 14 and 18). Section 12(5)(4) states: '[The feasibility of completing the programme within the standard period of study is guaranteed. This includes, in particular: ...] an appropriate and manageable examination schedule and organisation, whereby, **as a rule, only one examination** is scheduled **per module** and modules should comprise at least five ECTS credits.' In the context of the survey of the federal states, universities point out that, in particular, the requirement for one examination per module does not always meet the (subject-specific) pedagogical requirements for competence-based assessment. Furthermore, this regulation complicates the combination of ungraded coursework – which is intended to provide students with feedback on their individual learning progress throughout their studies – and final module examinations. The fact that the phrase 'as a rule' already allows for exceptions in justified cases is not considered sufficiently flexible. This is particularly so because the explanatory memorandum to the MRVO states that, in full-time study, no more than six examinations per semester should be expected, whereby 'examinations' also include coursework, academic achievements or other forms of evidence, such as the completion of a work placement, the conduct of a laboratory experiment, participation in excursions, etc. It should also be borne in mind that no other European country apart from Germany has regulations on minimum module sizes and maximum numbers of examinations.
 What is your view on the requirements for a minimum module size and a set number of exams per module (usually one exam)?

4. Section 18 sets out which stakeholders are required to provide feedback on degree programmes as part of the quality management system at system-accredited universities. In the survey of the federal states, some universities point out that it is difficult (particularly in advisory board models where participation is intended to span several years) to recruit students from outside their own institution. There is no question that the student perspective should be incorporated in all cases. In your opinion, should it also be possible, in justified individual cases, to involve students from one's own university – but not from the degree programme being evaluated – in the relevant evaluation procedures, rather than **students from outside the university**?
5. The working group has put forward a number of suggestions for **the further development of programme and system accreditation procedures**. We would ask for your views on the following points:
 - a. In your view, does it make sense to change the focus of the assessment in re-accreditation processes (e.g. by examining key topics in order to provide impetus for the further development of degree programmes or quality management systems)? If so, how?
 - b. What opportunities do you see for streamlining the procedures (programme and system accreditation, particularly with regard to re-accreditations)?