STIFTUNG Akkreditierungsrat

Report

Support for the Alternative Process at

Universities:

Stuttgart University of Media

Nürtingen-Geislingen University of Business and the Environment

Furtwangen University

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University	Stuttgart University of Media (HdM) Furtwangen University (HFU) Nürtingen-Geislingen University of Business and Environment (HfWU)
Additional information, if applicable	
If applicable, academic unit	

Program-specific procedure	☐
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Report dated	October 21, 2025[1]

[1] This report supplements the expert opinion on the accreditation of the Alternative Procedure dated September 20, 2021. Information on the design of the Alternative Procedure can be found there. The expert opinion is available in the Accreditation Council's database.

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1 Report on Participation in the Steps of the Alternative Procedure

The Alternative Procedure at HdM, HfWU, and HFU combines cooperative elements with individual implementations of the procedure at each institution. This report considers the universities collectively. This is done, on the one hand, against the backdrop of the comparability of the procedural steps, since the universities' quality advisory boards have conducted an assessment of the status of implementation of the same system accreditation criterion in accordance with the Study Program Accreditation Ordinance (StAkkrVO). On the other hand, this reflects an appreciation of the cooperative framework of the Alternative Procedure. The Accreditation Council hopes that this will support the exchange between the quality advisory boards and the universities in the upcoming internal mid-term evaluation of the Alternative Procedure.

The review, based on documentation, focused on the procedural steps of the Alternative Procedure that the universities carried out in 2024.

1.1 Monitoring of the Alternative Procedure at the Stuttgart Media University

The third meeting of the Quality Advisory Board at the Stuttgart Media University (HdM) took place on July 3, 2024. For the review based on documentation, the minutes, agenda, and meeting materials were made available for inspection. The main topic of the third meeting was "Strategic and Operational Processes in Academic Programs and Teaching."

In the context of current developments in the university's quality management, reports were given on specific university initiatives as well as progress in the joint "Quality Advisory Board" project. The university had implemented the recommendations made at the second meeting of the Quality Advisory Board and, among other things, established the "Teaching Mission Statement" working group. Its goal is to update the existing mission statement, taking into account artificial intelligence, the framework conditions of the structural and development plan, and, where applicable, the university's guiding values. The revision is expected to be completed within one year. The Quality Advisory Board assessed the steps taken so far positively and approved the implementation of the recommendations.

Among other things, the Quality Advisory Board's review focused on the HdM's system for establishing, reviewing, further developing, and discontinuing degree programs. In addition, the structure of the quality management system was explained to the board, including the process map as well as the strategic processes in academic studies and teaching and their subprocesses. Representatives from individual degree programs provided information on the implementation of strategic processes in the establishment, revision, and discontinuation of degree programs, using specific degree programs as examples. The following examples were cited:

- Example 1: Establishment of the new degree program in Social Media Marketing and Management (B.A.).
- Example 2: Fundamental revision of the Audiovisual Media (M.Eng.) program to establish the new Audiovisual Media Creation and Technology (M.Sc.) program and discontinue the predecessor program.

Furthermore, the administrative areas particularly relevant to academic studies and teaching were presented with the aim of reviewing operational processes in accordance with Section 17(2), sentence 3 of the StAkkrVO. In this regard, staff members from central units such as the Central Student Advising Office, Student Services, the Center for Learning & Development, and the Language Center provided insights into the operational processes in the area of academic studies and teaching. Finally, the complaint management system was explained in more detail with regard to the legal requirements under Section 17(2), sentence 2, of the StAkkrVO.

During the closing session, the Quality Advisory Board provided feedback on quality development at the HdM. The members of the Quality Advisory Board issued the following requirement:

- The HdM must define decision-making processes, areas of authority, and responsibilities for discontinuing degree programs and publish them university-wide. From the Quality Advisory Board's perspective, there is a lack of explicit clarification regarding the scenario in which a degree program is discontinued independently of any further development.

