

November 26, 2009

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Changes in Quality Assurance: the Case of Germany*

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*) This paper was presented at a seminar organized by the European Consortium for Accreditation in The Hague on December 09, 2009.

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I. Introduction

The German version of the Bologna reform in higher education aimed at serving a double purpose:

- (1) to further develop the cohesion between the European countries by creating a common higher education area and
- (2) to solve specific problems of the German university system, such as
 - the long average study duration,
 - a high attrition rate,
 - the lack of adequate funding in view of increasing numbers of students,
 - the disregard of basic requirements of employability in many curricula.

On the one hand, the responsible politicians stressed the Bologna goals of introducing

- easily readable and comparable degrees,
- a two-tier study system,
- a credit point system on the basis of student workload
- as well as enhancing mobility and
- fostering international cooperation in the area of QA/QM and in every other dimension of higher education and research.

On the other hand, they tried to solve the structural problems of the German system by demanding that all new Bachelor and Master programs must be accredited on the basis of detailed assessment criteria. Exceptions were medicine and law where state exams continued to prevail.

This meant that 10-16 thousand new study programs were expected to emerge out of the traditional diploma and magister artium-system as well as the state-controlled teacher education.

Under the supervision of the German Accreditation Council (AC) six Accreditation Agencies carried out the program accreditation according to standards and guidelines prescribed by the AC. Opposition against the Bologna reform was strong in the universities. Especially in the southern federal states professors and university leaders insisted that excellence in research was the only prerequisite for a good academic education. They polemicized against the Bachelor programs as being sub-standard tracks for the intellectually “underexposed” students who should not have been admitted to the university in the first place. The “Universities of Applied Sciences” (Fachhochschulen), however, were very much in favor of the new study programs and degree structure because they felt upgraded by the new right to offer Master degree programs.

In the northern and western federal states the ministries of higher education tied the funding of the study programs to successful accreditation from the very beginning of the Bologna process. Therefore practically all programs have been accredited to date and quite a few of them are in the process of re-accreditation already.

The opposition of the southern coalition of university leaders and politicians on the one hand and the growing conviction in the northern part of Germany that after the completion of the system change quality assurance and quality enhancement should be the primary responsibility of the HEIs themselves led to the introduction of the so-called “System Accreditation” (SA) in 2008/9. In the SA the functioning of the QA/QM system of the institution is the main object of the accreditation procedure. This implies that the quality of the study programs is confirmed by inference from the positive validation of the QA/QM system.

A sample of study programs are assessed in detail during the accreditation process, however, and three out of eight main features of a modern Bachelor or Master program are scrutinized across all programs of the institution.

II. Main features of System Accreditation

The System Accreditation can be briefly outlined as follows:

1. Procedure

- 1.1 In order to be eligible for SA a HEI must prove that for every 2500 students at least one study program has already been accredited. In addition, at least one “state regulated” program and one program in the area of teacher education must have successfully undergone the program accreditation if such programs are offered by the institution.
- 1.2 The HEI has to present to the accreditation agency a documentation describing the internal governance structure, a mission statement, the academic profile and the educational programs on offer, explicitly defined quality goals, and the system of internal quality assurance and quality enhancement in teaching and learning. The educational and research profile has to be embedded in a strategy for the institutional development of the university. A statement of the elected student representatives validating the documentation is also required.
- 1.3 The assessment procedure consists of two site visits of a group of five experts (three panel members with expertise in HE management and QA, one student with experience in institutional governance and accreditation, one representative of the employment sector) and an in-depth evaluation of a sample of study programs.

1.4 During the first site visit the panel members talk to all stakeholders in the university and to the authors of the self-report in order to gain a proper understanding of the internal governance structure and steering mechanisms of the institution and to find out whether the information provided is sufficient. In order to streamline the SA procedure the panel of experts takes a first preliminary decision on the sample of study programs to be validated according to the standards and guidelines for program accreditation (PA) issued by the Accreditation Council. They also decide which three out of eight main features characterizing the Bachelor and Master programs they want to review across all the study programs of the institution. Evidence of the way the university has administered the proper implementation of these attributes must be provided prior to the second site visit.

