

The impact of accreditation on the reform of study programmes in Germany

by

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The Bologna Process put in motion a series of reforms for higher education. In Germany, the “Bologna reform” focused national standards and guidelines which served as criteria for obligatory programme accreditation by external bodies. This article reports on the results of an empirical study that examined the effects and limitations of accreditation as a means of monitoring the reform of study programmes. An analysis of 1 380 accreditation decisions taken in the Federal State of Lower Saxony between July 2004 and December 2009 and a series of interviews of key actors in the state’s 36 higher education institutions gave rise to a better understanding of whether accreditation does in fact support HEIs’ quality assurance goals.

L'impact de la certification des diplômes sur la réforme des programmes d'études en Allemagne

par

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Le Processus de Bologne a entraîné une série de réformes dans l'enseignement supérieur. En Allemagne, la « réforme de Bologne » a ciblé les normes et directives nationales qui ont servi de critères pour la certification obligatoire des programmes par des organismes externes. Cet article fait le point sur les résultats d'une étude empirique portant sur les effets et les limites de la certification des diplômes comme moyens de mise en œuvre de la réforme des programmes d'études. L'analyse de l'adoption de 1 380 décisions sur la certification des diplômes dans l'État fédéral de Basse-Saxe entre juillet 2004 et décembre 2009 ainsi qu'une série d'interviews effectués auprès d'acteurs clés dans 36 établissements de l'enseignement supérieur de cet État ont permis de mieux comprendre si la certification des diplômes permet en effet de soutenir les objectifs d'assurance qualité des EES.

The aims of the study project

The Bologna Process, which was launched in 1999, led to an in-depth reform of the higher education system in Germany. However, after ten years of assuring quality through programme accreditation, it is clear that while the reform has had positive effects in many ways, there are also a number of problem areas. This has led the Central Evaluation and Accreditation Agency (ZEvA), Hanover, to carry out an empirical investigation destined to provide higher education institutions (HEIs) with the information and advice they need in order to make internal adjustments and to lay the foundations for advancing and/or refining the process of external quality assurance and control.

This study provides an evaluation of the accreditation decisions concerning study programmes made between July 2004 and December 2009 in 25 HEIs and 11 vocational academies in the Federal State of Lower Saxony. In addition, managers in the HEIs responsible for the structural reform of study programmes, as well as student representatives, were asked to give their opinion on the reform process and its results.

During the course of our investigations, we sought to answer the following questions:

- Have the reform goals and quality criteria been accepted by the HEIs?
- To what extent do the new study programmes live up to the structural reform criteria imposed by Ministers of Education and the Accreditation Council?
- Has the state been able to successfully assess and control the reform process through accreditation?
- What, according to reform managers and students, are the obstacles that have hampered the reform?
- Are there other forms of quality control that might be more appropriate?

The structural reform of the German higher education system: quality control through accreditation

The Bologna reforms aimed, notably, to:

- introduce a system of easily understandable and compatible degrees;
- introduce a credit point system (ECTS);
- promote mobility;

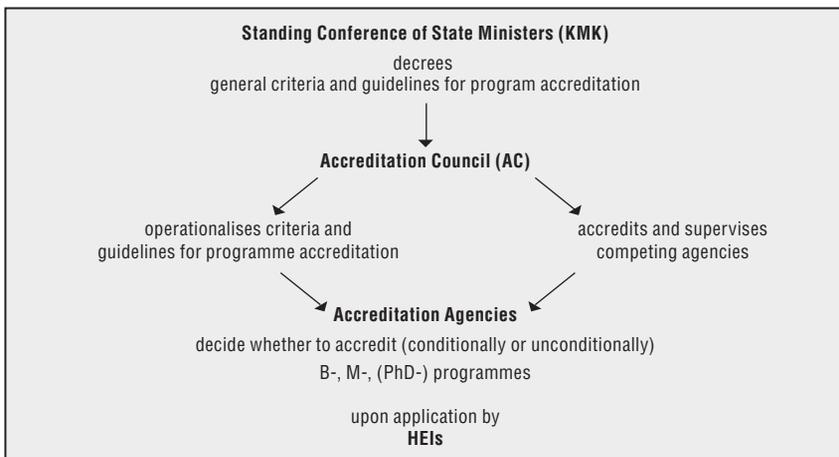
- strengthen the European dimension of higher education; and
- cultivate international co-operation in quality assurance.

In Germany, these goals were complemented by the following objectives:

- shorten the effective duration of studies;
- reduce attrition rates;
- limit funding requirements despite a growing number of students; and
- focus on labour market requirements at the expense of general academic education (Künzel, 2009).

The national accreditation system has some particularly striking features, such as elaborate external control mechanisms based on detailed criteria and guidelines. These do not, however, take explicit account of all aspects of the extended catalogue of reform goals. Another characteristic of the accreditation process is the specific organisation of the accreditation system itself (Kohler, 2011) (Figure 1).

Figure 1. **The German accreditation system**



The system has a three-tier structure: first, the Standing Conference of State Ministers of Education and Cultural Affairs (KMK) issues general prescriptions for the reform in terms of accreditation criteria as well as rules and regulations for the process of programme accreditation (Kultusministerkonferenz, 2010). Second, the Accreditation Council (AC) transcribes these prescriptions into concrete rules and regulations and transmits them to the accreditation agencies (Akkreditierungsrat, 2010a). Lastly, the accreditation procedures are carried out by accreditation agencies that have been licensed (accredited) by the AC (i.d., 2010b). Although these agencies do not make a profit from this exercise, they compete

amongst each other for clients. This can lead to agency-specific interpretations of the guidelines and criteria, thus causing inconsistencies in study reform across the country (Künzel, 2011). In addition, specificities in individual states which deviate from the commonly agreed accreditation criteria issued by the KMK tend to increase such inconsistencies (*i.d.*, 2009).

