

2026 Self-Assessment Report for the External Review by ENQA

German Accreditation Council (GAC)

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1. Introduction

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

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

The work on the SAR was an occasion for the agency to reflect and analyse its activities and policies over the past years, to identify challenges and to implement initiatives that support the further development of the agency. The SAR is a joint project involving the Board, GAC (German Accreditation Council)¹, and the staff of the Head Office, thus drawing on the expertise and knowledge of colleagues from all parts of the agency for feedback. In addition, the draft SAR was discussed at the joint meeting in March 2026 with the agencies operating in Germany.

The SAR follows the structure contained in annex 1 of the Guidelines for ENQA Agency Reviews. The version of 2021 of the guidelines applies to this review.² In the SAR thus the main headlines are provided by these guidelines.

Citations are marked with quotation marks ("..."). Special German terms are set in italic.

Disclosure of AI use

Artificial Intelligence tool (deepl.com) was used to support certain aspects of wording and layout of this document. Specifically, AI was applied to assist with language refinement.

All content was subsequently verified by the responsible parties to ensure accuracy, objectivity, and compliance with [ENQA Policy on the Use of Artificial Intelligence in Agency Reviews](#). The use of AI did not replace human oversight or decision-making at any stage of the process.

3. Higher education in the context of GAC

The German higher education system is primarily characterised by three structural features:

Federal structure

Due to the federal constitution in Germany, responsibility for education, including higher education, lies for the most part with the sixteen *Länder* (States). The *Länder* are responsible for the basic funding and organisation of institutions. In the following, the German Terms *Land* and *Länder* are used consistently instead of state(s).³

Each *Land* has its own higher education legislation. The Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* in the Federal Republic of Germany (*Kultusministerkonferenz* – KMK) is an important coordination body in that context. The Sub-Conference of Science Ministers within the KMK enables joint initiatives, ensures the mobility and comparability of university degrees, serves to formulate common subject-specific and interdisciplinary higher education policy concerns at the federal level, and conducts the subject-specific policy dialogue with the key players in higher

¹ The "Accreditation Council" is the main body of GAC.

² See the official [Guide of Content by ENQA](#).

³ In official documents from Germany or the EU, the translation "state(s)" is also used; see [Facts about Germany](#), provided by the Federal Foreign Office. By contrast, the "federal state" refers only to the federal government of Germany as a whole.

education policy in Germany. However, the SAR largely refers to the KMK, as this is the higher-level body referred to in the [Interstate Study Accreditation Treaty](#) (ISAT).

Diversified higher education institutions offering diverse study programmes

145 The German Diploma Supplement template classifies German higher education institutions (HEIs) according to three types: *Universitäten* (Universities), *Fachhochschulen* (FH) / *Hochschulen für Angewandte Wissenschaften* (HAW) and *Kunst- und Musikhochschulen* (Universities of Art/Music).⁴

150 In Germany, there are currently 422 HEIs with about 2.9 million students in total. 109 are Universities, 209 are Universities of Applied Sciences, 52 are Universities of Art/Music, 52 belong to other categories (Universities of Public Administration, Universities of Theology and Universities of Education).⁵ 118 of the HEIs are state-recognised private institutions.⁶ About 87% of all students are enrolled at public HEIs.⁷

155 There are essentially two university-level academic qualifications, a bachelor's degree and a master's degree. In addition, there are courses in some subject areas (e.g. medicine, law and, in some *Länder*, teacher education), that lead to state-certified exams. A few degree programmes still lead to a *Diplom* qualification. For a doctorate, only certain HEIs are eligible: Universities as well as specialised institutions of university standing, some of the FH/HAW/UAS and some Universities of Art/Music are doctorate granting institutions.

160 In winter semester 2024/2025, German HEIs offered 22,143 degree programs. Of these, 10,009 are bachelor's and 10,420 are master's programs, 1,378 leads to a state or church degree, and 336 lead to a diploma or magister degree or an artistic degree. 92.3% of all degree programs lead to bachelor's and master's degrees.⁸

Financing

165 The financing of the German higher education system is based on the competencies pursuant to the Basic Law of the Federal Republic of Germany. Public HEIs receive the largest part of their funding from the *Länder*. The budget funds of the *Länder* cover, in general, personnel and material costs, as well as investments. Research and teaching at the HEIs are additionally funded through special programmes financed by the federal government and the *Länder*. HEIs also apply for state and private funds (external funds), particularly for financing research projects.

⁴ Section 8.1 of the [diploma supplement template](#); provided by the German Rectors' Conference.

⁵ See [Total of higher education institutions](#) by Destatis (Federal Statistical Office of Germany).

⁶ See [Private institutions of higher education](#) by Destatis.

⁷ See [Institutions of higher education Students by states](#) and [Institutions of higher education Students at private institutions of higher education](#) by Destatis.

⁸ See [Statistical data on degree programmes at universities in Germany: degree programmes, students, and graduates](#) provided by German Rectors' Conference (German only).

170 4. Quality assurance of higher education in the context of GAC

GAC Foundation itself is an agency in the sense of the ESG. Due to the German two-tiered accreditation system which will be laid out in greater detail later, responsibilities are shared between GAC and the EQAR-listed agencies.⁹ Therefore, in this self-assessment report, “the agencies” addresses only these organisations mentioned in the Footnote.

175 The Interstate Study Accreditation Treaty of 2018 (abbreviated: [ISAT](#)) regulates the accreditation system.

Decrees of the *Länder* based on this treaty contain the details on accreditation criteria and procedural rules. They are based on a [Specimen Decree](#) adopted by the KMK.¹⁰

Please note

- 180
- that the decrees of each *Land* are nearly identical with the Specimen Decree, so that in the following only the Specimen Decree is mentioned when citing the legal basis.
 - that the formal and academic criteria as well as the main procedural rules for the accreditation processes are roughly outlined in the ISAT. Since they are explained in more detail in the Specimen Decree, also in this respect only the Specimen Decree will be referred to in the following.

185 Concerning GAC Foundation as an institution, the ISAT must be supplemented by a law adopted by the *Land* in which GAC is located. This *Land* has always been North Rhine-Westphalia. This special law is the Act Establishing the Foundation of the Accreditation Council (Foundation GAC) (Accreditation Council Act).¹¹ Together with the ISAT, it bindingly defines the tasks, responsibilities, and powers of GAC. The provisions of the Accreditation Council Act are, apart from some transitional provisions, largely
190 identical in content to ISAT Articles 5 to 14. For this reason, as a rule, only the ISAT is referred to in this report in connection with the description of the legal tasks of GAC.

The 2018 legal framework in conjunction with GAC’s new tasks made it necessary to revise its Statutes¹² and the Rules of Procedure of GAC¹³ and of the GAC Foundation Council.¹⁴ The Statutes and Rules of Procedure entered into force at the end of 2018, being overhauled in 2025.

195 August 2018 saw the entry into force of the fee schedule adopted by GAC to implement the provision in ISAT Article 3 (6) on the charging of fees for the conduct of accreditations.¹⁵

ISAT Article 3 states the tasks of GAC as follows:

- 200
- “1. The accreditation and re-accreditation of study programmes and internal quality assurance systems as well as other quality assurance procedures agreed with the Accreditation Council and the respective *Land* on the basis of the criteria of Article 2 through the award of the foundation’s seal.
 2. It determines the requirements for the recognition of accreditations through foreign institutions, taking the developments in Europe into consideration.
 3. It promotes international cooperation in the field of accreditation and quality assurance.

⁹ AAQ, ACQUIN, AHPGS, AKAST, AQ Austria, AQAS, ASIIN, EVALAG, FIBAA and ZEVA.

¹⁰ See [Specimen Decree](#).

¹¹ See; [Interstate Study Accreditation Treaty](#). Due to the ISAT, Interstate Study Accreditation Treaty, the name of the Law on the Establishment of a Foundation “Foundation for the Accreditation of Study Programmes in Germany” was changed to “Act Establishing the GAC Foundation” ([Accreditation Council Act](#) [German Only]).

¹² See [Bylaws of the Accreditation Council Foundation](#).

¹³ See [Rules of Procedure of the Accreditation Council](#).

¹⁴ See [Rules of Procedure of the Board of Trustees of the Accreditation Council Foundation](#).

¹⁵ See [Consolidated version of the Fee Schedule](#).

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

210 5. It authorises the agencies within the meaning of Article 3 (2) sentence 2. As a requirement for the authorisation the agency must prove that it is reliably able to exercise the tasks of the assessment and the preparation of the review report; this is refutably assumed for agencies that are listed in the EQAR.

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

215 First and foremost, it is the task of GAC to accredit study programmes, quality management systems and alternative procedures (see 4.1 below). Therefore, external quality assurance, as defined within the German system, lies in the centre of GAC’s activities. The other statutory tasks concern, on the one hand, the authorisation of agencies, on the other hand, other important tasks such as cooperation with the *Länder* and international cooperation.¹⁶

4.1 GAC as part of an accreditation system

220 The Terms of Reference of this review summarise: “[...] the review should consider that GAC is integrated in an ‘accreditation system’, consisting also of the 16 German *Länder* laying down the criteria for accreditation, and of the agencies who provide the reports GAC decides upon.”¹⁷

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

225 Accordingly, ISAT Article 15 states:

230 “The accreditation system shall be evaluated on behalf of the Standing Conference of the Ministers of Education and Cultural Affairs and the German Rectors’ Conference, in particular with respect to the organisational structure and work of the foundation as well as the other rules of procedure, regularly and at appropriate intervals, for the first time five years after this interstate (study accreditation) treaty comes into effect.”

235 The agencies act in the German accreditation system as partners of GAC in the sense of Interpretation 23 of the EQAR document Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies.¹⁸ EQAR there specifies that the agency which “*only implements parts of the process and relies on input/preparatory work carried out by other agencies, should ensure that such input/preparatory work is carried out in line with the ESG. For partners or subcontractors that are also EQAR-registered agencies it can be assumed that their external QA activity is ESG-compliant.*”

As the agencies authorised by GAC have to be listed in EQAR, their ESG-compliance has been proved. To ensure a link to the German legal framework, based on the agency's registration in EQAR, a formal authorisation is provided to them by GAC.¹⁹

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¹⁶ See for international cooperation chapter [6.3 Agency’s international activities](#).

¹⁷ See the Terms of Reference of this review.

¹⁸ See [Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies](#).

¹⁹ See the [corresponding resolutions of GAC](#).

4.2 Accreditation procedures must be science-led

To further understand the German accreditation system, it is important to know that according to Article 5 (3) of the German Basic Law “Arts and sciences, research and teaching shall be free.”²⁰ The Federal Constitutional Court ruled: “The requirement to obtain accreditation for study programmes restricts a higher education institution’s freedom to decide on the content, organisation, and methodical approach of the study programme and courses taught. The prerequisite that accreditation be obtained also interferes with the rights of teaching staff, and of faculties or departments.”²¹ “Quality assurance measures that interfere with the freedom of research and teaching require an adequate statutory basis.”²² What is needed is an overall structure of quality assurance “in which decision-making powers and rights of participation, influence, information and control are structured in such a way that dangers to the freedom of teaching are avoided.”²³

From this, the *Länder* have derived the following changes in the current system in 2018:

- Majority²⁴ by double votes of professors in GAC concerning the fulfilment of academic criteria in accreditation decisions²⁵
- Majority of professors in the review panels²⁶
- Binding guidelines by the German Rectors’ Conference (*Hochschulrektorenkonferenz* – HRK) for the appointment of professorial experts²⁷

²⁰ See [Basic Law for the Federal Republic of Germany](#).

²¹ See [order of the First Senate of 17 February 2016](#) - 1 BvL 8/10 para. 52.

²² [Order of the first senate](#), para. 59.

²³ [Order of the first senate](#), para. 60.

²⁴ See Article 9 (2) no. 1 [ISAT](#).

²⁵ See Article 9 (4) [ISAT](#).

²⁶ See § 25 (3) [Specimen Decree](#).

²⁷ See Article 3 (3) [ISAT](#) and chapter [8.4 ESG Standard 2.4 Peer-review experts](#).

5. History, profile and structure of GAC

Before 2018, the German accreditation system provided for a division of tasks between GAC, and agencies approved by GAC in such a way that GAC accredited the agencies based on an assessment procedure. The agencies then made the accreditation decisions.

Since 2018, when the Interstate Study Accreditation Treaty ([ISAT](#)) came into fact, GAC takes the accreditation decisions itself. The agencies are still responsible for the assessment.

“GAC”, German Accreditation Council refers to the overall organisation. Sometimes in this report, reference is made to the Accreditation Council. This is because, pursuant to Article 8 of ISAT²⁸, GAC has three bodies:

- GAC, the German Accreditation Council,
- the GAC Foundation Council and
- the Board.

For further support, there is also a Head Office.

Article 9 states that the Accreditation Council resolves all GAC’s matters unless they are assigned to the Foundation Council or to the Board (see below).

GAC, German Accreditation Council (Article 9 ISAT)

The German Accreditation Council (GAC) is the central decision-making body of GAC Foundation. It decides on the accreditation and re-accreditation of study programmes, internal quality assurance systems of HEIs and alternative procedures.

Board (Article 10 ISAT)

The Board implements the resolutions of the GAC Foundation and conducts the current business of GAC, unless GAC has reserved tasks for itself. Its members are the chairperson of GAC, the deputy chairperson of GAC and the managing director of GAC.

GAC Foundation Council (Article 11 ISAT)

“(1) The foundation council monitors the lawfulness and economic efficiency of the management of the foundation’s business by the Accreditation Council and the Board.

(2) The foundation council consists of:

1. Six representatives of the states,
2. Five representatives of the German Rectors’ Conference.”²⁹

Head Office (Article 12 ISAT)

GAC maintains its Head Office in Bonn that is managed by the managing director. The Head Office “[...] supports the execution of the foundation’s business and is subject to instruction from the chairperson of the Board.”³⁰ which is, according to ISAT Article 10, the chairperson of GAC.

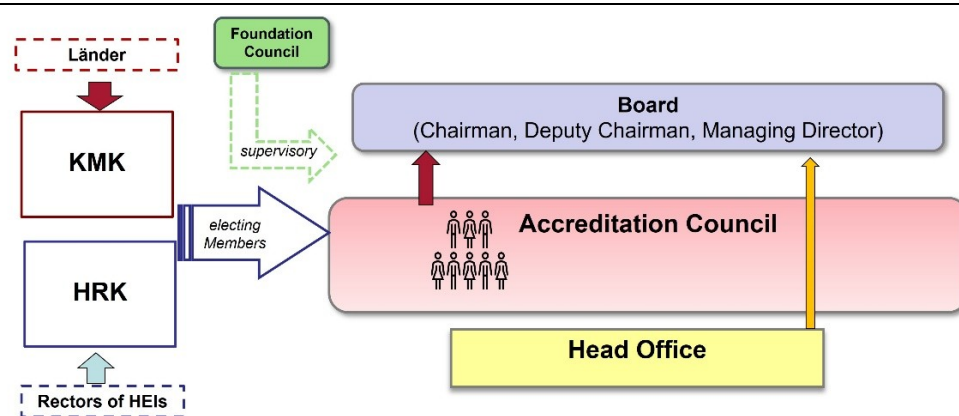
In 2022, the Head Office implemented an organisational reform, which was primarily based on the increase in complex tasks and a rising workload due to multiple responsibilities. As a result, the Head Office was given a structure that organises the areas of work into departments and staff departments.³¹

²⁸ See for details on the [ISAT](#) the explanation later in this chapter.

