

German Accreditation Council (GAC)

Self-Assessment Report for the External Review by ENQA

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Table of Contents

	Table of Contents	3
50	List of Slides	4
	List of Abbreviations	4
	1. Introduction	7
	2. Development of the self-assessment report (SAR)	7
	3. Higher education and QA of higher education in the context of the agency	8
55	4. History, profile and activities of the agency	10
	5. Higher education quality assurance activities of the agency	24
	6. Processes and their methodologies	26
	7. Agency's internal quality assurance	35
	8. Agency's international activities	39
60	9. Compliance with European Standards and Guidelines (Part 3)	42
	9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance	42
	9.2 ESG Standard 3.2 Official status	46
	9.3 ESG Standard 3.3 Independence	46
	9.4 ESG Standard 3.4 Thematic analysis	49
65	9.5 ESG Standard 3.5 Resources	52
	9.6 ESG Standard 3.6 Internal quality assurance and professional conduct	54
	9.7 ESG Standard 3.7 Cyclical external review of agencies	54
	10. Compliance with European Standards and Guidelines (Part 2)	55
	10.1 ESG Standard 2.1 Consideration of internal quality assurance	55
70	10.2 ESG Standard 2.2 Designing methodologies fit for purpose	57
	10.3 ESG Standard 2.3 Implementing processes	62
	10.4 ESG Standard 2.4 Peer-review experts	65
	10.5 ESG Standard 2.5 Criteria for outcomes	70
	10.6 ESG Standard 2.6 Reporting	73
75	10.7 ESG Standard 2.7 Complaints and appeals	77

	11. Information and opinions of stakeholders	79
	12. Recommendations and main findings from previous review(s) and agency's resulting follow-up.....	80
	13. SWOT analysis.....	85
80	14. Current challenges and areas for future development	86
	Glossary of terms	88
	List of annexes	93

List of Slides

85	Slide 01: Main shifts in the German accreditation system
	Slide 02: Composition of the Accreditation Council
	Slide 03: GAC's bodies
	Slide 04: Programme accreditation submissions per year
90	Slide 05: System accreditation submissions per year

List of Abbreviations

95	This list of abbreviations is sorted according to the acronym. In the Glossary of terms there are tables sorted by the full English or by the German term, respectively.
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Acronym	German term	English equivalent
AAQ	Schweizerische Agentur für Akkreditierung und Qualitätssicherung	Swiss Agency for Accreditation and Quality Assurance
ACQUIN	Das Akkreditierungs-, Zertifizierungs- und Qualitätssicherungs-Institut	The Accreditation, Certification and Quality Assurance Institute
AKAST	Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland	Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany
AQ Austria	Agentur für Qualitätssicherung und Akkreditierung Austria	Agency for Quality Assurance and Accreditation Austria

Acronym	German term	English equivalent
AQAS	Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen e. V.	Agency for Quality Assurance through Accreditation of Study Programmes
ASIIN	Akkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, Informatik, Naturwissenschaften und Mathematik	Accreditation Agency for Study Programmes in Engineering, Informatics, Natural Sciences and Mathematics
BMBF	Bundesministerium für Bildung und Forschung	Federal Ministry of Education and Research
CHEA		Council for Higher Education Accreditation
CIQG		CHEA International Quality Group
DAAD	German Academic Exchange Service	Deutscher Akademischer Austauschdienst
DEQAR		Database of External Quality Assurance Results
DFG	Deutsche Forschungsgemeinschaft	German Research Foundation
EHEA		European Higher Education Area
EKKA		Estonian Quality Agency for Higher and Vocation Education
ELIAS	Elektronisches Informations- und Antragssystem	Electronic Information and Application System
ENQA		European Association for Quality Assurance in Higher Education
EQAR		European Quality Assurance Register for Higher Education
ESG		Standards and guidelines for quality assurance in the European Higher Education Area
FH/HAW	Fachhochschulen/Hochschulen für Angewandte Wissenschaften	Universities of Applied Sciences
GAC	Stiftung Akkreditierungsrat	German Accreditation Council
GJU		German Jordanian University
GNW	Gewerkschaftliches Gutachter/innen-Netzwerk	

Acronym	German term	English equivalent
HEI; HEIs		Higher education institution; higher education institutions
HRG	Hochschulrahmengesetz	Higher Education Framework Act
HRK	Hochschulrektorenkonferenz	German Rectors' Conference
INQAAHE		International Network for Quality Assurance Agencies in Higher Education
KMK	Kultusministerkonferenz	Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany
MRVO	Musterrechtsverordnung	Specimen Decree
NCEQE		National Center for Educational Quality Enhancement
NIAD-UE		National Institution for Academic Degrees and University Education
PDCA		Plan-Do-Check-Act
QA	Qualitätssicherung	Quality Assurance
QACHE		Project Quality Assurance of Cross-border Higher Education
RPAAP	Verfahrensordnung Alternative Akkreditierungsverfahren	Rules of Procedure for Alternative Accreditation Procedures
SAR	Selbstbericht	Self-Assessment Report
WR	Wissenschaftsrat	German Council of Science and Humanities
ZEVA	Zentrale Evaluations- und Akkreditierungsagentur	Central Evaluation and Accreditation Agency

1. Introduction

- 100 GAC herewith submits its self-assessment report for the external review regarding the correct and appropriate implementation and application of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Furthermore, the review serves as basis for the request for GAC's inclusion in the European Quality Assurance Register for Higher Education (EQAR).
- 105 GAC has the legal form of a foundation of public law. It was originally set up by the North Rhine-Westphalian Law on the Establishment of a Foundation 'Foundation for the Accreditation of Study Programmes in Germany' of 15 February 2005. With the Interstate Study Accreditation Treaty, which came into force on 1 January 2018, the name of the foundation was changed to Foundation Accreditation Council. In international contexts and thus also in this
- 110 self-assessment report, the foundation is referred to as the German Accreditation Council (GAC).

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

- 115 The work on the SAR was an opportunity for the agency to analyse its activities and policies over the past years, to identify challenges and to implement initiatives that support the further development of the agency. The SAR is a joint project involving the Board, the Accreditation Council, and the staff of the Head Office, thus drawing on the expertise and knowledge of colleagues from all parts of the agency for feedback.
- 120 GAC's management together with senior staff prepared the first draft based on an analysis of the evidence and an assessment of progress made since the last review. A working group of the Accreditation Council with broad participation of the stakeholder groups supported the editorial work. A first draft of the SAR was sent to the working group, the whole Accreditation Council, and the staff members in April 2021. End of April 2021 the working group met to
- 125 discuss and revise the draft. The final draft was debated and adopted in the Accreditation Council on 23 June 2021.

How to read this report?

130 The structure of the SAR is given by the structure contained in annex 1 of the Guidelines for ENQA Agency Reviews. The version of 2016 of the guidelines applies to this review.¹ In the SAR thus the main headlines are provided by these guidelines.

Furthermore, in chapters 9 and 10, the assessment of each ESG standard is preceded by the reproduction of the respective standard, marked with bold print and grey background.

135 Citations are marked with quotation marks and italics.

3. Higher education and QA of higher education in the context of the agency

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

Federal structure

Due to the federal system in Germany, responsibility for education, including higher education, lies for the most part with the sixteen states (Länder). The Länder are responsible for the basic funding and organisation of institutions. Each Land has its own higher education legislation. The Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany (Kultusministerkonferenz – KMK) is an important coordination body in that context.

150 **Diversified higher education institutions offering diverse study programmes**

The German Diploma Supplement template classifies German higher education institutions (HEIs) as follows:

“Higher education (HE) studies in Germany are offered at three types of Higher Education Institutions (HEI).

155 *- Universitäten (Universities) including various specialised institutions, offer the whole range of academic disciplines. In the German tradition, universities focus in particular on basic research so that advanced stages of study have mainly theoretical orientation and research-oriented components.*

160 *- Fachhochschulen (FH)/Hochschulen für Angewandte Wissenschaften (HAW) (Universities of Applied Sciences, UAS) concentrate their study programmes in engineering and other technical disciplines, business-related studies, social work, and design areas.*

¹ See <https://www.enqa.eu/wp-content/uploads/Guidelines-for-ENQA-Agency-Reviews.pdf>

The common mission of applied research and development implies an application-oriented focus of studies, which includes integrated and supervised work assignments in industry, enterprises or other relevant institutions.

165 - Kunst- und Musikhochschulen (Universities of Art/Music) offer studies for artistic careers in fine arts, performing arts and music; in such fields as directing, production, writing in theatre, film, and other media; and in a variety of design areas, architecture, media and communication.

170 *Higher Education Institutions are either state or state-recognised institutions. In their operations, including the organisation of studies and the designation and award of degrees, they are both subject to higher education legislation.*¹²

In Germany, there are currently 423 HEIs with about 2.9 million students in total. 108 are Universities, 211 are Universities of Applied Sciences, 52 are Universities of Art/Music, 52 belong to other categories (Universities of Public Administration, Universities of Theology and Universities of Education).³ 116 of the HEIs are private, state-recognised institutions.⁴ About 90 per cent of all students are enrolled at public HEIs.⁵

180 The most common university-level academic qualifications are Bachelor's degrees and Master's degrees. In addition, there are courses that lead to state-certified exams in some subject areas (e.g. medicine, law and, in some Länder, teacher education). A few degree programmes lead to a Diplom qualification still.

In total, there were over 20,000 study programmes at HEIs in Germany in the winter semester 2020/2021. 1.6 million students then studied in Bachelor's study programmes.⁶

185 Furthermore, the doctoral studies should be mentioned. The leading model in Germany is the individual, supervised doctorate.⁷

² Section 8.1 of the diploma supplement template; https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-11-Mitglieder/Diploma_Supplement_englisch_2018.pdf.

³ See <https://www.destatis.de/EN/Themes/Society-Environment/Education-Research-Culture/Institutions-Higher-Education/Tables/type-institution.html;jsessionid=0C2142169416475F4AAB424449DD0738.live742>.

⁴ See <https://www.destatis.de/EN/Themes/Society-Environment/Education-Research-Culture/Institutions-Higher-Education/Tables/private-institutions-of-higher-education-total.html>.

⁵ See <https://www.destatis.de/EN/Themes/Society-Environment/Education-Research-Culture/Institutions-Higher-Education/Tables/total-states-further-indicated-winter-term.html> and <https://www.destatis.de/EN/Themes/Society-Environment/Education-Research-Culture/Institutions-Higher-Education/Tables/students-private-institutions-of-higher-education.html>.

⁶ See <https://de.statista.com/statistik/daten/studie/2854/umfrage/bachelor--und-masterstudiengaenge-in-den-einzelnen-bundeslaendern/>; <https://de.statista.com/themen/1205/bachelor-und-master/> (in German only).

⁷ See <https://www.academics.de/ratgeber/promotion-statistik> (in German only)

Financing

190 The financing of the German higher education system is based on the competencies pursuant
to the Basic Law of the Federal Republic of Germany. Public HEIs receive the largest part of
their funding from the state, i.e. the Länder. The budget funds of the Länder cover, in general,
personnel and material costs, as well as investments. Research and teaching at the HEIs are
195 additionally funded through special programmes financed by the federal government and the
Länder. HEIs also apply for state and private funds (external funds), particularly for financing
research projects.⁸

For quality assurance in the context of the agency see chapter [4. History, profile, and activities of the agency](#).

200 4. History, profile and activities of the agency

On terms

GAC itself is an agency in the sense of the ESG. Due to the German two-tiered accreditation
system which will be laid out in greater detail later, responsibilities are shared between GAC
205 and the agencies that are well known to ENQA and EQAR (ACQUIN, AQAS, ZEvA, ASIIN,
AAQ, to name some of them). Therefore, in this self-assessment report, “the agency” mostly
means GAC whereas “the agencies” or “the assessment agency/-ies” speaks of the organisa-
tions mentioned before.

“GAC”, German Accreditation Council refers to the overall organisation. Sometimes in this re-
210 port, reference is made to the Accreditation Council. This is because, pursuant to Article 8 of
the Interstate Study Accreditation Treaty⁹, GAC has three bodies:

- The Board,
- the Foundation Council and
- the Accreditation Council.

215 Article 9 states that the Accreditation Council resolves all GAC’s matters, so that in practice,
GAC and Accreditation Council mostly coincide. Nevertheless, this report refers to

⁸ See for further information https://eacea.ec.europa.eu/national-policies/eurydice/content/higher-education-funding-31_en.

⁹See for details on the Interstate Study Accreditation Treaty the explanation later in this chapter.

“Accreditation Council” only if this specific body is meant, for example, when it comes to its composition and its actions.

220 In this document, “state” and “Land” (singular), as well as “states” and “Länder” (plural), are used synonymously.¹⁰

Development of a decentralised accreditation system

225 Essential foundations for accreditation were laid in 1998: The Bundestag and Bundesrat passed the fourth amendment to the Higher Education Framework Act (HRG) and abolished the compulsory development of framework examination regulations. In the same year, the KMK and the German Rectors' Conference (Hochschulrektorenkonferenz – HRK) passed fundamental resolutions on the introduction of an accreditation system.

230 After a pilot phase, the basic structure of a decentralised system was fixed in 2002, valid for the next 15 years, in which GAC set out basic requirements for the accreditation procedure and certified and monitored agencies, while the agencies in turn carried out accreditation procedures and accredited study programmes. In 2005, GAC acquired legal capacity with the North Rhine-Westphalian Law on the Establishment of a Foundation ‘Foundation for the Accreditation of Study Programmes in Germany’.

235 Reorganisation of the accreditation system since 2016

240 Due to a decision of the German Federal Constitutional Court in February 2016,¹¹ the German accreditation system has recently been reformed. The Federal Constitutional Court confirmed the approach of binding external quality assurance of teaching through accreditation, which is not limited to academic subject-related criteria but also assesses the organisation of studies, the study requirements, and the success of studies. The court criticised, however, that the legislator had “[...] *de facto handed over the standardisation of academic and procedural and organisational requirements for accreditation* [...]”¹² without making the essential decisions itself and demanded a better legal basis for the German accreditation system.

245 This legal foundation is now available with the Interstate Treaty on the organization of a joint accreditation system to ensure the quality of teaching and learning at German higher education

¹⁰ In official documents from Germany or the EU, the translation “state(s)” is also used; see <https://www.tatsachen-ueber-deutschland.de/en/politics-germany/political-system>, https://europa.eu/european-union/about-eu/countries/member-countries/germany_en. By contrast, the “federal state” refers only to the federal government of Germany as a whole.

¹¹ See order of the First Senate of 17 February 2016 - 1 BvL 8/10; https://www.bundesverfassungsgericht.de/SharedDocs/Entscheidungen/EN/2016/02/Is20160217_1bvl000810en.html;jsessionid=04E6CF9A53F3E1EB37505B7DD8928828.2_cid377.

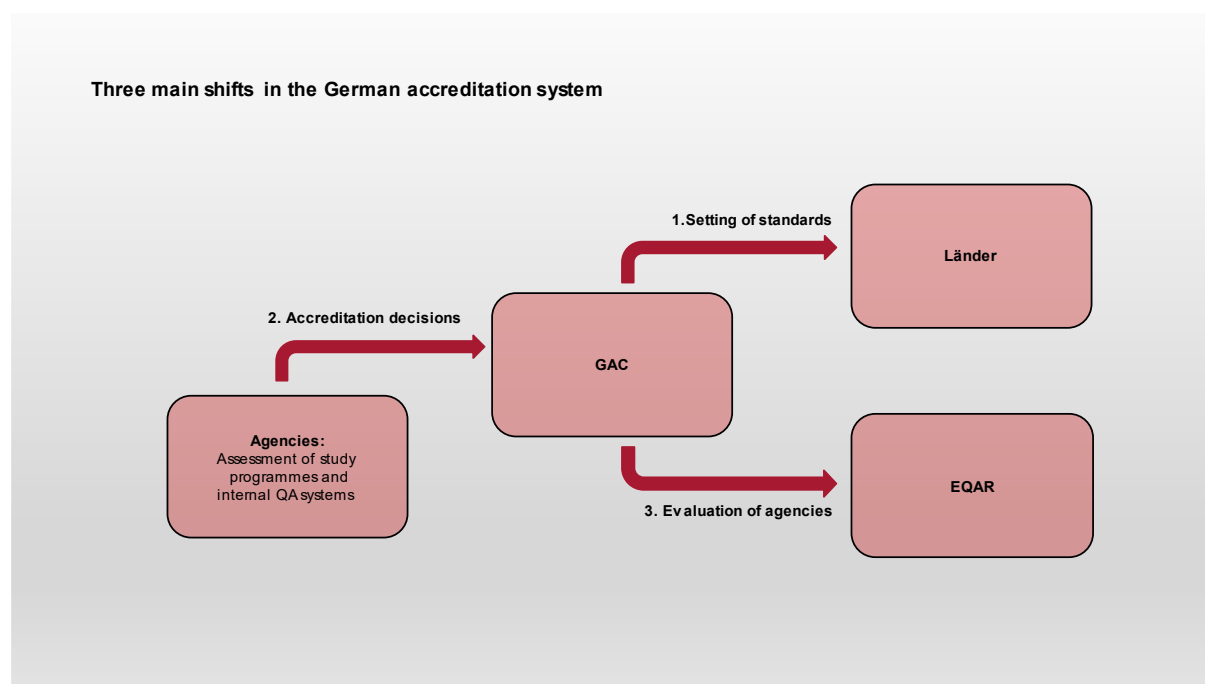
¹² Order of the first senate (see footnote 10), para. 80

institutions (Interstate Study Accreditation Treaty) by all 16 Länder which came into effect on 01 January 2018¹³ and on decrees of the Länder based on this treaty.¹⁴

Major shifts in the accreditation system

1. The power to set regulations, which were previously partly held by GAC, has been transferred to the Länder (see Article 5 (3) no. 6 Interstate Study Accreditation Treaty).
2. The authority to take accreditation decisions has been transferred from agencies to GAC (see Article 5 (3) no. 1 Interstate Study Accreditation Treaty).
3. The evaluation of agencies, which was previously carried out by GAC, has been transferred to EQAR (see Article 5 (3) no. 5 of the Interstate Study Accreditation Treaty).

Slide 01: Three main shifts in the German accreditation system



1. Shift concerning the setting of standards

To address the main criticism of the Federal Constitutional Court, criteria and procedural rules have been laid down in the Interstate Study Accreditation Treaty and in legal decrees of the Länder. In this way, the democratic legitimation is guaranteed. However, GAC has adopted a series of supplementary resolutions to ensure consistency of application of criteria and

¹³ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begrundung_Englisch.pdf.

¹⁴ See <https://www.akkreditierungsrat.de/en/accreditation-system-legal-basis/laws-and-regulations/laws-and-decrees>.

procedural rules.¹⁵ Besides, Article 5 (3) no. 6 of the Interstate Study Accreditation Treaty gives GAC the mandate to submit suggestions for decrees.

2. Shift regarding the responsibility for accreditation decisions

270 In the past, the German accreditation system provided for a division of tasks between GAC, and agencies approved by GAC in such a way that GAC accredited the agencies based on an assessment procedure. The agencies then made the accreditation decisions. Now, GAC takes the accreditation decisions itself. The agencies are still responsible for the assessment. This measure promotes a more consistent decision-making practice based on the specified criteria.