The design and methodology of the study

The process of structural reform of educational programmes involves three levels of authority – those of:

- control by the political system;
- external assessment and control by the accreditation system; and
- implementation and quality assurance by the management of the HEIs.

The issue of whether central or decentralised control bodies are involved and how they interact provides further variables. The central *versus* decentralised powers in question are the AC and the agencies (at the level of external control), on the one hand, and the central leadership of the HEIs *versus* the decentralised management of the departments, on the other. However, this study does not discuss the problems emanating from the interaction between the AC and the agencies; neither does it elaborate in detail on the differing views of central leadership and the HEI department managers.

Because of the complexity of the subject we explored, two complementary methodological approaches were adopted: first, 1 380 accreditation decisions taken between July 2004 and December 2009 concerning study programmes in Lower Saxony were scrutinised and the publicly available documentation relating to this process was carefully studied. Second, the results of this analysis were used to generate interview questions for those responsible for reform in the HEIs as well as student representatives. The study was conducted on the basis of a standardised questionnaire.

Analysing the documentation

An attempt to analyse the accreditation documents by means of statistical methods proved to be difficult because the conditional accreditation decisions which revealed the violation of AC quality standards were formulated in extremely diverse and inconsistent ways. A second major problem resulted from the differing levels of abstraction on which the accreditation criteria were defined, as well as the fact that they were partly overlapping. The documents were therefore examined from three different angles:

- AC standards;
- the AC criteria which implicitly define these standards; and
- violations of these criteria as stated in the conditional accreditation decisions.

Therefore, the caveats linked to conditional accreditation decisions had to be translated into clear, standardised statements that defined the respective deviations from individual AC standards. In order to do that, each standard had to be transcribed into all conceivable ways of violating it. Subsequently, all conditional accreditation decisions were translated into standardised statements that were then codified for the purpose of statistical analysis (see Appendix A1). These transcriptions had to be done in an intersubjectively consistent manner so that it did not matter which one of the research assistants had worked on them. The process of codification was therefore tested extensively until a high standard of intercoder reliability (87%) was reached.

In addition to the conditional accreditation decisions, the following information was encoded: the characteristics of the HEIs that were offering new study programmes, the study programmes themselves, and the number and kind of violations of AC standards. The conditions on which the accreditation decisions were contingent were then interpreted as indicators of implementation problems; this in turn implied that either the reform process was not being well administered by means of programme accreditation or that the HEIs were not able, or not willing, to meet certain AC standards.

The analysis of the accreditation or reaccreditation documents comprised all the Bachelor, Master and PhD programmes that had been introduced by the HEIs and vocational academies in Lower Saxony during the period in question. For 93% of the programmes, all the required data were available.

Online survey and interviews

The kind and number of violations of AC standards detailed in the conditional accreditation decisions were viewed as indications of problems hindering the implementation of the reform process. In order to gather subjective information about these objective empirical data, the drivers of reform in the HEIs, as well as student representatives, were asked to give their opinion on three topics:

- the validity of the reform goals and the quality criteria set by KMK and AC;
- the subjective and objective obstacles impeding the reform; and
- how effectively and efficiently the reform had been managed and the effectiveness and efficiency of quality control through programme accreditation.

Online questionnaires were sent to vice-presidents of HEIs, Bologna commissioners, quality managers, deans of study and programme managers. The respondents were also given the opportunity to make suggestions on where and how external conditions could be improved in order to make the reform

successful. They were asked to give their opinion about more effective methods of quality assurance and institutional management in general. Consequently, the questionnaires were composed of a mixture of open and closed questions.

In addition to this survey, 24 interviews with selected student representatives from 10 HEIs were conducted in order to collect more detailed information about the mechanisms related to the reform process, the conditions in which it took place and any problems experienced. The students were selected so as to represent major study areas in the higher education system.

Results of the study

Analysis of the accreditation documents

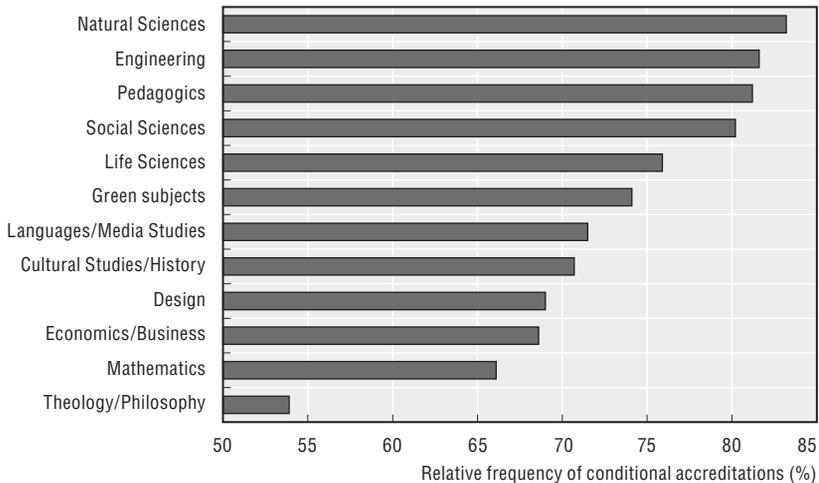
Of the 1 380 accreditation decisions analysed, 1 036 pertained to university programmes, 329 to study programmes at universities of applied sciences (*Fachhochschulen*) and 15 to programmes at vocational academies (*Berufsakademien*). Of the accredited programmes, 644 were Bachelors and 710 were Masters. In relation to the decisions themselves, 365 (i.e. 26.5%) were unconditional accreditations and 1 015 (i.e. 73.5%) were conditional; there were a maximum of 14 conditions per programme, but only 2 on average.