²⁹ Article 11 (1) and (2) [ISAT](#).

³⁰ Article 12 (1) sentence 2 [ISAT](#).

³¹ See the [Organisational chart of the Head Office](#).



*HRK: German Rectors' Conference

*KMK: The Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the federal Republic of Germany

Figure 01: GAC Foundation's bodies

The Accreditation Council has 23 members.

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

- i. 8 professors from state or state-recognised higher education institutions in the Federal Republic of Germany who have to represent at least four groups of subjects from the humanities, social sciences, natural sciences and engineering sciences,
- ii. 1 representative of the German Rectors' Conference,
- 305 iii. 4 representatives of the states in the Federal Republic of Germany,
- iv. 5 representatives from professional practice, one of whom is a representative of the state ministries responsible for service and collective bargaining law,
- v. 2 students (representatives),
- vi. 2 foreign representatives with accreditation experience,
- 310 vii. 1 representative of the agencies in an advisory capacity."³²

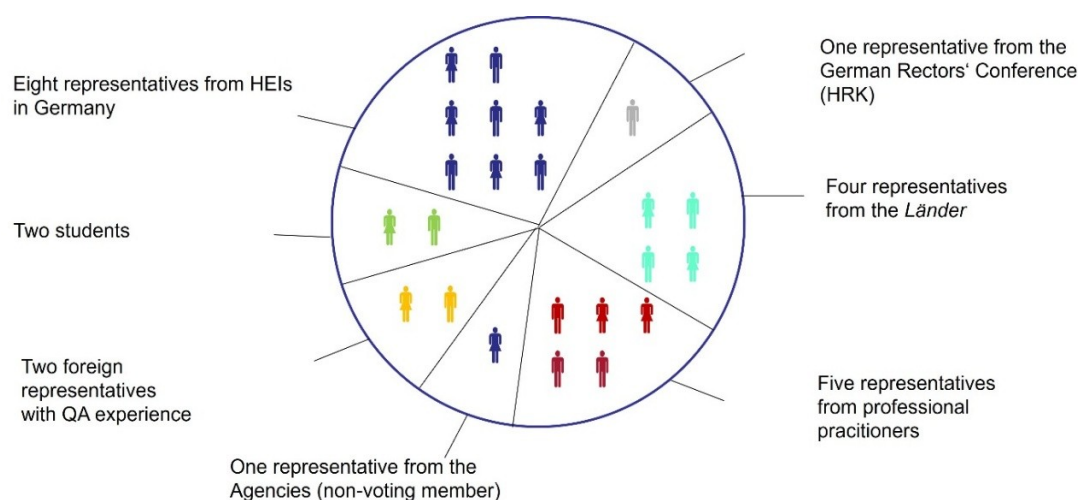


Figure 02: Composition of the Accreditation Council

315 The members of the Accreditation Council are supplemented by substitute members³³ and permanent guests.³⁴

³² Article 9 (2) sentence 1 of the [ISAT](#).

³³ See section 8 (4) of the [Statutes](#).

³⁴ See section 8 (7) of the [Statutes](#).

6. Functions and activities of GAC

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. Alternative procedures also lead to accredited study programmes. The focus is therefore on the quality of teaching and learning.³⁵

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.³⁶ 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 (§ 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.³⁷

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

- programme accreditation (single and cluster of study programmes, also joint degrees)
- system accreditation
- accreditation of alternative procedures

There is another quality assurance procedure, which is also mentioned in the ToR: the equivalency assessment for the German Jordanian University. This is not a standalone, standard process, 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.

See chapter [8.1 ESG Standard 2.1 Consideration of internal quality assurance](#) for a detailed description of the different quality assurance activities of GAC.

The accreditation of joint degree programmes by way of recognition of assessments carried out under the European Approach for Quality Assurance of Joint Programmes³⁸ according to the Terms of Reference is not considered as a separate quality assurance activity as it falls under the type of

³⁵ See Article 1 (1) and Article 2 (1) of the [ISAT](#) for the focus on the quality of teaching and learning and especially on bachelor's and master's study programmes.

³⁶ See page 3 of the [diploma supplement](#) of the Standing Rectors' Conference.

³⁷ An example of this are study programmes in the field of auditing. If, at the request of the HEI, it is to be decided within the scope of the accreditation procedure if a master's study programme is "*particularly suitable for the training of auditors within the meaning of the Auditing Examination Ordinance*" representatives or commissioners of the professional bodies participate in the accreditation procedure as representatives of professional practice; see [resolution of the KMK of 17 November 2005](#).

³⁸ See [European Approach for Quality Assurance of Joint Programmes](#), provided by EQAR.

programme accreditation. Special characteristics of these accreditation procedures are nevertheless transparently identified in the sections on the fulfilment of the ESG standards.

6.1 Processes and their methodologies

6.1.1 Programme accreditation

355 Within the programme 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, § 22 (1) of the? [Specimen Decree](#). If a study programme has successfully undergone an accreditation procedure, it receives an accreditation with or without conditions (§ 22 (1) Specimen Decree) and bears GAC's seal of quality for the period of its accreditation, which is eight years (§ 22 (4) Specimen Decree). If study
360 programmes “*have a high affinity on subject level that goes beyond the mere affiliation to a disciplinary culture*”³⁹, accreditation can also be carried out as part of a cluster procedure (§ 30 (1) and (2) Specimen Decree); nevertheless, the accreditation decision always refers to the individual study programmes.

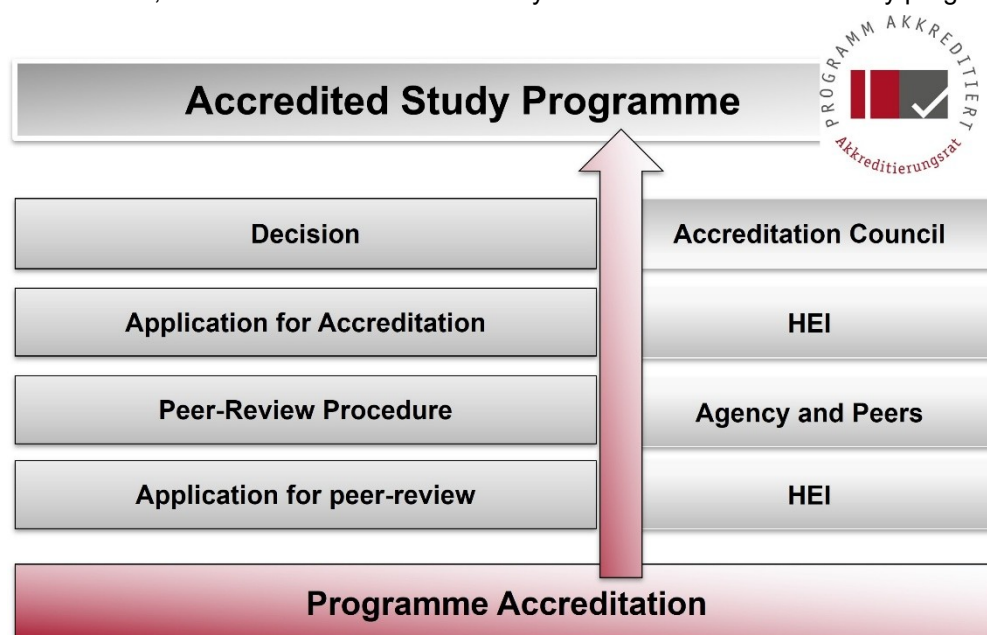


Figure 03: Process of the programme accreditation

365 The accreditation procedure is a multi-stage process based on the principle of peer review. If an 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 (§ 25 Specimen Decree⁴⁰). The detailed process for programme accreditation can be found in annex 01.

370 *Programme accreditation of joint programmes according to § 33 Specimen Decree*

§§ 10, 16 and 33 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.

375 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 detailed process for programme accreditation of joint programmes according can be found in annex 01.

³⁹ See § 30 (1) sentence 1 [Specimen Decree](#).

⁴⁰ See chapter [8.4 ESG Standard 2.4 Peer-review experts](#).

6.1.2 System accreditation

The object of system accreditation is the internal quality assurance system of state or state-recognised HEIs in Germany (Article 1, Article 2 (1) and Article 3 (1) no. 1 of the ISAT). With system accreditation, a HEI receives the right to award the seal of GAC for its self-assessed study programmes (§ 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 (§ 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 (§ 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. A more detailed process for system accreditation can be found in annex 01.

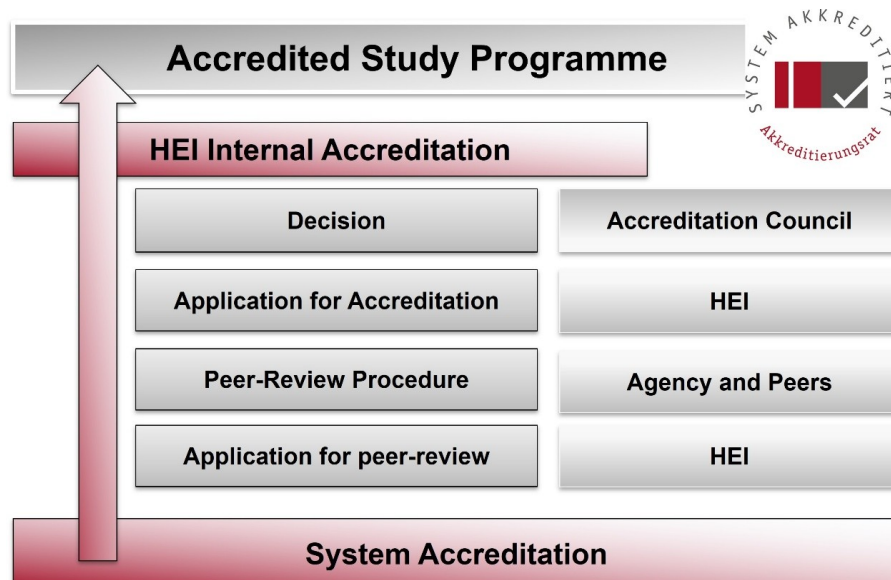


Figure 04: Process of the system accreditation

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 to carry out a peer review procedure, the agency in question appoints a review panel (§ 25 Specimen Decree; chapter [8.4 ESG Standard 2.4 Peer-review experts](#) for details).

6.1.3 Accreditation of alternative procedures

With the ratification of the ISAT, the *Länder* established the accreditation of alternative procedures as a third procedural line. (Article 3 (1) no 3 ISAT).

400 The object of accreditation is a 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 § 34 (2) [Specimen Decree](#)) and that the alternative procedure itself complies with the ESG (preamble and section 3 (3) sentence 2 of the Rules of Procedure for Alternative Accreditation Procedures ([RPAAP](#))).⁴¹ The accreditation procedure of an Alternative Procedure therefore assesses whether the Alternative Procedure 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. With successful accreditation, the HEI receives the self-accreditation rights for the study programmes assessed within the alternative procedure (section 6 (2) RPAAP).

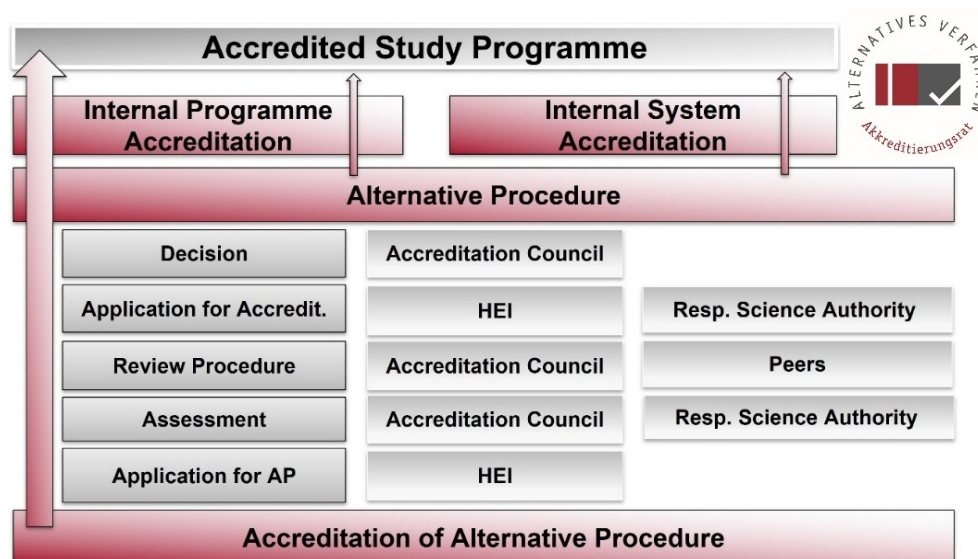


Figure 05: Process of the alternative procedure

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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 GAC must be obtained (§ 34 (3) sentence 1 Specimen Decree; section 3 RPAAP).

Figure 05 shows a condensed process scheme. The detailed process for alternative procedures can be found in annex 01.

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Examples of completed alternative procedures can be found [here](#).

⁴¹ See [Rules of Procedure for Alternative Accreditation Procedures, Resolution of the Accreditation Council](#).

6.1.4 Equivalency assessment (GJU)

The Equivalency assessment is a one-off project that does not constitute a separate, permanent line of procedure. The background is that HEIs abroad with a clear connection to Germany (German backed universities) have interest in proving that they meet German quality standards. The German Jordanian University (GJU) had approached GAC to get a certificate of equivalence for its study programmes, provided that it proves the fulfilment of the formal and academic criteria laid down in the Specimen Decree in assessment procedures that were carried out by an assessment agency authorised by GAC according to part 4 of the Specimen Decree. Those requirements were set out in a contract between GJU and GAC.⁴²

In the event of success, the Accreditation Council will certify the GJU's fulfilment of the criteria in the respective study programme by means of a certificate of equivalence. No legal consequences are associated with this. In case of deficiencies, GAC can make recommendations. Conditions will not be imposed, as no accreditation decisions with legal consequences will be taken. After completion of the procedure, GAC will publish the decision and the review report including the names of the experts in ELIAS. At the time of reporting, only the contract has been concluded.

6.1.5 Electronic Information and Application System (ELIAS)

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 GAC.

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

In addition to supporting the internal review process, the system includes a reporting tool that allows members of GAC 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 GAC 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. There is an interface to DEQAR.

All German HEIs can submit accreditation applications to GAC. This is reflected in the high amount of programme accreditation submissions per year (figure 06). Yearly variations may occur due to differences in accreditation cycle endings, new study programmes, new system accreditations and accreditation extensions.⁴³

⁴² See [Agreement between the German Accreditation Council and the German Jordanian University](#).

⁴³ See § 26 [Specimen Decree](#) for accreditation extensions.