275 The legal nature of the agencies' actions, which had not been clarified until then, was another essential trigger for the transfer of decision-making authority to GAC. The accreditation decisions are administrative acts which the agencies, as private-law actors, could not issue as easily as GAC, which is a foundation under public law.

3. Shift concerning the evaluation of agencies

280 GAC, as a rule, no longer evaluates agencies, as EQAR, as an established, neutral European inspection body, is now available. All EQAR-registered agencies can work in Germany. To ensure a link to the German legal framework, based on the agency's registration in EQAR, a formal authorisation is provided to them by GAC. This authorisation, however, only consists of

285 an exchange of notes.¹⁶

Legal basis

The Interstate Study Accreditation Treaty of 2018 regulates the accreditation system.

290 Decrees of the Länder based on this treaty contain the details on accreditation criteria and procedural rules. They are based on a Specimen Decree adopted by the KMK.¹⁷

Please note

- that the decrees of the Länder are nearly identical with the Specimen Decree, so that in the following only the Specimen Decree is mentioned when citing the legal basis.

¹⁵ For details see, for example, chapter [10.2 ESG Standard 2.2 Designing methodologies fit for purpose](#).

¹⁶ See the corresponding resolutions of the Accreditation Council at <https://www.akkreditierungsrat.de/en/accreditation-system/agencies/agencies>.

¹⁷ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_English.pdf.

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- that the formal and academic criteria as well as the main procedural rules for the accreditation processes are roughly outlined in the Interstate Study Accreditation Treaty. Since they are spelled out in the Specimen Decree, also in this respect only the Specimen Decree will be referred to in the following.

300 Concerning GAC as an institution, the Interstate Study Accreditation Treaty must be supplemented by a law adopted by the Land in which the organisation is located. This Land has always been North Rhine-Westphalia. This special law is the Act Establishing the Foundation Accreditation Council (Accreditation Council Act).¹⁸ Together with the Interstate Study Accreditation Treaty, it bindingly defines the tasks, responsibilities, and powers of GAC. The provisions of the Accreditation Council Act are, apart from some transitional provisions, largely identical in content to Articles 5 to 14 of the Interstate Study Accreditation Treaty. For this reason, 305 as a rule, only the Interstate Study Accreditation Treaty is referred to in this report in connection with the description of the legal tasks of GAC.

The new legal framework in conjunction with GAC's new tasks made it necessary to revise its Statutes¹⁹ and the Rules of Procedure of the Accreditation Council²⁰ and of the Foundation 310 Council.²¹ The Statutes and Rules of Procedure entered into force at the end of 2018.

August 2018 saw the entry into force of the fee schedule adopted by GAC to implement the provision in Article 3 (6) of the Interstate Study Accreditation Treaty on the charging of fees for the conduct of accreditations.²²

315 **GAC as part of an accreditation system**

The Terms of Reference of this review summarise: "*[...] the review should consider that GAC is integrated in an 'accreditation system', consisting also of the 16 German States ("Länder") laying down the criteria for accreditation, and of the agencies who provide the reports GAC decides upon.*"²³

¹⁸ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Akkreditierungsratsgesetz_eng.pdf; Due to the Interstate Study Accreditation Treaty, the name of the Law on the Establishment of a Foundation "Foundation for the Accreditation of Study Programmes in Germany was changed to Act Establishing the Foundation Accreditation Council (Accreditation Council Act).

¹⁹ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Satzung%20Stiftung%20Akkreditierungsrat_eng.pdf.

²⁰ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Geschaeftsordnung_Stiftung_Akkreditierungsrat_2018.pdf (in German only).

²¹ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/SR_Geschaeftsordnung_2018.pdf (in German only).

²² See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Geb%C3%BChrenordnung%20Stiftung%20Akkreditierungsrat_2021.pdf (in German only).

²³ See the Terms of Reference of this review.

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

Accordingly, Article 15 of the Interstate Study Accreditation Treaty provides as follows:

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

330 The agencies act in the German accreditation system as partners of GAC in the sense of Interpretation 23 of the EQAR document Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies.²⁴ EQAR there specifies that the agency which *“only implements parts of the process and relies on input/preparatory work carried out by other agencies, should ensure that such input/preparatory work is carried out in line with the ESG. For partners or subcontractors that are also EQAR-registered agencies it can be assumed that their external QA activity is ESG-compliant.”*

335 As the agencies authorised by GAC are listed in EQAR, their ESG-compliance can be assumed.

340 There is only one assessment agency authorised in Germany that is not currently registered in EQAR: AKAST, the Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany. It was authorised by GAC pursuant to § 24 (1) sentence 2 of the Specimen Decree.²⁵

AKAST applied to join EQAR based on the review report from the 2018 re-accreditation conducted by GAC. On 17 June 2019, the Register Committee rejected the application because Standard 3.3 was assessed as not complied with.

345 After completion of the revision and adaptation of the Statutes and other basic documents, the application for a Focused Review was submitted to EQAR by AKAST in spring 2021. In this review will be evaluated Standard 3.3 as well as Standards 2.7 and 3.4, which had been assessed as partially fulfilled. GAC will again act as the coordinator of the review. It is planned

²⁴ See https://www.eqar.eu/assets/uploads/2020/09/RC_12_1_UseAndInterpretation-OfTheESG_v3_0.pdf.

²⁵ Here, § 24 (1) sentence 2 Specimen Decree in connection with (7) of the resolution of the Accreditation Council of 20 February 2018 on the “Authorization of Agencies in the German System”, see <https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Authorization%20of%20Agencies%20in%20the%20German%20System.pdf>, applied. (7) of the resolution states: “The authorization of agencies not listed in EQAR is exceptionally permissible in justified individual cases if compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) is periodically demonstrated by an external evaluation.”

to submit the report to EQAR at the end of September so that the EQAR Committee can decide upon AKAST in November 2021.

350 Should GAC, within the framework of the accreditation of an alternative procedure, delegate the implementation of the assessment procedure to a third party, this third party would also be bound to comply with the Rules of Procedure for Alternative Accreditation Procedures (RPAAP) and thus to comply with the ESG.²⁶

355 **Statutory tasks**

Article 3 of the Interstate Study Accreditation Treaty states the tasks of GAC as follows:

360 *“1. The accreditation and re-accreditation of study programmes and internal quality assurance systems as well as other quality assurance procedures agreed with the Accreditation Council and the respective state on the basis of the criteria of Article 2 through the award of the foundation’s seal.*

2. It determines the requirements for the recognition of accreditations through foreign institutions, taking the developments in Europe into consideration.

3. It promotes international cooperation in the field of accreditation and quality assurance.

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

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

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

First and foremost, it is the task of GAC to accredit study programmes, quality management
375 systems and alternative procedures. Therefore, external quality assurance, in the form defined within the German system, lies in the centre of GAC’s activities.²⁷ The other statutory tasks concern, on the one hand, the authorisation of agencies, on the other hand, other important tasks such as cooperation with the Länder and international cooperation.²⁸

²⁶ See the RPAAP at <https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Rules%20of%20Procedure%20for%20Alternative%20Accreditation%20Procedures.pdf>; for details on the accreditation of alternative procedures see chapter 6. [Processes and their methodologies](#).

²⁷ See chapter 5. [Higher education quality assurance activities of the agency](#)

²⁸ See for international cooperation chapter 8. [Agency’s international activities](#).

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Mission Statement and Interim Review

Mission Statement

The Mission Statement, fundamentally revised in 2019, summarises the self-image and basic principles of GAC and formulates the mission, the strategic goals, and the manner of their intended implementation:

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- *“The German Accreditation Council is a joint institution of the states for external quality assurance of teaching and learning in Germany. It fulfils the tasks assigned to it in the Interstate Study Accreditation Treaty and actively participates in the design and further development of goals and requirements of the accreditation system in Germany.*
- 390 • *The German Accreditation Council is committed to academic freedom and autonomy of higher education institutions and sees the primary responsibility for the quality of teaching and learning at higher education institutions.*
- *It understands accreditation as a regular, external quality assurance process, which is carried out as a scientifically guided procedure with peer review and the participation of*
- 395 • *the relevant stakeholders.*
- *It ensures that the accreditation procedures are carried out quickly, reliably, on time and transparently from the application to the decision of the Accreditation Council. In particular, the administrative work involved in submitting applications should be kept to a minimum for higher education institutions and agencies.*
- 400 • *It acts in accordance with the European Standards and Guidelines (ESG) and the Interstate Study Accreditation Treaty as well as its implementation through corresponding decrees of the Länder.*
- *It ensures that accreditation decisions are taken independently of third parties and that potential conflicts of interest are prevented by means of appropriate measures.*
- 405 • *It promotes the dialogue between all actors involved in the accreditation system and works towards a trustful cooperation of all represented stakeholders.*
- *It reflects on the implementation of its tasks and regularly evaluates the feedback from higher education institutions and agencies in order to use the results for an experience-based further development of the quality assurance system and the application procedures in accordance with its legal mandate.”²⁹*
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Interim Review

The main strategic and planning document of GAC is its Interim Review, published 2020.³⁰

Here, the Accreditation Council has laid down three priorities for its remaining term of office until the end of 2021:

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- Handling of the expected large “wave” of applications.
- Systematic reflection on GAC’s work.

²⁹ See <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/mission-statement/mission-statement>.

³⁰ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf

- Evaluation of GAC in the European context.

See chapter [9.1 ESG Standard 3.1 Activities, Policy and Processes for quality assurance](#) for more details.

Accreditation procedures must be science-led

To further understand the German accreditation system, it is important to know that according to Article 5 (3) of the German Basic Law “*Arts and sciences, research and teaching shall be free.*”³¹ The Federal Constitutional Court ruled: “*The requirement to obtain accreditation for study programmes restricts a higher education institution’s freedom to decide on the content, organisation, and methodical approach of the study programme and courses taught. The prerequisite that accreditation be obtained also interferes with the rights of teaching staff, and of faculties or departments.*”³² “*Quality assurance measures that interfere with the freedom of research and teaching require an adequate statutory basis.*”³³ What is needed is an overall structure of quality assurance “*in which decision-making powers and rights of participation, influence, information and control are structured in such a way that dangers to the freedom of teaching are avoided.*”³⁴

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

- Majority³⁵ and double votes of professors in the Accreditation Council concerning the fulfilment of academic criteria in accreditation decisions³⁶
- Majority of professors in the review panels³⁷
- Binding guidelines by the HRK for the appointment of professorial experts³⁸

Organisational structure

According to Article 8 of the Interstate Study Accreditation Treaty, GAC has three bodies, the Accreditation Council, the Foundation Council and the Board.

³¹ https://www.gesetze-im-internet.de/englisch_gg/englisch_gg.html#p0034.

³² Order of the first senate (see footnote 10), para. 52

³³ Order of the first senate (see footnote 10), para. 59

³⁴ Order of the first senate (see footnote 10), para. 60

³⁵ See Article 9 (2) no. 1 Interstate Study Accreditation Treaty.

³⁶ See Article 9 (4) Interstate Study Accreditation Treaty.

³⁷ See § 25 (3) Specimen Decree.

³⁸ See Article 3 (3) Interstate Study Accreditation Treaty and annex 07 as well as chapter [10.4 ESG Standard 2.4 Peer-review experts](#).

445 *Accreditation Council (Article 9 Interstate Study Accreditation Treaty)*

The Accreditation Council is the central decision-making body of GAC. It decides on the accreditation and re-accreditation of study programmes, internal quality assurance systems of HEIs, alternative procedures and equivalency assessments. The Accreditation Council has 23 members.

450 “[...] (2) Members of the accreditation council are:

1. Eight professors from state or state-recognised higher education institutions in the Federal Republic of Germany who have to represent at least four groups of subjects from the humanities, social sciences, natural sciences and engineering sciences,

2. One representative of the German Rector’s Conference,

455 3. Four representatives of the states in the Federal Republic of Germany,

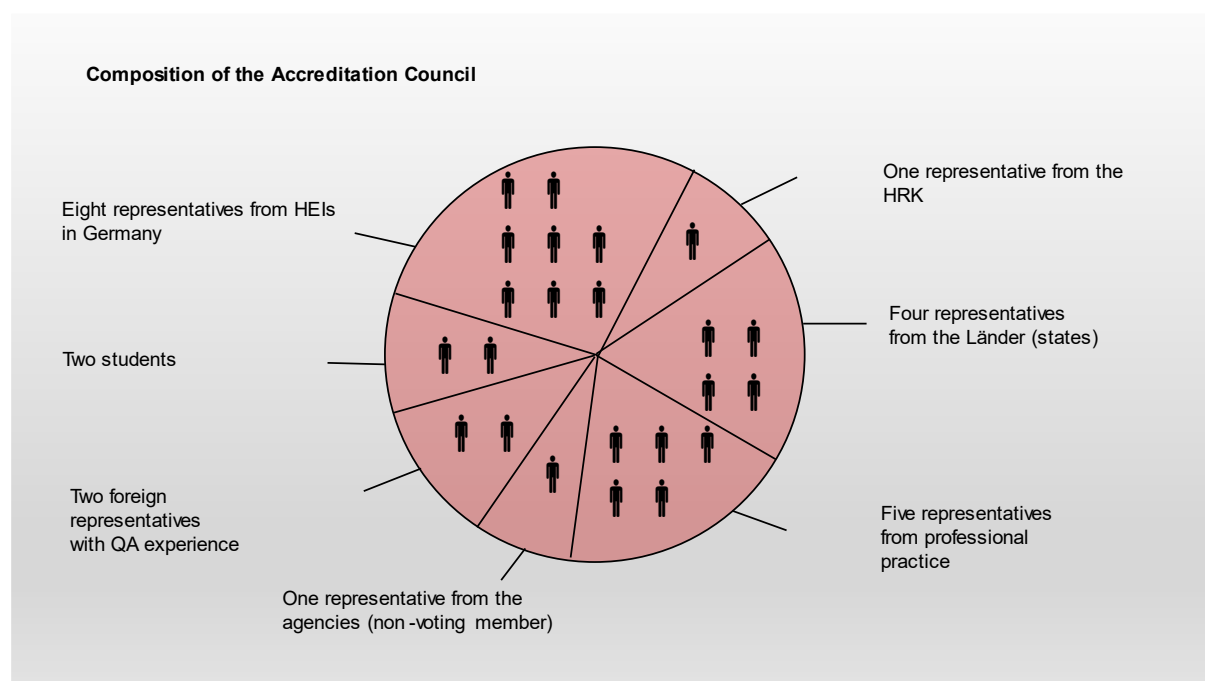
4. Five representatives from professional practice, one of whom is a representative of the state ministries responsible for service and collective bargaining law,

5. Two students,

6. Two foreign representatives with accreditation experience,

460 7. One representative of the agencies in an advisory capacity.”³⁹

Slide 02: Composition of the Accreditation Council



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³⁹ Article 9 (2) sentence 1 of the Interstate Study Accreditation Treaty

The members of the Accreditation Council are supplemented by substitute members⁴⁰ and permanent guests.⁴¹

Foundation Council (Article 11 Interstate Study Accreditation Treaty)

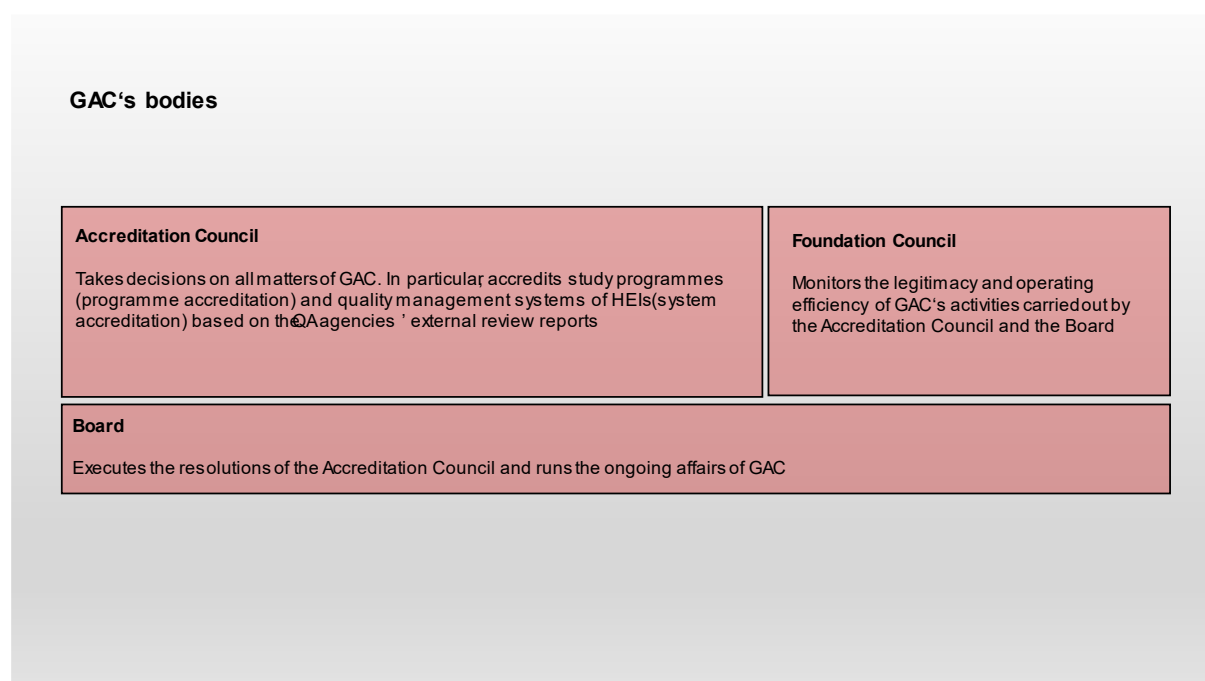
- 470 “(1) The foundation council monitors the lawfulness and economic efficiency of the management of the foundation's business by the accreditation council and the Board.
- (2) The foundation council consists of:
1. Six representatives of the states,
2. Five representatives of the German Rector's Conference.”⁴²

475 *Board (Article 10 Interstate Study Accreditation Treaty)*

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

480 Council and the managing director of GAC.

Slide 03: GAC's bodies



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⁴⁰ See section 8 (4) of the Statutes.

⁴¹ See section 8 (7) of the Statutes.

⁴² Article 11 (1) and (2) of the Interstate Study Accreditation Treaty

Head Office

Besides, Article 12 of the Interstate Study Accreditation Treaty stipulates that GAC maintains a Head Office. The Head Office is in Bonn. It is managed by the managing director. The Head Office “[...] supports the execution of the foundation’s business and is subject to instruction from the chairperson of the Board.”⁴³ which is, according to Article 10 Interstate Study Accreditation Treaty, the chairperson of the Accreditation Council.

Complaints and Appeals Commission

Furthermore, the Accreditation Council decided on a complaints procedure on 26 February 2019 and thus established an external commission to address complaints and appeals.

“This commission consists of three external members: a professor, a student member and a member proposed by the agencies. It discusses appeals and complaints and submits a recommendation to the Accreditation Council for final decision.”⁴⁴

Electronic Information and Application System (ELIAS)

When it became apparent at the end of 2016 that GAC would be entrusted to decide on applications for accreditations, Board and Accreditation Council immediately launched a project to set up a fully digital system to handle this task. In 2017 and 2018, an electronic web-based application processing system (called ELIAS) had been developed and activated in January 2019.