This requirement was supplemented by the following recommendations:

- The role of the university administration should be explicitly stated and described in all processes.
- The HdM should set deadlines for responding to complainants in cases of substantiated complaints.
- An overview listing the contact persons for all types of complaints should be published. If this has already been published—which was unclear at the time of the meeting—the recommendation is no longer applicable.
- In connection with the introduction of the new campus management system, the HdM should examine the extent to which processes and structures can be optimized.
- In the event that the audit is suspended, the HdM should examine whether an adjustment to the following accreditation deadline is necessary. As a general rule, when setting the accreditation deadline, a prior extension must be factored in.

Finally, the Quality Advisory Board commented on the requirements of § 17(1), sentence 4; § 17(2), sentence 2; and § 17(2), sentence 3 of the StAkkrVO:

- Section 17(1), sentence 4, of the StAkkrVO[2] was assessed as fulfilled, with the exception that there is no explicit provision for the case in which a degree program is discontinued without replacement, regardless of any further development (see the requirement of the HdM Quality Advisory Board on page 4 of this accompanying report).
- Section 17(2), second sentence, of the StAkkrVO[3] was assessed as fully met.
- § 17(2), sentence 3, StAkkrVO[4] was reviewed—with the exception of resource allocation—and assessed as met. Resource allocation has not yet been reviewed and will be considered at a later date.

1.2 Monitoring of the Alternative Procedure at the Nürtingen-Geislingen University of Applied Sciences for Business and the Environment

The documentation from the Nürtingen-Geislingen University of Applied Sciences for Business and the Environment (HfWU), particularly the overarching meeting materials, was characterized by a high degree of transparency. Particularly noteworthy were the matrix outlining the measures taken to date regarding compliance with the system accreditation criteria of the StAkkrVO and the next steps in accordance with the recommendations of the HfWU Quality Advisory Board, as well as the draft resolution for the conformity assessment.

Fourth Meeting of the Quality Advisory Board

On March 13, 2024, the fourth meeting of the HfWU Quality Advisory Board was held in person. The meeting began with a discussion of the implementation to date of the Quality Advisory Board's recommendations. Several recommendations have already been implemented by the HfWU or are in the planning stages: A matrix documenting ongoing processes will be updated annually and presented to the Quality Advisory Board. A faculty survey has also been integrated into the internal accreditation process and is to be incorporated into the QM bylaws. In addition, a working group is currently developing a new concept for course evaluation, particularly regarding the design of the questionnaires. An onboarding program for both new and experienced deans of studies is being introduced to familiarize them with tasks within the quality management system and to strengthen collaboration with semester representatives.

[2] "The university has defined decision-making processes, areas of authority, and responsibilities for the establishment, review, further development, and discontinuation of degree programs, as well as the university's own procedures for the accreditation of degree programs within the framework of its quality management system, and has published these university-wide."

[3] "[The quality management system] […] includes procedures for handling internal conflicts at the university as well as an internal grievance system."

[4] "[The quality management system] is based on closed-loop control mechanisms, encompasses all areas of the university's operations that are directly relevant to academic studies and teaching, and is equipped with adequate and sustainable resources."

One of the subjects of the Quality Advisory Board's review was the external evaluation of degree programs. For this purpose, two deans of studies from the most recently accredited Faculty of Environment, Design, and Therapy were initially present for a discussion. In a second meeting, two external students—who had been involved in the process as evaluators for two bachelor's degree programs in the Faculty of Environment, Design, and Therapy—joined the meeting remotely. The Quality Advisory Board concluded that the process for involving external students is, overall, "well thought out and functional" (see minutes of the 4th meeting of the HfWU Quality Advisory Board on March 13, 2024, p. 7). The participation of externally enrolled students with a close academic connection to the subject area—
"genuine" external students, as well as the opportunity to prepare joint reports. The integration of internal and external students in discussions with the Rector's Office was also considered beneficial. The Quality Advisory Board deemed the guiding questions used and the written report appropriate in light of the objectives.

