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Statement on the report by the Accreditation Council in relation to the application by the Foundation for International Business Administration Accreditation (FIBAA) from 23.05.2016 for reaccreditation by the Accreditation Council for programme and system accreditation,

for renewal of membership of the European Association for Quality Assurance in Higher Education (ENQA) and

for re-registration in the European Quality Assurance Register for Higher Education (EQAR)

Bonn, 18th January 2017

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1. Statement on the report by the Accreditation Council in relation to the application by the Foundation for International Business Administration Accreditation (FIBAA) from 23.05.2016 for reaccreditation by the Accreditation Council for programme and system accreditation,
for renewal of membership of the European Association for Quality Assurance in Higher Education (ENQA) and
for registration in the European Quality Assurance Register for Higher Education (EQAR)

Dear ladies and gentlemen,

firstly, we would like to express our thanks for the constructive discussion held during the site visit conducted by the expert group of the Accreditation Council and for the opportunity to make a statement on the expert review report from 04.01.2017. We have incorporated the suggestions of the expert group and improved our methods further.

Before we discuss the expert report in detail, we would like to start by addressing a few points:

- In regards to *Part I, Summary*, we would like to point out that, of all of the system accreditation procedures carried out in Germany, eleven were conducted and concluded by FIBAA. This corresponds to an overall quota of 20%¹ of all system accreditation procedures. In addition, FIBAA has been commissioned with other system accreditation procedures and one procedure is currently ongoing. Beyond the framework of accreditation in Germany, FIBAA has conducted and concluded 10 institutional procedures in the last five years; three further procedures are in process. For this reason, we request that the report takes into account that FIBAA has a relatively high degree of experience with institutional procedures.
- For clarification reason, we would like to inform you that the new Managing Director, Professor Kerstin Fink, has been the sole Managing Director of FIBAA since 1 January 2017.
- The review report template marked as missing in ESG Standard 2.5 Criteria for outcomes with reference to Standard 2.6 Reporting was not attached to the application for reaccreditation (see Anlage_1_Review Report Template_PROG_FIBAA_dt and Annex_2_Review Report Template_PROG_FIBAA_en).
- FIBAA's homepage (in the internal reviewer area) now, once again, contains the correct link to the presentation mentioned in Chapter 2.4.
- Meanwhile FIBAA has been able to prepare the English-language procedure documents for national Swiss institutional accreditation in accordance with the Swiss Federal Act on the Funding and Coordination of the Higher Education Sector (HEdA). The [English-language question and assessment catalogue](#) and a corresponding [manual](#) for the procedure are linked.

¹ As of 10 January 2017, according to the homepage of the Accreditation Council.

- FIBAA has complied with the Accreditation Council in applying the “Rules for the Accreditation of Agencies, Resolution of the Accreditation Council from 23.09.2016”, which were adopted in September and, therefore, after submission of the self-documentation was prepared to be accredited according to these current rules. We assume this does not put us at a disadvantage.
- FIBAA assumes that recommendations or conditions that it has since demonstrated will have an impact on the assessment of the standards/criteria in the review report.

2. Statement on the evaluation regarding the European Standards and Guidelines (ESG)

2.1 ESG Standard 3.1 Use of external quality assurance procedures for higher education

The expert group issues the following recommendation:

Recommendation 1: The agency should intensify its internal strategy debates as the comparatively new areas of activity of certification, institutional procedures including system accreditation and evaluation procedures have, up until now, experienced relatively low demand.

FIBAA gratefully accepts the advice of the expert group regarding the strategic discussion but also points out that it has already introduced some initial measures. In spring 2016, the agency established a working group (WG) for strategy, whose members are representatives from the committees and management and also represent both academia and professional practice. The first meeting was held on 22nd of April 2016 in Berlin and the second on 28th of November 2016, also in Berlin. This all-day workshop took place together with the Executive Committee of FIBAA Foundation Council and its management. The content of the workshops included the discussion of FIBAA's strategic approach in the coming years on the following topics:

- FIBAA's positioning on the market due to changed framework conditions
- Review of the fields of business of offer, products and customer demand
- Stronger international focus
- Cooperation agreement with other higher education partners

Professor Fink has been given the task of drafting a strategic concept for FIBAA's further development by summer/autumn 2017.