“Conditional accreditation” signifies that the HEI in question has to demonstrate to the agency within a certain period of time (defined by the rules of the AC) that it has met the specified caveats. If it fails to do so, the accreditation is revoked by the agency. The data show that the percentage of conditional accreditations has gone up from 60% in 2004 to almost 90% in 2009 (the relative frequency of conditional accreditations depends on the year of decision [Cramérs $V = 0.15$; $p < 0.001$]). This trend is paralleled by a rise in the number of reports of violated criteria per programme, but there is no difference between accreditation and re-accreditation decisions in this respect.

The number of caveats in conditional accreditation decisions was especially marked between 2008 and 2009. This poses the question whether control through accreditation had increased over time. It is not clear, however, if this was indeed the case because the number of available data is too small and the time series does not extend beyond 2009. What can be safely assumed, however, is that over the course of a decade, the professionalism of the panels of experts employed by the agencies and – even more so – of the agencies’ standing accreditation commissions grew significantly, thus leading to a more critical perception of the quality of programmes.

A further guiding question concerned possible differences in the reform process according to study areas (Figure 2). These were aggregated into 12 major subject areas according to similarities of academic culture and

Figure 2. **The relative frequency of conditional accreditations across 12 main study areas**



research methodology. While, on average, 73.6% of all accreditation decisions were conditional, an even higher percentage of conditional accreditations were documented for 6 of the 12 main study areas [$\chi^2(11) = 42.6$; $p < 0.001$].

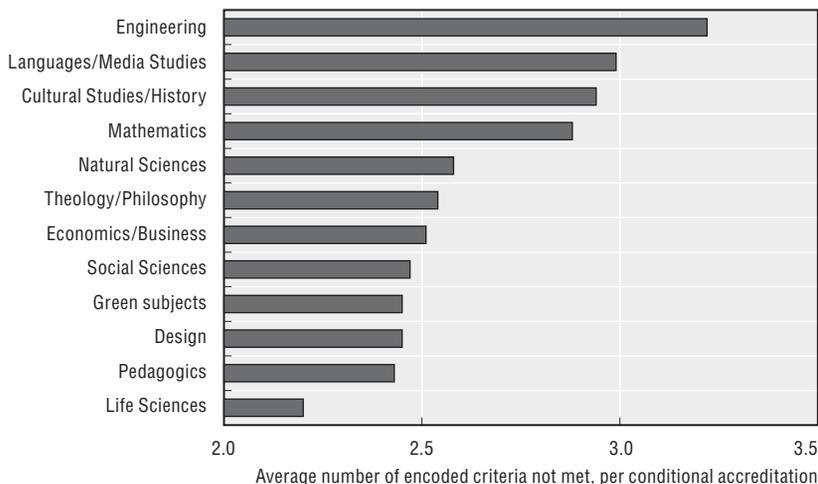
Study programmes in the natural sciences (Chemistry, Physics and Geosciences) showed the largest percentage of violations of quality criteria (83.2%), followed by Engineering, Pedagogics and Social Sciences.

The average number of violations per study programme is 2.72. The programmes that showed the most violations of accreditation criteria were Engineering Sciences, followed by Language/Media Studies, Cultural Studies/History and Mathematics [Kruskal-Wallis-Test; $\chi^2(11) = 27.1$; $p < 0.01$] (Figure 3).

These results imply that the obstacles hindering the reform process differed widely across the major study areas. Especially resistant to change seem to be the “MINT” subjects (Mathematics, Informatics, Natural and Technological Sciences), with the exception of Mathematics. A closer look at the kind of conditions imposed by the accreditation agencies reveals that the reform managers in these study areas resisted, in particular, the standards relating to modularisation.

It is also interesting to note that the size of institutions matters. Study programmes in large universities were accredited unconditionally more often than those in medium-size or small institutions [$\chi^2(2) = 23.7$; $p < 0.001$]. On the other hand, small universities of applied sciences had to deal with an above-average number of accreditation conditions [Kruskal-Wallis-Test; $\chi^2(2) = 27.4$; $p < 0.001$]. It seems plausible to assume that the third variable (“Effective

Figure 3. **The average number of encoded criteria not met across 12 main study areas**



quality management”) can explain this result: large universities can afford qualified support at central and department level.

Finally, it is worth mentioning that the number of conditions (or violations of standards for that matter) does not depend on the kind of degree programme (Bachelor, Master or Doctorate) or on the status of the HEI (university, university of applied sciences or vocational academy). The ownership of the institution (public/private) does not matter, either.

One of the goals of the study was to try to identify specific problem areas in the reform process. In other words, was the reform equally successful with respect to each and every quality standard?

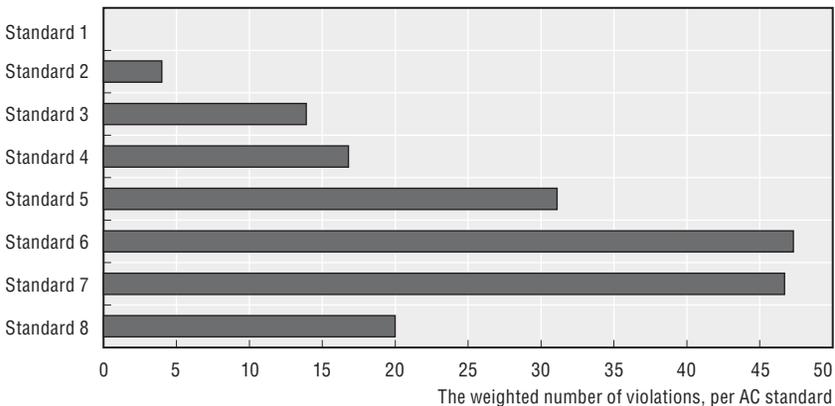
In order to answer this question, the statistical analysis of the accreditation documents was based on two different indicators:

1. The distribution of violations (as measured by the number of accreditation conditions in their encoded form) across the eight AC quality standards.
2. The distribution of violations (as measured by the number of accreditation conditions in their encoded form) across the AC criteria which operationalise the AC standards.