At the same time, the Quality Advisory Board identified room for improvement and made several recommendations (paraphrased here):

- In one instance, for example, it became apparent that the external students had not been clearly informed about which degree programs they were supposed to evaluate. Although the resulting misunderstanding was resolved quickly, a clearer clarification of the assignment—ideally set forth in writing in the participation agreement—is recommended. In addition, the joint preparation of evaluation reports should be officially offered to students as an option.
- To avoid overwhelming students—particularly during cluster evaluations—it is recommended to clarify early on which evaluations the students could undertake. Furthermore, the introduction of a separate discussion format between internal and external students, without the involvement of HfWU, was viewed as a useful addition.
- According to the Quality Advisory Board, direct communication between deans of studies and external students should be avoided to prevent the impression that students are required to justify their actions. Instead, inquiries should be forwarded via the quality management system, and all parties involved should be informed of the designated communication channels. Finally, the current expense allowance for external students should be reviewed and, if necessary, adjusted on a sliding scale to reflect the actual expenses incurred.

In conclusion, the HfWU Quality Advisory Board discussed the implementation and documentation of compliance decisions. It was decided that, when documenting the compliance review conducted by the Quality Advisory Board, the checklist for verifying compliance with the accreditation criteria for quality management systems—which was developed by the three member universities

, should serve as a guide. The Quality Advisory Board also resolved that, at one of its upcoming meetings, all compliance decisions regarding the criteria and sub-criteria addressed to date should be made retrospectively, following a final review of the external evaluation (with a focus on the program advisory boards).

Fifth Meeting of the Quality Advisory Board

The fifth meeting of the Quality Advisory Board took place on July 8, 2024, as an online meeting via Teams. The meeting began with a review of the implementation of recommendations to date. The proposed tiered structure for expense reimbursements for external students—a fixed amount per evaluation plus a supplement for additional degree programs—was welcomed by the Quality Advisory Board. Furthermore, the university explained that in the future, each degree program will establish its own advisory board, a practice that is already being implemented, particularly for new degree programs.

The focus of the meeting was the external evaluation of the degree programs. As part of this process, discussions were held with program directors as well as with academic advisory boards and advisory boards representing professional practice. The Quality Advisory Board assessed the process for involving representatives from academia and professional practice as transparent and functional. It was also positively noted that, at the request of the degree programs, the advisory boards can be expanded to include additional members with relevant expertise.

However, from the Quality Advisory Board's perspective, it did not yet become sufficiently clear during the discussions with the experts and deans of studies how it is ensured that the academic advisory boards systematically and formally review, evaluate, and document the subject-specific criteria of the StAkkVO. The Quality Advisory Board therefore requests that the university develop a plan for how the work of the subject-area advisory boards can be better documented and made usable within the framework of quality management. According to the Quality Advisory Board, one possible approach would be to plan meetings based on the accreditation criteria, as well as to have program directors conduct more intensive preparation and follow-up for the advisory board meetings, supported by the quality management team.

Sixth Meeting of the Quality Advisory Board

The sixth meeting of the Quality Advisory Board took place on October 25, 2024, as an online meeting via Zoom. The meeting revealed that there are still outstanding issues regarding the integration of the program advisory boards into the HfWU's quality management system. The advisory board members therefore intend to focus particularly on the following questions at the subsequent seventh meeting:

- How is impartiality defined both at the individual level (advisory board member) and for the advisory board as a body (composition of the advisory board)? Is this the same for all subject-area advisory boards?
- How does the process for selecting advisory board members work? Who nominates advisory board members, who verifies their impartiality, and who appoints them?
- How is it ensured that all subject-matter criteria can be discussed by the advisory board members during the accreditation period? How are the results documented?
- What (program) documents are available to the subject-area advisory boards as sources of information?

Regarding compliance decisions, it was noted that the accreditation process encompasses many tools and requires an understanding of their interrelationships. The Quality Advisory Board therefore wishes to explore this in greater depth in certain areas. It was decided that compliance decisions should be made and documented as late as possible, but always before a change in the membership of the Quality Advisory Board, so that current decisions are available for the reaccreditation under the Alternative Procedure.

1.3 Support for the Alternative Procedure at Furtwangen University

Fourth Meeting of the Quality Advisory Board

The meeting of the Quality Advisory Board of Furtwangen University (HFU) took place on July 22, 2024, as an in-person meeting in Tuttlingen. During the meeting, questions regarding the requirements and recommendations from previous meetings were addressed, as well as discussions on contracts, delegation of authority in quality management, process maps, student participation in the peer review process, and questions regarding the processes for establishing, further developing, and discontinuing degree programs. In addition, discussions were held with program coordinators, faculty members, and students from the “Mechatronics and Digital Production” (B.Sc.) and/or “Applied Materials Science” (M.Sc.) and “Engineering Psychology” (B.Sc.) programs. Representatives of the Friends of the University Association and the program advisory boards were also involved in subsequent discussions.