The system consists of two main elements:

- a platform for the application process,
- the database for accredited study programmes and HEIs.⁴⁵

ELIAS maps the entire process of programme and system accreditations according to the new requirements:

- The application system enables HEIs to select the study programmes to be accredited from the data pool and apply online.
- The responsible programme managers from the Head Office of GAC handle the applications in ELIAS and post the draft accreditation decisions as meeting documents.

⁴³ Article 12 (1) sentence 2 of the Interstate Study Accreditation Treaty

⁴⁴ Extract from the resolution of the Accreditation Council of 26 February 2019; see <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/complaints-and-appeals/complaints-and-appeals>.

⁴⁵ See annex 01 for a graphical presentation of the system architecture of ELIAS and its different web portals.

- The draft accreditation decisions and miscellaneous meeting documents are made available to the members of the Accreditation Council via the platform.
- After the Accreditation Council has taken the final accreditation decision, the official accreditation notices are created in ELIAS and electronically sent to the institution.
- For accreditation with conditions, there is a follow-up process implemented in the system.
- The decisions of the Accreditation Council as well as the accreditation reports are automatically published in the external ELIAS database.

However, some functionalities have not yet been fully completed in the initial programming phase. For example, the application procedures for alternative accreditation procedures, as well as for joint degree programmes and for substantial change to the subject of the accreditation during the accreditation's period of validity and for alternative procedures, have not yet been released. The decisions are currently prepared outside the system, and manually entered/published in the database. The same applies for the equivalency assessment, as this is a singular project, at least as things stand at the time of reporting.⁴⁶

ELIAS also offers evaluation and documentation options.⁴⁷

The system additionally corresponds with two external databases: Higher Education Compass (German database of all study programmes)⁴⁸ and DEQAR (Database of External Quality Assurance Results).⁴⁹

Internal meetings usually take place every week for about two hours to coordinate the technical or functional components to be implemented. In addition, the Head Office receives daily feedback from the HEIs and agencies, as well as the members of Accreditation Council which help GAC to further develop ELIAS and make it even more user-friendly.

Programme and system accreditation submissions per year

All German HEIs can submit accreditation applications to GAC. This is reflected in the high amount of programme accreditation submissions per year (see slide 04). Yearly variations may occur due to differences in accreditation cycle endings, new study programmes, new system accreditations and accreditation extensions.⁵⁰

⁴⁶ See for the different types of procedure GAC offers chapter [6. Processes and their methodologies](#).

⁴⁷ The questionnaire tool in ELIAS is not yet in place at the time of reporting, however. It is expected to be operational by summer 2021; see chapter [7. Agency's internal quality assurance](#).

⁴⁸ See <https://www.hochschulkompass.de/en/study-in-germany.html>.

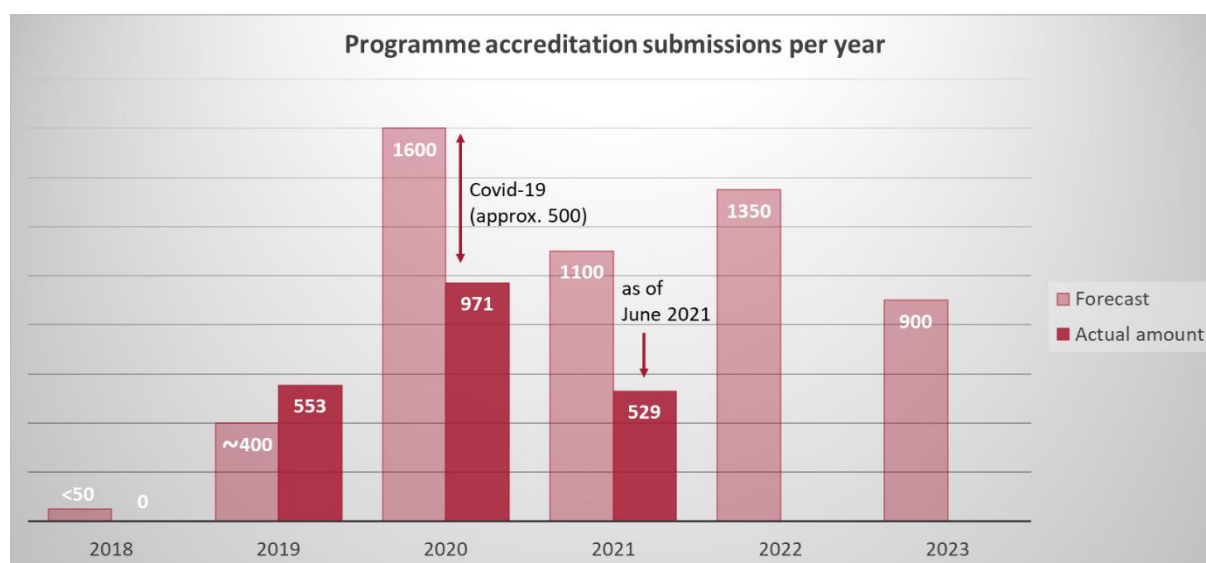
⁴⁹ See <https://www.eqar.eu/qa-results/search/by-institution/>.

⁵⁰ See § 26 Specimen Decree for accreditation extensions.

The data presented in slide 04 and 05 is subject to several limiting factors, most importantly: During planning/build-up of the ELIAS database in 2018/2019, processing of applications was not or not completely done via the database and is therefore not or not completely included.

The forecasts, particularly for 2022/2023, are and will be affected by planning decisions within the HEI's up to 2025. Therefore, reliability is limited, errors of a few hundred programme accreditation submissions are possible.

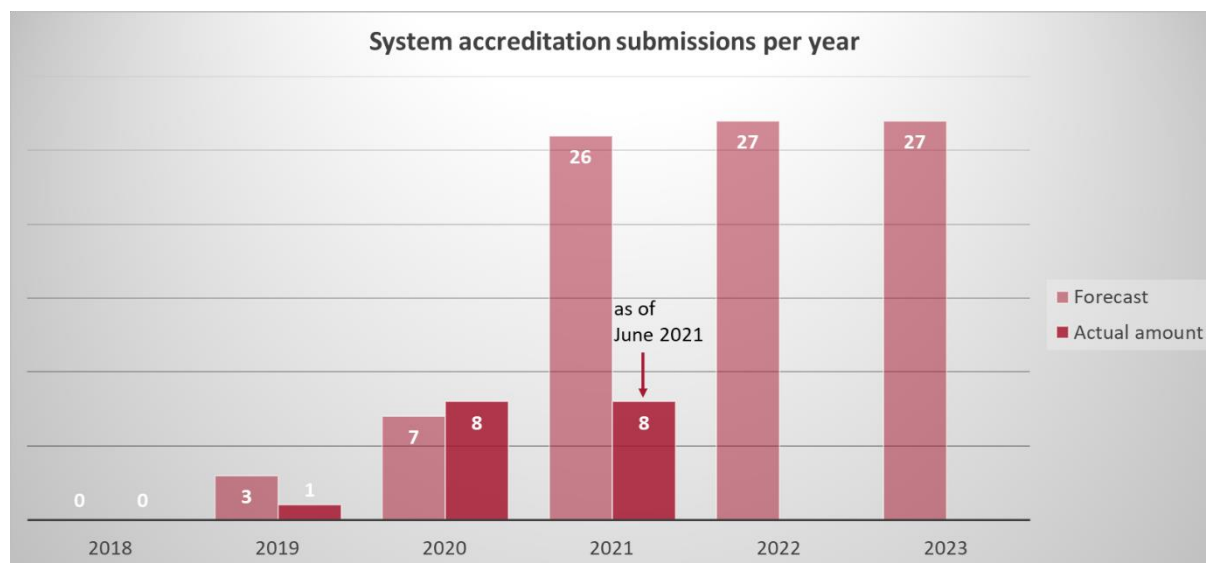
Slide 04: Programme accreditation submissions per year



Programme accreditation submissions per year (source for actual amounts: ELIAS database). The numbers represent single programmes, albeit that programmes may be submitted in a cluster. Variations in accreditation cycle endings, existing system accreditations, accreditation extensions and new programme/system accreditation forecasts are included into the calculation as far as available in June 2021. The forecast for 2021 already includes some Covid-19 related extensions and forecast thereof.

Slide 05: System accreditation submissions per year

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System accreditation submissions per year (partial and full system accreditations subsumed; source for actual amounts: ELIAS database). Variations in accreditation cycle endings, existing system accreditations and new system accreditation forecasts are included into the calculation as far as available in June 2021. The forecast for 2021/2022 already includes some Covid-19 related extensions.

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5. Higher education quality assurance activities of the agency

Subject of the quality assurance activities of GAC

575 The subject of all quality assurance activities of GAC are Bachelor's and Master's study programmes of German state or private, state-recognised HEIs, either directly in programme accreditation or indirectly in system accreditation, where it is examined whether the HEI in question is itself able to ensure compliance with the standards for its study programmes. The focus is therefore on the quality of teaching and learning.⁵¹

580 A distinction must be made between this and the quality assurance of research where a system of peer reviews for externally funded research projects has been established. Doctoral studies are not included in the portfolio of GAC.⁵² However, HEIs are free to develop holistic quality management systems that also include research.

⁵¹ See Article 1 (1) and Article 2 (1) of the Interstate Study Accreditation Treaty for the focus on the quality of teaching and learning and especially on Bachelor's and Master's study programmes.

⁵² See for details chapter [12. Recommendations and main findings from previous review\(s\) and agency's resulting follow-up](#).

Besides, academic, and professional accreditation are separated. GAC is only responsible for academic accreditation. There are three exceptions to this principle:

- For teacher education programmes and theological programmes the fulfilment of the professional requirements is compulsorily checked in the accreditation procedures carried out by GAC (see § 22 (5) and § 25 (1) sentences 3 to 5 Specimen Decree).
- Fulfilment of the requirements under professional regulations is also in other disciplines relevant for the (academic) accreditation decision if the HEI promises that graduates can gain access to a regulated profession upon completion of the study programme, i.e., the practice of this profession is part of the qualification objective according to § 11 (1) Sentence 1 Specimen Decree.
- § 35 Specimen Decree offers the possibility of an organisational connection of the procedures of academic and professional accreditation.⁵³

Quality assurance activities in the scope of the ESG

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

- Programme accreditation,
- system accreditation,
- accreditation of alternative procedures,
- equivalency assessment.

See chapter [6. Processes and their methodologies](#) for a detailed description of the different quality assurance activities of GAC.

Accreditation of joint degree programmes

The accreditation of joint degree programmes by way of recognition of assessments carried out according to the European Approach for Quality Assurance of Joint Programmes⁵⁴ according to the Terms of Reference is not considered as a separate quality assurance activity as it falls under the activity programme accreditation. Special characteristics

⁵³ An example of this are study programmes in the field of auditing. If, at the request of the HEI, it is to be decided within the scope of the accreditation procedure if a Master's study programme is "*particularly suitable for the training of auditors within the meaning of the Auditing Examination Ordinance*" representatives or commissioners of the professional bodies participate in the accreditation procedure as representatives of professional practice; see resolution of the KMK of 17 November 2005 at https://www.kmk.org/fileadmin/veroeffentlichungen_beschluesse/2005/2005_11_17-Wirtschaftspruefer-Akkreditierung.pdf.

⁵⁴ See https://www.eqar.eu/assets/uploads/2018/04/02_European_Approach_QA_of_Joint_Programmes_v1_0.pdf.

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

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Activities outside the scope of the ESG

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GAC makes clear distinctions between quality assurance activities and the activities which are not in the scope of the ESG. Cooperation agreements with foreign quality assurance agencies as well as international projects such as Twinning aim at capacity building, at the exchange of information and expertise.⁵⁵ They do not include any assessment or evaluation of a HEI or study programme. Therefore, they have nothing in common with GAC's quality assurance activities. Besides, the activities are clearly separated on the GAC homepage.⁵⁶

6. Processes and their methodologies

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Programme accreditation

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The objects of programme accreditation are Bachelor's and Master's programmes, offered by state or state-recognised HEIs in Germany (see Article 1, Article 2 (1) and Article 3 (1) no. 2 of the Interstate Study Accreditation Treaty). Within the accreditation, it must be demonstrated that the study programme complies with the formal criteria according to part 2 and the academic criteria according to part 3 of the Specimen Decree (see § 22 (1) Specimen Decree). If a study programme has successfully undergone an accreditation procedure, it receives an accreditation with or without conditions (see § 22 (1) Specimen Decree) and bears GAC's seal of quality for the period of its accreditation, which is eight years (see § 22 (4) Specimen Decree). If study programmes "*have a high affinity on subject level that goes beyond the mere affiliation to a disciplinary culture*"⁵⁷, accreditation can also be carried out as part of a cluster procedure (see § 30 (1) and (2) Specimen Decree); nevertheless, the accreditation decision always refers to the individual study programmes.

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The accreditation procedure is a multi-stage process based on the principle of peer review. If a HEI according to § 24 Specimen Decree commissions an assessment agency, authorised by GAC, to carry out the procedure, the agency in question appoints a review panel (see § 25 Specimen Decree⁵⁸).

⁵⁵ See chapter [8. Agency's international activities](#).

⁵⁶ See <https://www.akkreditierungsrat.de/en/international-affairs/international-affairs>.

⁵⁷ § 30 (1) sentence 1 Specimen Decree

⁵⁸ See chapter [10.4 ESG Standard 2.4 Peer-review experts](#).

The HEI hands in a self-evaluation report to the assessment agency (see § 24 (2) Specimen Decree).

645 Fulfilment of the formal criteria from part 2 of the Specimen Decree is assessed by the assessment agency. The assessment agency documents the results in a formal report, which is made available to the experts (see § 24 (3) and (4) Specimen Decree).

650 The academic assessment of the study programme by the review panel is based on the criteria laid down in part 3 of the Specimen Decree (see § 24 (4) Specimen Decree) and, in addition to the analysis of the application documents, includes a site visit at the HEI (see § 24 (5) Specimen Decree). During this site visit, the review panel holds talks with representatives from the status groups of the HEI (see substantiation of § 24 (5) Specimen Decree).

655 In cases of a concept accreditation of a programme not yet begun and in case of a re-accreditation of a study programme, the review panel can decide to dispense with the site-visit and will then assess the programme in a desk-top validation (see § 24 (5) Specimen Decree). The explanatory memorandum to the specimen decree states that the possibility of waiving the site-visit only exists if it has no added value compared to the assessment of the academic criteria based on documents. In the agencies' practice, the waiver has not played a major role.

660 In line with EQAR's statements,⁵⁹ GAC also considers a site visit carried out online due to the Covid-19 pandemic to be permissible.

Subsequently, the experts prepare a review report with a proposal for a decision on the accreditation of the study programme (see § 24 (4) Specimen Decree).

665 The agencies give the HEIs the opportunity to comment on the review report. On the one hand, this allows possible factual errors in the report to be corrected; on the other hand, the HEI can also comment on the findings of the review panel.

670 The Accreditation Council decides on the accreditation of the study programme on application by the HEI. Its decision is based on the formal report and the review report (see § 22 (1) Specimen Decree). Pursuant to Article 3 (4) of the Interstate Study Accreditation Treaty, the HEIs may also attach a statement to their application for accreditation. If the Accreditation Council intends to deviate significantly from the experts' proposal, the HEI can submit a further statement before the Accreditation Council's decision (see § 22 (3) Specimen Decree).

After completion of the procedure, GAC according to § 29 Specimen Decree publishes its decision and the review report including the names of the experts in ELIAS.

⁵⁹ <https://www.eqar.eu/covid-19/#can-our-agency-review-be-organised-with-an-online-site-visit>

Possible decisions are: Accreditation without conditions, accreditation with conditions and rejection of accreditation (see § 22 (1) and § 27 Specimen Decree). In case of a positive accreditation decision, the study programme will bear GAC's quality seal (see § 22 (4) Specimen Decree). Accreditation is granted for a period of eight years (see § 26 Specimen Decree).

In case of an accreditation with conditions, according to § 27 Specimen Decree, the HEIs "usually" have a deadline of twelve months to prove their fulfilment to GAC. Although the deadline thereafter can be longer or shorter in special cases, the Accreditation Council generally grants the twelve-month deadline for reasons of equal treatment. The possibility provided for in § 27 (2) Specimen Decree to subsequently extend the deadline is, on the other hand, used by the Accreditation Council in cases in which the HEI has submitted documents for fulfilment of conditions in due time, but these are not sufficient.

Programme accreditation of joint degree programmes according to § 33 Specimen Decree

For joint degree programmes, the Specimen Decree and the decrees of the Länder allow the application of the European Approach for Quality Assurance of Joint Programmes (European Approach).

§ 10 (1) of the Specimen Decree states:

"(1) A joint degree programme is either a Bachelor's or a Master's study programme that is coordinated and offered by a domestic higher education institution together with one or more higher education institutions from a foreign state or states in the European Higher Education Area that leads to a joint degree and that has the following features:

- 1. an integrated curriculum,*
- 2. usually at least 25 percent of the study programme completed at one or more foreign higher education institutions,*
- 3. contractually governed cooperation,*
- 4. coordinated admissions and examination system, and*
- 5. a joint quality assurance."*

§§ 10, 16 and 33 of the Specimen Decree contain the criteria for joint degree programmes. Those stipulations transpose the European Approach into German law; for legal reasons, the European Approach itself is only mentioned in the explanatory memorandum to the decree.

The formal and academic criteria for joint degree programmes according to § 10 (2) and § 16 (1) Specimen Decree correspond to the criteria of the European Approach.

The procedural rules of the European Approach were implemented in § 33 Specimen Decree.

710 GAC according to § 33 only checks whether an assessment has taken place according to the European Approach by an agency listed in EQAR, i.e., whether the study programme has been assessed according to the criteria and procedural rules of the European Approach. It does not carry out a second assessment of the study programme. For recognition, however, it requires a review report from which the application of the European Approach is clear; if not, the application must be rejected/the review report must be improved.

715 If an assessment has taken place according to the European Approach with a positive outcome, GAC makes an accreditation decision by way of recognition of this assessment. This accreditation has the same legal consequences as the "normal" accreditation by the Accreditation Council. However, the accreditation period is six years, as provided for in the European Approach. It also follows from § 33 (1) sentence 2 no. 6 Specimen Decree that any conditions
720 which the experts/the assessment agency have stipulated must be fulfilled before the recognition decision can be made by GAC.

After completion of the procedure, GAC publishes the decision, as well as the review report including the names of the experts and, if applicable, the decision of the (foreign) assessment agency in German and English in ELIAS.

725 At the time of reporting, GAC took seven accreditation decisions according to § 33 Specimen Decree. This activity is delegated to the Board.⁶⁰ There would probably be more cases if the European Approach was applied in Germany not only to study programmes leading to a joint degree, but also to integrated double and multiple degree programmes.