Programme accreditation submissions per year (as of Jan 2026)

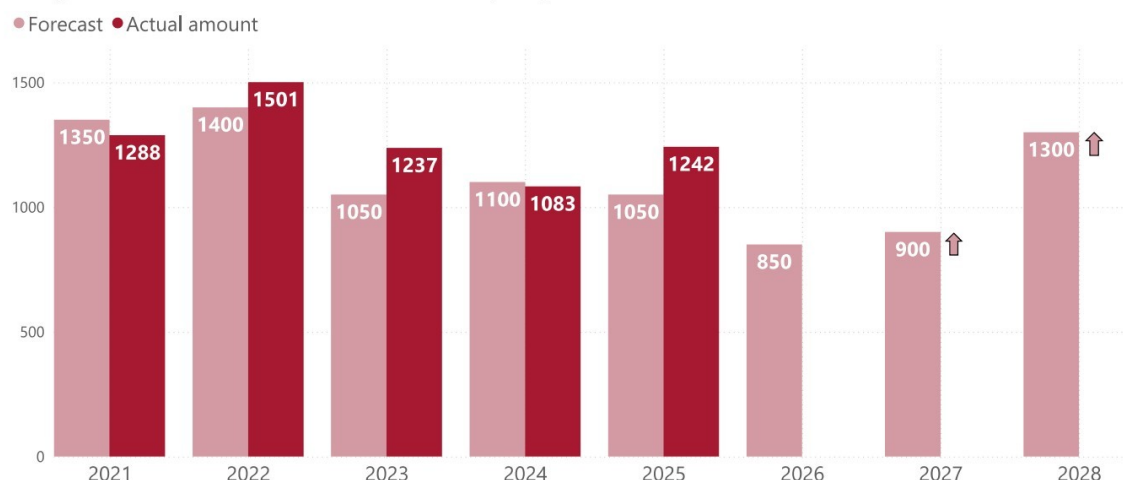


Figure 06: Programme accreditation submissions per year

Programme accreditation submissions per year (source: ELIAS database). The numbers represent single programmes, albeit that programmes may be submitted in a cluster. The forecast for current and subsequent years is updated yearly (in January), to indicate actual numbers for every GAC meeting. Arrows up indicate possible changes of the forecast with incoming accreditation extensions, etc.

System accreditation submissions per year (as of Jan 2026)

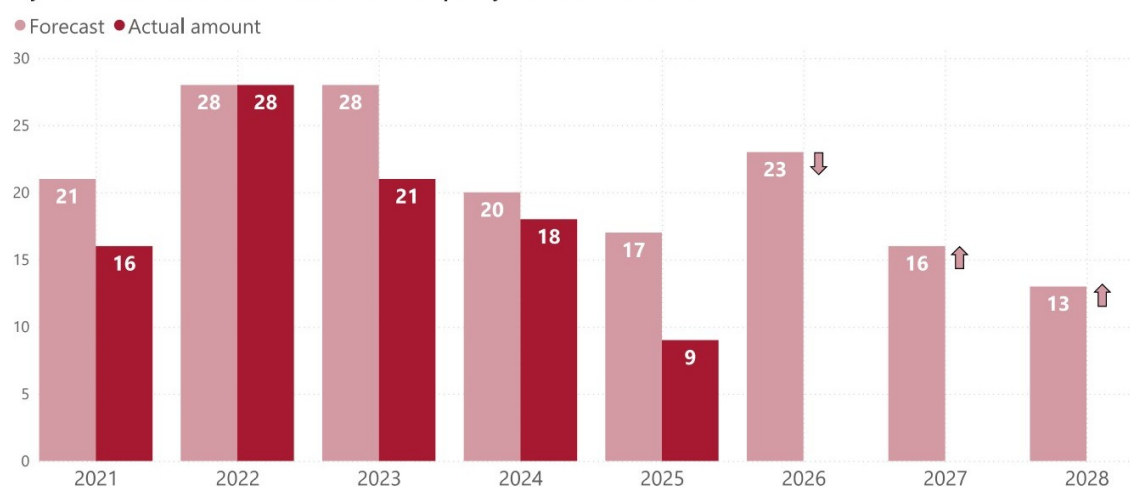


Figure 07: System accreditation submissions per year

System accreditation submissions per year (partial and full system accreditations subsumed; source: ELIAS database). The forecast for current and subsequent years is updated yearly (in January), actual numbers for every GAC meeting. Arrows up indicate possible changes of the forecast with incoming accreditation extensions, etc.

Detailed information and process descriptions of ELIAS can be found in annex 02.

6.1.6 Complaints and Appeals Commission

470 GAC approved on a complaints procedure on 26 February 2019 and thus established an external commission to address complaints and appeals.⁴⁴ The Complaints and Appeals Commission consists of three external members: a professor, a student and a delegate proposed by the agencies. The commission discusses appeals and complaints and submits a recommendation to GAC for final decision on the appeal or the complaint.⁴⁵ For more details see Chapter [8.7 ESG Standard 2.7 Complaints and appeals](#).

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6.2 GAC's internal quality assurance

GAC's quality management concept, adopted by GAC in 2019,⁴⁶ contains its quality goals and its basic quality management framework. It specifies the implementation of GAC's quality assurance and development in processes and responsibilities.

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

Quality management is intended to meaningfully link the existing goals, concepts and processes of GAC, by means of a quality cycle and thus provide impulses for sustainable further development. The quality cycle is based on a continuous, cyclical process that is generally recognised in the context of quality management concepts: the PDCA cycle (Plan-Do-Check-Act) according to Deming.

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6.2.1 GAC quality reports

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.

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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. Detailed information on the evaluations of the Quality Reports 2021 to 2025 can be found in annex 03.

495 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. One example is the feedback regarding the processing of applications within a reasonable timeframe (annex 03, slide 05). This situation deteriorated again in 2025, which is also reflected in the actual processing times. In response, Programme Accreditation and System Accreditation have begun to analyse and optimise their processes in order to speed up procedures without compromising quality.

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Another example of this is the feedback on the usability of ELIAS (annex 03, slide 05), which was very negative in the early years. The ELIAS team responded by stepping up training and offering regular consultation hours for database enquiries. Since then, satisfaction levels in this regard have improved significantly.

505

⁴⁴ See [Complaint and Appeal Procedures of the Accreditation Council Foundation](#).

⁴⁵ See [Statements, objections, complaints and legal action](#).

⁴⁶ See [Quality Management at the Accreditation Council Foundation](#).

6.2.2 Quality dialogue

In September 2019, the first annual GAC quality dialogue took place in Frankfurt in cooperation with the University of Oldenburg. The topic of the quality dialogue was quality standards and quality assurance in academic continuing education. The next quality dialogue on the topic of "dual study programmes" in cooperation with Osnabrück University of Applied Sciences was originally planned for June 2020. Due to the Covid-19 pandemic, it took place in June 2021. The following year saw the third edition of the "Quality Dialogue", this time on teacher training programmes. In 2023, the Quality Dialogue focused on the topic of "Diversity at universities – challenges and opportunities for teaching". In 2024, the topic of "study ability, dropout rates and academic success" brought multifactorial constructs into focus. No Quality Dialogue took place in 2025; instead, a hybrid event was held to introduce the new Specimen Decree.

The one-day online Quality Dialogues are characterised by a high level of multiplier activity: organised by the Head Office and supervised by members of GAC, panels are conducted by representatives of HEIs, students, agencies and representatives from professional practice. The dialogue format is enjoying growing popularity among all stakeholders: starting with around thirty participants in 2019, almost 400 people from HEIs, students, agencies and representatives of professional practice took part in the format in 2024.

Since 2021, GAC has also been organising a smaller online format called "The Accreditation Council in Dialogue" to complement the larger Quality Dialogue format. Eight events have taken place so far (as of October 2025). In contrast to the Quality Dialogue, these event formats are shorter and focus on more specific topics, such as individual academic criteria.

An Overview of the events:

"Quality Dialogue"	"The Accreditation Council in Dialogue"
Quality Dialogue 2024: 'Accessibility, Dropout Rates, Academic Success' Quality Dialogue 2023: "Diversity in Higher Education" Quality Dialogue 2022: "Teacher Training" Quality Dialogue 2021: "Dual Study Programmes from an Accreditation Perspective" Quality Dialogue 2019: "Academic Continuing Education and Lifelong Learning"	10 October 2025 – Topic of the day: System accreditation – the efficiency of quality management systems 27 May 2025 – Topic of the Day: Special challenges in the accreditation of music, art and design degree programmes 14 November 2024 – Topic of the day: alternative procedures 14 February 2024 – Topic of the day: Cooperation with non-higher education institutions 19 October 2023 - Topic of the Day: Diversity of QM systems - What scope do higher education institutions have? 21 November 2022 - Topic of the Day: Role and self-image of expert panels 5 May 2022 - Topic of the Day: System Accreditation 17 February 2022 - The Significance of Learning Outcomes for the Accreditation of Degree Programmes 8 September 2021 - Topic of the Day: Dual Degree Programmes

Figure 08: Overview of dialogue events

The various feedback formats regularly conducted by GAC and aimed at all stakeholders in the accreditation system are well established and well received. In particular, the increase in participation in the “Quality Dialogue” and “Accreditation Council in Dialogue” formats over the years testifies to the high level of acceptance and strong demand for GAC's dialogue offerings.

GAC plays an important and unique role here as a multiplier in the German accreditation system.

6.2.3 Exchange with agencies and HEIs

The extended meeting of GAC together with all agencies approved by GAC at the beginning of each year provides an opportunity for exchange with the representatives of the agencies. In addition, an exchange between the Board and the management of the agencies takes place every spring.

To optimise cooperation at the operational level, regular feedback meetings between the Head Office and the agencies' staff have been held since 2019 for the areas of programme accreditation and system accreditation.

The ELIAS department has held workshops with each agency to explain the functions of the database. These workshops focus on presenting the application workflow (which only HEIs are familiar with) and evaluating the respective agency's data in ELIAS for the agency.

Members of the Board and/or the Head Office regularly participate in the exchange forum for system-accredited universities, which was initiated by Münster University of Applied Sciences and is attended by around 100 members of system-accredited universities.

6.2.4 Internal instruments

To ensure quality assurance in the processing of applications, the examination of applications and the decision on accreditations are carried out in a multi-stage procedure. A system of checks and balances has been established through the defined process steps of cross-checking in the Head Office, a rapporteur system and decision-making in GAC, figure 08.

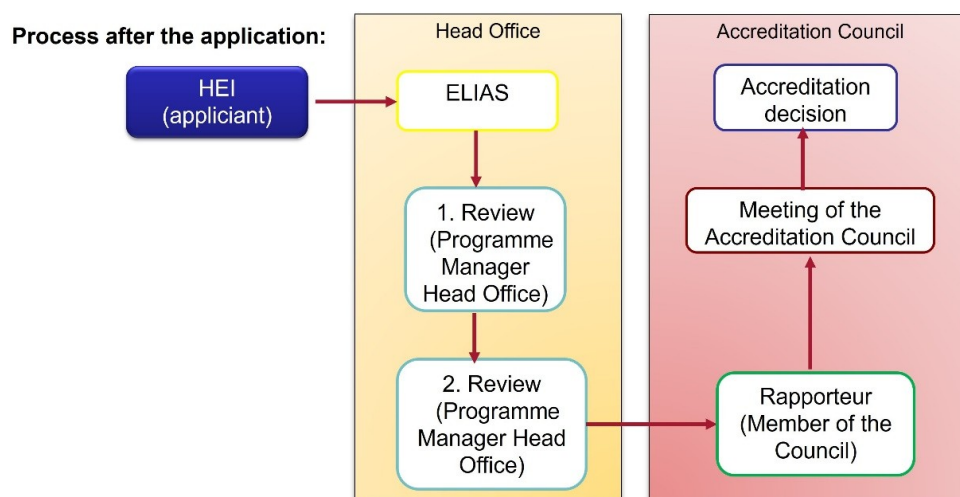


Figure 08: Process after the application

The three procedural departments (programme accreditation, system accreditation, alternative procedures) have internal knowledge management systems of varying scope, the contents of which – insofar as they are relevant to external stakeholders – are communicated via FAQs or guidelines. In addition, regular meetings are held between all departments and staff units to enable employees to exchange views on the interpretation of the accreditation criteria and to discuss processes and procedural issues.

Process descriptions ensure that accreditation applications are processed in a uniform manner.

6.3. GAC's international activities

The promotion of international cooperation in the field of accreditation and quality assurance is explicitly named as one of the six statutory tasks of GAC in the ISAT, which underlines the importance of these tasks for GAC.

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

To achieve the greatest possible benefit for GAC in times of scarce resources, a monthly International Affairs working group has been set up in which all interested programme managers from GAC's Head Office can participate. With the help of this working group, the existing expertise of GAC's programme managers in the international field shall be pooled and utilised.

6.3.1 International Networks

The GAC is a long-standing active member of the leading European and international quality assurance networks such as ENQA (full member 2000-2018, 2018-2021 affiliate of ENQA, full member again from 2021) and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). It regularly participates in international working groups, meetings and conferences.

6.3.2 International agreements

GAC has established the following international agreements with quality assurance agencies abroad which aim at the exchange of expertise:

- [Agreement with the Japanese quality assurance agency NIAD-QE National Institution for Academic Degrees and University Education](#),
- [Agreement with the US quality assurance agency CHEA International Quality Group \(CIQG\)](#) and
- [Agreement with the Chilean quality assurance agency Comisión Nacional de Acreditación](#).

6.3.3 International projects

Bologna Hub Peer Support

GAC is associated partner in the project line "Bologna Hub Peer Support" (BHPS) of the German Academic Exchange Service (DAAD). BHPS aims to support the implementation of Bologna key commitments across the European Higher Education Area (EHEA) through tailored peer learning and counselling. The "Bologna Hub Peer Support Plus (BHPS+)" project builds on the successful peer support approach developed through the previous projects "Bologna Hub Peer Support" (2020–2022) and "Bologna Hub Peer Support II" (2022–2024).

European Degree Label Policy Lab

The EU Commission will organise a "European Degree Label Policy Lab" to develop detailed guidelines and action plans to put in place a joint European degree label with national experts and representatives of higher education institutions, quality assurance/accreditation agencies, students, and economic and social partners. In addition to representatives from the federal government, the *Länder* and the HRK, a member from the Head Office will also be participating.

International work shadowing

In September 2021, the Quality Manager spent a week as a guest at the Austrian accreditation agency AQ Austria to exchange information and experience on the procedures and different processes between the German and Austrian accreditation system.

In September 2024, the Head of the Department of alternative procedures spent three days as a guest at the Norwegian accreditation agency NOKUT to learn about the specific features of the Norwegian accreditation system.

6.3.4 International quality assurance activities

- 605 International quality assurance activities such as the accreditation of joint degree programmes are explained in the chapter [Programme accreditation of joint programmes according to § 33 Specimen Decree](#).

7. Compliance with Part 3 of the European Standards and Guidelines

610 The following subsections explain how GAC implements the relevant ESG requirements. At the same time, it provides a comparison with the suggestions and comments from ENQA, if relevant. Those impulses from the ENQA review 2021 are highlighted in grey.

7.1 ESG Standard 3.1 Activities, policy and processes for quality assurance

615 **Impulses from the review 2021:** The panel recommends the agency to urgently launch a reflection process regarding its role and future strategy, in collaboration with its key stakeholders and constituencies (and beyond the stakeholder representatives already involved in the agency), and to subsequently revisit its mission statement and strategic plans accordingly.