First, the requirement issued by the Quality Advisory Board at its meeting on November 7, 2022, was discussed, which reads as follows:

- Pursuant to § 17(2), second sentence, of the StAkkrVO, the independence of the quality assessment must be ensured. To verifiably meet this criterion, it is necessary that

the members of the peer groups sign a written declaration of impartiality. This declaration could, for example, be included in the participation agreement.

At the meeting on January 15, 2024, the advisory board members had pointed out that peers must not only receive the criteria for bias but also actively confirm their impartiality. This requirement has since been implemented: Peers receive the criteria via email and confirm their impartiality via email as well. The Quality Advisory Board therefore considers this requirement to have been met.

Regarding § 17(1), sentence 4 of the StAkkrVO[5], the advisory board members praised the new documentation of the processes in the QM manual. Following the loss of the previous descriptions in the electronic management and assistance systems FINDO (Furtwanger Information and Documentation Software) and FINQUAS (Furtwanger Quality Assurance System), this is viewed as particularly positive.

With regard to compliance with Section 17(1), sentence 4 of the StAkkrVO, the advisory board members made the following recommendations:

- The Quality Advisory Board recommends publishing the newly developed QM Manual within the university and also making it available to students in order to ensure transparency regarding the processes.
- For the process of further developing degree programs, the Quality Advisory Board recommends establishing a list of criteria similar to that used for the process of establishing new degree programs.
- To support the process of discontinuing degree programs, the Quality Advisory Board recommends adopting a phase-out/discontinuation policy for all degree programs, which, among other things, specifies how long after a degree program is phased out exams will still be offered.

Interim Meeting of the Quality Advisory Board

On November 29, 2024, the university and the Quality Advisory Board met virtually via Zoom for an interim meeting. The interim meeting, which takes place approximately half a year after the main meeting, serves to evaluate progress in implementing the requirements and recommendations issued by the Quality Advisory Board and, if necessary, to discuss special topics on which the university seeks the Quality Advisory Board's assessment.

[5] § 17(1), sentence 4, StAkkrVO: "The university has defined decision-making processes, areas of authority, and responsibilities for the establishment, [….,] further development, and discontinuation of degree programs […..] within the framework of its quality management system and has published them university-wide."

During the meeting, two recommendations dated November 7, 2022, were first discussed: First, peer groups should be given the opportunity to engage in dialogue with various stakeholders, such as students and graduates, beyond the information previously provided by deans of studies. Second, it was recommended that alumni surveys be conducted regularly and that their results be made available to the peer groups as early as the kick-off meeting. According to the university, however, both proposals would require far-reaching changes to the quality management system. Greater alignment with the program accreditation process would have organizational and financial implications, such as the need to provide expense reimbursements for external evaluators, which have not been budgeted for thus far. Furthermore, the university explained that implementing the second recommendation would require the alumni survey to be completely redesigned and standardized across all faculties. However, this could only take place after the new organizational model is introduced. The Rector's Office therefore plans to address both recommendations within the newly restructured QM Board, which is to take on the further development of the QM system as its central task.

Subsequently, the recommendations dated January 15, 2024, regarding the Teaching Mission Statement were addressed. It had been recommended to review the mission statement for its relevance—for example, with regard to the profile of bilingualism—to document the revision process, and to improve communication of the mission statement, particularly to students. Currently, the mission statement is discussed during the first-semester welcome event and as part of the onboarding process for new students; it is published on the university's website (see https://www.hs-furtwangen.de/zukunft-erleben/warum-hfu/zentrum-fuer-lehren-und-lernen-zll, last accessed on April 16, 2025). As part of the reorganization of the QM Board[6], the review and further development of the mission statement were defined as a permanent task of quality development and enshrined in the QM Board's rules of procedure. The university also noted that as soon as the new QM Board begins its work, a corresponding process will be developed and documented in the QM manual.