Ad (1): Since the AC has operationalised each standard by a different number of criteria and each AC criterion can be violated in a number of ways (as defined by the encoded criteria), merely counting the number of violations of AC standards mentioned in the conditional accreditations would have distorted the picture. The number of violations of each standard was therefore weighted (divided) by the number of encoded criteria attached to it.

Figure 4 shows the weighted distribution of reported violations against the AC's eight quality standards. Clearly, Standard 6 (System of Examinations) has been violated the most. The other frequently mentioned caveats in conditional accreditations pertained to Standard 7 (Transparency and Documentation), Standard 5 (Operating the Study Programme) and Standard 8 (Quality Assurance). Only very few violations were noted with regard to Standards 2 (Qualification Goals of the Concept of Studies) and 3 (Conceptual Position of the Programme in the Study System). Standard 1 (System Control of the Institution) has not been subject to any caveats.

Figure 4. **The weighted number of violations per AC standard**



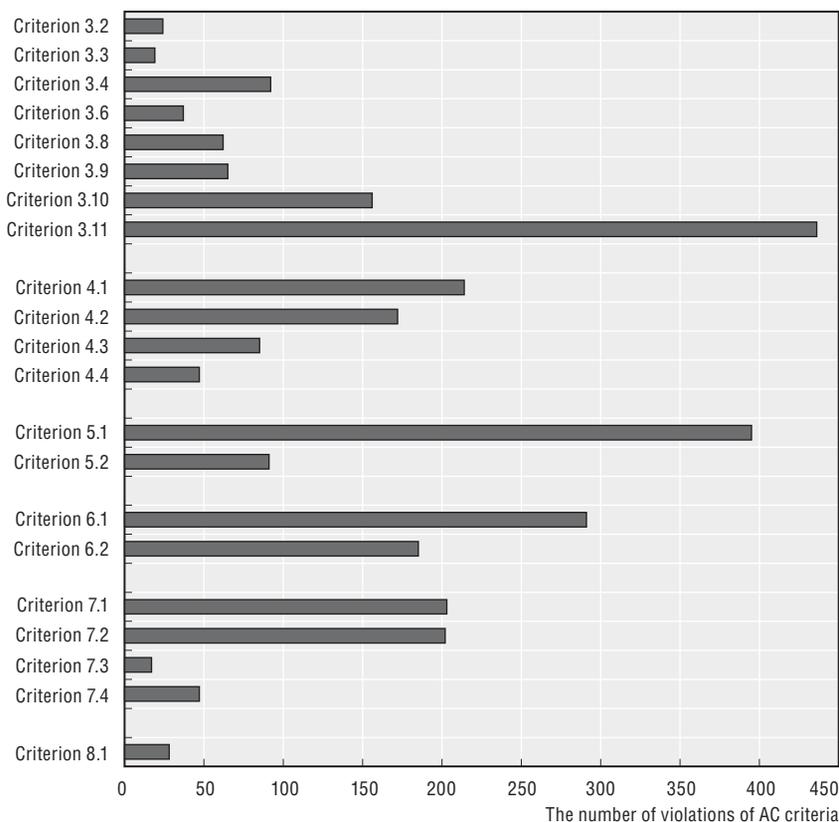
Note: For a definition of AC standards, see the Appendix A1.

This result does not necessarily permit us to conclude that it was not possible to meet the standards in an equal manner. It is just as plausible to argue that not all the standards can be regulated equally well by accreditation criteria. For instance, the findings for Standard 1 (System Control) and Standard 8 (Quality Assurance) may have been distorted because they cannot be adequately assessed at the programme level.

Ad (2): On account of the complexity of its standards, the AC had to define operational criteria that not only spelled out the different dimensions of these standards but could also be used to assess the quality of programmes through accreditation. Since the conditional accreditations refer to AC criteria, the distribution of violations as measured by the encoded (standardised) criteria not met by HEIs was plotted against these criteria (Figure 5).

This figure shows that modularisation apparently posed a major problem since 436 (i.e. 15.2%) of all caveats prescribed by agencies pertained to the fact that study modules were insufficiently constructed and described (Code 3.11). The second most frequent critique (395 violations, or 13.8%) refers to a lack of

Figure 5. **The number of violations of AC criteria**
> 5% of all violations



Note: For the legend to the codes, see the Appendix A1.

adequate human and material resources (Code 5.1) followed by a failure to attune examinations with the programme's qualification goals and its modules and to design them to be knowledge- as well as competence-oriented (Code 6.1; 291 violations or 10.2 %).

The main findings of the document analysis can be resumed as follows:

- The number of violations of AC criteria varies across the main study areas. There is a high incidence of certain problems (especially inadequate modularisation) in the MINT programmes.
- Implementation problems are especially frequent in the following areas of study reform:
 - ❖ modularisation;
 - ❖ examinations;

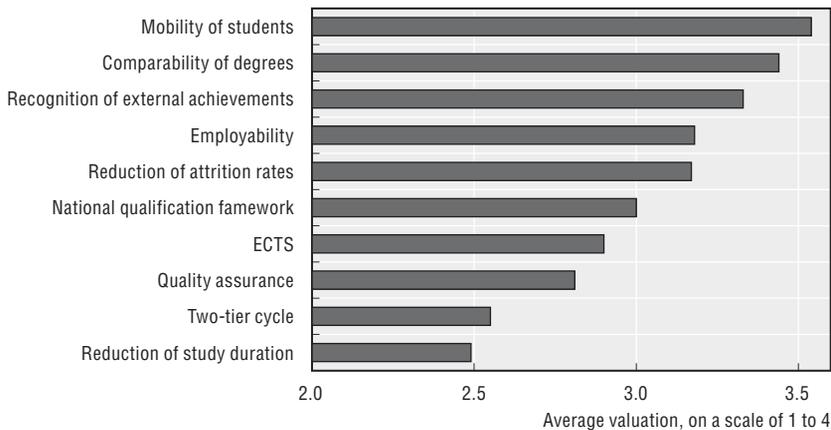
- ❖ feasibility of study requirements;
- ❖ human and material resources;
- ❖ transparency and documentation.