1.5 The eight features out of which one has to be chosen by the expert panel while two are selected randomly read as follows:

- (1) Definition of educational goals,
- (2) Adherence to the prescriptions concerning credit point systems (ECTS) and the modularization of study programs,
- (3) Definition of access requirements, recognition of externally gained credits and prior learning, and selection procedures,
- (4) Workload of students,
- (5) Physical (classrooms, libraries, IT, laboratories etc.) infrastructure and teaching personnel available for each program,
- (6) Organization and co-ordination of teaching and learning,
- (7) Module- and competence-oriented student assessment systems, the burden on students and teaching personnel implied by them, and the published information about these assessment systems,
- (8) Subject-specific and general student counseling.

If state-regulated programs are offered (teacher education, for example), one of the special features characterizing these programs must also be included in the sample.

The institution has to demonstrate that these features have been scrutinized by its own (internal) quality assurance system or – in the course of an accreditation exercise – by an (external) quality assurance agency.

1.6 During the second site visit the expert panel critically analyzes the report and documentation provided by the HEI and reviews the material on the selected features of the study programs. The panel members talk to the university leadership, representatives of faculty, students and support staff and to the commissioner for gender equality. In view of their findings the experts review the selection of study programs to be included in the sample of programs which will be assessed according to the rules for program

accreditation. They draw up a draft report on the institution's QA/QM system, which will then be handed over to the expert groups in charge of assessing the selected sample of study programs.

- 1.7 The sample of study programs to be assessed in detail comprises 15% of all programs offered, minimally three programs. The selection takes account of the results of the review of program features, of the critical findings regarding the functioning of the QA/QM system, the entire spectrum of programs offered, the relation of Bachelor to Master programs and of "small" and "large" programs. In addition, one of each type of state-regulated programs, in particular one of every type of teacher education programs has to be included. If the observation of these criteria leaves some freedom of choice the selection has to be made at random. If a study program is included in the sample which has been accredited during the last three years, a desktop validation on the basis of the accreditation documents suffices.
- 1.8 For each assessment of a study program in the sample a separate expert panel is formed. In the cases of theological study programs and programs for teacher education representatives of the church or the ministry of education, respectively, have to be included in the panel. While the assessment does not lead to an accreditation decision it is important that flaws and weaknesses detected are appraised as to whether or not they are a consequence of functional deficits of the QA/QM system.
- 1.9 In co-operation with the peer group leaders and in view of the program evaluations the members of the SA panel draw up the final report. The report makes an explicit judgment on the effectiveness of the QA/QM system of the institution and explicates whether problems detected in the sample of program features or in the sample of evaluated programs can be traced back to functional deficits of the QA/QM system. It concludes with a recommendation to the commission of the agency responsible for the final accreditation decision as to whether or not the QA/QM system of the institution should be accredited. Before this final decision is made by the competent body the report (void of the recommendation) is sent to the university to be checked for factual mistakes.
- 1.10 The accreditation decision is made on the basis of the panel report and the comments of the HEI. The decision can only be an unconditional "yes" or "no", even recommendations for improvement are not permitted. However, the accreditation procedure can be suspended for a period of usually 12, maximally 24 months, if the institution needs more time to produce sufficient and satisfactory evidence in some area of assessment. The accreditation agency publishes the decision, a summary of the panel report and the names of the experts on the panel. A negative decision must be substantiated. If

the HEI files an objection against the decision, an independent group of experts deals with the complaints and produces a proposal for a final decision.

The (positive) accreditation is valid for 6 years. It implies that all study programs of the HEI which were controlled by its QA/QM system or newly developed after the accreditation are acknowledged as accredited programs.