In addition, the recommendations from the last meeting on July 22, 2024, were also addressed. The Quality Advisory Board had recommended making the QM Manual accessible university-wide—including to students—creating a list of criteria for the further development of degree programs, and adopting regulations governing the phasing out or discontinuation of degree programs. Regarding these points, the university explained that the QM Manual will be made available to all members of the university via the HFU learning platform starting at the end of the first or beginning of the second quarter of 2025

[6] As part of the accreditation process under the Alternative Procedure, the university had been required to define the role and responsibilities of the QM Board, a necessity arising from the establishment of the Quality Advisory Board under the Alternative Procedure, since the latter had assumed functions previously performed by the QM Board. Consequently, as part of fulfilling this requirement, the university defined the objectives and responsibilities of the QM Board as an advisory committee of the Senate, thereby repositioning it. At its 124th meeting, the Accreditation Council assessed this requirement as fulfilled.

will be made available to the public. A first draft of a list of criteria for the further development of degree programs is available and is currently being discussed in various committees. The new QM Board is to take over further work on this, and will also ensure alignment with the amended Model Statute and the Study Program Accreditation Ordinance of the State of Baden-Württemberg.

Regarding the phase-out provision, the HFU has developed a regulation stipulating that courses will continue to be offered after their final approval for a period equal to 1.5 times the standard duration of study (rounded up). According to the HFU, this will be incorporated into the General Section of the Study and Examination Regulations. In this context, the Quality Advisory Board pointed out that, in addition to the phase-out provision, a written notice should be prepared for each affected degree program, specifying which courses will be offered for the last time and when. In the course of the new elections, it is also proposed that the Quality Advisory Board be introduced to the newly constituted committees.

2 Findings on Alternative Approaches to External Quality Assurance

2.1 Impressions from the Accreditation Council's monitoring

The documents provided by the universities for the review based on file evidence show that the alternative procedure is being consistently implemented as intended at all three universities. They provide compelling evidence of the thorough work carried out by the Quality Advisory Boards—and, consequently, by the universities—in addressing the system accreditation criteria of the Model Statute. All procedural steps carried out and the measures derived from the review are also transparent to outsiders.

It is particularly clear that the concept of the Alternative Procedure as a continuous system assessment significantly strengthens the role of external evaluators (in the form of the quality advisory boards) as *"critical friends*." The quality advisory boards of all three universities appear to have fully embraced this special role, as evidenced by their intensive and constructively critical engagement with the specific subareas of the quality management systems under consideration.

The iterative examination of individual criteria of the MRVO or specific aspects of the quality management systems is also viewed as beneficial. This applies above all to the quality advisory boards' monitoring of the universities' implementation of these criteria. This enables a more in-depth examination of individual areas of quality assurance and development. At the same time, the quality development of the systems becomes traceable in "real time," so to speak; the sequence of identifying needs or opportunities for improvement and their implementation thus also becomes transparent to external stakeholders.

Another positive aspect here is that criteria, which are sometimes addressed less comprehensively in the comparatively more condensed system accreditation procedures, can be given more attention in the alternative procedure. This applies, for example, to the discussion of performance areas directly relevant to studies and teaching during the Quality Advisory Board meeting at the HdM. Ideally, the nuanced work of the quality advisory boards and the resulting measures taken by the universities can also serve as individual examples of *best practices* through exchanges among the stakeholders.

In some cases, there is still potential for further development or optimization of the implementation of the alternative procedure, which will be addressed in the following chapter.

2.2 Notes on the Possible Further Development of the Alternative Procedure

To provide context for the following points, it should first be noted that, according to the State Treaty on Study Program Accreditation, the Accreditation Council is also responsible for ensuring consistent decision-making practices regarding the interpretation of criteria. The question of how consistent decisions can be reached within the accreditation system across different procedural approaches presents a fundamental challenge. In alternative procedures that address the system level—as in the present case—the Accreditation Council delegates part of its authority to the higher education institutions conducting the procedure, so that they also bear shared responsibility for ensuring consistency in decisions regarding the system accreditation criteria.