7.1.1 External quality assurance activities

620 GAC undertakes external quality assurance activities on a regular basis as defined in part 2 of the ESG. As clarified in the tripartite Terms of Reference for this evaluation procedure, this ESG evaluation has shown that in the German system, agencies and GAC proceed in a division of labour and responsibility:

“According to Interstate Treaty, GAC wishes to be reviewed as an organisation (“in particular with respect to the organisational structure and work of the foundation”), and on the other hand the review should consider that GAC is integrated in an accreditation system, consisting also of the 16 German States laying down the criteria for accreditation, and of the agencies who provide the reports GAC decides upon”⁴⁷

625

7.1.2 Strategic planning

As a result of the latest ENQA review, GAC began a strategy process in spring 2022, which ended in 2024 with the adoption of its mission statement, which incorporates the guiding principles adopted in 2019 as well as GAC's vision and mission.

630

University lecturers, students, representatives of the states, professional practice and agencies, as well as the German Rectors' Conference and the international higher education sector were involved in the design through two face-to-face workshops in 2023. A key focus of the process was the discussion of GAC's self-image and external image, which was primarily incorporated into the mission statement. The remaining areas of action – helping to shape the further development of the accreditation system, transparency and dialogue, and (international) cooperation with stakeholders – have now been incorporated into the vision and mission of the mission statement as cross-cutting issues.

635

At its 121st meeting in 2024, GAC adopted the current [version of the mission statement](#), which was published on GAC's website in summer 2024. The primary task of GAC is the accreditation of study programmes, quality management systems and alternative procedures. External quality assurance, as defined in the German system, is therefore at the heart of GAC's activities. However, these tasks of GAC –prompted by the last ENQA review as well as in the [EQAR Approval of the Application according ESG 3.1](#) – led to a deeper discussion about the role and position of GAC in the accreditation system, which was addressed in the strategy process.

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645 The focus was primarily on the implementation of the procedural guidelines, which was specified in the strategy process under the question of whether accreditation – and thus GAC – should be control or dialogue. As a result, these two sides were not seen as contradictory, but rather as a productive area of

⁴⁷ ToR, p.2.

tension that is mutually dependent in terms of quality assurance and quality development in the PDCA-Cycle.

650 The mission statement therefore emphasises compliance with and orientation towards the European Standards and Guidelines (ESG) as well as the German ISAT and the corresponding state regulations.

At the same time, GAC is committed to dialogue and cooperation with stakeholders; GAC promotes dialogue between all parties involved in the accreditation system and strives for trusting cooperation. This applies both within the German accreditation system and in international cooperation: GAC supports the recognition of academic achievements and degrees abroad to promote student mobility and improve the transparency of study programmes.

660 The GAC is also committed to the quality management concept in its mission statement. At the heart of this concept is GAC's goal, as formulated in its guidelines, to 'reflect on the implementation of its tasks and regularly evaluate feedback from higher education institutions and agencies in order to use the results for the experience-based further development of the quality assurance system and the application procedures [...]'.
 665

In order to implement GAC's goal, also formulated in its mission statement, to "[...] that accreditation decisions are made independently of third parties, and potential conflicts of interest are avoided [...]", the [Code of Conduct for members](#), deputies and permanent guests of GAC was adopted in 2018 and has been regularly updated since (most recently in 2025).

Involvement of stakeholders

The described strategic and planning approach makes clear that GAC closely interacts with its stakeholders in feedback and exchange formats. In addition to the planned structured evaluation via ELIAS, feedback formats are the communication via FAQs, the newsletter and social media, the Quality Dialogue, feedback discussions with agencies and the regular participation in the exchange forum of system-accredited HEIs.⁴⁸

675 As regards the governance of GAC Foundation, GAC as the main decision-making body consists of students, professors, representatives of professional practice and of the *Länder*, of two international members and a representative of the agencies (in consultative capacity). As such it is the main forum where the stakeholders work together for reliable accreditation decisions and the continuous improvement of the accreditation system. Stakeholders are also involved as experts in accreditation procedures. In case of accreditation of alternative procedures, GAC, if it conducts the review of the alternative procedure itself, selects them. In all other procedures they are selected by the agencies.⁴⁹

680 At the same time, GAC is aware that all members, as representatives of their stakeholder groups, play an important role as multipliers – but that they can only convey a fraction the issues, questions and problems of their group to the Council.⁵⁰

GAC therefore holds regular meetings and dialogues with key stakeholders. These include, for example:

- Visits by the chair of the State Rectors' Conferences
- 685 • Regular meetings between GAC and the agencies at management and staff level
- Participation in meetings of the trade union expert network

⁴⁸ See for details chapter [6.2 Agency's internal quality assurance](#).

⁴⁹ See chapter [8.4 ESG Standard 2.4 Peer-review experts](#).

⁵⁰ See also [Stakeholder Involvement in Quality Assurance](#) by ENQA 2025.

- Exchange formats with the Student Accreditation Pool (organisation of students in accreditation procedures in Germany)
- Participation and reporting at annual faculty conferences and faculty associations
- 690 • Exchange with employers' associations and business organisations

Furthermore, the dialogue formats (Chapter [6.2.2 Quality dialogue](#)) are explicitly designed to discuss topics and criteria of the Specimen Decree together with university lecturers, students, representatives of the states, professional practice and agencies, as well as the German Rectors' Conference and the international higher education sector. The quality dialogue and other GAC formats are developed and
695 organised in advance in dialogue with experts from these stakeholder groups.

GAC sees these events not only as a source of information, but also as essential feedback from stakeholders. This is of enormous importance for the work and further development of key activities.

However, despite the mentioned activities since the last evaluation, stakeholder involvement remains a task with plenty of room for improvement. As the new term for the members of GAC has started at
700 January 1st of 2026 and has a standard duration of four years (two for student members), we will consider in the latter half of 2026 the strategy's implementation with the new membership, focusing on stakeholder engagement and, if needed, revised communication strategies.

7.2 ESG Standard 3.2 Official status

705 GAC Foundation, according to section 1 of the Accreditation Council Act⁵¹, is a foundation under public law with legal capacity that the *Länder* have set up for accreditation and quality assurance in teaching and learning at German HEIs.

7.3 ESG Standard 3.3 Independence

710 **Impulses from the review 2021:** GAC should get together with other agencies with the goal of clarifying responsibilities and procedures, not just in the light of the Specimen Decree, but also regarding the ESG. Establishing a regular dialogue where all institutions see eye to eye as partners in the system far beyond the annual "feedback meeting" will also be pivotal in the long run, as will be a clearer formal communication line regarding decisions.

715 As explained in section [Quality-dialogue](#), joint activities and exchanges between GAC and agencies now extend far beyond a single meeting per year. The extended meeting of GAC together with all agencies active in Germany at the beginning of each year provides an opportunity for exchange with the representatives of the agencies at eye level. In addition, an exchange between the Board and the management of the agencies takes place every winter. To optimise cooperation at the operational level,
720 regular feedback meetings between the Head Office and the agencies' staff have been held since 2019 for the areas of programme accreditation and system accreditation.

GAC would like to emphasize that these activities did not originate from GAC alone. Rather, GAC and colleagues from the agencies agreed that cooperation among them should be improved and strengthened at all levels. What we are reporting here, therefore, is a joint effort.

⁵¹ [Accreditation Council Act](#) [German Only]).

725 The ELIAS department has held workshops with each agency to explain the functions of the database. These workshops focus on presenting the application workflow (which only HEIs are familiar with) and evaluating the respective agency's data in ELIAS for the agency.

At the ENQA members' forum 2024 in Hannover, the chairman of GAC and the managing director of ZEvA together presented the German system of QA for HEIs.

730 Furthermore, the dialogue formats have been explicitly designed to discuss topics and criteria of the Specimen Decree together with university lecturers, students, representatives of the states, professional practice and agencies, as well as the German Rectors' Conference and the international higher education sector.

735 The quality dialogue and other GAC formats are developed and organised in advance in dialogue with experts from these stakeholder groups. The agencies play an important role as intermediaries in this process, because they are the contact point for the HEIs in the accreditation procedure and responsible for training the peers. GAC therefore considers the agencies to be important partners in the joint organisation of quality dialogues and other formats.

Organisational independence

740 As described in [chapter 7.2](#), GAC is a separate, independent legal entity. GAC is fully responsible for its actions. GAC is the only body responsible for the quality assurance procedures of GAC Foundation. Also, it has been purposely designed as a representative body where the interests of the various stakeholders are expressed.

745 According to Article 9 (4) ISAT, 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 demands 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."⁵²

750 Nonetheless, all groups collaborate in GAC on an equal footing. All members bring their expertise to the table and accordingly see themselves primarily as experts and not as members 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.

A detailed description of GAC appointment process can be found in annex 04.

Code of conduct

755 The code of conduct for members, deputy members and permanent guests of GAC states that the members of GAC act as experts and not as delegates.⁵³

Operational independence and independence of formal outcomes

760 GAC is solely responsible for all staff issues, including appointment and dismissal of staff. According to Article 12 (2) of the ISAT the "[...] superior of GAC's employees is the chairperson of the Board". All decisions, such as accreditation decisions, are taken by GAC, independently of the ministry or other third parties.

⁵² [Order of the first senate](#) (German only), para. 60; see also [chapter 4](#).

⁵³ See [Principles of the Accreditation Council](#).

The experts are appointed independently by the agencies or by GAC (in case of accreditation of alternative procedures if GAC conducts the procedure).⁵⁴

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557.4 ESG Standard 3.4 Thematic analysis

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Impulses from the review 2021: GAC is recommended to strategically plan thematic analyses in consultation with the external stakeholders as soon as possible, rather than wait for the end of the accreditation cycle. In developing the new plan, GAC should consider the centrality of its role in the system for producing thematic analyses. The strategic plan should thus be more ambitious than is currently the case, both in the number of the analyses produced annually and the topics they cover.

775

As already mentioned, GAC's electronic database and application submission tool ELIAS form the backbone of any general qualitative and quantitative analysis in connection with external quality assurance measures. GAC has broadened its scope in data analysis, related/adjacent or directly leading to (future) thematic analyses, significantly under the Label ARDA. The ARDA (**A**kkreditierungs**R**at **D**aten**A**nalyse – GAC data analysis) project regularly publishes evaluations from ELIAS on specific topics relating to the formal and academic criteria of the Specimen Decree on GAC's website for all stakeholders in the accreditation system.

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In this way, GAC fulfils its responsibility as a central player in the accreditation system. At the same time, it implements one of its mission statement's goals: to provide quality impetus for the continuous development of the accreditation system.

In addition to numerous data analyses, GAC has produced several thematic analyses in recent years, which have been published on the website and are freely accessible. These include:

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- Report: [“Conditions in system accreditation under the new legislation – thematic analysis”](#) (2025):
- Thematic analysis on [“Studyability and academic success in self-evaluation reports”](#) (2024)
- On the evaluation [“Conditions in programme accreditation under the new legislation – thematic analysis”](#) (2023)

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For the findings of the thematic analyses and related publications and dashboards refer to <https://akkreditierungsrat.de/elias-ar-datenanalyse/ar-datenanalyse-arda/> see annex 05.

7.5 ESG Standard 3.5 Resources

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Impulses from the review 2021: If GAC is to fulfil its tasks in the following period - which include handling an increased number of accreditations and self-reflection as well as an evaluation of the wider German QA system - it urgently needs a substantial increase in human resources. The organisation of the work of GAC should also be reconsidered – some suggestions include increasing the number of potential rapporteurs (e.g. by involving students) and the frequency of meetings.

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In accordance with Article 6 (1) of the ISAT, funding of GAC is a shared responsibility of the 16 *Länder*.

Under Article 6 (4) ISAT, GAC may charge fees, as specified in its fee schedule, to cover its administrative expenses; it implemented this in the fee schedule adopted on 11 July 2018 and amended on 09

⁵⁴ See for details chapter [8.4 ESG Standard 2.4 Peer-review experts](#).

⁵⁵ The feedback on strategic plans has been addressed in Chapter 7.1 ESG 3.1. This point is being raised again here because feedback from 2021 called for the expansion of thematic analyses, which were relatively limited at the time of the last review.

December 2025. This provides for an annual basic fee tiered according to the size of the HEI and procedure fees for each accreditation decision. The basic fee is paid by each HEI that has at least one currently accredited study programme.

805 When the current accreditation system was established, the *Länder* and the HRK agreed that around 55 percent of the budget would come from allocations from the *Länder* and 45 percent from fees. For the 2026 fiscal year, the annual budget for GAC is 2.926.350 Euro.

810 The 2023 economic plan approved an increase from 12.75 to 22 full-time equivalents (FTE). At that time, the positions were approved for a limited period from 2025 to 2028 with a distinct reduction path by so-called KW notes. I.e., the positions will be discontinued on a defined date. GAC is now endeavouring to make the positions permanent. The employees already have permanent contracts.

815 Since 2025, the human resources at GAC's Head Office in 2026 comprise a managing director (full-time), a deputy managing director (actual part time), fourteen programme managers (13,6 full-time equivalents), six administrative assistants (5,4 full-time equivalents) and a secretary (full-time) employed on a permanent basis. At its 122nd meeting on 25-26 September 2024, GAC approved the budget for 2026 with the mandate to have the time and personnel costs reviewed externally as part of a personnel requirements assessment (PBE) with the participation of the *Länder*.

820 In 2024, the Head Office itself estimated the minimum staffing level at 27.8 full-time equivalents. The management consultancy Kienbaum was commissioned in 2024/5 to examine the workload at the Head Office. In view of the tasks set out in the State Treaty on Study Accreditation, Kienbaum determined that the Head Office required 24.30 (FTEs) in terms of staffing. That means that all positions with KW notes should be made permanent plus an additional 2,3 FTEs. In October 2025, the Foundation Council approved the economic plan for 2027 based on the staffing level of 24.3 FTEs. The final decision on this is expected in September 2026 at the earliest.

825 Since 2021, the Head Office has been using external freelance staff to a limited extent to process applications. However, due to the highly specialised nature of this work, external support is closely supervised by internal team members. For quality assurance reasons, all applications are subject to an internal cross-check, which is carried out by permanent staff.

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

835 At its Head Office, located at Adenauerallee 73, Bonn, GAC has rented office space comprising 15 offices on four floors, with a total of 26 workspaces and two meeting rooms. Total floor space measures approximately 520 m². The workspaces are equipped with laptops, screens, and keyboards, which were renewed in 2025. A company agreement on flexible working locations and hours stipulates that employees need to be present in the Head Office at least one day a week. To ensure that personal communication within the team continues, all employees have Tuesday as their attendance day. And there is a system to communicate availability/absence via teams software.

Information about GAC's personnel and the staff members' responsibilities can be found on [GAC's website](#).

840 The rapporteurs in GAC, however, work on a voluntary basis. As already mentioned under 6.2.4 Internal instruments, the rapporteurs conclude the review process for an application and, as members, report to the GAC on the contents of the application. The number of rapporteurs has also been significantly increased: both the professorial members and their deputies take on tasks as rapporteurs on an equal

footing, which has led to a significant reduction in the workload for members. Student and other members in some cases also act as rapporteurs. This represents an increase from 8 to up to 16 rapporteurs.⁵⁶

7.6 ESG Standard 3.6 Internal quality assurance and professional conduct

Impulses from the review 2021: GAC is recommended to strengthen its dialogue with German quality assurance agencies and other stakeholders, and improve tools required for GAC's self-reflection. Furthermore, GAC is recommended to strengthen the 'act' phase of the PDCA cycle.