The expert group issues the following recommendation:

Recommendation 2: It should be transparently regulated which measures respectively head-office-internal processes in which line of activity ensure the separation of consultancy and accreditation. Also should be clarified that an application for a quality assurance procedure to be conducted cannot be made at the same time as or shortly after consultancy services.

The expert group indicated that the existing resolution by FIBAA regarding the separation of assessment and consultation could be interpreted in such a way that consultancy could take place directly following assessment. This interpretation does not correspond to FIBAA's intentions and is not applied. In order to formulate the resolution in accordance with the guidelines of the Accreditation Council, the Executive Committee of FIBAA Foundation Council adopted an adapted resolution on 17th of January 2017 (see Annex_3_Decision_Foundation_Council_Separation_Consultation_Assessment, and also on our [homepage](#)).

2.2 ESG Standard 3.3 Independence

The expert group issues the following recommendation:

Recommendation 3: The Agency should adopt the rules of procedures currently available in draft form for the F-AC INST and the Appeals Committee.

Both drafts, which now take account of the requirements of the Federal Constitutional Court in accordance with a majority of academic votes in the committees, have since been adopted (see Annex_4_GO_FAK_INST and Annex_5_GO_Beschwerdeausschuss).

2.3 ESG Standard 3.4 Thematic analysis

The expert group issues the following recommendation:

Recommendation 4: The agency should continue to increase the amount of analytical publications in the future and also cover fields of activity beyond programme and system accreditation.

FIBAA complies with the ESG Standard “Agencies shall regularly publish reports in which general findings made during the implementation of external quality assurance procedures are described and analysed.” and has, in accordance with this criterion, already conducted and published a range of thematic analyses of its work in the last five years (see Annex_6_Publications).

In order to incorporate the recommendations of the expert group promptly and in consensus, FIBAA has already held detailed discussions regarding future publications in its *jour fixe* on 10th of January 2017. As part of this, alongside content topics, there was also discussion of whether the personnel resources necessary for this are available and to what extent analytical publications going beyond programme and system accreditation are a core responsibility of an accreditation agency and to what extent they are affordable.

2.4 ESG Standard 3.6 Internal quality assurance and professional conduct

The expert group issues the following recommendation:

Recommendation 5: The agency should guarantee for all fields of business that conclusions are regularly drawn from other internal and external feedback (alongside evaluations). The QM concept should also be adopted by the agency’s responsible committees.

FIBAA already incorporates feedback for all fields of business in its quality circles and each time conducts complete PDCS circles. The evaluations, in addition to internal and external feedback, are included in this cycle. These are presented in the QM handbook and are described and depicted below using an example (see Figure 1).