The universities' documentation makes it clear that the quality advisory boards diverge from the Accreditation Council's previous decision-making practice on certain points regarding the assessment of criteria implementation. This is evident, for example, in the recommendation of the HFU Quality Advisory Board regarding the criterion under Section 17(1) of the StAkkrVO, which requires that the quality management manual be made accessible within the institution and to students. To date, the Accreditation Advisory Board has interpreted the requirement for "university-wide publication" of the aforementioned criterion to include students as a mandatory requirement. The present recommendation could be understood to mean that this group is not necessarily covered by the criterion.

In this context, the critical inquiries raised by the Quality Advisory Boards of the HfWU and the HFU regarding the structure of internal program accreditations are also acknowledged; on the one hand, this concerns the issue of the comprehensiveness of the criteria review and the use of guiding questions in internal accreditation procedures (HfWU)—which has been repeatedly criticized by the Accreditation Council in system accreditation procedures in the past—as well as the

involvement of internal stakeholder groups—and in particular students—in the evaluations conducted by external reviewers (HFU). The quality advisory boards should be encouraged to continue to critically monitor these issues.

In this context, the issue of divergence can be viewed from two perspectives. On the one hand, with regard to the implementation of the alternative procedure, it should be examined how the Quality Advisory Boards' engagement with the Accreditation Council's decision-making practices could be conducted more consistently in their work. This includes, in particular, the question of how the Quality Advisory Boards can obtain relevant information on the Accreditation Council's decision-making practices.

On the other hand, the criteria for the accreditation of degree programs and quality management systems also allow for some leeway in interpretation, the use of which is expressly encouraged, as made clear in the introduction to the explanatory memorandum for the Model Statutory Ordinance. If decisions made in alternative procedures diverge from the Accreditation Council's decision-making practices, this can also lead to a fruitful discourse on the interpretation of the criteria. If a divergent interpretation of the criteria appears to be emerging, contact could be sought with the Accreditation Council, for example, requesting its assessment of the matter. This would also enable the Accreditation Council to review its own decision-making practice and, if necessary, adjust it in the future.

2.3 Signs of New Insights

In the context of monitoring the alternative procedures at HdM, HFU, and HfWU, certain questions are already emerging whose further examination could reveal potential for the further development of the accreditation system. The following questions have arisen so far:

- How can consistent decisions be ensured across different procedural frameworks? In the case of system accreditation or system-accredited institutions, this concerns the program level; in the case of alternative procedures, it concerns the program level and, where applicable, the system level. In alternative procedures involving an accreditation agency, it can be assumed that the agency's representatives will pass on relevant information to the decision-making bodies, since the agencies generally have insight into the Accreditation Council's decision-making practices as part of their own activities. For system-accredited institutions of higher education with systems that do not involve agencies, this access is not immediately available; in such cases, ways would need to be found to make information on the Accreditation Council's decision-making practices accessible to the institutions that conduct institutional procedures.

- From the opposite perspective: How can information on the decision-making practices of system-accredited or institutionally accredited higher education institutions reach the Accreditation Council, with the aim of fostering a mutual exchange regarding the interpretation of the criteria? What formats would be conceivable for this?
- In “high-frequency” accreditation processes with short-term resubmission cycles, are requirements necessary, or are recommendations sufficient here? Can the continuous support of the institution as *“critical friends”* in such “ongoing processes” lead to a change in the role of evaluators, such that the cooperative yet critical assessment of the subject under review renders control mechanisms largely superfluous?
- Can general insights for the design of system accreditation procedures or the internal processes for the further development of quality management systems at universities be derived from an in-depth examination of the system accreditation criteria?

2.4 Assessment by the Universities

The universities thank the Accreditation Council for its careful and nuanced evaluation of the procedural steps taken to date. The assessments and evaluations contained in the report largely reflect the experiences and observations that the three universities have made in their collaboration with the quality advisory boards and in the implementation of the quality advisory board model.

On the one hand, the universities can confirm the added value of the alternative procedure highlighted in the report. Compliance with the accreditation criteria is ensured by the systematic approach of the quality advisory boards. They are responsible for regularly reviewing the criteria specified by the StAkkrVO, issuing requirements and recommendations as necessary, and thus ensuring that the quality management systems function in accordance with the criteria. Furthermore, the universities also see significant added value in the process for the continuous development of their internal quality management systems (QM systems).