730 **System accreditation**

The object of system accreditation is the internal quality assurance system of state or state-recognised HEIs in Germany (see Article 1, Article 2 (1) and Article 3 (1) no. 1 of the Interstate Study Accreditation Treaty). With system accreditation, a HEI receives the right to award the seal of GAC for its self-assessed study programmes (see § 22 (4) Specimen Decree). During
735 system accreditation, a HEI must demonstrate that it systematically implements the formal and academic criteria laid down in the Specimen Decree (see § 17 (1) Specimen Decree). To this end, the quality management system must provide for regular evaluations of the study programmes and the areas of performance relevant to teaching and learning, involving internal and external students, external academic experts, representatives of professional practice and
740 graduates (see § 18 (1) Specimen Decree). A positive system accreditation certifies that the

⁶⁰ Based on section 12 of the Statutes.

HEI's quality management system in the field of teaching and learning is suitable for ensuring that the qualification goals and quality standards of its study programmes are achieved.

The accreditation procedure is a multi-stage process based on the principle of peer review. If a HEI according to § 24 Specimen Decree commissions an assessment agency to carry out a peer review procedure, the agency in question appoints a review panel (§ 25 Specimen Decree; see chapter [10.4 ESG Standard 2.4 Peer-review experts](#) for details).

The HEI hands in a self-evaluation report to the assessment agency (see § 24 (2) Specimen Decree).

The assessment of the quality management system by the review panel is carried out based on the criteria for quality management systems laid down in part 3 of the Specimen Decree (see § 24 (4) Specimen Decree) and usually includes two site visits at the HEI in which the review panel will hold discussions with representatives from the status groups of the institution (see substantiation of § 24 (5) Specimen Decree).

Subsequently, the experts prepare a review report with a proposal for the accreditation of the HEI's internal quality management system (see § 24 (4) Specimen Decree).

The agencies give the HEIs the opportunity to comment on the review report. On the one hand, this allows possible factual errors in the report to be corrected; on the other hand, the HEI can also comment on the findings of the review panel.

The evaluation procedure also provides for a random sample. *"During random sampling, it is checked whether the effects intended by the quality management system under assessment occur on the level of the study programme."*⁶¹ (see for details on the random sample § 31 Specimen Decree).

The Accreditation Council decides on the accreditation of the quality management system on application by the HEI. The process is similar to the one used in programme accreditation: The basis for the decision is the review report submitted by the review panel as well as the formal report drawn up by the assessment agency (see § 22 (1) Specimen Decree). The formal report shall state in the initial system accreditation that at least one study programme has passed through the quality management system at the time of application. In the case of system re-accreditation, it must be shown that all Bachelor's and Master's study programmes have passed through the institution's internal quality management system at least once (see § 23 (1) no. 2 to 4 Specimen Decree). Pursuant to Article 3 (4) of the Interstate Study Accreditation Treaty, the HEIs may attach a statement to their application for accreditation. If the Accreditation Council intends to deviate significantly from the proposal of the peers, the HEI can submit

⁶¹ § 31 (1) sentence 2 Specimen Decree

a further statement before the Accreditation Council's decision (see § 22 (3) Specimen Decree).

After completion of the procedure, GAC according to § 29 Specimen Decree publishes its decision and the accreditation report including the names of the experts in ELIAS.

Possible decisions are: Accreditation without conditions, accreditation with conditions and rejection of accreditation (see § 22 (1); § 27 Specimen Decree). In the event of a positive accreditation decision, the quality management system bears the quality seal of GAC and the HEI receives the right to award GAC's seal for the study programmes it has assessed itself (see § 22 (4) Specimen Decree). Accreditation is granted for a period of eight years (see § 26 Specimen Decree).

In case of an accreditation with conditions, according to § 27 Specimen Decree, the HEIs "usually" have a deadline of twelve months to prove their fulfilment to GAC. In practice, the Accreditation Council generally grants the twelve-month deadline here as well.

Accreditation of alternative procedures

Process and methodology

In 2012, the German Council of Science and Humanities proposed an experimentation clause to "[...] also allow particularly ambitious higher education institutions other procedures of external assessment - under the supervision of the Accreditation Council".⁶² The Accreditation Council adopted this recommendation and in 2014 called on the HEIs to test such alternative approaches within the framework of an experimental clause. Four experiments were approved by the Accreditation Council, whose assessment procedures began in 2016 under the close supervision of the Accreditation Council and were completed in 2020.

The experiences with the procedures within the framework of the experimental clause were incorporated into the further development of the accreditation system in Germany. With the ratification of the Interstate Study Accreditation Treaty, the Länder subsequently established the accreditation of alternative procedures as a third procedural line. (see Article 3 (1) no 3 Interstate Study Accreditation Treaty).

"The alternative procedure should be suitable to gain fundamental knowledge of alternative approaches to external quality assurance beyond the procedures named in Article 3 paragraph

⁶² German Council of Science and Humanities: "Recommendations on Accreditation as an Instrument of Quality Assurance", 2012, p. 11: http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/Sonstige/WR_2012_Akkreditierung.pdf (in German only)

1 numbers 1 and 2 of the interstate study accreditation treaty" (§ 34 (3) sentence 4 Specimen Decree).

Object of accreditation is the alternative procedure. During the accreditation of the alternative procedure, a HEI must demonstrate that it, with the help of the alternative procedure, systematically implements the formal and academic criteria laid down in the Specimen Decree (see § 34 (2) Specimen Decree) and that the alternative procedure itself complies with the ESG (see preamble and section 3 (3) sentence 2 of the Rules of Procedure for Alternative Accreditation Procedures (RPAAP)).

With successful accreditation, the HEI receives the self-accreditation rights for the study programmes assessed within the alternative procedure (see section 6 (2) RPAAP).

The framework for these procedures is to be found in § 34 Specimen Decree and in the RPAAP which the Accreditation Council adopted based on § 34 (4) Specimen Decree.

The procedure for accreditation of an alternative procedure is a multi-stage peer review. Before an alternative procedure is carried out, the approval of the competent science authority of the respective Land and the Accreditation Council must be obtained (see § 34 (3) sentence 1 Specimen Decree; section 3 RPAAP).

After approval has been granted, the details of the review shall be specified in an agreement to be concluded between GAC and the HEI submitting the application (see section 4 RPAAP).

The HEI subsequently submits a self-evaluation report based on the previous application (see section 5 (2) RPAAP). The assessment is carried out by external independent experts (see section 5 (2) RPAAP). GAC may carry out the procedure itself or delegate it to third parties (see section 5 (4) RPAAP). The result of the assessment procedure is a review report with assessment proposals (see section 6 (1) RPAAP). According to section 6 (1) RPAAP the HEIs are given the opportunity to comment on the report; factual errors can be asserted in this way, as can the HEI's differing opinions on the findings of the review panel.

"The Accreditation Council decides on the accreditation, on application by the higher education institution, by determining the equivalence of the alternative accreditation procedure to the procedures under article 3 sentence 1 no. 1 and 2 of the Interstate Treaty." (section 6 (1) RPAAP).

After completion of the procedure, GAC according to section 6 (6) of the RPAAP publishes its decision and the accreditation report including the names of the experts in ELIAS.

Possible decisions are: Accreditation without conditions, accreditation with conditions and rejection of accreditation (see section 6 (3) RPAAP). On accreditation, GAC awards its seal to

the alternative procedure, which gives the HEI the right to award the seal for its study programmes if they have undergone the assessment procedure for study programmes provided for in the accredited procedure (see section 6 (2) RPAAP). Accreditation of an alternative accreditation procedure is limited to a maximum of eight years (see § 34 (5) sentence 1 Specimen Decree and section 6 (2) RPAAP).

As a rule, two years before the accreditation period expires, the alternative procedure is evaluated by an independent, scientifically oriented institution which reports to the Accreditation Council. The Accreditation Council makes a recommendation on whether the alternative procedure should be continued based on the evaluation results and the results of the monitoring of the procedure (see § 34 (5) sentence 3 Specimen Decree and section 9 RPAAP on the evaluation).

Currently ongoing accreditation procedures regarding alternative procedures

Since the RPAAP were only adopted in 2019, there is no experience yet with completed accreditation procedures of alternative procedures. However, two accreditation procedures were initiated in 2020. The assessment in both procedures is carried out by GAC. The two alternative procedures submitted for accreditation are to be presented briefly, as they represent the range of possible procedures in an exemplary manner:

- Alternative procedure of the Harz University of Applied Sciences: The Harz University of Applied Sciences carries out a programme-related alternative procedure. The core element is the regular internal workshops on programme development with the participation of students and professors, which are complemented every eight years by the participation of external experts. The institution has also created its own accreditation committee, the majority of which is made up of external members from the areas of university management, student body and professional practice. A representative of an assessment agency is an advisory member. It is expected that the alternative procedure will provide insights into how teachers and students can be more involved in accreditation procedures and how external expertise can be strengthened in accreditation committees. The accreditation procedure of the alternative procedure is expected to be completed in November 2021. At the time of reporting, the expert training has taken place and the first on-site visit is imminent.
- Alternative procedure of the Hochschule der Medien, the Hochschule Furtwangen, the Hochschule für Wirtschaft und Umwelt Nürtingen-Geislingen: The procedure of the three HEIs in Baden-Württemberg is system-oriented. The HEIs work together to continuously evaluate and further develop their quality assurance systems in, partly joint, annual quality conferences. This also includes the institutions' own internal procedures

for the accreditation of study programmes. In addition to the cooperation of three HEIs in quality assurance, the outstanding feature of this alternative procedure is the continuous evaluation. GAC will therefore accompany this procedure particularly closely throughout the entire accreditation period. At the time of reporting, the Accreditation Council has, in principle, decided on the agreement for the implementation of the accreditation procedure with the three HEIs but has not yet contracted. Accreditation is expected to take place in November 2021.

Equivalency assessment (GJU)

HEIs abroad with a clear connection to Germany (German backed universities) have interest in proving that they meet German quality standards. This is particularly important for the recognition of the degrees awarded by such HEIs. The German Jordanian University (GJU) had approached GAC to get a certificate of equivalence for its study programmes, provided that it proves the fulfilment of the formal and academic criteria laid down in the Specimen Decree in assessment procedures that were carried out by an assessment agency authorised by GAC according to part 4 of the Specimen Decree. Those requirements were set out in a contract between GJU and GAC.⁶³ This is, at least as things stand at the time of reporting, a singular project. Similar projects with other universities are not planned.

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

⁶³ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/20200211_Vereinbarung_Gleichwertigkeitsfeststellung.pdf (in German only)

7. Agency's internal quality assurance

Fundamentals of the quality management of GAC

905 GAC's quality management concept, adopted by the Accreditation Council in 2019,⁶⁴ contains GAC's quality goals and its basic quality management framework. It specifies the implementation of GAC's quality assurance and development in processes and responsibilities.

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

Quality management is intended to meaningfully link the existing goals, concepts and processes of GAC, by means of a quality cycle and thus provide impulses for sustainable further development. The quality cycle is based on a continuous, cyclical process that is generally recognised in the context of quality management concepts: the PDCA cycle (Plan-Do-Check-
915 Act) according to Walter Deming.⁶⁵

GAC's PDCA cycle

The PDCA cycle was described in the quality report of 2020 which was adopted by the Accreditation Council at its 108th meeting⁶⁶ as follows:

920 *"1. Process step "Plan": What are the quality goals and concepts of GAC?*

The Accreditation Council has adopted the following quality objectives and concepts in its mission statement (printed matter AR 51/2019) and in its quality management concept (printed matter AR 67/2019). These include:

- 925 • *The German Accreditation Council ensures that the accreditation procedures are carried out quickly, reliably, on time and transparently from the application to the decision of the Accreditation Council. In particular, the administrative work involved in submitting applications should be kept to a minimum for Higher Education Institutions and agencies.*
- 930 • *It acts in accordance with the European Standards and Guidelines (ESG) and the Interstate Study Accreditation Treaty as well as its implementation through corresponding decrees of the Länder.*
- *It ensures that accreditation decisions are taken independently of third parties and that potential conflicts of interest are prevented by means of appropriate measures.*
- 935 • *It promotes the dialogue between all actors involved in the accreditation system and works towards a trustful cooperation of all represented stakeholders.*

2. Process step "Do": How do Accreditation Council and Head Office implement the individual quality goals operationally?

⁶⁴ See <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/quality-management/quality-management-german-accreditation-council>.

⁶⁵ See annex 03 for a graphical presentation of the PDCA cycle.

⁶⁶ See annex 02, pages 2-4 (in German only).

The quality objectives are implemented operationally in the Head Office through the regular processing of accreditation applications, in the preparation and follow-up of accreditation decisions, in the preparation and implementation of resolutions and in the other tasks of GAC.

Core operational processes include:

- the introduction, use and further development of ELIAS for application handling (including process descriptions),
- communication with all stakeholders of the accreditation system,
- creation of internal process descriptions and orientation aids (subject allocation, business distribution plan, office organisation, handbook programme accreditation),
- preparation of external orientation aids (resolutions, FAQ).

3. Process step "Check": How do structured evaluation and feedback formats work?

The implementation of the quality objectives through the operational core processes is subject to both regular and ad hoc reviews. On the one hand, this is ensured by structured evaluations in ELIAS following application procedures (questionnaire tool), which are regularly evaluated. A further regular external evaluation will be carried out by an ENQA review.

On the other hand, different feedback offers for all actors of the accreditation system (universities, students, agencies, Länder, etc.) are used, which can initiate a review of operational core processes on an ad hoc basis.

Exemplary feedback offerings include:

- The members of the Accreditation Council perform an important function as communicative interfaces between the respective stakeholder area and the Accreditation Council.
- GAC invites the management of all agencies annually to a joint conference and thus ensures a regular exchange with the agencies.
- Through the format of the Quality Dialogue, GAC offers an annual exchange forum on topics related to accreditation.
- The Board and the programme managers take part in working groups, associations of the scientific faculties at German universities, conferences, etc. and thus enable a direct exchange with all stakeholders of the accreditation system.
- The Head Office conducts feedback rounds on programme accreditation with the agencies.
- The Head Office offers ELIAS trainings for the user groups if required.
- The Head Office ensures regular and transparent communication for different target groups through the publication of resolutions and results letters, FAQs, a newsletter, and the use of social media.

All these feedback formats offer the stakeholders of the accreditation system the opportunity to provide feedback on the operational core processes of GAC on a regular and/or occasion-related basis.

4. Process step "Act": How are operational or conceptual consequences derived from the review?

The further handling of structured and ad-hoc feedback is differentiated according to addressing and relevance:

- Feedback that affects core operational processes within the Head Office is dealt with in office meetings and Jour Fixes. There can be consequences derived from this, which can be implemented, for example, in the form of further development of ELIAS processes, further development of internal orientation aids or the creation of external orientation aids.

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- *Feedback concerning ongoing business in accordance with § 12 (2) of the Statutes is dealt with by the Board. This may result in consequences in the form of Board resolutions or draft resolutions which are submitted to the Accreditation Council for decision.*
 - *Feedback relevant to the accreditation system as a whole shall be dealt with in the Accreditation Council. From this, consequences can be derived in the form of resolutions as well as an adjustment of the quality objectives.*
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All three levels represent closed and at the same time complementary control cycles and form the quality management of GAC. The Head Office also compiles an annual activity report in which evaluations from the structured evaluation in ELIAS as well as results from the feedback formats are documented".

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See <https://www.akkreditierungsrat.de/en/news-and-publications/news-and-publications> for the activity reports for the last years.

Status of the implementation of the quality management

1000 Contrary to the original plans of the 101st meeting of the Accreditation Council, not all described instruments and processes could be implemented completely by the end of 2020. The main reasons for the delay are the Covid-19 pandemic, the changed prioritisation in the further development of the ELIAS portal and the large volume of accreditation applications. The following instruments and processes have already been implemented or are in the process of

1005 implementation:

Structured evaluation of accreditation procedures

A questionnaire tool in ELIAS is expected to be operational by the end of 2021. It will give HEIs the opportunity to provide feedback following accreditation procedures. This feedback can address organisational, content-related, and technical aspects of the accreditation process. The feedback is collected anonymously and documented by the Head Office in accumulated form once a year. The results are also published in accumulated form in the quality report and thus form the basis for the further development of the operational processes and conceptual framework conditions.

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Feedback formats

- *New website and communication concept*

In 2018/2019, the website of the Accreditation Council was visually and technically renewed. All information on the current accreditation system can be found there, also in English. The public database (ELIAS) is also linked there.⁶⁷

In March 2020, the Accreditation Council adopted a communication concept in which, in addition to the information offered on the website of GAC and the established forms of communication of the press release, result letters to the stakeholders and FAQs, further proactive communication formats were introduced in the form of a Twitter account and a newly designed newsletter (with a subscriber list of over 1,000 addresses).

The website and the communication concept provide an essential basis for the various feedback formats by ensuring a regular and transparent flow of information from GAC to all stakeholders in the accreditation system.

- *Quality Dialogue*

In September 2019, the first annual Quality Dialogue of GAC took place in cooperation with the University of Oldenburg in Frankfurt. The topic of the Quality Dialogue was quality standards and quality assurance in continuing academic education. The next Quality Dialogue with the topic “dual study programmes” in cooperation with the Osnabrück University of Applied Sciences was originally scheduled to take place in June 2020. Due to the Covid-19 pandemic, it took place in June 2021

- *Feedback discussions with agencies*

The enlarged meeting of the Accreditation Council together with all agencies authorised by GAC at the beginning of each year offers an exchange with the representatives of the agencies. At the 103rd meeting in March 2020, the Interim Review⁶⁸ was presented and discussed with the agencies. At the 108th meeting in March 2021, agencies and GAC held a dialogue on the quality of assessment reports.

To optimise the cooperation on the operational level, several feedback talks between the Head Office and the agencies were held 2019-2021. Such feedback talks take place on a regular basis of about four per year.

- *Exchange Forum of System-Accredited Higher Education Institutions*

⁶⁷ <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/tasks-german-accreditation-council>

⁶⁸ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf.

Members of the Board and/or the Head Office regularly participate in the Exchange Forum of System-Accredited Higher Education Institutions initiated by Münster University of Applied Sciences, in which about 100 members of system accredited HEIs participate.

- *ELIAS trainings for the user groups*

1060 The Head Office conducted ELIAS training for employees of HEIs in November 2019, in March and in May 2020. The members of the Accreditation Council are also trained regularly, most recently in April 2021.

Internal instruments

1065 To ensure quality assurance in the handling of applications, the review of applications and the decision on accreditations take place through a multi-stage process. A system of "checks and balances" has been established through the defined process steps of examination and cross-checking of applications in the Head Office, a rapporteur system⁶⁹ and decision-making in the Accreditation Council.

1070 To ensure consistent application of criteria, in 2020, the creation of a Handbook Programme Accreditation was started. The aim of the handbook is to systematically record the Accreditation Council's decision-making practice on issues that regularly arise in the assessment practice and thus to create a central repository of knowledge for the Head Office.

1075 In addition, an internal Jour Fixe Programme Accreditation is held on a regular basis, at least before each meeting of the Accreditation Council, which offers the programme managers the opportunity to exchange views on the interpretation of accreditation criteria and to discuss procedural issues.

Besides, process descriptions guarantee the consistent processing of accreditation applications.

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8. Agency's international activities

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

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⁶⁹ See chapter [10.2 ESG Standard 2.2 Designing methodologies fit for purpose](#).

International Networks

1090 GAC is a long-standing active member of the leading European and international quality assurance networks such as ENQA (membership 2000-2018, from 2018 affiliate of ENQA) and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). It regularly participates in international working groups, meetings and conferences.