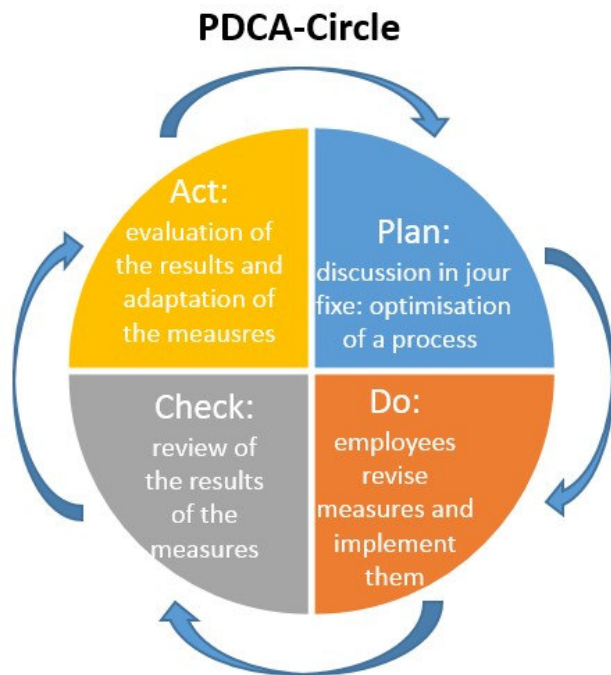


Figure 1: FIBAA's general PDCA circle

Adaptation/optimisation (process plan) is planned, depending on the occasion, for example in the *jour fixe* and/or in a committee meeting. This results in measures that are developed/adopted and then implemented (process do) by the various stakeholders (committees, employees etc.). Feedback is regularly given through evaluations, but also through *jour fixes*, committee meetings etc. (process check). The findings/results from the feedback are incorporated into FIBAA's QM system (process act) and result in the continuous improvement of FIBAA's work.

Following the site visit, the Foundation Council discussed and adopted FIBAA's updated QS concept in its meeting on 6th of December 2016 (see Annex_7_FIBAA_QS_Concept).

The expert group issues the following recommendation:

Recommendation 6: The different codes of conduct for committee members and expert groups should be adjusted if necessary.

"Non-discrimination" for all status groups is required and published in FIBAA's mission statement.

FIBAA accepts the suggestion to also include non-discrimination in the code of conduct and in the declaration of confidentiality for the commission members and experts. The agency has already applied this measure (see Annex_8_Declaration_Confidentiality_CM, Annex_9_Vertraulichkeitserklaerung_GA_dt, Annex_10_Confidentiality_Agreement_E_en).

The declarations of confidentiality for experts are published and can be viewed on our homepage in [German](#) and [English](#).

2.5 ESG Standard 2.2 Designing methodologies fit for purpose

The expert group issues the following recommendation:

Recommendation 7: FIBAA should adopt the rules of appointment.

The draft, which now takes account of the requirements of the Federal Constitutional Court in accordance with a majority of academic votes in the committees, has since been adopted (see Annex_11_Stiftungsrat_Berufungsordnung).

2.6 ESG Standard 2.5 Criteria for outcomes

The expert group issues the following recommendation:

Recommendation 8: The agency should publish the weighting of criteria for awarding the premium seal.

FIBAA incorporated the recommendation of the expert group and already published the weighting for the criteria for awarding the premium seal on the homepage for all relevant procedures (see also Annex_12_Premium_Seal_Weighting).

Homepage: [Programme Accreditation dt.](#); [Programme Accreditation en](#); [Institutional Audit Austria](#); [Institutional Accreditation dt](#); [Institutional Accreditation en](#); [Institutional Accreditation: Strategic Management dt](#); [Institutional Accreditation: Strategic Management en](#); [Certification dt](#), [Certification en](#)

2.7 ESG Standard 2.6 Reporting

The expert group issues the following recommendation:

Recommendation 9: The agency should review the process for database entries in such a way that all decisions made in programme and system accreditation procedures, including the publication of the review reports are entered immediately and completely in the database of accredited study programmes.

The publication of all decisions for programme and system accreditation is stipulated by law and must, therefore, be applied by FIBAA comprehensively. Regarding immediateness, this cannot be guaranteed in all cases as the higher education institution must first enter the study programme in the Higher Education Compass and only then the agencies can continue editing this file. This means the agency is not the process owner in this case.

Nonetheless, FIBAA did respond to the comment by the expert group and already modified the processes in its QM handbook by entering shorter deadlines as follows (see Annex_13_Higher_Education_Compass):

- Email from FIBAA Office to the higher education institution with 7-day response deadline, this was previously 14 days.
- If no response is received, the FIBAA office grants an extension by email of 3 days.
- If there is again no response, the FIBAA office notifies the FIBAA management and a prompt request is made by the management to the concerning higher education institution (letter from the management to the higher education institution requesting that the study programme should promptly be entered into the Higher Education Compass and requesting notification that the Accreditation Council has been informed that the study programme was not entered yet).