The results of the interim evaluation also indicate that the visibility of the topic of “quality” is increasing across the university and is being recognized more strongly by the individual member groups within the universities. For example, the chair of the Quality Advisory Board reports once a year to the Senate or to the joint meeting of the Senate and the University Council

. In particular, the consortium shares the Accreditation Council's assessment that the Quality Advisory Boards have proven themselves in their role as "critical friends," with Quality Advisory Board members carrying out their duties with a high degree of professional and personal responsibility and evaluating the instruments and processes under review critically and carefully. This strong sense of commitment is also evident in the fact that nearly all Quality Advisory Board members were available for another three-year term (changes occurred only among two student members due to the completion of their studies), thereby ensuring not only professional and methodological continuity but also personnel continuity.

Likewise, the members of the consortium see a decisive advantage of the alternative procedure in the fact that the Quality Advisory Boards gain deeper insight into the universities' quality management systems with each review topic and personally monitor compliance with the conditions they previously imposed, as well as the further developments resulting from their recommendations. If necessary, aspects relevant to accreditation—as well as those beyond it—can be addressed again upon resubmission. If, for example, the legal framework changes—as was most recently the case with the Model Statutory Ordinance—the quality advisory boards monitor the universities' implementation, evaluate it, and also re-examine previously issued requirements and/or recommendations in light of the changed legal situation, so that adjustments can be made as needed. Compared to standard system accreditation, the alternative procedure thus also offers the advantage of being able to react quickly to changed requirements. The quality advisory board model also makes it possible to develop tailored measures through dialogue between the institution and the quality advisory board. This is a process that is neither provided for nor possible in conventional accreditation procedures, but has a significant impact on the quality and acceptance of the measures at the institutions.

In contrast to published guidelines accessible to everyone—such as the MRVO—universities view the ever-evolving case law on the one hand and continuous evaluation on the other as a systemic challenge that, if fully implemented, leads to a significant increase in complexity. To the extent that adjudication practice is not (yet) reflected in the FAQs or other publications by the Accreditation Council regarding the interpretation of the MRVO, this practice constitutes implicit guidance from the Accreditation Council for the consortium universities and the advisory agency. In order to take adjudication practice into account, it should be made explicit accordingly.

With regard to the further development of the Quality Advisory Board model, it is in any case helpful for the consortium partners to know whether conformity decisions deviate from established practice. Therefore, it would be beneficial if the consortium partners were informed by the secretariat

of the Accreditation Council—which always receives the complete documentation of the advisory board meeting(s) that took place after one year has elapsed—about any anomalies in the conformity decisions made.

This gives the consortium's universities the opportunity to coordinate across institutions, involving the chairs of the quality advisory boards. Should this cross-institutional coordination reveal that an even broader exchange would be beneficial for clarifying the issues, a consortium-wide discussion involving all quality advisory boards could be initiated. Such a discussion, thanks to its broad base, the subject-matter expertise of the individual members, and a perspective that spans three different quality management systems, would likely lead to valuable insights and, at the same time, to moderate and balanced solutions. If the results of the discussion are fed into the Accreditation Council via the secretariat, it can be expected that this will spur further development of the accreditation system as a whole. This, in turn, contributes to the goal of alternative procedures as formulated in the MRVO.

The structural parity between the Accreditation Council and the Quality Advisory Board in the review of system accreditation criteria, as set forth in the model, could be addressed through the publication of guidelines on the interpretation of the MRVO by the Accreditation Council. Compared to current decision-making practice, we believe this would represent an improvement consistent with the systemic further development of the accreditation system through the alternative procedure. Such explicit and general guidelines would provide clarity and give universities greater certainty in implementing appropriate development measures. In the assessment of the member universities, this could yield positive effects for the entire accreditation system.

3 Proposals for the Further Structure of Monitoring

The present review of the documents shows that, based on the available records, the ongoing monitoring of the alternative procedure at HdM, HFU, and HfWU is initially sufficient. The overarching meeting documents and minutes are sufficient for the document review; should there be a need for additional documents, the Accreditation Council would contact the universities. The institutions are requested to send the relevant documents to the Accreditation Council's secretariat at the end of each year or upon completion of the respective procedural step.