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

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International agreements

GAC has established the following international agreements with quality assurance agencies in Japan, the USA and Chile which aim at the exchange of information and expertise:

- 1100 • Agreement with the Japanese quality assurance agency NIAD-UE National Institution for Academic Degrees and University Education,⁷⁰
- Agreement with the US quality assurance agency CHEA International Quality Group (CIQG)⁷¹ and
- Agreement with the Chilean quality assurance agency Comisión Nacional de Acreditación.⁷²

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International projects

QACHE

1110 GAC was a partner in the project QACHE - Quality Assurance of Cross-border Higher Education, which focused on the quality of transnational study programmes. The project was co-financed by the Erasmus+ programme of the European Union. The aim was to create a common European quality assurance approach for cross-border higher education. The project ran until March 2016.

As a further project result, a country report was prepared by GAC's Head Office, which contains an inventory of the offers of German HEIs abroad and their quality assurance.⁷³

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⁷⁰ https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/NIAD-UE_GAC_Memorandum_of_Understanding.pdf

⁷¹ https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/CIQG_GAC_MoA.pdf

⁷² https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/CNA-AR-Memorandum_of_Understanding_unterzeichnet.pdf

⁷³ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/AR_Qache_Laenderbericht_BRD_en.pdf.

EHEA Peer Support

At the Ministerial Conference held in Paris in 2018, the ministers of higher education of the EHEA agreed that full implementation of three key commitments, to ensure that all countries fully implement the three-cycle system, the smooth recognition of qualifications and study periods and quality assurance is crucial for the success of the Bologna Process.

The ministers adopted a structured peer support approach to promote the implementation of the three key commitments. The peer support approach was to be facilitated by the establishment of three Thematic Peer Groups, each dealing with one of the three key commitments. The Thematic Peer Group C on Quality Assurance was established with the aim of fostering peer support among countries. Accordingly, a European project was created to facilitate and finance a system of staff mobility across Europe with the aim of sharing expertise from this field.

GAC took part in Thematic Peer Group C on Quality Assurance. Due to the Covid-19 pandemic, of several planned staff exchanges, only one, with AQ Austria, could be realised.

Twinning project Georgia

GAC is a partner in the two-year Twinning project “Strengthening capacities for quality assurance and governance of qualifications in Georgia”. It runs until June 2021 and is dedicated to the following three components:

- Strengthening quality assurance of education and training in a LifeLongLearning perspective,
- Contributing to the implementation of the new national qualifications framework,
- Contributing to improved model of governance, monitoring and dissemination of the Georgian quality assurance agency National Center for Educational Quality Enhancement (NCEQE)'s outputs.

The project partners are Germany (DAAD, BMBF and Accreditation Council) and Estonia (the Estonian accreditation agency EKKA). Within the project period, various expert missions are planned for each individual component.

Two activities were already implemented with the participation of GAC.

- Development of NCEQE concept proposal for a quality assurance framework of the formal and non-formal education
- Elaboration and dissemination of handbooks and toolkits

Twinning project North Macedonia

1150 Currently, GAC participates with a leading Polish partner and German partner DAAD in a Twinning project grant call. Overall objective of the proposed 30-month Twinning project is strengthening and operationalisation of the national qualifications framework of North Macedonia, aiming to increase the employability, mobility and social integration of workers and learners.

1155 GAC can especially contribute to reviewing the institutional quality assurance framework and to developing efficient and applicable quality assurance methodologies and procedures in North Macedonia. By participating in further Twinning projects, GAC strives to enlarge its international network, to strengthen European cooperation in quality assurance of higher education and to contribute to European unification.

1160 Details of the North Macedonia Twinning Project are currently under negotiation with the project partners. In case of a positive award decision, the project start is expected for the second half of 2021.

International quality assurance activities

1165 International quality assurance activities such as the accreditation of joint degree programmes and the equivalency assessment are explained in chapter [5. Higher education quality assurance activities of the agency](#).

9. Compliance with European Standards and Guidelines (Part 3)**1170 9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance**

1175 **Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.**

External quality assurance activities

1180 GAC undertakes external quality assurance activities as defined in part 2 of the ESG on a regular basis. As clarified in the tripartite Terms of Reference for this evaluation procedure, this ESG evaluation takes into account that in the German system, agencies and the Accreditation Council proceed in a division of labour and responsibility.

Strategic planning

1185 GAC has a published Mission Statement.⁷⁴ It summarises the self-image and basic principles of GAC and formulates the mission, the strategic goals and the manner of their intended implementation.

1190 As mentioned, in chapter [4. History, profile and activities of the agency](#), GAC operates within a legal framework that comprises six tasks. First and foremost is the task of accrediting study programmes, quality management systems and alternative procedures. Therefore, external quality assurance, in the form defined within the German system, lies in the centre of GAC's activities. The five other tasks that, in general, already existed in the old system are less prominent in comparison. The Mission Statement therefore starts with the commitment that GAC "*fulfils the tasks assigned to it in the Interstate Study Accreditation Treaty*" and focuses mainly on the accreditation job.

1195 It is notable that the Accreditation Council has finally adopted its Mission Statement in June 2019, one and a half year after the start of Germany's current accreditation system. This was due to an early strategic choice: In its constitutive meeting on 20 February 2018, the Accreditation Council made the policy decision not to produce all-encompassing policy and planning papers, but to develop its strategy in a modular way from the reality of administrative practice.⁷⁵

1200 The Interim Review, adopted by the Accreditation Council in March 2020,⁷⁶ in its second chapter, explains in detail how this "piecemeal engineering"-approach on strategy and planning, based on the Mission Statement, has unfolded since then and how a set of single decisions helped to shape the proceedings.

1205 Based on GAC's self-commitment in its Mission Statement, that it ensures the quick, reliable and transparent execution of accreditation procedures, components of this modular strategic approach are the increase in personnel and space at the Head Office, the adaption of the GAC's internal working procedures to the new legal tasks, the implementation of tools which streamline the processing of accreditation applications, and of measures to ensure the consistent application of accreditation criteria.⁷⁷

1210 In implementation of the goal from the Mission Statement to enhance process efficiency within GAC and to promote "*[...] the dialogue between all actors involved in the accreditation system*"

⁷⁴ <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/mission-statement/mission-statement>

⁷⁵ See Interim Review, page 1.

⁷⁶ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf

⁷⁷ See Interim Review and for details on these measures also [10.2 ESG Standard 2.2 Designing methodologies fit for purpose](#).

and work[s] towards a trustful cooperation of all represented stakeholders” the Interim Review refers to a number of additional resolutions by the Accreditation Council, e.g. on what is expected from an accreditation report, on the reporting obligations for system-accredited HEIs and on the size of expert panel in cluster accreditation procedures.⁷⁸

Another component already implemented is the GAC’s quality management concept.⁷⁹ At the centre of this concept is the GAC’s objective, as stated in its Mission Statement, to reflect “on the implementation of its tasks and regularly evaluate[s] the feedback from higher education institutions and agencies in order to use the results for an experience-based further development of the quality assurance system and the application procedures [...]” In implementing the GAC’s objective, also stated in the Mission Statement, to ensure “[...] that accreditation decisions are taken independently of third parties and that potential conflicts of interest are prevented [...]”, the code of conduct for members, substitute members and permanent guests of the Accreditation Council, was adopted.⁸⁰

GAC states further in its Mission Statement that it is “[...] committed to academic freedom and the autonomy of HEI [...]” HEIs have the primary responsibility for quality in teaching and learning. Accreditation can be understood as supporting HEIs to reflect on their activities and to initiate a continuous process of quality development. Consequently, GAC has implemented several quality development measures as important components of its piecemeal engineering approach, which are the prize for quality development, the Quality Dialogue and the section on quality development in accreditation reports.⁸¹

For its remaining term of office until the end of 2021, GAC, in its Interim Review, has laid down three priorities (see already chapter [4. History, profile and activities of the agency](#)):

- 1) Handling of the expected large “wave” of applications,
- 2) Systematic reflection on GAC’s work
- 3) Evaluation of GAC in the European context.

As of spring 2021, the priority under 1) has been tackled and measures to improve efficiency of application processing have been continued. Since internal calculations based on the data in the accreditation database showed that a high number of applications will be received in

⁷⁸ See Interim Review, page 13, for details on those resolutions.

⁷⁹ See Interim review, page 14 and chapter [7. Agency’s internal quality assurance](#).

⁸⁰ See page 15 of the Interim Review and <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/code-conduct/code-conduct>.

⁸¹ See page 15 of the Interim Review and for details on the quality development measures chapter [10.2 ESG Standard 2.2 Designing methodologies fit for purpose](#).

programme accreditation in the course of 2020,⁸² further process optimisation was necessary. This concerned, for example, the organisation of meetings as well as the further development of ELIAS.⁸³

1245 The item 2) on the list has been heavily affected by the pandemic. The reflection congress, envisaged for 2021, which was planned as an important building block to achieve the goal from the Mission Statement of regularly reflecting on the performance of GAC's tasks, had to be postponed due to pandemic-related additional workload and the uncertainty whether an event in presence would be possible. Instead, the Quality Dialogue about dual study programmes, 1250 cancelled in 2020, has been held in June 2021.

Concerning number 3), the preparatory work for the international evaluation also proceeded as planned.

Involvement of stakeholders

1255 The described strategic and planning approach makes clear that GAC closely interacts with its stakeholders in feedback and exchange formats. In addition to the planned structured evaluation via ELIAS, feedback formats are the communication via FAQs, the newsletter and Twitter, the Quality Dialogue, feedback discussions with agencies and the regular participation in the exchange forum of system-accredited HEIs.⁸⁴

1260 As regards the governance of GAC, the Accreditation Council as the main decision-making body consists of students, professors, representatives of professional practice and of the Länder, of two international members and a representative of the agencies (in consultative capacity). As such it is the main forum where the stakeholders work together for good accreditation decisions and the continuous improvement of the accreditation system. Stakeholders are also 1265 involved as experts in accreditation procedures. In case of accreditation of alternative procedures, GAC, if it conducts the review of the alternative procedure itself, selects them. In all other procedures they are selected by the agencies.⁸⁵

Separation of activities within the scope of the ESG and other tasks

1270 See chapter [5. Higher education quality assurance activities of the agency](#) for the distinction between activities within the scope of the ESG and activities outside the scope of the ESG.

⁸² See chapter [4. History, profile and activities of the agency](#).

⁸³ See for details the Interim Review.

⁸⁴ See for details chapter [7. Agency's internal quality assurance](#).

⁸⁵ See chapter [10.4 ESG Standard 2.4 Peer-review experts](#).

9.2 ESG Standard 3.2 Official status

1275 **Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.**

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

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9.3 ESG Standard 3.3 Independence

1285 **Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.**

Organisational independence

Legal framework

As described in [the previous chapter](#), GAC is a separate, independent legal entity. GAC is fully responsible for its actions.

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The composition of the Accreditation Council

The Accreditation Council is the only body responsible for the quality assurance procedures of the GAC. The Foundation Council, which “[...] *monitors the lawfulness and economic efficiency of the management of GAC's business* [...]”⁸⁶ and consists of six representatives of the Länder and five representatives of the HRK, does not interfere with the quality assurance procedures. See chapter [4. History, profile and activities of the Agency](#) on the composition of the Accreditation Council.

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According to Article 9 (2) sentence 2 of the Interstate Study Accreditation Treaty, the professors are appointed for a period of four years by the KMK at the suggestion of the HRK.

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For the other member groups of the Accreditation Council, Article 9 (2) sentence 4 provides for the following nomination rules:

- The representative of the HRK and the students are nominated by the HRK,

⁸⁶ Article 11 (1) Interstate Study Accreditation Treaty

- the representatives of the Länder are nominated by the KMK,
- 1305 • the representative of the state ministries responsible for service and collective bargaining law is nominated by the KMK in agreement with the Standing Conference of Ministers and Senators of the Interior of the Länder,
- the representatives of the professional practice and
- the foreign experts are nominated jointly by the KMK and the HRK and
- 1310 • the representative of the agencies is nominated by the agencies.

Those members (all members apart from the professors) are then, according to Article 9 (2) sentence 4, appointed unanimously by the KMK and the HRK for a period of four years; with exception of the students which are according to section 8 (3) of the Statutes appointed for two years.

- 1315 According to Article 9 (2) sentence 8 of the Interstate Study Accreditation Treaty, members of the Accreditation Council may be dismissed by the Foundation Council for good cause. This provision has not yet been applied in practice.

- The nomination criteria are set out transparently. For the professors, Article 9 (2) sentence 3 of the Interstate Study Accreditation Treaty applies, according to which that the HRK ensures
- 1320 “[...] that the different types of higher education institutions and the diversity of subjects are taken into appropriate account and that the professors are not university executives”. Besides, the resolution of the 22nd general meeting of the HRK of 22 May 2017 and the statement of the HRK, which was adopted by the HRK Board on 26 April 2021,⁸⁷ clearly describe the selection process with regard to professorial members and the other members nominated by the
- 1325 HRK. After that, the HRK also selects the international (professorial) members of the Accreditation Council. The student members are proposed by the student accreditation pool⁸⁸. The representatives of professional practice are proposed jointly by the employers' associations and the trade unions, respectively.

- The appointment by the KMK (regarding professors) or the KMK and the HRK jointly (regarding
- 1330 the other member groups) is a purely formal procedural step. Within this step, there is no interference in the selection process.

The Accreditation Council has been purposely designed as a representative body where the interests of the various stakeholders are expressed. According to Article 9 (4) Interstate Study Accreditation Treaty, the professors have a double vote in accreditation decisions. The

⁸⁷ See for details the statement of the HRK in annex 04 and the resolution which is contained in an attachment to the statement.

⁸⁸ The student accreditation pool is the nationally legitimised student interest group that sends students to the accreditation system and promotes their participation in it. See <https://www.studentischer-pool.de/studierendeoeffentlichkeit/>.

1335 background for this rule is the Federal Constitutional Court's resolution of 2016 on accreditation
 which demanded an overall structure "*in which decision-making powers and participation
 rights, influence, information and control are structured in such a way that dangers to the free-
 1340 dom of teaching are avoided.*"⁸⁹ Nonetheless, all groups work together in the Accreditation
 Council on an equal footing. Each member brings his or her expertise to the table and accord-
 1340 ingly sees himself or herself primarily as an expert and not as a member of a stakeholder
 group. It has been experienced that in the case of controversially discussed applications, the
 professors regularly argue from their own experience and subject perspective and thus also
 represent quite different views.

1345 *Code of conduct*

Besides, the code of conduct for members, deputy members and permanent guests of the
 Accreditation Council states that the members of the Accreditation Council act as experts and
 not as delegates.⁹⁰

1350 The code of conduct declares that "[...] *the members*"⁹¹ *of the Accreditation Council observe
 the following principles:*

- *Members of the Accreditation Council act and decide as experts in the field of quality assurance at higher education institutions (HEIs) solely on the basis of quality aspects and are not bound by the instructions of third parties.*
- *Members of the Accreditation Council act and decide in good faith and to the best of their knowledge and belief in the interest of the Foundation.*
- *Members of the Accreditation Council shall maintain confidentiality towards third parties.*
- *Members of the Accreditation Council shall not use their membership to assert their own interests or the interests of third parties and shall exclude any misuse of information obtained during their activities.*
- *Members of the Accreditation Council and deputy members declare a conflict of interest or their partiality with regard to an agenda item to be dealt with to the chairperson without delay, at the latest however after the opening of the meeting. In such a case, they shall not participate in decisions of the Accreditation Council on the matter. Members on the part of the Länder do not vote in decisions concerning HEIs in their own Länder.*
- *Membership of the Accreditation Council is incompatible with the simultaneous activity*
 - *in agencies approved by the Accreditation Council, or for an organisation which is legally, institutionally, organisationally, financially or personnel related to one of the above mentioned agencies, as far as quality assessments in the German accreditation system are concerned*

⁸⁹ Order of the first senate (see footnote 10), para. 60; see also chapter [4. History, profile and activities of the Agency.](#)

⁹⁰ See <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/code-conduct/code-conduct>.

⁹¹ if not otherwise described, members, deputy members and permanent guests are included.

- 1370 ○ *in or for organisations that carry out quality assessments of HEIs in the German accreditation system, such as in the context of alternative procedures. Participation in internal assessments at system-accredited HEIs is compatible with membership of the Accreditation Council.*
- 1375 • *Since permanent guests participate in the meetings in a purely advisory capacity, i.e. without voting rights, it is not excluded that this group of persons may also work in agencies at the same time.*
- 1380 • *Members of the Accreditation Council only accept gifts or hospitality services from third parties if they are appropriate to the occasion in terms of reason, type and scope and if neither parties involved nor third parties can be given the impression of being influenced or expected in return. The corresponding regulations for its officials of the state North Rhine-Westphalia, in which GAC is seated, shall apply analogously.”*

Operational independence and independence of formal outcomes

- GAC is solely responsible for all staff issues, including appointment and dismissal of staff.
- 1385 According to Article 12 (2) of the Interstate Study Accreditation Treaty the “[...] superior of GAC’s employees is the chairperson of the Board”.
- All decisions, such as accreditation decisions and decisions in equivalency assessments are taken by GAC, independently of the ministry or other third parties.
- The experts are appointed independently by the agencies or by GAC (in case of accreditation
- 1390 of alternative procedures if GAC conducts the procedure).⁹²

9.4 ESG Standard 3.4 Thematic analysis

- 1395 **Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.**

Within the current accreditation framework, GAC still is, as in the “old” system, committed to the implementation of thematic analyses for its external quality assurance activities.

- GAC’s electronic database and application submission tool ELIAS is the backbone of any general qualitative and quantitative analysis concerning external quality assurance activities. New application submissions are filed and processed within ELIAS. Older data⁹³ has been imported
- 1400 into the database and is being consolidated or newly collected in a dedicated and ongoing project with completion projected for the end of 2021 (Projekt Datenbank 2021). Data from the Higher Education Compass is used to add to and in parts update the master data of study

⁹² See for details chapter [10.4 ESG Standard 2.4 Peer-review experts](#).

⁹³ I.e. accreditation decisions as well as general information on study programmes and/or HEIs, which have as of yet not filed a new application for re-accreditation.

1405 programmes in ELIAS. Current accreditation decisions, reports and historical data are available to the public.

The most recent activities regarding ESG 3.4 were concerned with conditions imposed in accreditations. Conditions are an important part of accreditations in Germany since their beginning around 2000.

1410 Although, in the explanatory memorandum to the Specimen Decree with regard to § 24, the Länder committed to the goal of reducing the numbers of conditions imposed, stating that they “*should only come into question in future in exceptional cases*”, conditions remain the main instrument of the Accreditation Council to ensure that the criteria for study programmes as well as for quality management systems are fully met. They reveal issues in form and/or content of
1415 the object under accreditation and allow for countermeasures from the HEIs. Simultaneously, they indicate to points of interest within the accreditation process, particularly for the GAC itself, but also, e. g. for report preparation of the agencies.

Besides, an accreditation decision is an administrative act. It is regulated by the North Rhine-Westphalia Administrative Procedure Act, section 36 of which permits administrative acts to
1420 be made subject to conditions – granting accreditation subject to conditions is always preferable to not granting accreditation when the concerns raised are capable of being resolved.