The results of the online surveys

We had hypothesised that in order for the reform process to be successful, its goals had to be widely accepted.

Figure 6 ranks the average score attributed to the reform goals by reform managers in HEIs. The higher the average grade, the more the goal is accepted. Clearly, most of the reform goals are (on average) considered to make sense, although there are wide discrepancies between levels of appreciation. The most popular ones are fostering student mobility (this goal is also linked to comparable degree structures and the recognition of competences acquired externally), followed by employability and reducing attrition rates. More instrumental goals, such as introducing a credit point system, quality assurance measures, a two-tier study system and shortening the duration of study time to graduation, are significantly less valued.

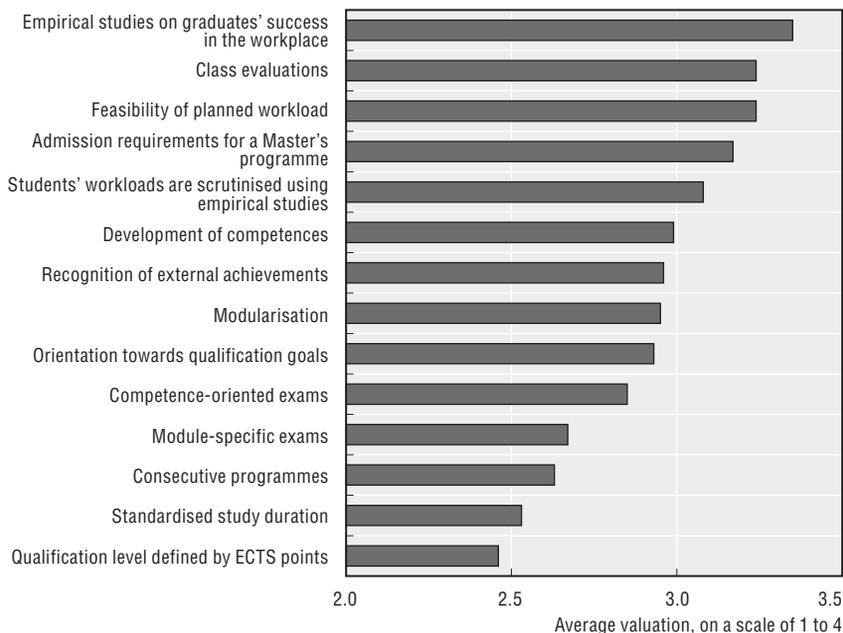
Figure 6. An appraisal of reform goals



Note: This figure shows respondents' appraisal of the reform goals; averages are on a scale of 1 (not suitable) to 4 (suitable).

Figure 7 shows how AC criteria were ranked with respect to how suitable they are for guiding the reform process toward its goals. Overall, the criteria seem to be considered suitable. Some of them, however, are scarcely appreciated, notably those relating to module-specific exams, consecutive degree programmes, standardised study duration and the definition of qualification levels for Bachelor's and Master's degrees by accumulated ECTS points.

Figure 7. **The suitability of AC quality criteria with respect to the reform goals**



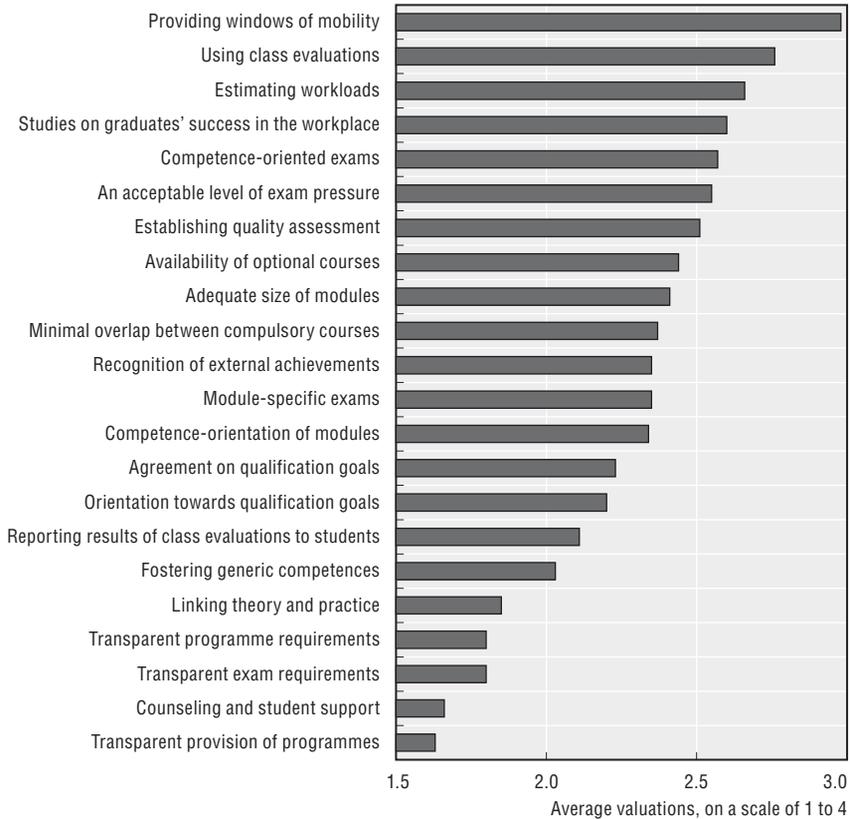
Note: This figure shows respondents' average ratings on a scale of 1 (not suitable) to 4 (suitable).

The open questions in the questionnaire furnish additional insights into the views of actors within HEIs. They are especially critical of the standardised quality criteria that, in their opinion, neglect subject-specific circumstances and entail too much inflexibility. The top-down approach of the reform process is perceived as another weakness. They also consider that the reform process is impeded by some of the quality goals and criteria that are difficult to operationalise.