GAC has an effective internal quality management system that incorporates stakeholder feedback that is described in detail in [6.2 GAC's internal quality assurance](#). The discussion in Chapter 4.4.2 has made it clear that HEIs' satisfaction with the procedures and the transparency of GAC's decisions has gradually increased and can be assessed as positive overall.

GAC opposes intolerance or discrimination of any kind. The code of conduct for members, deputy members and permanent guests of GAC⁵⁷ ensures that all persons involved in its activities are competent and act professionally and ethically correct.

New employees must undergo an introductory programme in the first six months, and they have also a mentoring through a senior staff member. Office meetings and the Jour Fixe Programme Accreditation give staff the possibility to discuss recent developments in quality assurance. There are annual appraisal interviews to identify personal aims and needs for professional training. All staff members are encouraged to attend (international) conferences and take part in professional networks.

New members of GAC get an individual introduction by the Head Office as well as to the ELIAS system.

The dialogue events mentioned in [section 6.2.2](#) are explicitly designed to discuss topics and criteria of the Specimen Decree together with university lecturers, students, representatives of the states, professional practice and agencies, as well as the German Rectors' Conference and the international higher education sector. The quality dialogue and other GAC formats are developed and organised in advance in dialogue with experts from these stakeholder groups. GAC sees these events as essential feedback from stakeholders. This is of enormous importance for the work and further development of key activities. For the list of events, see [section 6.2.2](#).

From 2022 to 2024, our focus was on the strategy process and the development of a mission statement (Chapter [7.1 ESG Standard 3.1 Activities, policy and processes for quality assurance](#)). University lecturers, students, representatives of the *Länder*, professional practice and agencies, as well as the German Rectors' Conference and international higher education were involved in the conception and realization.

To prepare a joint analysis by agencies and GAC, which could serve to identify desiderata and objectives for future Thematic analyses, GAC decided in 2023, together with the agencies, to set up a working group. The working group included representatives from the agencies EVALAG and AQ Austria, as well as employees from the Head Office. An online survey was open in the fourth quarter of 2024 with free text fields and was aimed at members of the committees of GAC and the agencies (such as accreditation commissions and technical committees), as well as management. The aim was to generate a broad

⁵⁶ This expansion also takes on board the feedback of the [EQAR Approval of the Application according ESG 2.5](#), which noted "that the current organisation of the Council's work included the risk that analysis of cases might often be 'monopolised' in the hands of a single (academic) Council member, while some other Council members are currently not participating in the preparatory work as rapporteurs".

⁵⁷ See [Principles of the Accreditation Council](#) and chapter [7.3 ESG Standard 3.3 Independence](#).

range of opinions from the stakeholders and status groups in the accreditation system, which would provide insights for joint thematic analyses.

885 A total of 75 people took part in the survey. In terms of participation, the group of professors accounted for the largest proportion of participants at 52%, followed by agency representatives at 19%, professionals at 12%, the 'Other' group at 7%, students at 4% and quality assurance staff from higher education institutions at 2%. For more information see annex 06.

The respondents' answers revealed different perspectives. The following points can be deduced as a conclusion:

- 890 • Accreditation is seen by all participant groups as an additional activity that ties up considerable human and time resources.
- The risk of overly formalised procedures is pointed out, which also applies to the application of the MRVO criteria.
- 895 • Accreditation remains an essential driver for the quality development of degree programmes – but also for the self-reflection of teaching staff.
- Accreditation does not in itself guarantee professional suitability.
- 900 • All participant groups consistently noted that student involvement in accreditation procedures is very low and, due to the involvement of individuals from student self-government or committees, is not necessarily representative. It was also noted that prospective students have little knowledge of the accreditation system and that the accreditation status therefore has little influence on their choice of study programme.

GAC and the agencies have not developed any immediate thematic analyses based on this but are retaining the findings as a basis for future studies.

905 Addressing stakeholder opinions took also place at the 127th meeting of GAC in December 2025. GAC discussed the black book published by the professional association of professors at German universities of applied sciences/universities of applied sciences (HLB)⁵⁸, which unfortunately contained 'fake news' in its critical commentary on accreditation.⁵⁹

910 It gave out false information about accreditation periods and the creators of the accreditation system (the European Commission was repeatedly named as the responsible party) as well as exaggerated or outdated information about costs. The managing director then contacted one of the authors of the black book and was subsequently offered the opportunity to participate in an HLB podcast in 2027 and provide correct and more detailed information about the accreditation system.

7.7 ESG Standard 3.7 Cyclical external review of agencies

915 GAC had been full member of ENQA from 2000 to 2018. External evaluation procedures were carried out in 2001, 2008 and 2013. Due to the parallel restructuring of its own system, GAC had not applied for renewal in September 2018, but GAC became affiliate of ENQA instead. After establishing its new task structure, GAC renewed its membership in June 2022 following a successful review process. GAC has also been listed in the EQAR since 1 June 2022.

⁵⁸ See Press Release of ["The Black Book of Bureaucracy at Universities of Applied Sciences: Problems – Causes – Solutions"](#) (German only).

⁵⁹ See ["The Black Book of Bureaucracy at Universities of Applied Sciences: Problems – Causes – Solutions"](#) (German only).

920

8. Compliance with Part 2 of the European Standards and Guidelines)

The following subsections explain how GAC implements the relevant ESG requirements. At the same time, it provides a comparison with the suggestions and comments from ENQA, if relevant. Those impulses from the ENQA review 2021 are highlighted in grey.

8.1 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 ISAT 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 German 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 and in accreditation of alternative procedures, the assessment is multi-level. See for details chapter [8.5 ESG Standard 2.5 Criteria for outcomes](#).

The implementation of the standards in the Specimen Decree can be found in annex 07. It contains a tabular list and further explanation.⁶⁰

8.2 ESG Standard 2.2 Designing methodologies fit for purpose

Impulses from the review 2021: The panel believes that as the central body in the German system, GAC should start a reflection process on the ownership of processes and their methodologies in collaboration with its key stakeholders and constituencies (and beyond the stakeholder representatives already involved in GAC). One of the outcomes of the process can be a revision of its mission statement and quality policy.

Due to the stipulation of the Federal Constitutional Court that the criteria and procedural rules for accreditation must be contained in legal regulations, criteria and procedural rules in the current accreditation system have been laid down in the ISAT and in decrees of the *Länder* based on the Specimen Decree.

Guiding Principles

As mentioned in Chapter 7.1 (ESG 3.1), the ISAT and GAC's Mission Statement are, among others, based on the guiding principles of primary responsibility of the HEIs for quality assurance and enhancement in teaching and learning, accreditation as an external, science-led quality assurance system for teaching and learning and compatibility with the ESG.⁶¹

These guiding principles are implemented in all types of [QA processes](#), in programme and system accreditation and in the accreditation of alternative procedures.

In all types of QA processes the same quality standards for study programmes apply: the criteria of part 2 and 3 of the Specimen Decree. They are based on the "fitness of and fitness for purpose" principle. The HEI has a large scope in the choice of qualification goals for its study programmes, provided those goals are in accordance with the framework.⁶² It is crucial that the study programme concept and its implementation match these qualification goals. The HEI must also regularly review its study

⁶⁰ The indication "§" refers to the sections of the [Specimen Decree](#).

⁶¹ See [Mission Statement of GAC](#).

⁶² See [Qualifications Framework for German Higher Education Degrees](#).

programmes with a view to achieving its goals and, if necessary, improve them. The criteria thus support the HEIs to continuously apply the PDCA cycle.

In system accreditation, the HEIs have even more ownership of the processes than in programme accreditation. They must show that they guarantee the fulfilment of the mentioned standards with their internal quality management system. To this end, the quality management system must provide for regular evaluations of the study programmes. But there is no detailed regulation on how the internal system must be structured.

The HEIs have the greatest individual responsibility in the accreditation of alternative procedures. Here, too, the criteria for study programmes and quality management systems contained in the Specimen Decree must be complied with. However, the procedure by which the fulfilment of these criteria is assessed is developed by the HEI itself.

Stakeholder involvement

For the redesign of the Specimen Decree, the *Länder* have consulted with GAC, which includes all relevant stakeholders, as well as with representatives of the HRK, with agencies, with representatives of the professional practice and with student representatives.⁶³

The Standing Conference of the Ministers of Education and Cultural Affairs began to evaluate the Specimen Decree in 2021. To this end, all stakeholders in the accreditation system were surveyed, including GAC, but also stakeholders like the Confederation of German Employers' Associations, the German Trade Union Confederation, the churches, the German Rectors' Conference, the Association of Private Universities, students (Free Association of Student Bodies and the Student Accreditation Pool), and the Association of Agencies.

As a result of this complex evaluation process, the Standing Conference of the Ministers of Education and Cultural Affairs decided in 2024 to amend the Specimen Decree under the State Treaty on Study Accreditation (MRVO). The key findings from the more than 550 responses received on the MRVO are that the accreditation system was generally assessed as suitable for ensuring the quality of study programs. The provisions of the MRVO were not fundamentally questioned.⁶⁴ The report of the results can be found in annex 08.

Stakeholders are also closely involved in the daily further development and improvement of processes by structured evaluations and various exchange formats.⁶⁵

⁶³ See the list of consulted stakeholders in the [Introduction of the explanatory memorandum](#) to the [Specimen Decree](#).

⁶⁴ See the [press release from the Standing Conference of the Ministers of Education and Cultural Affairs](#) (German only).

⁶⁵ See chapters [6.2 GAC's internal quality assurance](#) and [7.1 ESG Standard 3.1 Activities, policy and processes for quality assurance](#).

8.3 ESG Standard 2.3 Implementing processes

Impulses from the review 2021: The panel recommends GAC to consult all its stakeholders – agencies, states, HEIs, students and professional organisations, on the need to implement additional follow-up measures, and the forms in which they could be implemented. Based on such a consultation, GAC can agree with the agencies on the division of tasks.

The process step of the substantial changes (*wesentliche Änderungen*) provides an ideal opportunity for a permanent follow-up process within the accreditation cycle. Since the application type was set up in ELIAS in April 2024, over 250 applications for significant changes have been submitted to GAC (previously, applications were submitted by email). The high number shows that HEIs are aware of the measure and are making good use of it to further develop their programmes during the accreditation cycle.

Procedural steps

Procedures in programme accreditation, system accreditation and accreditation of alternative procedures consist of the following procedural steps:

- Compiling of a self-evaluation report,
- an external assessment including a site visit,
- completion of an accreditation report,
- submission of the application to GAC,
- decision by GAC,
- publication of the decision and the accreditation report and a
- follow up, especially concerning conditions imposed by GAC.

Concerning programme and system accreditation, these steps are laid down in part 4 of the Specimen Decree. For the accreditation of alternative procedures, the Specimen Decree only defines the basic features of the procedure. The mentioned procedural steps are in detail regulated in the [RPAAP](#).

A wider part of the follow up is the duty of disclosure of any changes in the Specimen Decree, which means that the HEI is obliged to inform GAC immediately of any substantial change to the subject of the accreditation during the accreditation's period of validity. As it is not entirely straightforward to define what constitutes a substantial change, GAC has developed a set of FAQs based on the definitions in the Specimen Decree and GAC's administrative practice.⁶⁶

For details see also chapter [6.1 Processes and their methodologies](#).

Roles of GAC and agencies in the accreditation system

In programme and system accreditation procedures there is a division of labour between the agencies and GAC: The agencies appoint the experts and are responsible for the accreditation report. GAC takes the accreditation decision, carries out the follow-up and ensures the integrity of the accreditation process. Concerning the accreditation of alternative procedures, GAC has regulated in its RPAAP that GAC either carries out the procedure itself or can delegate it to third parties. However, until further notice, GAC has decided to conduct the accreditation procedures concerning alternative procedures itself.⁶⁷

The agencies act as partners of GAC in the sense of Interpretation 23 of the EQAR document Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies.⁶⁸ As the agencies

⁶⁶ See [FAQ 18 Essential changes](#).

⁶⁷ See chapter [6.1 Processes and their methodologies](#).

⁶⁸ See chapter 5 History, profile and structure of GAC for details.

1030 authorised by GAC are listed in EQAR, their ESG-compliance has been proven. The experts regularly confirm that the agencies acknowledged by GAC carry out their procedures in compliance with the ESG.⁶⁹

1035 GAC ensures the integrity of the accreditation process, however. If an agency does not carry out an assessment fully according to the procedural rules, GAC rejects the report. In some cases, for example, in which the review panel was obviously not adequately composed, GAC asked for a supplementation of the review panel. Should an assessment agency repeatedly and systematically disregard the rules, GAC could also withdraw its authorisation.⁷⁰

Challenges for GAC regarding its role of assessing and decision taking

1040 The different roles within the accreditation system require not only transparent processes and a common understanding of the criteria, but also a mutual understanding of the different tasks and responsibilities of the three actors: GAC, agencies and HEIs.

1045 GAC is the only institution in the accreditation system that is directly or indirectly responsible for the accreditation of all bachelor's and master's programmes in Germany. At the same time, however, its work is largely based on the preparatory work carried out by the agencies. GAC must not act as a second expert but essentially checks the plausibility of the experts' proposals.

GAC is dependent on good preparatory work by the agencies. GAC is not on site but makes its decisions based on documents. This guarantees its independence. On the other hand, GAC is dependent on meaningful and complete accreditation reports.

1050 This two-stage system is a challenge for HEIs, as their procedures are accompanied and assessed by the agencies, but the application for accreditation is submitted to GAC, which then makes the decision.

1055 This creates an incomplete triangle between the three actors: A direct institutional relationship exists in the accreditation process only between GAC and the HEI, as well as a private law relationship between the HEI and the agency, also the assessment process between the peers, the agencies and the HEIs. Aware that the triangle is incomplete, GAC is seeking informal exchange with the agencies.⁷¹ Currently, this is operating quite well and smoothly.

In its role as a multiplier in the system, GAC is currently facing another challenge: In recent years, GAC has reached out to cover the tasks specified in the state treaty to a higher level of professionalism. Still, there is room for more, if capacity of GAC and the Head Office allow.

1060 GAC is therefore faced with the challenge that not all measures can be maintained at the same level of intensity. This applies to the further development of knowledge management, but also to the frequency of dialogue formats, which had to be reduced in 2025.

1065 At the same time, however, the personnel requirements analysis also showed that there are no areas where considerable savings or cutbacks are possible without affecting GAC's core tasks of implementing quality-assured procedures.

⁶⁹ See for example the reviews of [AQ Austria](#), [EVALAG](#) and [AHPGS](#).

⁷⁰ See (6) of the resolution of GAC of 20 February 2018 on the "[Authorization of Agencies in the German System](#)" for the possibility of withdrawal of the authorisation.

⁷¹ See [6.2 GAC's internal quality assurance](#) and [7.6 ESG Standard 3.6 Internal quality assurance and professional conduct](#).