- 1.11 The assessment of a sample of study programs has to be repeated after three years (“half-time sample”).
- 1.12 The SA can be restricted to an organizational subunit of the HEI, if the university leadership provides good reasons for such a restriction and if it can show that the QA/QM system of the subunit is embedded in an institution-wide QA/QM system.
- 1.13 The re-accreditation of the QA/QM system follows essentially the same rules and criteria as the initial accreditation. However, the HEI must include in its documentation
 - the report on the “half-time sample” and
 - measures taken to deal with the problems detected during the assessment of the “half-time sample”.

2. Criteria

In order for a HEI to be successful in the SA it must meet six criteria prescribed by the Accreditation Council. These criteria spell out detailed requirements which can only be briefly summarized in this presentation.

2.1 Criterion 1:

The HEI has defined and published an educational profile for its programs and the institution at large as part of its development strategy. It continually revises the educational goals of its programs.

2.2 Criterion 2:

The HEI has a steering system in place which guarantees that the educational goals of its study programs include high academic standards, employability, citizenship and personal development. The steering system guarantees that the goals of the Bologna reform in general and of the National Qualification Framework in particular are met, that all state requirements are fulfilled and that all stakeholders are involved in the reform process and in the enhancement of the quality of the institution’s educational processes.

2.3 Criterion 3:

The HEI applies a system of QA and quality enhancement which meets the ESG for Quality in Higher Education.

2.4 Criterion 4:

The HEI has a reporting system in place which documents the structural and procedural characteristics of the educational programs as well as the processes, measures, results and effects of the QA/QM system.

2.5 Criterion 5:

The competences, responsibilities and decision making processes in the QA/QM system for teaching and learning are clearly defined and published.

2.6 Criterion 6:

At least once a year the HEI informs its commissions for teaching and learning as well as the general public and the owner of the HEI about measures and results of quality assurance and quality enhancement in teaching and learning.

III. Problems

The introduction of SA in addition to PA poses a number of additional problems for the future development of QA in the German HE system.

1. Problems in the execution of SA:

- Reviewing three out of eight comprehensive features of an educational program across all programs on offer entails an extreme expense of time and energy. It cannot be done in a few hours during the second site visit.
- It is not clear at all how the size of the program sample has to be determined.
- It remains unclear how the HEI is expected to prove the existence and effectiveness of a QA/QM system. Is it sufficient to describe its elements and the communication network connecting them? Or is it necessary to present documentation of the running operations of the system?

2. Problems of proper judgment in SA:

- Since it is possible that all the educational programs of the HEI have been accredited prior to the SA the quality of the programs may be a result of the process of program accreditation and not reflect the effectiveness of the institution's internal QA/QM system.
- If in the program sample flaws are detected the expert team is expected to decide whether these flaws are caused by a malfunctioning of the QA/QM system. However, what other causes, if any, could be held responsible for the deficiencies?

3. Problems of transition to SA:

- After ten years of program accreditation it has become apparent that important quality standards and criteria of the Bologna reform have not been properly and effectively fulfilled. Therefore thorough redesigning and realignment of many programs is an undisputable necessity. If many HEIs should be successful in SA in the near future they will not put their study programs through a re-accreditation process. It will then be practically impossible to bring about the necessary corrections in due time.
- When starting an SA process it is assumed that the HEI has already applied its QA/QM system to all its educational programs. How then is it possible that some universities have applied for SA only a year after the possibility of SA was opened up?
- Counseling in connection with accreditation is strictly forbidden. An independent counseling service for the development of QA/QM systems did not exist and could not be set up prior to the publication of the standards and guidelines for SA. Thus QA in Germany has had no chance to grow from QA at program level to QA/QM at institutional level.

4. Problems of enhancing quality by SA:

A problem inherent in accreditation in general and in SA in particular is its conservative or static nature. The accreditation process examines whether certain external standards are met or not. In contrast to an evaluation or institutional audit it leads to a “yes or no” decision, abstaining from any kind of recommendation or requirement for change. Therefore, an independent third party, like the owner of the university, the ministry of higher education or some other authority, is needed in order to provide the necessary incentive and backing for measures of improvement to be taken by the university leadership. Thus any kind of accreditation should be linked to some form of strategic management by contract. The accreditation procedure in Switzerland is a good example in kind.