The focus in thematic analysis on conditions is on study programme accreditations, since they provide data from a large cohort with reasonable comparability of single programmes. This was already clear in 2017. So, in 2017/2018, GAC conducted a retrospective thematic analysis
1425 concerning the conditions imposed in accreditations based on the “old” accreditation system.⁹⁴ This was updated and compared to new findings in the Interim Review 2020.⁹⁵

See for the findings of the thematic analyses annex 05. These findings are regularly discussed with agencies and HEIs. But they also lead to temporary risings of certain types of conditions.

The thematic analysis of external quality assurance activities is work in progress, as no study
1430 programme or internal quality management system has of yet completed an accreditation cycle (8 years from 2018 onward) under the aegis of the GAC and thus potential learning effects at HEIs cannot yet be fully investigated.

GAC will continue its yearly monitoring of conditions imposed in accreditations post-pandemic and with a more consolidated database from 2022 onward. Parallel to this, in a meta-analysis,
1435 validity and functionality of the categorisation of accreditation conditions within the first

⁹⁴ https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Bericht_Auflagenstichprobe_final.pdf

⁹⁵ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf

thematic analyses will be reflected upon. With improvements to the database in place, it is possible to expand the scope of thematic analysis, for example to

- identify points of interest in the overall study programme system (by using the master data of study programmes available in ELIAS to follow, e.g. new trends in study programme setups) or to
- select subsets (e.g., specific programmes like joint degree programmes or part-time, regional, specific types of HEIs, new vs. re-accreditations, specific accreditation agencies).

Other fields of action have been identified particularly in the implementation of thematic analysis for system accreditation and accreditation of alternative procedures. Applications for system accreditation have steadily increased in the past years and a substantial number of institutions are expected to file their first re-accreditation submission within the next years. Thematic analysis in this field may be used, e.g. to identify advantages and/or disadvantages of centralised versus decentralised quality management systems.

The following table gives an overview of past and future activities concerning thematic analysis and published reports.

Year	Topic
Yearly	Thematic analysis of conditions imposed in accreditations (after consolidation of the database)
2015	Sample analysis on joint programmes ⁹⁶
2016	Sample analysis on franchise cooperations in higher education ⁹⁷
2018	Sample analysis on system accreditation ⁹⁸
2017/18	Thematic analysis concerning the conditions imposed in accreditations based on the “old” accreditation system
2020	Interim Review with update on the 2017/18 thematic analysis and comparison
2022, yearly onward	Thematic analysis on conditions after consolidation of the database within the current accreditation system

⁹⁶ http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Berichte/AR_Bericht_Stichprobe_JointProgrammes.pdf (in German only)

⁹⁷ http://archiv.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Beschluss_Franchise_Auswertung_2016.03.17_Drs.21-2016.pdf (in German only)

⁹⁸ https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Bericht_themenbezogene_Stichprobe_Systemakkreditierung_2017_01.pdf (in German only)

2026 onward First study programmes completing a full accreditation cycle in the current accreditation system and re-entering the application process, thematic analysis possible for recurring phenomena on single study programme level

9.5 ESG Standard 3.5 Resources

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Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

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Compared to the situation at the time of the last ENQA assessment in 2013, staffing has improved significantly during the transition to the current accreditation system.

In accordance with Article 6 (1) of the Interstate Study Accreditation Treaty, funding of GAC is a shared responsibility of the 16 Länder.

1465

Under Article 6 (4) Interstate Study Accreditation Treaty, GAC may charge fees, as specified in its fee schedule, to cover its administrative expenses; it implemented this in the fee schedule adopted on 11 July 2018 and amended on 19 March 2020.

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

1470

When the current accreditation system was established, the Länder and the HRK agreed that 55 percent of the budget would come from grants from the Länder and 45 percent from fees. For the 2021 fiscal year (FY identical with calendar year), the annual budget for GAC is 1,462,600 Euro.⁹⁹

1475

A total annual budget of 1,000 Euros is available for the further training of employees. If needed, this amount be topped up from other budget titles. In addition, employees have numerous informal opportunities for development, for example through participation in conferences and projects, especially international projects such as Twinning.

1480

In line with the official staffing plan, the human resources at GAC's Head Office comprise a managing director (full-time), ten programme managers (8.0 full-time equivalents), three administrative assistants (2.75 full-time equivalents) and a secretary (full-time) employed on a permanent basis.

⁹⁹ A table summarising the annual budget for the years 2016 to 2021 can be found in annex 10.

Because a higher workload and fee revenue are expected in 2021 due to an alternative accreditation procedure and a projected increase in programme accreditation cases, two additional programme managers were hired on a temporary basis until 31 December 2021.

1485 GAC also employs an academic assistant for 20 hours per month. Employees are remunerated in accordance with framework collective wage agreement for civil service employees in the states (Tarifvertrag für den Öffentlichen Dienst der Länder (TV-L)).

At its Head Office, located at Adenauerallee 73, Bonn, GAC has rented office space comprising 12 separate offices, since January 2019 on three floors, with a total of 17 workspaces and a meeting room, and total floor space measuring approximately 360 sqm.

1490 The workstations are equipped with laptops, screens, and keyboards, which will be renewed every four years. During the Covid-19 pandemic the staff can flexibly choose between work at the office or at home. New software has been procured that enabled telephone calls to be made via laptops, thus improving accessibility.

1495 Information about GAC's personnel and the staff members' responsibilities can be found on GAC's website.¹⁰⁰

1500 With the temporary hiring of staff, GAC should be able to process the projected high number of accreditation applications in programme accreditation for 2021 and the upcoming system accreditations and accreditations of alternative procedures with the required diligence. It has been found, however, that the processing time per application is above the estimates made in 2018. In the medium term, the situation will probably ease, as more and more HEIs are striving for system accreditation, which is less resource intensive for GAC than programme accreditation. Currently, however, the focus is clearly on dealing with the programme accreditation applications, and GAC can fulfil its other legal tasks to a barely sufficient extent, only.

1505 Beginning in June 2021, GAC will start discussions on sustainable funding that will extend for approximately one year. As of now, increases seem to be needed concerning programme managers as well as specialised staff maintaining the database.

¹⁰⁰ <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/head-office/head-office>

9.6 ESG Standard 3.6 Internal quality assurance and professional conduct

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Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

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GAC has an effective internal quality management system that incorporates stakeholder feedback that is described in detail in chapter [7. Agency's internal quality assurance](#).

GAC opposes intolerance or discrimination of any kind. The code of conduct for members, deputy members and permanent guests of the Accreditation Council¹⁰¹ ensures that all persons involved in its activities are competent and act professionally and ethically correct.

1520

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

1525

New members of the Accreditation Council get an individual introduction by the Head Office as well as into ELIAS system.

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The agencies act in the German accreditation system as partners of GAC in the sense of Interpretation 23 of the EQAR document Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies; see for details chapter [4. History, profile and activities of the Agency](#).

9.7 ESG Standard 3.7 Cyclical external review of agencies

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Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

GAC was full member of ENQA since 2000 and renewed its membership regularly. External evaluation procedures were carried out in 2001, 2008 and 2013. Due to the parallel restructuring of the current system, GAC had not applied, however, for renewal of the membership which

¹⁰¹ See <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/code-conduct/code-conduct> and chapter [9.3 ESG Standard 3.3 Independence](#).

1540 had been expired in September 2018. GAC became affiliate of ENQA instead. As the current German accreditation system is now settled, GAC decided to apply for full membership in ENQA again. Besides, it will for the first time also launch an application to be listed in EQAR.

10. Compliance with European Standards and Guidelines (Part 2)

1545

10.1 ESG Standard 2.1 Consideration of internal quality assurance

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

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The preliminary remarks of the substantiation of the Specimen Decree as well as the introduction to the substantiation of the Interstate Study Accreditation Treaty state explicitly that one of the guiding principles for the current German accreditation system is its compatibility with the ESG.

1555 In all types of procedures, the HEIs must prove that the study programmes in question fulfil the formal and academic criteria for study programmes included in parts 2 and 3 of the Specimen Decree. In system accreditation procedures and accreditation procedures concerning alternative procedures, the assessment is multi-level. See for details chapter [10.5 ESG Standard 2.5 Criteria for outcomes](#).

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The following table shows how the criteria in all types of procedures correspond to the standards of ESG part 1. The detailed version of this grid can be found in annex 06.

	Programme accreditation and equivalency assessments	System accreditation	Accreditation of alternative procedures
ESG 1.1	§ 14	§ 14; § 17	§ 14; § 17; ESG 1.1 ¹⁰²
ESG 1.2	§§ 6,8,11,12,13	§§ 6,8,11,12,13; § 17	§§ 6,8,11,12,13; § 17; ESG 1.2
ESG 1.3	§§ 12,15	§§ 12,15; § 17	§§ 12,15; § 17; ESG 1.3
ESG 1.4	§§ 5,6,12,14	§§ 5,6,12,14; § 17	§§ 5,6,12,14; § 17; ESG 1.4
ESG 1.5	§ 12	§ 12; § 17	§ 12; § 17; ESG 1.5
ESG 1.6	§§ 12,15	§§ 12,15; § 17	§§ 12,15; § 17; ESG 1.6
ESG 1.7	§ 14	§ 14; § 18	§ 14; § 18; ESG 1.7
ESG 1.8	Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states	Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states; § 18	Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states; § 18; ESG 1.8
ESG 1.9	§ 14	§ 14; §§ 17 and 18	§ 14, §§ 17 and 18; ESG 1.9
ESG 1.10	§ 26: Period of validity for the accreditation	§ 26: Period of validity for the accreditation	§ 34 Abs. 5: Period of validity for the accreditation

1565 The indication “§” refers to the sections of the Specimen Decree.

¹⁰² The ESG from part 1 are mentioned here because they are directly part of the accreditation criteria in alternative accreditation procedures.

10.2 ESG Standard 2.2 Designing methodologies fit for purpose

1570 **External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.**

1575 Due to the stipulation of the Federal Constitutional Court that the criteria and procedural rules for accreditation must be contained in legal regulations, criteria and procedural rules in the current accreditation system have been laid down in the Interstate Study Accreditation Treaty and in decrees of the Länder based on the Specimen Decree.

Guiding Principles

1580 The Interstate Study Accreditation Treaty and GAC's Mission Statement are, among others, based on the guiding principles of primary responsibility of the HEIs for quality assurance and enhancement in teaching and learning, accreditation as an external, science-led quality assurance system for teaching and learning and compatibility with the ESG.¹⁰³

These guiding principles are implemented in all types of procedures, in programme and system accreditation and in the accreditation of alternative procedures.

1585 In all three procedures the same quality standards for study programmes apply: the criteria of part 2 and 3 of the Specimen Decree. They are based on the "fitness of and fitness for purpose" principle. The HEI has a large scope in the choice of qualification goals for its study programmes, provided those goals are in accordance with the framework.¹⁰⁴ It is crucial that the study programme concept and its implementation match these qualification goals. The HEI
1590 must also regularly review its study programmes with a view to achieving its goals and, if necessary, improve them. The criteria thus support the HEIs to continuously apply the PDCA cycle.

1595 In system accreditation the HEIs have even more ownership of the processes than in programme accreditation. They must show that they guarantee the fulfilment of the mentioned standards with their internal quality management system. To this end, the quality management

¹⁰³ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begruendung_Englisch.pdf; <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/mission-statement/mission-statement>

¹⁰⁴ See https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-03-Studium/02-03-02-Qualifikationsrahmen/2017_Qualifikationsrahmen_HQR.pdf (in German only).

system must provide for regular evaluations of the study programmes. But there is no detailed regulation on how the internal system must be constructed.

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

Stakeholder involvement

For the design of the specimen decree, the Länder have consulted with GAC, which includes all relevant stakeholders, as well as with representatives of the HRK, with agencies, with representatives of the professional practice and with student representatives.¹⁰⁵

According to § 36 Specimen Decree, it will be evaluated three years after the decree comes into effect. As the decree came into effect on 01 January 2018, the evaluation will be started in 2021 and completed in 2022. All relevant stakeholders will be involved in the evaluation, including GAC, which has the task according to Article 5 (3) no. 6 of the Interstate Study Accreditation Treaty of making proposals for amendments to the Specimen Decree.

Stakeholders are also closely involved in the daily further development and improvement of processes by structured evaluations and various exchange formats.¹⁰⁶

Measures by the Accreditation Council to ensure consistency and efficiency

In the implementation of its modular strategy,¹⁰⁷ and with the aim to enhance the consistent implementation of procedures and to increase the efficiency of its work processes, GAC took a series of, on the one hand, purely internal measures, and on the other hand, measures that (also) directly benefit the applicant HEIs and agencies.¹⁰⁸

Internal measures

- In 2020, the creation of an, for now internal, Handbook Programme Accreditation was started. The aim of the handbook is to systematically record the Accreditation Council's

¹⁰⁵ See the list of consulted stakeholders in the Introduction of the explanatory memorandum to the Specimen Decree at https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf.

¹⁰⁶ See chapters [7. Agency's internal quality assurance](#) and [9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance](#).

¹⁰⁷ See chapter [9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance](#).

¹⁰⁸ See for most of the measures mentioned here the Interim Review: https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf.

- 1625 decision-making practice on issues that regularly arise in the assessment practice and thus to create a central repository of knowledge for the Head Office.
- In ELIAS, functionalities have been added, according to which accreditation decisions that have already been issued with conditions are sorted and searchable by condition categories. ELIAS also contains text modules for conditions.
 - An internal Jour Fixe Programme Accreditation is held on a regular basis, which offers 1630 the programme managers the opportunity to exchange views on the interpretation of accreditation criteria and to discuss procedural issues.
 - Process descriptions guarantee the consistent processing of accreditation applications.
 - After a programme manager has prepared a draft accreditation decision for the Accreditation Council, each application for accreditation is cross-checked by a colleague to 1635 ensure consistency of the drafts.
 - For each application, a rapporteur from the group of professors in the Accreditation Council with close ties to the subject involved makes a preliminary assessment of the assessment agencies' and the review panel's accreditation proposals and is available to answer questions of the Accreditation Council members, the Board and Head Office 1640 on the application.¹⁰⁹
 - Draft accreditation decisions on which the rapporteur and the responsible programme manager agree and for which no further need for consultation is raised, are voted on "en bloc". This enables the Accreditation Council to have sufficient time to discuss contentious cases or complex accreditations despite the large number of applications.¹¹⁰
 - The members of the Accreditation Council are asked to inform the Head Office in advance of meetings on any need for consultation so that the programme managers can specifically prepare for questions on the matter.
 - Members of the Accreditation Council receive an executive summary, prepared by the Head Office, containing an overview of all applications.
 - Nevertheless, any issue concerning any application can be raised by all members 1650 within the regular meeting of the Accreditation Council.
 - The Accreditation Council appointed a supporting committee with representatives of all member groups to which the Accreditation Council can refer questions of principle or specific topics for preparation for the next Accreditation Council meeting.
 - Based on section 12 of the Statutes, the Accreditation Council has delegated decisions 1655 on extensions of accreditations, decisions on the compliance with formal conditions,

¹⁰⁹ See Interim Review, page 11.¹¹⁰ See Interim Review, page 12.

decisions on substantial changes, approvals of the composition of clusters and accreditations concerning joint degree programmes to the Board.¹¹¹

1660 *External measures*

- With ELIAS, GAC has a strong instrument that not only makes the processing of applications in its Head Office and its bodies much more efficient, but also makes it much easier for the HEIs to submit applications.¹¹²
- For efficient processing of accreditation reports from currently ten accreditation agencies, the Interstate Study Accreditation Treaty and the Specimen Decree commissioned GAC to specify a uniform structure for accreditation reports. This structure has been realised by templates which are used by HEIs as guidance for their self-evaluation reports and by agencies for reporting.¹¹³
- The Accreditation Council adopted several resolutions to ensure consistency of application of criteria and procedural rules, e.g. on what is expected from an accreditation report, on the reporting obligations for system-accredited HEIs and on the size of expert panel in cluster accreditation procedures.¹¹⁴
- GAC informs HEIs and agencies via FAQ, newsletter and Twitter on new information about/changes to procedural requirements for application and the Accreditation Council's decision-making practice.¹¹⁵

Support of quality development at HEIs

In its Mission Statement, GAC emphasises that it “[...]is committed to academic freedom and autonomy of higher education institutions and sees the primary responsibility for the quality of teaching and learning at higher education institutions.”¹¹⁶ With this in mind, GAC has taken several measures to support quality development.

Prize for quality development

The Specimen Decree points out in the substantiation of § 24 that review reports can also contain recommendations on the quality development of the study programme or the quality management system, which are designed to increase quality beyond the standards on which

¹¹¹ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Satzung%20Stiftung%20Akkreditierungsrat_eng.pdf.

¹¹² See chapter 4. [History, profile and activities of the agency](#) for details on ELIAS.

¹¹³ See Interim Review, page 11.

¹¹⁴ See Interim Review, page 13.

¹¹⁵ See Interim Review, page 14.

¹¹⁶ <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/mission-statement/mission-statement>

accreditation by the Accreditation Council is based. In addition, expert opinions can also name best practice models of the study programme. GAC has taken up this idea and introduced a prize for quality development. The prize is intended to reward special achievements in quality development in teaching and learning at the level of programmes and quality management systems, which can serve as inspiration for other HEIs.¹¹⁷

Quality Dialogue

Based on the goal formulated in the Mission Statement of promoting dialogue between all actors involved in accreditation, GAC will discuss selected topics concerning teaching and learning in dialogue with HEIs and other groups of actors, thereby both strengthening the expertise of GAC and sensitising those involved in the evaluation procedures to the issues. The last Quality Dialogue took place in June 2021.

Chapter on quality development in the accreditation report

In the accreditation reports, the experts are asked, according to the report template, to evaluate the further development of the study programme during the accreditation period and, if necessary, the handling of recommendations in a separate chapter. The first experiences with this comprehensive chapter on quality development are to be evaluated positively; the evaluation panel has the freedom to set accents here and is supported in placing the focus of its assessment on quality development.

Costs of accreditation

HEIs have primary responsibility for the quality of their provision and its assurance. Consequently, costs for quality assurance primarily lie with the HEIs and only a small part concerns the costs incurred by the HEIs for the implementation of procedures at the agencies and the Accreditation Council. As far as these costs are concerned, the substantiation of Article 3 (8) of the Interstate Study Accreditation Treaty states that "[...] *it can be assumed that the costs for the higher education institutions as well for the overall system will at least not rise, and that it is likely that when the aforementioned framework becomes effective, they could even fall.*" The most important factor here is certainly the extension of the accreditation period to eight years.¹¹⁸ It should just be mentioned that, as in the old system, costs of assessment can also

¹¹⁷ See <https://www.akkreditierungsrat.de/de/aktuelles-und-veroeffentlichungen-veranstaltungen/preis-fuer-qualitaetsentwicklung/preis-fuer> for further information on the prize (in German only)

¹¹⁸ See § 26 Specimen Decree; https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf; In the "old" accreditation system the accreditation term in programme accreditation was five (first accreditation) or seven years (re-

be reduced by cluster procedures.¹¹⁹ In addition, according to the Interstate Study Accreditation Treaty, the Länder have the possibility to “[...] *make regulations on the charges to be levied by the agencies [...]*” (Article 4 (5)). No use has been made of this option so far, however.