The three participating institutions had already announced in their application that they would conduct a midterm evaluation. In the summer of 2024, the three institutions—HdM, HfWU, and HFU—agreed to prepare a joint section of the self-evaluation as well as individual sections for each

institution. In the joint section, statistical data was collected, and various stakeholder groups (university administrations, quality advisory boards, senates, deans' offices, the steering committee and coordination group of the joint project, and the quality assurance agency) were surveyed. The results are to be analyzed both on an institution-specific basis and across institutions, and discussed in the relevant bodies.

The Accreditation Council is looking forward with interest to the results of this evaluation; it would be desirable if representatives of those involved in the alternative procedure and the Accreditation Council could exchange views on the experiences that have already been gained. Likewise, this forum could be used to discuss whether insights relevant to the accreditation system and its potential further development can already be drawn at this stage.

4 Monitoring Process

4.1 General Notes

The monitoring was conducted on the basis of the following documents submitted by the universities:

- HdM:
  - Consultation documents for the third meeting of the Quality Advisory Board of the Stuttgart Media University (HdM) focusing on “Strategic and Operational Processes in Academic Programs and Teaching”
  - Minutes of the 3rd meeting of the Quality Advisory Board of the Stuttgart University of Media (HdM) held on July 3, 2024, at the HdM Stuttgart
- HfWU:
  - Draft resolution for the conformity reviews by the HfWU Quality Advisory Board
  - Attachments for the 4th meeting on March 13, 2024
  - Documentation of the Advisory Board’s Work on Degree Programs and Curricula, as of July 2024
  - HfWU’s Follow-Up on Previous Recommendations from the Quality Advisory Board, as of July 2024
  - Annual Report for the Quality Advisory Board of the Nürtingen-Geislingen University of Applied Sciences for Business and the Environment (HfWU)
  - Minutes of the 4th meeting of the Quality Advisory Board of the Nürtingen-Geislingen University of Applied Sciences for Business and the Environment (HfWU) on March 13, 2024 (held in person in Nürtingen)
  - Minutes of the 5th meeting of the Quality Advisory Board of the Nürtingen-Geislingen University of Applied Sciences for Business and the Environment (HfWU) on July 8, 2024 (held online)
  - Minutes of the 6th meeting of the Quality Advisory Board of the Nürtingen-Geislingen University of Applied Sciences for Business and the Environment (HfWU) on October 25, 2024 (held online)
- HfWU:
  - Revised Proposed Agenda for the Quality Advisory Board Meeting on July 22, 2024, in Tuttlingen
  - Preparatory documents for the meeting of the Quality Advisory Board of Furtwangen University on Monday, July 22, 2024, at the Tuttlingen campus
  - Excerpt from the overall process map of Furtwangen University pursuant to Section 17(1), Sentence 4 of the StAkkrVO
  - Agreement on Participation in the Quality Advisory Board of Furtwangen University
  - Minutes of the 4th Meeting of the Quality Advisory Board of Furtwangen University (HFU)

- Draft Agenda for the 5th Meeting of the HFU Quality Advisory Board on November 29, 2024
- Draft: Proposal for a regulation on “Discontinued and Phased-Out Degree Programs” at Furtwangen University—Computer Science, Engineering, Business, Media, Health
- Draft: Rules of Procedure for the Quality Management Board of Furtwangen University
- Minutes of the 5th Meeting of the Quality Advisory Board of Furtwangen University (HFU) (held online via Zoom)

4.2 Legal Basis: *State Treaty on Study Program*

Accreditation, Model Statutory Ordinance / State

Statutory Ordinance, European Standards and

Guidelines (ESG)

Rules of Procedure for Alternative Accreditation Procedures (VoAAv)

4.3 Supervision by the Accreditation Council (Section 34(5), Sentence 2, MRVO)

- Prof. Dr. Christine Bescherer, Ludwigsburg University of Education

4.4 Support from the Accreditation Council’s Secretariat

- Adriane Janosch
- Ulf Schöne