GAC is working with the *Länder* and other relevant stakeholders to raise capacity and at the same time rationalize some of the tasks of the Head Office. One step in the Programme Accreditation Department is to reduce cross-checked approaches for simple follow-up processes (review of simple conditions, review of significant changes with minor content). GAC is also working on increasing its staff (see [Chapter 7](#)).

8.4 ESG Standard 2.4 Peer-review experts

Impulses from the Review 2021: GAC should address its worries about the lack of interest of experts to participate in accreditations primarily by discussing the matter with the agencies and supporting them in coming up with new ways of attracting experts and keeping them committed and interested in this type of work. Closer cooperation with the agencies and a clarification of their separate roles should also ensure that any issues regarding the selection of experts are prevented, rather than addressed by GAC post hoc.

At the meeting in 2024, GAC and the agencies debated how all stakeholders could work together to promote the recruitment of experts. It was agreed that the quality of the experts was crucial for the acceptance of the system. The agencies emphasised that there were no fundamental problems in finding well-qualified experts. Nevertheless, the participants pondered whether to set up a working group with all stakeholders and to develop a concept on how to improve the appreciation and recruitment of experts.

GAC was approached by the union's representative to set up a general data base for experienced experts. However, there are several reasons, why GAC does not intend to take over this task:

- limited capacity of human resources in the Head Office,
- unflexible data storage with short expiry dates, needs heavy maintenance
- conceding each agency free, flexible approaches for recruiting of experts,
- respecting experts as valuable key assets of each agency.

GAC supports the independent students' expert pool, where the national student representatives organize training and education sessions for young experts in a very efficient and professional manner. Since 2024, GAC is also supporting this organisation by a small annual contribution.

Composition of the review panels, selection criteria and procedures

The relevant regulations guarantee that the review panels contain all relevant stakeholders. The standards for peer-review experts are laid down in Article 3 (3) ISAT:

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

According to Article 3 (1) no. 3 ISAT the same applies to the accreditation of alternative procedures.

These rules are further specified as follows in the Specimen Decree (for programme and system accreditation) in Binding Guidelines for the Nomination of University Teachers for Expert Groups according to Art. 3 Para. 3 State Treaty on Study Accreditation of the HRK⁷² and the RPAAP.⁷³

⁷² See [Binding guidelines on the appointment of university lecturers to review panels in accordance with Article 3\(3\) of the State Treaty on the Accreditation of Study Programmes](#). (German only).

⁷³ See [RPAAP](#).

1105 The Specimen Decree stipulates in § 25 (1) sentence 2 that in programme accreditation, the review panel “is made up as follows:

1. at least two subject-related professors,
2. one subject-related representative with professional experience,
3. one subject-related student. “

1110 According to § 25 (3) sentence 2, the majority of experts in the review panel must have experience with programme accreditation. § 25 (3) sentence 1 states that the professors must have the majority of votes in the panel. This implements the requirement of the Federal Constitutional Court that the accreditation procedure must be science-led. However, in practice, all members of the review group have equal standing and fulfil their roles confidently.

1115 In system accreditation procedures the review-panel according to § 25 (2) Specimen Decree “is made up” as follows:

1. at least three professors with relevant experience in quality assurance of teaching and learning,
2. one representative with professional experience,
3. one student.”

1120 According to § 25 (3) sentence 2, the majority of experts in the review panel must have experience with system accreditation. § 25 (3) sentence 1 states, that, as in programme accreditation, the professors must have the majority of votes in the panel.

At alternative procedures, the assessments are - according to section 5 (2) of the RPAAP – carried out “by external, independent experts from the fields of society relevant for quality assurance, in particular representatives of the scientific community, professional practice and students.”

1125 The size of the review panel depends on the requirements of the assessment, which may result from the design of the alternative procedure; however, § 25 (2) Specimen Decree on system accreditation will be applied analogously, so that at least three professors, one representative of professional practice and one student are also required here. The requirement that professors must have the majority of votes also applies here (§ 34 (2) sentence 2 Specimen Decree).

1130 In accreditation procedures concerning joint degree programmes according to § 33 Specimen Decree, § 33 (1) sentence 2 no. 5 the review panel must include peers from at least two countries involved in the programme. This corresponds to the European Approach. Furthermore, GAC has two international members, so that the “view from outside” can be introduced into every accreditation decision.

1135 Besides, for the selection of professors, the assessment agency is bound by the Guidelines for the Nomination of University Teachers for Expert Groups according to Art. 3 Para. 3 State Treaty on Study Accreditation of the HRK.⁷⁴ The background to this is also that the Federal Constitutional Court had

In study programmes leading to regulated professions (see for professional accreditation chapter [5. Higher education quality assurance activities of the agency](#)) representatives of the body responsible for the respective regulated profession may supplement the expert groups depending on the requirements of the professional law. For teacher education programmes and theological programmes this is regulated in § 25 (1) sentences 3 and 4 [Specimen Decree](#).

According to a resolution of GAC of 21 June 2019 ([printed matter AR 35/2019](#)), GAC recommends that an expert from school life (teacher or school management) also participates as an expert in the assessment of teacher training bundles; this is in addition to the participation of a representative of the competent Land authority responsible for the school system as prescribed in § 25 (3) [Specimen Decree](#).

⁷⁴ See [Binding guidelines on the appointment of university lecturers to review panels in accordance with Article 3\(3\) of the State Treaty on the Accreditation of Study Programmes](#). (German only).

ruled that academia itself should steer the accreditation procedure. The guidelines establish criteria for the selection of professors in the review panels and describe the selection procedure.

1140 The Guidelines stipulate that in programme accreditation the professors must be actively involved in the academic community of their subject and have experience in the development, organisation, implementation and in the monitoring of study programmes. In system accreditation they must have experience in higher education governance and internal quality assurance of HEIs.⁷⁵

Division of labour between the agencies and GAC

1145 Based on the mentioned regulations and guidelines in programme and system accreditation the experts are appointed by the assessment agency commissioned to prepare the accreditation report. The same applies for alternative procedures if an assessment agency carries out the procedure. The agency is responsible for ensuring adequate, science-driven selection of the experts. The agencies have an ample experience and know-how regarding the ESG-compliant selection of review panels. In the ENQA evaluations of the agencies authorised by GAC, the experts stated that the agencies exercise great care regarding the procedures and criteria for selecting experts.⁷⁶

1155 GAC however ensures the integrity of the accreditation process and can, for example, reject the report and ask for new assessment with a supplemented review panel when it was not adequately composed. This happened in some cases, in which the subject orientation of the study programme was not sufficiently reflected in the review panel.⁷⁷ In such cases, the HEI was required to return the application so that it could be forwarded to the agency for revision.

The agencies' practice regarding the selection of experts is well reflected in non-binding guidelines as by the HRK⁷⁸ or the GNW⁷⁹ (union experts association), both addressing the selection of student members and representatives of professional practice.

1160 Mechanisms to prevent conflicts of interest

§ 25 (5) Specimen Decree stipulates that the “[...] following persons are excluded as experts:

1. anyone working or enrolled at the higher education institution applying for accreditation,
2. anyone working or enrolled at one of the higher education institutions involved in the study programme in the case of cooperative study programmes or joint-degree programmes, or
- 1165 3. anyone who is considered to be prejudiced according to the normal rules that apply in academia.”

This applies for programme and system accreditation. In alternative procedures according to Article 3 (1) no. 3 ISAT and Article 3 (2) sentence 1 ISAT applies accordingly, according to which independent experts are to be appointed.

1170 In addition, the mentioned non-binding guidelines of HRK and GNW can be consulted, which further specify possible reasons for bias.

⁷⁵ The binding guidelines further specify the selection criteria for both types of procedure.

⁷⁶ See for example the reviews of [AQ Austria](#), [EVALAG](#) and [AHPGS](#).

⁷⁷ In 2025, 36 applications were returned to the higher education institutions (HEIs) or the agencies as part of the programme accreditation process. To put this into perspective: in 2025, 410 applications were processed and decided upon for the first time as part of the programme accreditation process.

⁷⁸ See [Guidelines on the appointment of assessors and the composition of assessment panels for accreditation procedures](#) (German only).

⁷⁹ See [Proposal for the appointment of assessors and the formation of assessor panels for accreditation procedures within the Trade Union Network of experts](#) (German only).

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

Training and briefing of experts

1175 In programme accreditation procedures and system accreditation procedures the agencies are also responsible for the training and briefing of experts.⁸⁰ The guidelines of the HRK and the GNW reflect the agencies' practice also in this regard. The evaluations in the ENQA reviews recently carried out by agencies authorised by GAC show that the agencies carry out training and briefing of experts in accordance with the ESG.⁸¹

1180 Also, the Student Accreditation Pool regularly organises training seminars on programme and system accreditation. To become a member of the Student Accreditation Pool, successful completion of a programme accreditation seminar is required.⁸² GAC is supporting the instructor seminars of the Student Accreditation Pool by a membership fee and regular contributions to the seminars.

1185 In the accreditation of alternative procedures carried out by GAC, the experts are prepared for their role in the review process thoroughly. This includes a two-hour long online training (mandatory) in which they are familiarized with the requirements for the accreditation of alternative procedures. In addition, they also receive documents regulating alternative procedures (state decree, the ESG and the RPAAP, among others). As a rule, the experts appointed by GAC have extensive experience in the field of programme and system accreditation. Before the initial meeting with the HEI, there will be an internal preparatory meeting of the review panel based on the self-evaluation report of the HEI. Finally, the experts
1190 are accompanied by one or two representatives of the Head office, and the whole process is supervised by one to two members of GAC.

⁸⁰ If one of the agencies would conduct the procedure, that would be also the same in alternative procedures. The [RPAAP](#) provide this possibility of conduction, but it has not yet been applied due to the low number of alternative procedures.

⁸¹ See for example the reviews of [AQ Austria](#), [EVALAG](#) and [AHPGS](#).

⁸² See [Training seminars on programme and system accreditation organised by the Student Accreditation Pool](#) (German only).

8.5 ESG Standard 2.5 Criteria for outcomes

1195 **Impulses from the review 2021:** As part of its planned systematic reflection, GAC should self-evaluate
its method of work as well as the way it understands consistency. It is especially important that the
process includes clarifying the stakeholders' demands for consistency that GAC needs to assure. GAC
should urgently devote time and resources to introducing or further developing the mechanisms
1200 ensuring consistency of decision making, which include publishing analyses of precedents, interpretations
and guidelines. A formal on-boarding procedure, including training and opportunities to
discuss with experienced members, should be developed for new GAC members.

Chapters [6.1 Processes and their methodologies](#) and [8.2 ESG Standard 2.2 Designing methodologies fit for purpose](#)
outlined the further development of a consistent understanding of criteria within the pro-
gramme accreditation, system accreditation and alternative procedure guidelines within GAC. Continu-
ous knowledge management is based on manuals and guidelines, but also on the ARDA evaluation and
1205 the Shiny app (see annex 05).⁸³ At the same time, GAC's dialogue formats also serve to continuously
develop a common understanding of criteria with all stakeholders.

All accreditation procedures are based on the criteria which are included in a general form in the ISAT
and in more detail in part 2 and 3 of the Specimen Decree and the decrees of the *Länder* accordingly.
1210 The decrees are published on GAC's website.⁸⁴

Application of the same criteria for study programmes in all procedures

In all types of QA processes (programme accreditation, system accreditation and alternative proce-
dures) the study programmes have to fulfil the same criteria: HEIs have to prove that the study pro-
grammes meet the formal and academic criteria for study programmes included in parts 2 and 3 of the
1215 Specimen Decree.⁸⁵

An exception is the accreditation of joint degree programmes in accordance with the European Approach
(§ 33 Specimen Decree). Here, only the formal and academic criteria stipulated in §§ 10 and 16 Speci-
men Decree must be fulfilled. Those stipulations transpose the criteria of the European Approach into
German law; only for legal reasons, the European Approach itself is mentioned not in the Decree, but
1220 in the explanatory memorandum to the decree.

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

1225 The assessment of an alternative procedure is multi-level:

- In the accreditation of system-related alternative procedures, the HEI must systematically as-
sess and thus guarantee the fulfilment of the requirements for quality management systems
(§§ 17 and 18) of the Specimen Decree and thereby also guarantee the fulfilment of the criteria
for study programmes of part 2 and 3 Specimen Decree.⁸⁶

⁸³ The ARDA analyses, as well as the Shiny app, ensures consistency and enables the departments to evaluate
their decisions. In this way, GAC also considers the [EQAR Approval of the Application according ESG 2.5](#) and the
question, if the post-2018 system delivered a higher degree of consistency or not.

⁸⁴ See [Model legal and state ordinances](#).

⁸⁵ See § 22 (1) [Specimen Decree](#) for programme accreditation, § 17 (1) Specimen Decree for system accredita-
tions and § 34 (2) [Specimen Decree](#) as well as section 5 (1) of the [RPAAP](#).

⁸⁶ See § 34 (2) [Specimen Decree](#) as well as section 5 (1) of the [RPAAP](#).

- 1230
- In the accreditation of programme-related alternative procedures, the HEI must systematically assess and thus guarantee the fulfilment of the criteria for study programmes of part 2 and 3 Specimen Decree.⁸⁷
 - The alternative procedure itself must comply with the ESG.⁸⁸

Differentiation between formal and academic criteria

- 1235 In the German accreditation system, a distinction is made between formal and academic criteria for study programmes. The formal criteria according to part 2 of the Specimen Decree contain framework requirements that were previously regulated in joint structural requirements of the KMK. Compliance with the formal criteria is verified without the participation of the experts by the agencies' offices; the result is documented in the formal report. The academic criteria according to part 3 of the Specimen
- 1240 Decree contain the quality requirements to be examined by the experts, which were previously contained in GAC's criteria; the result is documented in the review report. The substantiation of the ISAT states that the division between formal and academic examination is intended primarily to serve procedural economy. The review panel is relieved of but not excluded from the examination of purely formal criteria.⁸⁹
- 1245 In system accreditation, and in the accreditation of alternative procedure if they are system-related, there is a distinction between formal and academic criteria on two levels: On one hand, the HEI must prove that it complies with the formal and academic criteria for study programmes at programme level. On the other hand, at the system level, the HEI must prove that it fulfils the academic criteria contained in § 17 and § 18 Specimen Decree. There, the central requirements for a functional quality management
- 1250 system in teaching and learning are defined. As a formal criterion at system level, in a first system accreditation procedure, the HEI must prove that at least one study programme has gone through the quality management system; in the case of renewed system accreditation, it must prove that all bachelor's and master's study programmes have gone through the quality assurance system at least once.⁹⁰
- 1255 One of the challenges is to examine formal as well as academic criteria in a balanced way. In its assessment of accreditation applications, GAC must avoid focusing too much on formalities, because these are easier to be checked in a file-based review. However, compliance with formal criteria is the prerequisite for good programme quality.