10.3 ESG Standard 2.3 Implementing processes

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include

- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow-up.

Procedural steps

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

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

Concerning programme and system accreditation, these steps are laid down in part 4 of Specimen Decree; for equivalency assessment the contract between GAC and GJU stipulates that the Specimen Decree applies accordingly.

For the accreditation of alternative procedures, the Specimen Decree only defines the basic features of the procedure. The mentioned procedural steps are in detail regulated in the RPAAP.

For details see chapter [6. Processes and their methodologies](#).

accreditation). In system accreditation the accreditation term was six (first accreditation) or eight years (re-accreditation).

¹¹⁹ See § 30 Specimen Decree.

1750 **Division of labour**

In programme and system accreditation procedures, as well as in equivalency assessments, there is a division of labour between the agencies and GAC: The agencies appoint the experts and are responsible for the accreditation report. GAC takes the accreditation decision, carries out the follow-up and ensures the integrity of the accreditation process. Concerning the accreditation of alternative procedures, the Accreditation Council has regulated in its RPAAP that GAC either carries out the procedure itself or can delegate it to third parties. However, GAC has decided to conduct the first accreditation procedures concerning alternative procedures itself.¹²⁰

The agencies act as partners of GAC in the sense of Interpretation 23 of the EQAR document Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies.¹²¹ As the agencies authorised by the Accreditation Council are listed in EQAR, their ESG-compliance can be assumed.¹²² The experts regularly confirm that the agencies accredited by the Accreditation Council carry out their procedures in compliance with the ESG.¹²³

The Accreditation Council ensures the integrity of the accreditation process, however. If an assessment agency does not carry out an assessment according to the procedural rules the Accreditation Council rejects the report. In some cases, for example, in which the review panel was obviously not adequately composed, the Accreditation Council asked for a supplementation of the review panel. Should an assessment agency repeatedly and systematically disregard the rules, the Accreditation Council could also withdraw its authorisation.¹²⁴

1770

Challenges for GAC regarding its new role of assessing and decision taking

Three years after the Interstate Study Accreditation Treaty came into force, the accreditation system is in "regular operation". The system has proven its functionality. However, the challenges associated with the new role of GAC are now also becoming visible.

GAC is the one institution in the accreditation system that bears responsibility, directly or indirectly, on the accreditation of all Bachelor's and Master's study programmes in Germany.

¹²⁰ See chapter [6. Processes and their methodologies](#).

¹²¹ See chapter [4. History, profile and activities of the Agency](#) for details.

¹²² See chapter [4. History, profile and activities of the Agency](#) for AKAST.

¹²³ See for example the review of AQ Austria at <https://www.enqa.eu/wp-content/uploads/AQ-Austria-external-review-report.pdf>, evalag at <https://www.enqa.eu/wp-content/uploads/Evalag-external-review-report.pdf> and AHPGS at <https://www.enqa.eu/wp-content/uploads/AHPGS-external-review-report.pdf>

¹²⁴ See (6) of the resolution of the Accreditation Council of 20 February 2018 on the "Authorization of Agencies in the German System" at <https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Authorization%20of%20Agencies%20in%20the%20German%20System.pdf> for the possibility of withdrawal of the authorisation.

At the same time, however, its activity builds substantially on the preliminary work of the agencies. It is not allowed to set itself up as a second expert, but essentially checks the plausibility of the expert proposals.

1780 GAC needs good "supply" on the part of the agencies. It is not on site but makes its decisions based on files. This guarantees its independence. On the other hand, GAC is dependent on complete and meaningful accreditation reports. There is still room for improvement in this respect.¹²⁵

1785 For GAC, there is also the challenge of making the accreditation decisions quickly. Besides the fact that GAC has limited manpower, it takes time to observe the administrative regulations. The possibility for the HEIs to comment is essential but makes the procedure more complex and lengthier. The procedures for fulfilling conditions and assessing significant changes are also time-consuming.

1790 As far as the objects of accreditation are concerned, it should be noted that study programme models are very diverse (for example, dual study programmes, franchise models, international cooperations or regulated study programmes). Their proper assessment requires the development of specific expertise in GAC.

1795 In system accreditation, an open question is how the equivalence of the procedures across the system-accredited HEIs and to the study programmes accredited by way of external programme accreditation can be guaranteed.

1800 Alternative procedures offer the opportunity for innovation in the accreditation system and strengthen the HEIs' own responsibility. The accreditation procedures are very resource-intensive, especially if, as is currently the case, GAC carries out the procedures itself. However, the conduct of the procedures by the Accreditation Council itself also gives it the opportunity to gather expertise in this area.

Measures to ensure consistency

To enhance the consistent implementation of procedures GAC took a series of measures, see [ESG Standard 2.2 Designing methodologies fit for purpose](#).

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¹²⁵ See chapter [10.6 ESG Standard 2.6 Reporting](#) for details.

10.4 ESG Standard 2.4 Peer-review experts

1810 **External quality assurance should be carried out by groups of external experts that include (a) student member(s).**

Composition of the review panels, selection criteria and procedures

The relevant regulations guarantee that the review panels contain all relevant stakeholders.

1815 The standards for peer-review experts are laid down in Article 3 (3) of the Interstate Study Accreditation Treaty:

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

1820 According to Article 3 (1) no. 3 Interstate Study Accreditation Treaty the same applies to the accreditation of alternative procedures.

These rules are further specified as follows in the Specimen Decree (for programme and system accreditation, as well as in equivalency assessments¹²⁶) in Binding Guidelines for the

1825 Nomination of University Teachers for Expert Groups according to Art. 3 Para. 3 State Treaty on Study Accreditation of the HRK¹²⁷ and the RPAAP.¹²⁸

¹²⁶ In equivalency assessments, the rules of the Specimen Decree for the selection of experts in programme accreditation according to the contract between the GJU and the Accreditation Council apply accordingly.

¹²⁷ See annex 07 and https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-04-Lehre/02-04-01-Qualitaetssicherung/Verfahrensleitfaden_Gutachterbenennung_gem._Akkreditierungsstaatsvertrag.pdf (publication in German only).

¹²⁸ See <https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Rules%20of%20Procedure%20for%20Alternative%20Accreditation%20Procedures.pdf>.

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

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

1830 *Programme accreditation and equivalency assessments*¹²⁹

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

1. *at least two subject-related professors,*
2. *one subject-related representative with professional experience,*
- 1835 3. *one subject-related student.”*

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

1840 members of the review group have equal standing and fulfil their roles confidently.

System accreditation

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

- 1845 1. *at least three professors with relevant experience in quality assurance of teaching and learning,*
2. *one representative with professional experience,*
3. *one student.”* According to § 25 (3) sentence 2 the majority of experts in the review panel must have experience with system accreditation. § 25 (3) sentence 1 states, that,
- 1850 as in programme accreditation, the professors must have the majority of votes in the panel.

Alternative procedures

According to section 5 (2) of the RPAAP the assessment is carried out *“by external, independent experts from the fields of society relevant for quality assurance, in particular representatives of the scientific community, professional practice and students.”*

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The size of the review panel depends on the requirements of the assessment, which may result from the design of the alternative procedure; however, § 25 (2) Specimen Decree on system accreditation will be applied analogously, so that at least three professors, one representative

1860 of professional practice and one student are also required here. The requirement that

¹²⁹ In equivalency assessments, the rules of the Specimen Decree for the selection of experts in programme accreditation according to the contract between the GJU and the Accreditation Council apply accordingly.

professors must have the majority of votes also applies here (see § 34 (2) sentence 2 Specimen Decree).

Involvement of international experts

1865 In accreditation procedures concerning joint degree programmes according to § 33 Specimen Decree, § 33 (1) sentence 2 no. 5 the review panel must include peers from at least two countries involved in the programme. This corresponds to the European Approach. Furthermore, the Accreditation Council has two international members, so that the "view from outside" can be introduced into every accreditation decision.

1870 *Binding Guidelines for the Nomination of University Teachers for Expert Groups according to Art. 3 Para. 3 State Treaty on Study Accreditation*

Besides, for the selection of professors, the assessment agency is bound by the Binding Guidelines for the Nomination of University Teachers for Expert Groups according to Art. 3
1875 Para. 3 State Treaty on Study Accreditation of the HRK.¹³⁰ The background to this is also that the Federal Constitutional Court had ruled that academia itself should steer the accreditation procedure. The guidelines establish criteria for the selection of professors in the review panels and describe the selection procedure. In terms of content, they essentially correspond to the regulations and practice for the selection of experts in the "old" accreditation system.

1880 The Binding Guidelines stipulate that in *programme accreditation* the professors must be actively involved in the academic community of their subject and have experience in the development, organisation, implementation and in the monitoring of study programmes. In *system accreditation* they must have experience in higher education governance and internal quality assurance of HEIs.¹³¹

1885 Also concerning the *selection procedure*, the mentioned guidelines reflect the practice of the agencies when they describe the procedure in *programme and system accreditation* as follows:

- The HEI may propose a subject profile to the review panel,
- the assessment agency proposes the review panel,
- 1890 • the HEI may give indications of conflict of interest,

¹³⁰ See annex 07 and https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-04-Lehre/02-04-01-Qualitaetssicherung/Verfahrensleitfaden_Gutachterbenennung_gem._Akkreditierungsstaatsvertrag.pdf (publication in German only).

¹³¹ The binding guidelines further specify the selection criteria for both types of procedure.

- the assessment agency checks for impartiality, makes proposal for review panels and puts them together.

1895 In *equivalency assessments and alternative procedures*, the mentioned selection criteria and the selection procedure are applied analogously (see for alternative procedures footnotes 1 und 2 in the Binding Guidelines).

Division of labour between the agencies and GAC

1900 Based on the mentioned regulations and guidelines *in programme and system accreditation* the experts are appointed by the assessment agency commissioned to prepare the accreditation report. The same applies for *alternative procedures* if an assessment agency carries out the procedure. The agency is responsible for ensuring adequate, science-driven selection of the experts. The agencies have an ample experience and know-how regarding the ESG-compliant selection of review panels. In the ENQA evaluations of the agencies authorised by GAC, the experts stated that the agencies exercise great care regarding the procedures and criteria
1905 for selecting experts.¹³²

GAC however ensures the integrity of the accreditation process and can, for example, reject the report and ask for new assessment with a supplemented review panel when it was not adequately composed. This happened in some cases, in which the subject orientation of the study programme was not sufficiently reflected in the review panel.

1910 The agencies' practice regarding the selection of experts is well reflected in non-binding guidelines as by the HRK¹³³ or the GNW¹³⁴ (union experts association), both addressing the selection of student members and representatives of professional practice.

Mechanisms to prevent conflicts of interest

1915 § 25 (5) of the Specimen Decree stipulates that the “[...] *following persons are excluded as experts:*

1. *anyone working or enrolled at the higher education institution applying for accreditation,*

¹³² See for example the review of AQ Austria at <https://www.enqa.eu/wp-content/uploads/AQ-Austria-external-review-report.pdf>, evalag at <https://www.enqa.eu/wp-content/uploads/Evalag-external-review-report.pdf> and AHPGS at <https://www.enqa.eu/wp-content/uploads/AHPGS-external-review-report.pdf>.

¹³³ See annex 08 and https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-04-Lehre/02-04-01-Qualitaetssicherung/Leitlinien_Gutachter_1_2018_mit_Cover.pdf (publication in German only).

¹³⁴ See <https://www.gutachternetzwerk.de/veroeffentlichungen/handreichungen-beitraege-aus-dem-netzwerk/> for the GNW; the guidelines are available at https://www.gutachternetzwerk.de/fileadmin/user/Veroeffentlichungen/Beitraege_aus_dem_Netzwerk/GNW_Benennung_Gutachterinnen_April2020.pdf (in German only).

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

This applies for programme and system accreditation, as well as for equivalency assessments.¹³⁵ In alternative procedures according to Article 3 (1) no. 3 Interstate Study Accreditation Treaty, Article 3 (2) sentence 1 of the Interstate Study Accreditation Treaty applies accordingly, according to which independent experts are to be appointed.

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

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

Training and briefing of experts

In *programme accreditation procedures, equivalency assessments, system accreditation procedures*, and, if one of the agencies would conduct the procedure, also in *alternative procedures*, the agencies are also responsible for the training and briefing of experts. The guidelines of the HRK and the GNW reflect the agencies' practice also in this regard.

The positive evaluations in the ENQA procedures recently carried out by agencies authorised by the Accreditation Council show that the agencies carry out training and briefing of experts in accordance with the ESG.¹³⁶

In the accreditation of *alternative procedures* carried out by GAC, it pays attention to a corresponding careful preparation of experts. In the accreditation procedure concerning the alternative procedure at the Harz University of Applied Sciences the experts underwent a two-hour expert training in which they were familiarised with the requirements for the accreditation of alternative procedures; they were able to build on their experience in system and programme accreditation. GAC appointed professional and student experts relying on the GNW and the student accreditation pool, where they received previous training. Besides, they have received the state decree, the ESG and the RPAAP for preparation. Before the initial meeting with the

¹³⁵ In equivalency assessments, the rules of the Specimen Decree for the selection of experts in programme accreditation according to the contract between the GJU and the Accreditation Council apply accordingly.

¹³⁶ See for example the review of AQ Austria at <https://www.enqa.eu/wp-content/uploads/AQ-Austria-external-review-report.pdf>, evalag at <https://www.enqa.eu/wp-content/uploads/Evalag-external-review-report.pdf> and AHPGS at <https://www.enqa.eu/wp-content/uploads/AHPGS-external-review-report.pdf>.

1950 HEI, there will be an internal preparatory meeting of the review panel based on the self-evaluation report of the HEI. Regarding the experts' preparation in the procedure of the three Baden-Württemberg HEIs and in all further alternative accreditation procedures, GAC will proceed accordingly.

10.5 ESG Standard 2.5 Criteria for outcomes

1955 **Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.**

1960 All accreditation procedures are based on the criteria which are included in a general form in the Interstate Study Accreditation Treaty and in more detail in part 2 and 3 of the Specimen Decree and the decrees of the Länder accordingly. The decrees are published on GAC's website.¹³⁷

Application of the same criteria for study programmes in all procedures

1965 In all types of procedures (programme accreditation, system accreditation, alternative procedures, and equivalency assessments) the criteria study programmes have to fulfil are the same: HEIs have to prove that the study programmes meet the formal and academic criteria for study programmes included in parts 2 and 3 of the Specimen Decree.¹³⁸

1970 An exception is the accreditation of joint degree programmes in accordance with the European Approach (§ 33 Specimen Decree). Here, only the formal and academic criteria stipulated in §§ 10 and 16 Specimen Decree must be fulfilled. Those stipulations transpose the criteria of the European Approach into German law; for legal reasons, the European Approach itself is only mentioned in the explanatory memorandum to the decree.

1975 In system accreditation procedures, the assessment is multi-level: It is assessed whether the internal quality management system of the HEI fulfils the criteria for such systems included in § 17 and § 18 Specimen Decree and thus can ensure itself that the formal and academic criteria for study programmes are met.

¹³⁷ <https://www.akkreditierungsrat.de/en/accreditation-system-legal-basis/laws-and-regulations/laws-and-decrees>

¹³⁸ See § 22 (1) Specimen Decree for programme accreditation, § 1 (1) of the contract between GJU and GAC concerning equivalency assessments, § 17 (1) Specimen Decree for system accreditations and § 34 (2) Specimen Decree as well as section 5 (1) of the RPAAP.

Also, the assessment of an alternative procedure is multi-level:

- 1980 • In the accreditation of system-related alternative procedures it is assessed whether the HEI with the help of the alternative procedure systematically assesses and thus guarantees the fulfilment of the requirements for quality management systems (see §§ 17 and 18) of the Specimen Decree and thereby also guarantees the fulfilment of the criteria for study programmes of part 2 and 3 Specimen Decree.¹³⁹ The alternative procedure itself must comply with the ESG.¹⁴⁰
- 1985 • In the accreditation of programme-related alternative procedures it is assessed whether the HEI with the help of the alternative procedure systematically assesses and thus guarantees the fulfilment of the criteria for study programmes of part 2 and 3 Specimen Decree.¹⁴¹ The alternative procedure itself must comply with the ESG.¹⁴²

1990 **Differentiation between formal and academic criteria**

In the current accreditation system, a distinction is made between formal and academic criteria for study programmes. The formal criteria according to part 2 of the Specimen Decree contain framework requirements that were previously regulated in joint structural requirements of the KMK. Compliance with the formal criteria is verified without the participation of the experts by the agencies' offices; the result is documented in the formal report. The academic criteria according to part 3 of the Specimen Decree contain the quality requirements to be examined by the experts, which were previously contained in GAC's criteria; the result is documented in the review report. The substantiation of the Interstate Study Accreditation Treaty states that the division between formal and academic examination is intended primarily to serve procedural economy. The review panel is relieved of the examination of purely formal criteria.¹⁴³

In system accreditation, and in the accreditation of alternative procedure if they are system-related, there is a distinction between formal and academic criteria on two levels: On one hand, the HEI must prove that it complies with the formal and academic criteria for study programmes at programme level. On the other hand, at the system level, the HEI must prove that it fulfils the academic criteria contained in § 17 and § 18 Specimen Decree. There, the central requirements on a functional quality management system in teaching and learning are defined. As a formal criterion at system level, in a first system accreditation procedure, the HEI must prove that at least one study programme has gone through the quality management system; in the

¹³⁹ See § 34 (2) Specimen Decree as well as section 5 (1) of the RPAAP.

¹⁴⁰ See section 3 (3) sentence 2 of the RPAAP.

¹⁴¹ See § 34 (2) Specimen Decree as well as section 5 (1) of the RPAAP.

¹⁴² See section 3 (3) sentence 2 of the RPAAP.

¹⁴³ See substantiation of the Interstate Study Accreditation Treaty, page 7.

2010 case of renewed system accreditation, it must prove that all Bachelor's and Master's study programmes have gone through the quality assurance system at least once.¹⁴⁴

One of the challenges is to examine formal as well as academic criteria with equal weight. In its assessment of accreditation applications, GAC must avoid focusing too much on formalities, because these may be easier to be checked in a file-based review. However, compliance with formal criteria is the prerequisite for good programme quality.

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

2020 The academic criteria for study programmes are based on the “fitness of and fitness for purpose” principle: the HEI has a large scope in the choice of qualification goals for its study programmes, provided those goals are in accordance with the qualifications framework.¹⁴⁵ It is crucial that the study programme concept and its implementation match these qualification goals. The HEI must also regularly review its study programmes with a view to achieving its goals and, if necessary, improve them. The criteria thus support the HEI to continuously apply the PDCA cycle.

Some important new accents have been set lately:

- 2025
 - The phenomenon of "franchising" or programme-related cooperation with non-university institutions was comprehensively regulated in §§ 9 and 19 Specimen Decree.
 - It was specified that full-time professors are the central reference point when assessing the staffing of a study programme (see § 12 (2) Specimen Decree).
 - The term “dual” was protected (see substantiation of § 12 (6) Specimen Decree).
- 2030
 - A positive reference to professional discourse was added (see § 13 (1) Specimen Decree).¹⁴⁶

Measures to ensure consistent application of criteria

2035 The criteria for programme and system accreditation represent the essential quality standards which - in the case of programme accreditation - must be applicable to all study programmes regardless of their specific profile and subject orientation and - in the case of system accreditation - to different quality management models. The necessity associated with this requirement to pay attention to a high degree of general validity when formulating the criteria leads

¹⁴⁴ See § 23 (1) Specimen Decree for those formal criteria.