- If the higher education institution does not enter the study programme within five additional days, FIBAA informs the Accreditation Council.

The example given during the site visit primarily concerns only one higher education institution. The rector was informed by the management during a site visit.

2.8 ESG Standard 2.7 Complaints and appeals

The expert group issues the following recommendation:

Recommendation 10: The agency should make explicit reference on its homepage to the option of issuing complaints about the course of the procedure.

Following the suggestion by the expert group, FIBAA described the appeal process in the QM handbook and published it on its homepage in the respective procedure outlines. For example, [the outline of the procedure with options for making complaints is available here](#) for programme accreditation. (see Annex_14_Complaints_Outline_Procedure)

3 Statement concerning the assessment according to the criteria of the Accreditation Council²

Recommendations from the assessment concerning the European Standards and Guidelines which the expert group suggests to the Accreditation Council – for its area of responsibility – as conditions:

The expert group suggests the following condition:

3.1 Condition 1: The agency shall demonstrate that it has adopted rules of procedure for the F-AC INST and the Appeals Committee.

Condition 1 corresponds to Recommendation 3 ESG Standard 3.3

Both drafts, which now take account of the requirements of the Federal Constitutional Court in accordance with a majority of academic votes in the committees, have since been adopted (see Annex_4_GO_FAK_INST and Annex_5_GO_Beschwerdeausschuss).

The expert group suggests the following condition:

3.2 Condition 2: The agency shall demonstrate for all fields of business that conclusions are regularly drawn from other internal and external feedback (alongside evaluations) and that the QM concept has been adopted by the agency's responsible committees.

Condition 2 corresponds to Recommendation 5 ESG Standard 3.3

FIBAA already incorporates feedback for all fields of business in its quality circles and each time conducts complete PDCA circles. The evaluations, in addition to internal and external feedback, are included in this cycle. These are presented in the QM handbook and are described and depicted below using an example (see Figure 1).

² To improve readability, conditions according to the criteria of the Accreditation Council, which are formulated in the same way as the recommendations according to the ESG standards, are contained in grey boxes.