Fitness of and fitness for approach of the academic criteria for study programmes

- 1260 The academic criteria for study programmes are based on the "fitness of and fitness for purpose" principle: the HEI has a large scope in the choice of qualification goals for its study programmes, provided those goals are in accordance with the qualification's framework.⁹¹ It is crucial that the study programme concept and its implementation match these qualification goals. The HEI must also regularly review its study programmes with a view to achieving its goals and, if necessary, improve them. The criteria thus support the HEI to continuously apply the PDCA cycle.
- 1265 Some important new focuses have been set since 2018:
- The phenomenon of "franchising" or programme-related cooperation with non-university institutions was comprehensively regulated in §§ 9 and 19 Specimen Decree.

⁸⁷ See § 34 (2) [Specimen Decree](#) as well as section 5 (1) of the [RPAAP](#).

⁸⁸ See section 3 (3) sentence 2 of the [RPAAP](#).

⁸⁹ See substantiation in the [ISAT](#), page 7.

⁹⁰ See § 23 (1) [Specimen Decree](#) for those formal criteria.

⁹¹ See [Qualifications Framework for German Higher Education Degrees](#).

- It was specified that full-time professors are the central reference point when assessing the staffing of a study programme (§ 12 (2) Specimen Decree).
- The term “dual” was protected by the KMK (§ 12 (7) Specimen Decree).
- A positive reference to professional discourse was added (§ 13 (1) Specimen Decree).

Measures to ensure consistent application of criteria

The criteria for programme and system accreditation represent the essential quality standards which - in the case of programme accreditation - must be applicable to all study programmes regardless of their specific profile and subject orientation and - in the case of system accreditation - to different quality management models. The necessity associated with this requirement to pay attention to a high degree of general validity when formulating the criteria leads almost inevitably to a comparatively broad scope of interpretation of the individual criteria. As has been shown in recent years, there is a continuing need on one hand for measures which ensure the consistent application of criteria and on the other hand, for information on GAC's decision-making practice by HEIs and agencies. In addition, when the number of applications is high, as is currently the case, ensuring consistent decisions is more difficult but also more important.

GAC has foreseen different measures to ensure consistent application of the criteria (Condition categories and text modules for conditions in ELIAS, Handbook Programme Accreditation, Jour Fixe of the Accreditation departments, process descriptions, cross-checking of applications in the Head Office, rapporteur system, supporting committee, information via FAQ and social media).⁹² See chapter [8.2 ESG Standard 2.2 Designing methodologies fit for purpose](#).

GAC would like to point out that above measures are not intended as the development of additional criteria. The *Länder* have laid down very clearly that only ISAT and Specimen Decree contain the relevant set of criteria; therefore, the criteria-related actions by GAC are explanations and interpretations.

8.6 ESG Standard 2.6 Reporting

Programme accreditation, system accreditation, alternative procedures

The HEI must attach the accreditation report to its application for accreditation to GAC, which consists of the formal report and the review report (§ 23 (1) no 2 Specimen Decree). The formal report and the review report each contain an assessment proposal for GAC as to whether or to what extent the criteria have been met (§ 24 (3) and (4) Specimen Decree).

Both the formal report and the review report must be drawn up in report templates specified by GAC (§ 24 (3) and (4) Specimen Decree). On the one hand, this is intended to create the prerequisites for a speedy processing of the applications at GAC. On the other hand, the report templates contribute to improving the comparability of the evaluation results and thus the procedural transparency for the potential readership.

Standardisation should relate exclusively to the structure of the report, but under no circumstances to the evaluation of content. Overall, the reports should provide a clear picture of a study programme or a HEI internal quality management system - for GAC as well as for the HEI and interested public (students, ministries, potential employers etc.). Schematic text modules should be avoided as far as possible,

⁹² These measures reflect also the remarks in the [EQAR Approval of the Application according ESG 2.5](#), when the panel “considered critically the lack of formal mechanisms to ensure a consistent understanding and application of the criteria (e.g. guidelines, interpretations or a precedent database made available by GAC).”

remarkable characteristics of the study programme (positive as well as critical) should be laid out more prominently in presentation and evaluation.

The accreditation reports must fulfil the following functions:

1310

Readability, Completeness and Focus on quality development

The aim of accreditation should be to place quality development in teaching and learning at the centre of the procedure. The evaluation of the individual criteria should also focus on strengths and possible development needs, so that the heading has been supplemented at this point by the pair of terms "strengths and development needs".

1315

Although these three points may sound self-evident as the aims of accreditation, experience in the past has consistently shown that gaps were found in the reports, both in terms of the completeness of the assessment and the criteria to be examined. This is due to the diversity of voices in the process: agencies and peers base their accreditation reports on the self-assessments provided by the HEIs, whereas GAC and Head Office make their decisions on the basis of the accreditation report.

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In previous years, GAC often returned reports to the agencies. Since then, through regular exchanges between staff from the agencies and the Head Office, we have succeeded in reducing potential gaps or errors in the assessment of criteria.⁹³

Quality related data/key figures

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As early as 2012, the German Science and Humanities Council pointed out the need for an improved data situation in the accreditation system: "GAC and the states [should] ensure, in cooperation with other bodies involved - including higher education institutions, statistical offices, the HRK Hochschulkompass - that the data situation on study programmes and accreditation status is further improved. In the future, consideration should be given to the possibility of maintaining and publishing a [...] core data set of quality-related indicators (including, for example, success rates and grade distributions) for each study programme in order to make progress in the documentation of study quality and its further development."⁹⁴

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

1335

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

1340

Potential for improvement in accreditation reports

GAC needs plausible, comprehensible, and legible evaluations as a basis for its accreditation decisions and as a prerequisite for a swift and consistent processing of applications for programme and system accreditation. It published guidance notes for the preparation of accreditation reports in March 2019.⁹⁵

⁹³ In 2020, around 58 applications were returned for revision; in 2025, the figure was around 36. Furthermore, the returns are no longer primarily due to errors in the reports, but also to mistakes for which the HEIs are directly responsible.

⁹⁴ See [Recommendations on Accreditation as a Quality Assurance Tool](#), p. 74 (German only).

⁹⁵ See [Preliminary guidelines for the preparation of accreditation reports, Resolution of the Accreditation Council](#).

1345 In the early years of the new system, the traceability of assessments in accreditation reports was a recurring topic of discussion between GAC and agencies. Through regular dialogue, both parties have worked over the past few years to establish a better understanding of how to apply the criteria of the Specimen Decree and to produce traceable accreditation reports.

1350 As a result, the number of accreditation reports containing assessments that are incomplete or incomprehensible has decreased. Nevertheless, there are still occasional cases where GAC does not accept reports for decision and informs the HEI that the report needs to be revised.

Publication of reports

1355 In all types of procedure, GAC, according to § 29 Specimen Decree, publishes full reports in its database (ELIAS), which is accessible freely at <https://antrag.akkreditierungsrat.de/>. This also includes negative decisions. Thanks to ELIAS, the publication of the accreditation decision and the accreditation report is automated after GAC has made the decision.

Publication of quality reports by system-accredited HEIs

1360 The revision of the Specimen Decree in 2024 resulted in relatively few changes as regards the procedure and the criteria for system accreditation. Most importantly, HEIs are entitled to publish shortened quality reports upon the internal accreditation of their study programmes. Instead, only the accreditation decision and a summary of the assessment results (including imposed conditions, if applicable) need to be published in the ELIAS database (§ 18 (4) Specimen Decree). However, HEIs are still invited to
1365 continue publishing quality reports or comparable documents beyond these minimum requirements to provide comprehensive information on the quality assurance of their programmes. As quality reports have meanwhile been established as a standard tool at system-accredited institutions, there is a high chance for this good practice to continue at a large scale, even though it is not compulsory anymore.

Alternative procedures

1370 The review report according to section 6 (1) of the [RPAAP](#) must be attached to the application for accreditation to be submitted to GAC. The review report must provide evidence-based proof that the requirements for the accreditation of the alternative procedure are met. The accreditation decision and the accreditation report of GAC according to section 6 (6) of the RPAAP are published in ELIAS, as well as the internal quality reports of HEIs accredited in alternative procedures (§ 18 Specimen Decree⁹⁶).

1375 HEIs must publish the accreditation results of their own study programs accredited through alternative procedures in the same way as system-accredited HEIs.

⁹⁶ § 18 [Specimen Decree](#) is applicable in alternative accreditation procedures according to § 34 (2) Specimen Decree which says that also part 3 and thus § 18 if the Specimen Decree must be fulfilled in alternative accreditation procedures.

8.7 ESG Standard 2.7 Complaints and appeals

ESG 2.7 Complaints and appeals

1380 **Impulses from the Review 2021:** GAC should publish a formal description of the appeals and complaints procedure, with clearly described escalation steps.

Section [6.1.6 Complaints and Appeals Commission](#) explains that GAC decided on a complaints procedure on 26 February 2019 and thus established an external commission to address complaints and appeals.⁹⁷

1385 **Possibility to comment on the accreditation report**

Pursuant to Article 3 (4) ISAT, the HEIs may attach a statement to their application for accreditation, which they submit to GAC. HEIs should use this opportunity to comment if they wish to raise objections to the proposals in the accreditation report.

1390 It can happen that GAC intends to take an accreditation decision that deviates significantly from the proposal included in the agency's accreditation report, in a way that imposes additional burdens on the HEI, especially by imposing an additional condition. In that case, the HEI is given the opportunity to submit a (further) statement within one month in accordance with § 22 (3) Specimen Decree.

Appeals and complaints to GAC

1395 Both HEIs and third parties have the possibility to appeal to GAC against its decisions or to complain to GAC about procedural errors.

GAC set up a commission to deal with appeals and complaints. The Complaints and Appeals Commission consists of three external members: a professor, a student member and a member proposed by the agencies. The commission discusses appeals and complaints and submits a recommendation to GAC for final decision on the appeal or the complaint.

1400 GAC has defined the procedure in more detail in accordance with the recommendation from the last ESG-evaluation and in line with established practice. In its decision of March 2024, it defined both the competencies that the members of the commission must possess and the appointment process. Members of the commission and their deputies must have in-depth knowledge of the regulations and criteria applicable to accreditation procedures. They are appointed by GAC based on proposals from the respective member groups.

1410 In addition, in the aforementioned resolution, GAC adopted more detailed rules regarding the commission's mandate, terms of office, exclusion of bias and working methods. According to those rules, the commission is responsible for complaints regarding possible procedural errors and appeals against decisions made by GAC or the Board. A conflict of interest exists, among other things, if the complaint or appeal concerns a procedure carried out by the agency for which the commission member works or concerns a higher education institution with which the commission member in question has a membership relationship. If a member is biased, that member shall be represented by the respective deputy. The term of office of the commission members and their deputies shall be three years. The term of office may be extended once.

1415 GAC has also further defined the right of appeal and complaint, the time limits, as well as the content and form of complaints and appeals in its resolution of March 2024. Both, HEIs and third parties are entitled to lodge a complaint or appeal, if they were involved in the respective proceedings or are affected by the subject matter of the complaint or appeal. Anonymous complaints or appeals are not

⁹⁷ See [Complaints and appeals procedure of the German Accreditation Council](#).

1420 suitable for initiating proceedings. Complaints and appeals must be justified. They must be submitted within three months of the disputed decision being made or after the potential procedural error becomes known.

The resolution also describes in detail the procedure following receipt of the complaint. The commission may call in the responsible programme manager and rapporteur to its meeting to clarify open questions. It may also hold a discussion with the complainant to clarify open questions. In the case of an appeal or 1425 complaint from a third party, the higher education institution concerned shall be heard. The commission shall make a recommendation to GAC on whether to uphold or reject the appeal or complaint in whole or in part. Based on this recommendation, GAC shall decide whether to uphold the complaint or appeal in whole or in part or to reject it. GAC shall inform the complainant, the commission and, in the case of a complaint or appeal by a third party, the higher education institution concerned of the outcome of the 1430 proceedings.

In the event of an obviously incorrect decision or an obvious procedural error, this decision or procedural error may be corrected by the body that made the decision (GAC or Board) without referring the matter to the commission if the correction is to the benefit of the higher education institution affected by the decision.

1435 Information on the process is easily accessible at <https://www.akkreditierungsrat.de/en/foundation-ac-creditation-council/complaints-and-appeals/complaints-and-appeals>.

At the time of reporting, six appeal procedures have been completed by the commission. They mainly concerned conditions imposed by GAC or negative decisions. In two cases, the HEI's appeal was upheld; in four cases, the appeal was dismissed.

1440 In addition, GAC receives a large number of enquiries that do not fall within its remit. These enquiries do not relate to incorrect decisions made by GAC or procedural errors but concern general issues such as questions regarding the fee policy of a higher education institution.

In a few cases, enquiries have been received concerning deficiencies in study programmes at system-accredited higher education institutions. Only if the system accreditation decision itself is questioned 1445 would GAC have to re-examine this decision and, if necessary, amend or revoke it. There would have to be clear evidence of systematic deficiencies in a higher education institution's quality management system, meaning that the criteria for system accreditation were clearly not being met or were no longer being met. This has not been the case to date.

9. SWOT analysis

1450 A survey was conducted in March 2026 and was aimed at members, alternate members and permanent guests of GAC, as well as the managing directors of the accreditation agencies. Staff members of the Head Office also took part.

36 people took part in the survey; no questions were asked regarding their status (member, guest, agency, etc.). A full evaluation of the SWOT analysis can be found in annex 12.

1455 Here, we shall focus only on the key points from the SWOT analysis that play a significant role in the further development of GAC.

Strengths / Weaknesses

With regard to strengths, the following aspects were addressed

- 1460 • GAC plays a central role in the quality assurance system and facilitates broad stakeholder participation.
- GAC ensures an independent, consistent and transparent decision-making process that is widely accepted throughout Germany.
- GAC has a modern digital application process, an effective digital platform (ELIAS) and useful data analyses.
- 1465 • GAC has clear internal processes and a helpful knowledge management system; the Head Office acts as a point of contact and provides important support for HEIs.

With regard to weaknesses, the following three top points were identified:

- 1470 • GAC and the accreditation process are perceived as bureaucratic and protracted, which undermines acceptance of the accreditation procedure and system. This is exacerbated by the current staff shortages and the high volume of applications, which result in long processing times and create a backlog.
- At the same time, there is a lack of capacity for the systematic evaluation of decision-making practice, as well as to produce external guidance documents and manuals, and for the further development of the quality assurance system and strategic projects.
- 1475 • In terms of external communication and presentation, GAC is not living up to its potential; in particular, the Accreditation Council lacks visibility at the international level.

1480 Whilst the strengths confirm the current and future priorities of GAC's work, the weaknesses emphasize the challenge that, although GAC has tackled many of the issues in recent years, it has not yet achieved satisfactory results in all areas.

When the vision developed during the strategy process is set against the strengths and weaknesses, the following becomes apparent:

1485 In its vision, GAC states: *"We make quality-assured decisions on the accreditation of degree programmes, higher education quality management systems and alternative procedures. On behalf of the states, we thus generate visible added value for society by ensuring that students acquire qualified skills."*⁹⁸

⁹⁸ See [Mission Statement](#).