It is obvious, however, that there is also quite significant resistance against change as such ("I look upon every system change with horror"). In addition, the individuals responsible for advancing the reform process in HEIs are not necessarily familiar with the various interpretations of the criteria, and on occasion they feel outmanoeuvred by the frequent modifications to the criteria.

One of the objectives of analysing the accreditation documents was to identify problem areas in the study reform. In order to find out whether these same areas were considered problematic by actors within HEIs, reform managers were also asked to identify problem areas within their own study programmes. Figure 8 shows how these were ranked by managers driving the reform process in HEIs.

Figure 8. **Problem areas in the study reform, as perceived by HEI reform managers**



Note: This figure shows respondents' average ratings on a scale of 1 (unproblematic) to 4 (problematic).

These results are in line with the opinions voiced on the suitability of the accreditation criteria. Interestingly, the quality criteria that were considered not to be supporting the reform goals well are the same as those that had not been easy to fulfil.

Difficulties had been encountered when HEIs had attempted to:

- provide “windows of mobility” in the study programmes;
- make effective use of the results of class evaluations by students; and
- realistically estimate the workload generated by study programmes.

Additional problem areas were considered to stem from the need to:

- carry out empirical studies on graduates' success in the workplace;
- orient exams in function of competence goals;
- keep the pressure of examinations within acceptable boundaries; and
- introduce effective measures of quality assurance.

However, in general, reform managers in HEIs seem to accept a majority of the quality criteria. They view only about one-third of them as problematic, despite the fact that in 2009 about 90% of all accreditation decisions were conditional.

The opinions expressed on the issue of modularisation are somewhat surprising. While the document analysis revealed that this reform criterion had been identified as frequently causing implementation problems, thus leading to conditional accreditations, the reform managers did not think it was difficult to define adequate module sizes (as measured in ECTS points), to minimise overlap between compulsory courses, to determine a competence goal for each module and to realise examinations suited to module goals.

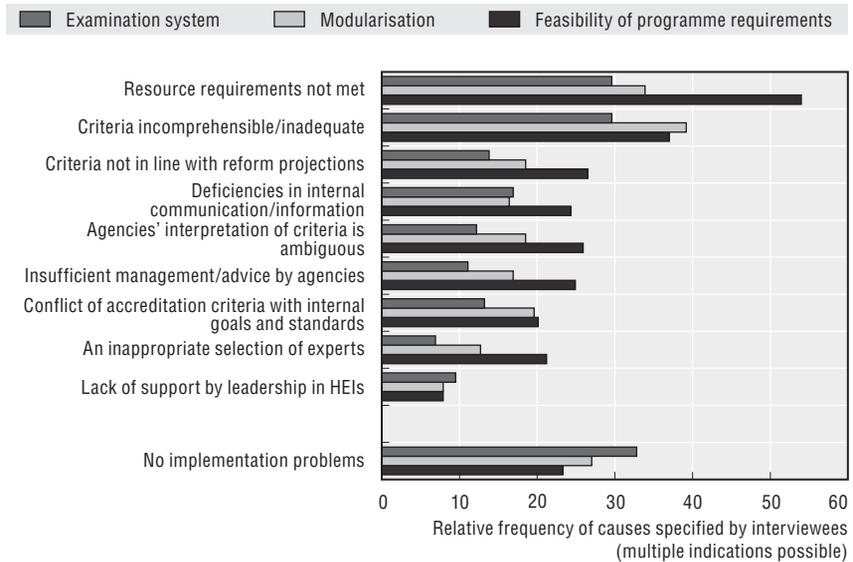
Another guiding question in the survey related to issues that were hindering the implementation of the reform. Since the caveats in the conditional accreditation decisions were conceived of as indications of implementation problems, the survey concentrated on the three areas of study reform that, according to the document analysis, were responsible for most conditional accreditation decisions: the feasibility of programme requirements, modularisation and the examination system (Figure 9).

Almost half of the managers pointed to a lack of resources, and claimed that another significant factor that was hindering the reform was the inadequacy or incomprehensibility of some of the quality criteria. These findings were in line with the insights we gained from the document analysis, where encoding the criteria had proven to be difficult because they overlapped and were ambiguous.

The significance of reform obstacles varies across the different areas of implementation: while the incomprehensibility of quality criteria was thought to have caused inadequate modularisation, insufficient resources were considered to have impeded the feasibility of programme requirements.

The answers to the open questions provide further details on the factors causing implementation problems.

Figure 9. Causes of implementation problems regarding the feasibility of programme requirements, modularisation and the examination system



Note: This figure shows the relative frequency of the causes of implementation problems, as indicated by respondents (multiple answers possible).

Within HEIs, problems tend to be generated by:

- the number of faculties and subject areas involved in a study programme;
- weaknesses in the internal management of quality issues;
- faculty members' negative attitude towards the Bologna reform;
- a lack of human and material resources; and
- a lack of knowledge and competence among support staff working on the reform process.

External factors which are hindering the reform are perceived as:

- the control-oriented approach of accreditation which is thought to infringe upon HEIs' autonomy;
- a lack of compliance on behalf of HEIs which is not detected by agencies;
- large discrepancies between agencies' operational standards;
- the divergence between state-specific criteria and the common criteria of the 16 federal states as laid down by KMK and AC;
- the resource-intensive nature of programme accreditation;
- a lack of competence among personnel in agencies who administer the accreditation procedure; and
- a lack of counselling during the implementation phase.

Managing the reform process and future regulations

Two additional guiding questions put to respondents in HEIs related to the problem of managing the reform process:

- Is programme accreditation accepted by the relevant actors in HEIs?
- Are there other ways to manage the reform process that are considered to be more appropriate?