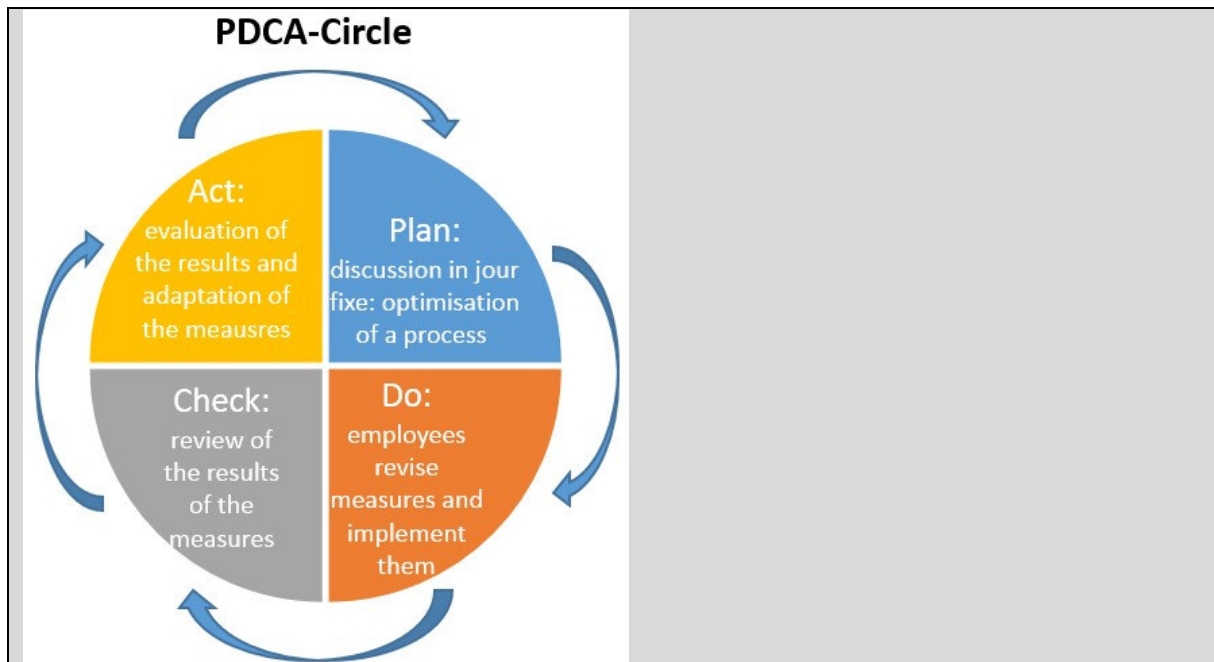


Figure 1: FIBAA's general PDCA circle

Adaptation/optimisation (process plan) is planned, depending on the occasion, for example in the *jour fixe* and/or in a committee meeting. This results in measures that are developed/adopted and then implemented (process do) by the various stakeholders (committees, employees etc.). Feedback is regularly given through evaluations, but also through *jour fixes*, committee meetings etc. (process check). The findings/results from the feedback are incorporated into FIBAA's QM system (process act) and result in the continuous improvement of FIBAA's work.

Following the on-site visit, the Foundation Council discussed and adopted FIBAA's updated QS concept in its meeting on 6 December 2016 (see Annex_7_FIBAA_QS_Concept).

The expert group suggests the following condition:

3.3 Condition 3: The agency shall demonstrate that it has adopted the rules of appointment.

Condition 3 corresponds to Recommendation 7 ESG Standard 2.2.

The draft, which now takes account of the requirements of the Federal Constitutional Court in accordance with a majority of academic votes in the committees, has since been adopted (see Annex_11_Stiftungsrat_Berufungsordnung).

The expert group suggests the following condition:

3.4 Condition 4: The agency shall demonstrate that it has revised the process for database entry in such a way that all decisions made in programme and system accreditation procedures, including the publication of the review reports are entered immediately and completely in the data-base of accredited study programmes.

Condition 4 corresponds to Recommendation 9 ESG Standard 2.6

The publication of all decisions for programme and system accreditation is stipulated by law and must, therefore, be applied by FIBAA comprehensively. Regarding immediateness, this cannot be guaranteed in all cases as the higher education institution must first enter the study programme in the Higher Education Compass and only then the agencies can continue editing this file. This means the agency is not the process owner in this case.

Nonetheless, FIBAA did respond to the comment by the expert group and already modified the processes in its QM handbook by entering shorter deadlines as follows (see Annex_13_Higher_Education_Compass):

- Email from FIBAA Office to the higher education institution with 7-day response deadline, this was previously 14 days.
- If no response is received, the FIBAA office grants an extension by email of 3 days.
- If there is again no response, the FIBAA office notifies the FIBAA management and a prompt request is made by the management to the concerning higher education institution (letter from the management to the higher education institution requesting that the study programme should promptly be entered into the Higher Education Compass and requesting notification that the Accreditation Council has been informed that the study programme was not entered yet).
- If the higher education institution does not enter the study programme within five additional days, FIBAA inform the Accreditation Council.

The example given during the on-site visit primarily concerns only one higher education institution. The rector was informed by the management during a site visit.

The expert group suggests the following condition:

3.5 Condition 5. The agency shall demonstrate that it has adjusted the “FIBAA manual for the accreditation of study programmes in accordance with the requirements of the Accreditation Council” and the template agreement for procedures in the area of competence of the Accreditation Council according to the resolution of the Accreditation Council.