The SWOT analysis does not call the accreditation itself into question, but rather the process, which is perceived as overly bureaucratic and – contrary to the vision – not as an opportunity for further development, but as a means of control. Furthermore, GAC has so far been not fully able to use its position to “award our seal of accreditation as a mark of quality and distinction for study and teaching – recognised throughout Germany and internationally.”⁹⁹

Opportunities / Risks

With regard to opportunities, the following findings stand out:

- GAC should strengthen its role as a central player by centralizing decision-making and its role as a standard-setting body. GAC can also use this to position itself as a quality hub within the higher education system.
- GAC ensures uniform quality assurance and provides an overview of developments in Germany, which enables more evidence based discussions on quality.
- In doing so, GAC also facilitates the joint further development of the Specimen Decree together with all stakeholders.

The following points emerge as threats:

- There is a risk that GAC will be perceived as a purely bureaucratic regulatory body.
- Linked to this is the risk of system-wide fatigue due to recurring reaccreditations without further development.
- Furthermore, it cannot be ruled out that resource shortages and overburdening may lead to a decline in quality, errors and staff absences.

When it comes to balancing opportunities and risks, it is also striking that GAC’s central role presents a tremendous opportunity not only for GAC itself but also for the accreditation system in Germany; at the same time, however, this role is more strongly associated with that of a bureaucratic supervisory body. The long processing times also reinforce the impression of a customer-unfriendly attitude. It was precisely this point that GAC addressed when drafting its mission statement, defining:

“In trusting and efficient cooperation with all stakeholder groups in the field of accreditation, we ensure transparency, orientation and security through consistent decisions.

We cultivate and demand open exchange with all stakeholder groups and provide quality impetus for the continuous further development of the accreditation system.”¹⁰⁰

It has become clear that the objectives set out in the mission statement will not be fully achieved within a short timeframe.

Rather, we see the results of the SWOT analysis as confirmation of the strategic focus areas identified during the 2022–2024 strategy process. This applies both to the strengths and opportunities – such as our strong central role within the system – and to the weaknesses and risks, such as the need to improve

⁹⁹ [ibit.](#)
¹⁰⁰ [ibit.](#)

communication and ensure transparent processes, as well as the need for greater involvement in international areas.

1525 We draw the following insights and considerations from the SWOT analysis:

- GAC must use its central position to counteract the impression of purely bureaucratic control in its external image – both in communication and in the presentation of transparent processes – whilst at the same time placing an even stronger focus on the further development of degree programmes, QA systems and the entire accreditation system in Germany. The existing dialogue formats are a good starting point in this regard.
- GAC and Head Office are considering how existing internal processes can be further developed to address both staff shortages and the significant backlog of applications. This includes, for example, approaches to streamlined review procedures, which are currently being devised in the areas of programme and system accreditation.

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10. Key challenges and areas for future development

The discussions in Sections 7 and 8 have shown that GAC has taken the feedback from the 2021 review on board constructively and has incorporated it as an important impetus for its work and further development: in particular, GAC has focused its strategic process on reflecting on its role and self-image. Furthermore, there was an intensification of dialogue with stakeholders, and among others also with the agencies. The thematic analyses were also further developed. In addition, GAC's quality management was expanded and the PDCA cycle strengthened. Subsequently, the quality assurance and consistency of GAC's decision-making practices were reinforced through internal knowledge management processes.

The SWOT analysis has shown that many of these areas have been developed satisfactorily; nevertheless, GAC – also as a conclusion from the SWOT analysis – identifies several key areas that present further challenges.

Communication and Stakeholder Involvement

“Bureaucracy” featured prominently in the SWOT analysis. As an umbrella term, it can encompass a wide range of aspects. We have already learned how important it is to analyze precisely where perceptions of bureaucracy originate. In some cases, even compliance with criteria or procedures as such are perceived as bureaucratic. Beyond this general perception, it is therefore essential to identify the specific sources of certain views.

One way to address this is through enhanced communication. While GAC can look back on a successful series of dialogue formats, it is evident that, within Germany's highly decentralized higher education system, exchange often takes place on an ad hoc, regional, or bilateral basis, or within highly structured formats. Going forward, GAC intends to make even greater use of its central role within the German system to create forums as independent spaces for exchange, reflection, and mutual understanding among all stakeholders.

This leads directly to the issue of stakeholder involvement. The previous ENQA review highlighted the importance of ownership. This remains an area for further development, and we will engage with stakeholders to explore how participation can be strengthened at all levels.

Against this background, the key outcomes of GAC's strategy process remain valid. The following areas of action have been defined as strategic priorities:

- Self-image and external perception of GAC
- Support for the development of the accreditation system
- Transparency and dialogue
- (International) cooperation with stakeholders

These priorities have been operationalised in a strategic plan for the current term of GAC's members, which began in 2026 and will run until 2029, following a recommendation from the Progress Visit.

However, all activities in this regard are limited because of the second important challenge:

Resources and workflows

In the previous ENQA review, GAC identified key areas and challenges for the future with which it will actively deal. Prominent among these is the task of handling the high number of applications while

maintaining consistently high quality, as well as the need for continuous and systematic reflection on its own activities.¹⁰¹ Staffing came out in the SWOT analysis as a relevant weakness as well as threat.

1580 The significant increase in staff positions at the Head Office by the *Länder* in 2022 has resulted in a considerable balancing in the overall workload of employees, for which GAC is very grateful to the *Länder*.

1585 Nevertheless, it should not be concealed that the staffing situation at the Head Office remains tense in correlation with the tasks of GAC. GAC is therefore faced with the question of whether it will be able to implement all the tasks identified as areas for action in the strategy process in the coming years with full energy as it has been done in the past. Starting 2026, the Head Office will proceed with a critical analysis of its work, to identify areas in which satisfactory results can be achieved even with reduced staffing levels. In the second half of 2026, priorities and their implications for all areas of activity will be discussed with GAC on several levels, including a strategic workshop.

1590 *GAC as Quality Hub in the Accreditation System*

The strategic process and the SWOT analysis have shown that GAC occupies a unique central position within the German accreditation system. At the same time, however, it is clear that GAC has not yet made it sufficiently public to be recognised by all stakeholders as a quality hub and not only as a quality assurance body.

1595 Yet this function is defined in GAC's core tasks, as Article 5(6) of the ISAT stipulates: "GAC supports the federal states in the further development of the German quality assurance system and submits proposals for the statutory regulations to be issued pursuant to Article 4".

1600 In the coming term of office, GAC intends to incorporate this task even more strongly into its strategic areas of action. The recent evaluation of the Specimen Decree demonstrated that GAC was able to provide the federal states with essential impetus for the further development of the statutory regulation – and thus of the entire accreditation system. As the higher education system is very dynamic, a next evaluation of the Specimen Decree is to be expected in a few years' time. GAC intends to proactively prepare for this further development.

1605 In this regard, GAC considers itself already well on the way, as the further development of quality assurance for degree programmes as well as quality systems is already being explicitly prioritised across various areas. In addition to the dialogue formats dealing with the interpretation of criteria in programme accreditation and system accreditation, this also includes the alternative procedures as an overall process, which implicitly provides for an evaluation of new quality assurance procedures in the implementing by HEIs.

1610 The thematic analyses, such as the guidance "[Promoting quality development through accreditation – a look at teacher training programmes](#)" (2022) or the thematic analyses "[Thematic analysis of studyability](#)"

¹⁰¹ A detailed account of how the suggestions and comments from the previous review have been addressed and can be found in [Chapter 7](#) and [Chapter 8](#).

[and academic success in self-evaluation reports](#)” (2024), are also an expression of GAC's efforts as a Quality Hub, to break new ground and share the insights gained with stakeholders.

GAC identifies the following issues as particular challenges for the coming years:

- 1615
 - What impact do AI and its integration have on degree programmes?
 - How does the increasing use of online formats in face-to-face degree programmes affect the nature of study?
 - What significance does the rise in European degrees hold for the German higher education system?
- 1620
 - How can 'accreditation fatigue' in established monitoring processes and in reaccreditation procedures be countered – both among HEIs and among peers?

GAC sees significant potential for development in these areas regarding the quality assurance of degree programmes and HEIs and intends to use its central role to provide experience-based impetus for the further development of the accreditation system.

1625 Abbreviations of Institutions and terms

Acronym	German term	English equivalent
AAQ ↗	<i>Schweizerische Agentur für Akkreditierung und Qualitätssicherung</i>	Swiss Agency for Accreditation and Quality Assurance
ACQUIN ↗	<i>Akkreditierungs-, Zertifizierungs- und Qualitätssicherungs-Institut</i>	Accreditation, Certification and Quality Assurance Institute
AHPGS ↗	<i>Akkreditierungsagentur im Bereich Gesundheit und Soziales - AHPGS</i>	Accreditation Agency for Health and Social Sciences (AHPGS)
AKAST ↗	<i>Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland</i>	Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany
AQ Austria ↗	<i>Agentur für Qualitätssicherung und Akkreditierung Austria</i>	Agency for Quality Assurance and Accreditation Austria
AQAS ↗	<i>Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen e. V.</i>	Agency for Quality Assurance through Accreditation of Study Programmes
ARDA ↗	<i>Akkreditierungsrat Datenanalyse</i>	AC-Data Analysis
ASIIN ↗	<i>Akkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, Informatik, Naturwissenschaften und Mathematik</i>	Accreditation Agency for Study Programmes in Engineering, Informatics, Natural Sciences and Mathematics
BMFTR ↗	<i>Bundesministerium für Forschung, Technologie und Raumfahrt</i>	Federal Ministry of Research, Technology and Space
CHEA ↗		Council for Higher Education Accreditation
CIQG ↗		CHEA International Quality Group
DAAD ↗	<i>German Academic Exchange Service</i>	Deutscher Akademischer Austauschdienst
DEQAR ↗		Database of External Quality Assurance Results
DFG ↗	<i>Deutsche Forschungsgemeinschaft</i>	German Research Foundation
EHEA		European Higher Education Area
ELIAS ↗	<i>Elektronisches Informations- und Antrags-system</i>	Electronic Information and Application System
ENQA ↗		European Association for Quality Assurance in Higher Education
EQAR ↗		European Quality Assurance Register for Higher Education
ESG		Standards and guidelines for quality assurance in the European Higher Education Area
EVALAG ↗	<i>Evaluationsagentur Baden-Württemberg</i>	Evaluation Agency Baden-Württemberg
FIBAA ↗		Foundation for International Business Administration Accreditation
FTE	<i>Vollzeitäquivalente</i>	full-time equivalents

Acronym	German term	English equivalent
FH/HAW	<i>Fachhochschulen/Hochschulen für Angewandte Wissenschaften</i>	Universities of Applied Sciences
GAC ↗	<i>(der) Akkreditierungsrat</i>	(the) German Accreditation Council
GAC Foundation	<i>Stiftung Akkreditierungsrat</i>	Foundation of the Accreditation Council
GG	<i>Grundgesetz</i>	Basic Law for the Federal Republic of Germany ↗
GNW ↗	<i>Gewerkschaftliches Gutachter:innen-Netzwerk</i>	Trade union network of experts
HEI; HEIs	<i>akademische Hochschulen und Universitäten</i>	Higher education institution; higher education institutions
HRG	<i>Hochschulrahmengesetz</i>	Higher Education Framework Act (German only) ↗
HRK ↗	<i>Hochschulrektorenkonferenz</i>	German Rectors' Conference
INQAAHE ↗		International Network for Quality Assurance Agencies in Higher Education
ISAT	<i>Studienakkreditierungsstaatsvertrag der Länder</i>	Interstate Study Accreditation Treaty ↗
KMK ↗	<i>Kultusministerkonferenz</i>	Standing Conference of the Ministers of Education and Cultural Affairs of the <i>Länder</i> in the Federal Republic of Germany
KW	<i>Keine Wiederbesetzung</i>	No re-employment after vacancy
Land / Länder	<i>Bundesland /Bundesländer</i>	State / States (the 16 States in Germany)
MRVO	<i>Musterrechtsverordnung, Stand 2024</i>	Specimen Decree as per 2024 ↗
NIAD-UE ↗		National Institution for Academic Degrees and University Education
PBE	<i>Personal-Bedarfs-Ermittlung</i>	Staffing Requirements Assessment
PDCA		Plan-Do-Check-Act
QA	<i>Qualitätssicherung</i>	Quality Assurance
RPAAP	<i>Verfahrensordnung Alternative Akkreditierungsverfahren</i>	Rules of Procedure for Alternative Accreditation Procedures ↗
SAR	<i>Selbstbericht</i>	Self-Assessment Report
TV-L	<i>Tarifvertrag für den Öffentlichen Dienst der Länder</i>	<i>Collective agreement for the public sector in the states</i>
WR ↗	<i>Wissenschaftsrat</i>	German Council of Science and Humanities
ZEVA ↗	<i>Zentrale Evaluations- und Akkreditierungsagentur</i>	Central Evaluation and Accreditation Agency

Legal Texts and Documents of GAC

Legal Texts	Basic Law for the Federal Republic of Germany Interstate Study Accreditation Treaty Specimen Decree Introduction of the explanatory memorandum to the Specimen Decree press release from the Standing Conference of the Ministers of Education and Cultural Affairs (German only). Order of the First Senate of the Federal Constitutional Court of 17 February 2016 Accreditation Council Act (German Only)
GAC Regulations	Authorization of Agencies in the German System Bylaws of the Accreditation Council Foundation Consolidated version of the Fee Schedule Mission Statement of GAC Principles of the Accreditation Council Rules of Procedure of the Accreditation Council Rules of Procedure of the Board of Trustees of the Accreditation Council Foundation
Process descriptions	Complaint and Appeal Procedures of the Accreditation Council Foundation Preliminary guidelines for the preparation of accreditation reports, Resolution of the Accreditation Council . Rules of Procedure for Alternative Accreditation Procedures, Resolution of the Accreditation Council Quality Management at the Accreditation Council Foundation
Agreements	Agreement between the German Accreditation Council and the German Jordanian University Agreement with the Japanese quality assurance agency NIAD-QE National Institution for Academic Degrees and University Education Agreement with the US quality assurance agency CHEA International Quality Group Agreement with the Chilean quality assurance agency Comisión Nacional de Acreditación

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Further Online Resources

Destatis (Federal Statistical Office of Germany).	Institutions of higher education Students by states Institutions of higher education Students at private institutions of higher education Private institutions of higher education Total of higher education institutions
EQAR	Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies
Federal Foreign Office	Facts about Germany
HRK (German Rectors' Conference)	Binding guidelines on the appointment of university lecturers to review panels in accordance with Article 3(3) of the State Treaty on the Accreditation of Study Programmes . (German only) Diploma Supplement

	Guidelines on the appointment of assessors and the composition of assessment panels for accreditation procedures (German only) Qualifications Framework for German Higher Education Degrees
Student Accreditation Pool	Training seminars on programme and system accreditation organized by the Student Accreditation Pool (German only)
Trade Union Network of Experts	Proposal for the appointment of assessors and the formation of assessor panels for accreditation procedures within the Trade Union Network of experts
WR	Recommendations on Accreditation as a Quality Assurance Tool

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Annex 01 Quality assurance processes

Annex 02 Electronic Information and Application System (ELIAS)

Annex 03 Evaluations and Quality Reports 2021-2025

Annex 04 GAC appointment process

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Annex 06 Joint analysis for future Thematic analysis

Annex 07 Implementation of the ESG in the specimen decree

Annex 08 Results of the inter-state working group of the KMK Higher Education Committee on the evaluation of the specimen decree

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