A large majority of respondents (64%) considered that the reform was “not successful” whereas only 36% thought it to be bearing fruit. The main stumbling block, according to them, is programme accreditation.

With respect to a possible future approach to driving and controlling the reform process, the most popular option (34.9%) was to leave these aspects in the hands of HEIs’ internal quality management bodies. The idea of accrediting the internal quality assurance system (“system accreditation”) is somewhat more popular (12.7 %) than programme accreditation (6.9%). Institutional evaluations (7.4%) and quality audits (7.9%) are not considered to be desirable alternatives, but from some of the remarks it can be concluded that these approaches are not well known.

Interviews: what the student representatives had to say

Talking to students enrolled in the main study areas proved to be valuable because their views shed light on the complex conditions of the reform process within HEIs. These interviews revealed four pertinent insights:

- Some reform areas that are considered to be unproblematic by managers are highly criticised by students for lack of sufficient progress on reforms such as the recognition of external study results and the existence of module-oriented exams. This may be an indication of inadequate communication and co-operation between the two groups of actors during the course of the reform process and in quality assurance activities.
- The students were also critical of the fact that some of the most flagrant violations of quality criteria were not revealed through programme accreditation. These include:
 - ❖ unrealistic workloads;
 - ❖ unfeasible study requirements;
 - ❖ ineffective class evaluations;
 - ❖ unacceptable exam pressure;
 - ❖ a lack of competence-oriented exams.

It seems that these criteria were not sufficiently scrutinised during the accreditation process. (It should, however, be noted at this point that some reform managers had admitted they had deliberately camouflaged these problems when preparing their documentation for programme accreditation.)

- The students were under the impression that, in many cases, the study reform had been carried out in a rather formalistic way and that the key protagonists had no – or little – intention of substantially altering the process of teaching and learning. Modularisation is a prominent example of this:
 - ❖ Exams that are oriented towards module goals are an exception; course exams are the rule.
 - ❖ The module goals have little or no bearing on course exams.
 - ❖ Modules are constructed as a formal combination of study courses; instructors have not developed a common understanding of the aims, content and methodology of their teaching.
- A key problem stressed by many interviewees is the perceived change in conditions, styles and attitudes of learning in the new programmes which reminds them of their school years:
 - ❖ Instead of trying to develop an ability to understand and solve complex problems, many students are content to acquire factual knowledge through rote learning.
 - ❖ Overloaded compulsory courses leave little or no room for individual interests and preferences.
 - ❖ Presence in class is mandatory.
 - ❖ Registering for exams is perceived to be an act of bureaucratic control.

It is worth noting that none of the standards or criteria governing accreditation explicitly addresses any of the features that characterise this ill-conceived study reform.

Conclusions

Programme accreditation is geared towards enforcing compliance with detailed, bureaucratic criteria that can easily be measured. The document analysis has shown, however, that some of the quality criteria cannot be assessed by programme accreditation. Furthermore, accreditation documents have not infrequently been produced solely for the purpose of accreditation, while teaching and learning have continued to adhere to the same procedure, year in, year out.

On the other hand, it is only possible to introduce an entirely new study system if compliance with certain structural standards is enforced. In that respect, programme accreditation has been successful to a large degree, even

though in many cases conditions were imposed and accreditation agencies had to ensure that they were met.

However, although programme accreditation obliges HEIs to comply with threshold standards, it does not support the continuous improvement of quality in teaching and learning essentially because this approach cannot eliminate the organisational differences between semantics and social structure. On the level of semantics, programme accreditation is governed by guidelines, rules, regulations and prescriptions that are laid down in various documents. However, on the level of social structure, the relevant processes and (even more so) the outcomes may differ substantially from what is described in the documents. Agencies lack the tools and expertise that they need in order to measure the impact of changes on the effectiveness of the teaching and learning process and on the quality of its outcomes; therefore, they cannot detect these differences during the course of the accreditation procedure.

Furthermore, HEIs only gain marginally from programme accreditation. Complex and detailed accreditation criteria lead to misunderstandings; varying interpretations create a need for counselling, this is alien to accreditation and thus cannot be met by the agencies. Furthermore, the additional resources necessary to underpin the reform were not granted; this situation was exacerbated by the enormous subjective opportunity cost perceived by the academics who were involved in preparing documentation for programme accreditation. Consequently, the benefit/cost ratio is estimated to be small by many of the reform managers.

Most importantly, however, the control-oriented approach of programme accreditation – and this is also true for system accreditation if it has to be repeated periodically – does not provide incentives for qualitative change. As long as time and energy expended on driving innovations and qualitative improvements in teaching and learning have no bearing on the success of either HEIs or their academic personnel, qualitative profiling of the educational activities will not become an integral part of institutional and individual strategy. An institutional quality culture can only develop if the quality assurance processes are owned by the institution and adopted by its members. This view is supported by 35% of reform managers who believe that a superior quality assurance system should leave HEIs' internal quality management bodies in control.

On the other hand, if it is not complemented by a periodic external evaluation of the methods, tools and processes employed by HEIs in order to continuously enhance the quality of teaching and learning, the system of quality assurance is not convincing, either. Even though it is the institutions' responsibility to ensure the quality of all its operations, it is indispensable that an external authority should periodically assess the quality of their management

practices. This would address the double need of counselling and accountability.
This is the main point of the study.