FIBAA changed its documentation in such a way that it corresponds to the current rules and requirements of the Accreditation Council (See Annex_15_ Handreichung_PROG_AR, Annex_16_ Handreichung_SYS_AR, Annex_17_ Mustervertrag_PROG_AR, Annex_18_ Mustervertrag_SYS_AR). The manuals and the procedure conditions are also published on the homepage:

[Handreichung der FIBAA zur Akkreditierung von Studiengängen gemäß den Anforderungen des Akkreditierungsrates: FIBAA manual for the accreditation of study programmes in accordance with the requirements of the Accreditation Council \(status January 2017, only in German\)](#)

[Handreichung der FIBAA zur Systemakkreditierung gemäß den Anforderung des Akkreditierungsrates: FIBAA manual for system accreditation in accordance with the requirements of the Accreditation Council \(status January 2017, only in German\)](#)

Verfahrensbedingungen Programm- und Systemakkreditierung im Auftrag der Stiftung zur Akkreditierung von Studiengängen in Deutschland (Akkreditierungsrat): [Procedure conditions for programme and system accreditation on behalf of the Foundation for The Accreditation of Study Programmes in Germany \(Accreditation Council, only in German\)](#)

The expert group suggests the following condition:

3.6 Condition 6. The agency shall formulate the resolution of the foundation council “Principles for the separation of assessment and consultancy in assessment procedures within the framework of the ESG” according to the resolution of the Accreditation Council “Standards for Structuring the Relationship between System Accreditation and Consultation Services” in the version from 20th of February 2013.

Condition 6 corresponds to Recommendation 2 ESG Standard 3.1

The expert group indicated that the existing resolution by FIBAA regarding the separation of assessment and consultancy could be interpreted in such a way that consultancy could take place directly following assessment. This interpretation does not correspond to FIBAA's intentions and is not applied. In order to formulate the resolution in accordance with the guidelines of the Accreditation Council, the Foundation Council adopted an adapted resolution on 17th of January 2017 (see [Annex_3_Decision_Foundation_Council_Separation_Consultation_Assessment](#), and also on our [homepage](#)).

The expert group suggests the following condition:

3.7 Condition 7. The agency shall demonstrate that it has clarified on its homepage, in accordance with Clause 4.1, the “Rules for the Accreditation of Study Programmes and for System Accreditation” in the version from 20th of February 2013, that study programmes at higher education institutions that have undergone system accreditation are only accredited if they were established in accordance with the requirements of the accredited system or were already subject to internal quality assurance in accordance with the requirements of the accredited system. Furthermore, the agency shall demonstrate that it only enters study programmes at higher education institutions that have undergone system accreditation as accredited in the database of the Accreditation Council if they have been accredited in accordance with the rules of the Accreditation Council.

FIBAA provided clarification on its homepage that study programmes at higher education institutions that have undergone system accreditation are only accredited if they have been established in accordance with the accredited system or were already the subject of internal quality assurance following the guidelines of the accredited system. The updated [formulation can be seen on the homepage](#).

Our position regarding the condition “Furthermore, the agency shall demonstrate that it only enters study programmes at higher education institutions that have undergone system accreditation as accredited in the database of the Accreditation Council, if they have been accredited in accordance with the guidelines of the Accreditation Council” is as follows:

As soon as a higher education institution has undergone system accreditation and the review report has been published, FIBAA enters the information regarding the higher education institution’s system accreditation into the Higher Education Compass. From this point onwards, the higher education institution is responsible for entering any study programmes that have undergone the institution’s internal quality assurance system in full.

As the agency is not informed of study programmes, that have undergone the quality assurance systems at system-accredited higher education institutions, FIBAA cannot enter this information into the Higher Education Compass. In addition, FIBAA is not entitled/has no access to this database information and therefore cannot enter this information into the Higher Education Compass.

We request that this part is removed from the review report. With the current process sequence, FIBAA would be unable, both technically and objectively, to fulfil a condition on this matter.