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APPENDIX A1

The German Accreditation Council's (AC) accreditation criteria

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| AC-Criterion 1.1: | The HEI has developed and documented quality standards for teaching and learning. |
| AC-Criterion 1.2: | The quality standards are implemented at programme level. |
| AC-Criterion 2.1: | The study programme is geared towards valid qualification goals. |
| AC-Criterion 2.2: | The qualification goals have been formulated in a complete and comprehensible way. |
| AC-Criterion 2.3: | The qualification goals have been completely specified. |
| AC-Criterion 2.4: | (Re-accreditation): Graduates' success in the workplace has implications for the re-assessment of programme goals. |
| AC-Criterion 3.1: | The National Qualification Framework for Degree Programmes in German Higher Education has been observed. |
| AC-Criterion 3.2: | The standard study duration and the volume of studies comply with the pertinent regulations. |
| AC-Criterion 3.3: | A thesis is required which meets defined and prescribed standards. |
| AC-Criterion 3.4: | The admission requirements comply with the legal regulations. |
| AC-Criterion 3.5: | The possibility of changing between study programmes regulated by §§ 18 and 19 Higher Education Framework Law (HRG) is provided for. |
| AC-Criterion 3.6: | It is possible to recognise knowledge and competences acquired externally. |
| AC-Criterion 3.7: | The typological characterisation of the study programme complies with the pertinent regulations. |
| AC-Criterion 3.8: | A comprehensive "diploma supplement" is provided. |
| AC-Criterion 3.9: | An adequate credit point system is in place. |
| AC-Criterion 3.10: | The programme is completely modularised. |
| AC-Criterion 3.11: | The description of the modules complies with the pertinent regulations. |
| AC-Criterion 3.12: | The state-specific criteria of Lower Saxony have been observed. |
| AC-Criterion 4.1: | The study concept advances knowledge as well as competences. |
| AC-Criterion 4.2: | The study concept is adequately designed. |
| AC-Criterion 4.3: | The feasibility of the study programme is warranted. |
| AC-Criterion 4.4: | (Re-accreditation): Revisions of the study concept are based on empirical studies by the HEI. |
| AC-Criterion 5.1: | The human and material resources and facilities necessary to carry out the study programme are in sufficient supply. |
| AC-Criterion 5.2: | The organisation and supporting tools of the study programme are in line with the conditions of operation. |
| AC-Criterion 6.1: | The exams are attuned to the qualification goals of the programme and its modules and they are oriented toward assessing knowledge as well as competences. |
| AC-Criterion 6.2: | The system of examinations allows students to complete the programme in due time. |
| AC-Criterion 6.3: | Compensations are granted for disadvantages incurred by disabled students on account of time constraints or formal requirements of the study programme and/or of placement tests. |
| AC-Criterion 6.4: | The regulations on examinations have been checked to comply with the relevant laws. |
| AC-Criterion 7.1: | The stipulations governing the organisation and study requirements of the programme have been documented and publicised. |

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| AC-Criterion 7.2: | The exam requirements, including the regulations concerning compensations for disabled students, have been adequately documented and publicised. |
| AC-Criterion 7.3: | Subject-specific and general provisions of counselling and advice have been publicised adequately. |
| AC-Criterion 7.4: | The labelling of the programme is correct. |
| AC-Criterion 8.1: | The HEI has installed an effective quality management. |
| AC-Criterion 8.2: | (Re-accreditation): The HEI makes use of the results of quality assessments. |

AC standards, AC criteria and examples of encoded criteria

AC Standard 1: System control of the HEI

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| AC Criterion 1.1: The HEI has developed and documented quality standards for teaching and learning. | Encoded Criterion 1.1.1: The HEI has not developed and/or documented quality standards for teaching and learning. |
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| AC Criterion 1.2: The quality standards are implemented at programme level. | ... |
| ... | ... |

AC Standard 2: Qualification goals of the study programme

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| AC Criterion 2.1: The study programme is geared toward valid qualification goals. | Encoded Criterion 2.1.1: The study concept is not geared toward (subject-specific and generic) qualification goals that are in line with the targeted level of qualification. |
| ... | ... |

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| AC Criterion 2.4: (Re-accreditation): The success of the graduates has implications for the re-assessment of programme goals. | ... |
| ... | ... |

AC Standard 3: Conceptual position of the programme in the study system

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| AC Criterion 3.1: The National Qualification Framework for Degree Programmes in German Higher Education has been observed. | Encoded Criterion 3.1.1: The Bachelor's degree has not been designed as a first degree qualifying for employment. |
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| AC Criterion 3.12: The state-specific criteria of Lower Saxony have been observed. | ... |
| ... | ... |

AC Standard 4: The study concept

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| AC Criterion 4.1: The study concept focuses on knowledge as well as competence. | Encoded Criterion 4.1.1: The study concept does not support the acquisition of valid subject-specific knowledge. |
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| AC Criterion 4.4: (Re-accreditation): Revisions of the study concept are based on empirical studies by the HEI. | ... |
| ... | ... |

AC-Standard 5: Operating the study programme

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| AC Criterion 5.1: The human and material resources and facilities necessary to carry out the study programme are in sufficient supply. | Encoded Criterion 5.1.1: Human resources are insufficient. |
| ... | ... |

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| AC Criterion 5.2: The organisation and supporting tools of the study programme are in line with the conditions of operation. | ... |
| ... | ... |

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| AC Standard 6: System of examinations | |
| AC Criterion 6.1: The exams are attuned to the programme's qualification goals and modules and they are oriented toward assessing knowledge as well as competences. | Encoded Criterion 6.1.1: The modules do not, or not all, terminate with exams. |
| ... | ... |
| AC Criterion 6.4: The regulations on examinations have been checked to comply with the relevant laws. | ... |
| ... | ... |
| AC Standard 7: Transparency and documentation | |
| AC Criterion 7.1: The stipulations governing the organisation and study requirements of the programme have been documented and publicised. | Encoded Criterion 7.1.1: The study requirements of the programme have not been made available adequately through documentation and publications. |
| ... | ... |
| AC Criterion 7.4: The labelling of the programme is correct. | ... |
| ... | ... |
| AC Standard 8: Quality assurance | |
| AC Criterion 8.1: The HEI has installed an effective quality management. | Encoded Criterion 8.1.1: A quality management system has not been installed or is not effective. |
| AC Criterion 8.2: (Re-accreditation): The HEI makes use of the results of quality assessments. | ... |