¹⁴⁵ See https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-03-Studium/02-03-02-Qualifikationsrahmen/2017_Qualifikationsrahmen_HQR.pdf (in German only).

¹⁴⁶ See for § 13 also chapter [12. Recommendations and main findings from previous review\(s\) and agency's resulting follow-up](#).

almost inevitably to a comparatively broad scope of interpretation of the individual criteria. As has been shown in recent years, there is a continuing need on one hand for measures which ensure the consistent application of criteria and on the other hand, for information on the Accreditation Council's decision-making practice by HEIs and agencies. In addition, when the number of applications is high, as is currently the case, ensuring consistent decisions is more difficult but also more important.

See chapter [10.2 ESG Standard 2.2 Designing methodologies fit for purpose](#) for the measures GAC has foreseen to ensure consistent application of the criteria (Condition categories and text modules for conditions in ELIAS, Handbook Programme Accreditation, Jour Fixe Programme Accreditation, process descriptions, cross-checking of applications in the Head Office, rapporteur system, supporting committee, information via FAQ and Twitter).

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

10.6 ESG Standard 2.6 Reporting

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

Programme accreditation, system accreditation, equivalency assessments

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

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

The review report should not be longer than 20 pages in programme accreditation and 100 pages in system and cluster accreditation (see § 24 (4) Specimen Decree).

2075 Standardisation should relate exclusively to the structure of the report, but under no circumstances to the evaluation of content. Overall, the reports should provide a clear picture of a study programme or a HEI internal quality management system - for GAC as well as for the HEI and interested public (students, ministries, potential employers etc.). Schematic text modules should be avoided as far as possible, remarkable characteristics of the study programme (positive as well as critical) should be given more space in presentation and evaluation.

2080 The accreditation reports must fulfil the following functions:

Readability

2085 The accreditation report must contain all information necessary for the above-mentioned groups. This includes information on the course of the procedure and on the legal basis, the description of the programme, the documentation of the assessment according to the criteria specified in the Specimen Decree as well as data on the programme.

2090 The proposals of the review panel on the fulfilment of the academic criteria and the proposals of the assessment agency on the fulfilment of the formal criteria are assigned to each study programme and can be found at the beginning of the accreditation report, as well as the brief information with a summarising assessment.

Completeness

2095 The structuring must be carried out according to the criteria defined in the Specimen Decree. For each academic criterion, a distinction is made between presentation, evaluation, and assessment proposal. Since documentation and evaluation often coincide in the case of the formal criteria, a distinction is not mandatory there. Completeness is to be understood as meaning that the assessment documented in the accreditation report contains an evaluative statement for each study programme and for each criterion.

2100 *Focus on quality development*

2105 The aim of accreditation should be to place quality development in teaching and learning at the centre of the procedure. For this reason, the report templates include a chapter entitled "Focal Points / Focus of Quality Development" which will become increasingly important, particularly in re-accreditation procedures. The evaluation of the individual criteria should also focus on strengths and possible development needs, so that the heading has been supplemented at this point by the pair of terms "strengths and development needs".

2110 *Quality related data/key figures*

As early as 2012, the Science Council pointed out the need for an improved data situation in the accreditation system: "*The Accreditation Council and the federal states [should] ensure, in cooperation with other bodies involved - including higher education institutions, statistical offices, the HRK Hochschulkompass - that the data situation on study programmes and accreditation status is further improved. In the future, consideration should be given to the possibility of maintaining and publishing a [...] core data set of quality-related indicators (including, for example, success rates and grade distributions) for each study programme in order to make progress in the documentation of study quality and its further development.*"¹⁴⁷

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

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

Potential for improvement in accreditation reports

GAC needs plausible, comprehensible, and legible evaluations as a basis for its accreditation decisions and as a prerequisite for the rapid and consistent processing of applications for programme and system accreditation. It published guidance notes for the preparation of accreditation reports in March 2019.¹⁴⁸ Nevertheless, the comprehensibility of the evaluations in the accreditation reports still needs to be improved. In part, the evaluations contained in the accreditation reports were incomplete or not comprehensible. In such cases, GAC did not accept the reports for decision and informed the HEI that the report must be revised. The quality of the accreditation reports was also discussed in the joint meeting of the Accreditation Council and the agencies in March 2021. There it was decided to develop a handout on the drafting of accreditation reports.

¹⁴⁷ „Akkreditierung als Instrument der Qualitätssicherung“, Bremen 2012, p. 74, <http://www.wissenschaftsrat.de/download/archiv/2259-12.pdf> (in German only).

¹⁴⁸ https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/AR_Beschluss_Vorlaeufige_Orientierungshinweise_fuer_die_Erstellung_von_Akkreditierungsberichten_2019-03-21_Drs._AR_36-2019.pdf (in German only).

Publication of reports

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

Publication of quality reports by system-accredited HEIs

The obligation to publish the accreditation decision and the accreditation report also applies to study programmes that have been accredited within the framework of the HEIs' internal accreditation procedures (see § 18 (4) sentence 2 and § 29 Specimen Decree). § 29 Specimen Decree also states that the publication shall be made on the website of GAC, i.e. in ELIAS. The accreditation reports of internal accreditations by system-accredited HEIs are called quality reports to distinguish them from accreditation reports in external programme and system accreditation procedures. The quality reports of the system-accredited HEIs do not necessarily have to be completely oriented towards the report template for programme accreditation specified by GAC. In view of the different design of their quality management systems, the system-accredited HEIs can decide on an appropriate reporting form. GAC has published guidelines for quality reports of system-accredited HEIs.¹⁴⁹ GAC is currently in the process of enforcing the obligation to publish the quality reports as not all HEIs yet fulfil this duty in a satisfactory manner.

Alternative procedures

Here, too, the review report according to section 6 (1) of the RPAAP must be attached to the application for accreditation to be submitted to the Accreditation Council. GAC provides a report template for the preparation of the review report, which can, however, be adapted to the circumstances of the respective alternative procedure by the institution carrying out the assessment procedure. The review report must provide evidence-based proof that the requirements for the accreditation of the alternative procedure are met. The accreditation decision and the accreditation report of the Accreditation Council according to section 6 (6) of the

¹⁴⁹https://www.akkreditierungsrat.de/sites/default/files/downloads/2020/AR_Beschluss_Hinweise%20f%C3%BCr%20Qualit%C3%A4tsberichte%20systemakkreditierter%20Hochschulen_2020-09-29_Drs.%20AR%2091-2020.pdf (in German only).

RPAAP are published in ELIAS, as well as the internal quality reports of HEIs accredited in alternative procedures (see § 18 Specimen Decree¹⁵⁰).

10.7 ESG Standard 2.7 Complaints and appeals

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Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

Possibility to comment on the accreditation report

2180 Pursuant to Article 3 (4) of the Interstate Study Accreditation Treaty, the HEIs may attach a statement to their application for accreditation, which they submit to the Accreditation Council. HEIs should use this opportunity to comment if they wish to raise objections to the proposals in the accreditation report.

2185 It can happen that the Accreditation Council intends to take an accreditation decision that deviates significantly from the proposal included in the accreditation report, in a way that imposes additional burdens on the HEI, especially by imposing an additional condition. In that case, the HEI is given the opportunity to submit a (further) statement within one month in accordance with § 22 (3) Specimen Decree.

2190 Appeals and complaints to the Accreditation Council

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

In addition to internal HEI complaints, deficiencies in internal accreditation procedures of system-accredited HEIs can be brought to the attention of GAC.

2195 GAC set up a commission to deal with appeals and complaints. The Complaints and Appeals Commission consists of three external members: a professor, a student member and a member proposed by the agencies. They are nominated by the Accreditation Council upon proposal of the respective member group. The commission discusses appeals and complaints and submits a recommendation to the Accreditation Council for final decision on the appeal or the
2200 complaint.

GAC provides information on how it has decided the appeal or complaint.

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

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

2205 At the time of reporting, one appeal procedure has been completed. An expert had complained against the fact that the Accreditation Council had deleted a condition in a system accreditation procedure due to the statement of the HEI. After the Complaints and Appeals Commission had recommended in its meeting of 16 April 2021 that the complaint be rejected, the Accreditation Council decided to follow this recommendation in its meeting of 22/23 June 2021. The appellant was informed of the decision.

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11. Information and opinions of stakeholders

HEIs are the main stakeholders in the accreditation system. The HRK as the association of state and state-recognised HEIs in Germany was asked by GAC to give a statement on

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- the nomination of members of the Accreditation Council by the HRK and
 - the changes in the accreditation system and the level of satisfaction with it.

The HRK Board adopted a corresponding statement on 26 April 2021.¹⁵¹

Concerning the nomination procedure and the HRK's explanations on this see chapter [9.3 ESG Standard 3.3 Independence](#). In this context the HRK welcomes the appointment of substitute members and permanent guests in the Accreditation Council. Indeed, this broadens the Accreditation Council's expertise. Besides the substitute members are available as rapporteurs which distributes the related workload among more heads. Insofar as the HRK criticises that active HEI rectors, presidents, vice-rectors, and vice-presidents are not regarded as members of academia and thus cannot be members of the Accreditation Council, this is because, according to the requirements of the Federal Constitutional Court, academia itself should steer the accreditation procedures.¹⁵²

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Concerning the changes in the accreditation system the HRK states, that it welcomes the increase in consistency as well as the stronger role of academia in accreditation. The HRK also sees the "*broadening and differentiation of types of accreditation through alternative accreditation*"¹⁵³ as positive. The only criticism of the HRK is that the Specimen Decree focuses strongly on programme accreditation, which in the opinion of the HRK could lead to higher education institutions replicating programme accreditation in internal quality management systems. Indeed, the criteria study programmes must fulfil are the same in all types of procedures: HEIs have to prove that the study programmes meet the formal and academic criteria included in parts 2 and 3 of the Specimen Decree.¹⁵⁴ This is due to the fact that the objective of accreditation in all procedures, including system accreditation, is in the end quality at the study programme level. However, the higher education institutions are relatively free to design their quality management systems that are to lead to this programme quality as § 17 and § 18 Specimen Decree show.¹⁵⁵

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¹⁵¹ See annex 04.

¹⁵² See [chapter 4. History, profile and activities of the agency](#).

¹⁵³ See HRK statement, page 6.

¹⁵⁴ See [chapter 10.5 ESG Standard 2.5 Criteria for outcomes](#).

¹⁵⁵ See [chapter 10.2 ESG Standard 2.2 Designing methodologies fit for purpose](#).

12. Recommendations and main findings from previous review(s) and agency's resulting follow-up

2245 In the letter confirming GAC's ENQA membership from 28 November 2013, the Board of ENQA considered that it would be advisable to take into consideration the ENQA panel's recommendations. The Board highlighted that the resources of GAC should be increased and that the Mission Statement of GAC should be updated. In the following the recommendations and the actions taken by GAC are illustrated; it must be considered that since then, the accreditation system has changed fundamentally. Nevertheless, the then given recommendations are still
2250 of value for GAC.

Recommendation of the Board of ENQA

*"In particular, the resources of the Agency should be increased. The Board noted that resources appear to be sufficient to undertake the threshold functions of GAC, but do not allow
2255 the Agency to adopt a stronger strategic and international position befitting such an important higher education system."*

Actions of GAC

2260 The Board's recommendation referred to the "old" accreditation system, in which GAC had other tasks. The staffing requirements in the current system are significantly higher due to the new tasks of GAC and the staffing has also been considerably increased. For resources see also chapter [9.5 ESG Standard 3.5 Resources](#).

Recommendation of the Board of ENQA

2265 *"In addition, the Board encourages the Agency to update its Mission Statement to take account of the move to system accreditation."*

Actions of GAC

2270 GAC has reworked its Mission Statement in 2019. The changed legal situation and the changed responsibilities of GAC made it necessary to fundamentally revise the Mission Statement from 2007. The Interim Review of 2020 is based on the GAC's Mission Statement.¹⁵⁶

¹⁵⁶ See chapter [9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance](#) for details.

Recommendation of the panel

2275 *“In the complex context in which the Council is operating, it would find high benefits from the development of a real strategic plan for the Accreditation Council, with particular attention paid to the areas of system development and internationalization.”*

Actions of GAC

2280 The main strategic and planning document of GAC is its Interim Review of 2020, based on GAC's updated Mission Statement.¹⁵⁷ In the second chapter of the review, the “piecemeal engineering”-approach on strategy and planning of GAC is explained in detail.¹⁵⁸

Recommendation of the panel

2285 *“It will be of paramount importance for the overall development of the German quality assurance system and for the Council itself to carry out a careful evaluation of the development of system accreditation; such an evaluation should consider the multifaceted consequences of this development on the operations of the Council and the accreditation agencies, as well as on quality assurance and quality improvement at the various types of HEIs, with a view to striking a desirable balance between the two types of accreditation.”*

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Actions of GAC

2295 In 2017, GAC conducted a sample analysis on system accreditations.¹⁵⁹ In addition to the analysis, an expert dialogue was organised in the same year to which the system-accredited higher education institutions and all relevant stakeholders were invited. As an overriding result of the sample, it could be determined that the agencies fulfilled the expectations of GAC for system accreditation procedures. Nevertheless, one result was that the process for awarding or withdrawing the seal for internally assessed study programmes should be evaluated in more detail in the review reports.

2300 The findings of GAC gained during the sample analysis and within the System Accreditation Forum, a joint conference of HRK and GAC in 2015, have been incorporated into the design of the current legal basis. E.g., the Specimen Decree, based on a suggestion by GAC, now provides that the quality standards for study programmes are the same, no matter if they are checked via a programme accreditation or by a system-accredited HEI via its internal quality

¹⁵⁷ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf

¹⁵⁸ See chapter [9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance](#) for details.

¹⁵⁹ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2019/Bericht_themenbezogene_Stichprobe_Systemakkreditierung_2017_01.pdf (in German only).

assurance mechanisms. In addition, the process of internal accreditation of study programmes
2305 by system-accredited HEIs was explicitly made a subject of assessment in system accredita-
tion in the current legal foundations (see § 17 Specimen Decree).

Besides, in the current accreditation system, GAC takes the decisions in programme and sys-
tem accreditation itself which guarantees consistency of interpretation of standards for study
programmes in programme accreditation on one hand and system accreditation on the other
2310 hand and thus consistency of decisions. This also enables the GAC to identify and correct
undesirable developments in good time.

The number of cases of system accreditations decided by the Accreditation Council in the
system of 2018 is still small, however, so that a large-scale evaluation of the experiences with
this type of procedure is not yet possible. For the potential to carry out thematic analyses on
2315 this in the future, see chapter [9.4 ESG Standard 3.4 Thematic analysis](#).

Recommendation of the panel

*“The Council should consider the desirability of including doctoral studies in its portfolio and
raise a discussion with regulating authorities about this.”*

Actions of GAC

As already outlined in the progress report of 2015, including doctoral studies in GAC’s portfolio
would not be advisable for two reasons: *“Firstly, doctoral studies in Germany are very closely
linked to research, and doctoral candidates are seen primarily as first-stage researchers rather
2325 than as advanced students, while GAC is competent in matters of teaching and learning but
not so much in research. This leads, secondly, to the fact that Germany is a country of shared
responsibilities in Higher Education and therefore there are several honourable institutions
here dealing with the research aspects of HE. Especially the Council of Science and Humani-
ties and the DFG (Deutsche Forschungsgemeinschaft) address quality issues with doctoral
2330 studies.”*¹⁶⁰

Recommendation of the panel

*“The Council should pay significantly more attention to its role, performance and impact be-
yond German borders, in particular with regard to the certification of non-German accreditation
2335 agencies, the international activities of German accreditation agencies and the visibility and
value of the official German quality seal in the world.”*

¹⁶⁰ Progress report of 03 September 2015, page 2 (see annex 09)

Actions of GAC

2340 According to Article 3 (2) sentence 2 of the Interstate Study Accreditation Treaty, all agencies listed in EQAR are allowed to carry out accreditation procedures in Germany. So far, the Accreditation Council has only authorised agencies that were already accredited under the old system in Germany, among them also the Swiss agency AAQ and the Austrian agency AQ Austria. The authorisation by the Accreditation Council could be attractive for small agencies, however, that limit themselves to the quality assurance of certain disciplines or have special expertise in these. Such agencies often work throughout Europe.

As to the recommendation to enhance the international visibility and value of GAC's seal, it must be clarified, that the primary task of the Accreditation Council is to ensure the quality of study programmes at German HEIs and should concentrate on this, especially in times of capacity bottlenecks and high application rates.

2350 However, HEIs abroad with a clear connection to Germany (German backed universities), have interest in proving that they meet German quality standards. The Accreditation Council decided to offer the GJU a certificate of equivalence provided that the university meets German accreditation standards.¹⁶¹ But, according to information from the North Rhine-Westphalian Ministry of Science (MKW), GAC's legal supervisor, it is not possible for the GJU's study programmes to be accredited with the GAC's seal as GAC has no state authority abroad and therefore cannot issue administrative acts with legal effect for foreign universities.

Recommendation of the panel

2360 *"The Council should also consider reviewing a number of pending issues, in particular with respect to:*

- *the desirable balance between generic and subject-specific standards and the linkage (or separation) of generic (academic) and professional accreditation;*
- *the simplification and possible mainstreaming of the procedure for private HEIs and the guarantee of their equal treatment;*
- 2365 • *the necessary updating and desirable upgrading of the Mission Statement;*
- *the adjustment of the name of the Foundation following the introduction of system accreditation;*
- *the further development of the Foundation's website and communications strategies in general."*

¹⁶¹ See chapter [6. Processes and their methodologies](#) for details.

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Actions of, and related to GAC*Generic and subject-specific standards*

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In the Specimen Decree, a new criterion § 13 named “*Subject-content organisation of the study programmes*” was introduced based on a suggestion by GAC. § 13 defines the subject-content assessment of study programmes and the special requirements for teacher education programmes. According to § 13 (1) sentence 1 the “*up-to-dateness and adequacy of the subject-related and scientific requirements*” must be checked by the experts. “*The subject-content design and the methodical-didactic approaches taken by the curriculum are checked continuously and adapted to further professional and didactic developments. To this end, the professional discourse on a national and if necessary international level is taken into account systematically.*”¹⁶²

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Regarding Article 5 (3) of the Basic Law, the regulation is limited to examining whether the HEI has the framework conditions to guarantee the up-to-dateness and adequacy of the subject-related and scientific requirements.

2385

Academic and professional accreditation are separated, see chapter [5. Higher education quality assurance activities of the agency](#).

Quality assurance procedures for private HEIs

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As already mentioned in the progress report, GAC is in regular contact with the German Council of Science and Humanities which is responsible for the so-called institutional accreditation of private HEIs. GAC and the Science Council work together to keep the processes as simple as possible, but it is a fact that most higher education acts of the Länder require separate accreditation procedures for private HEIs.

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Mission Statement

See above in this chapter.

Name of GAC

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Article 5 of the Interstate Study Accreditation Treaty states: “*The Foundation for the Accreditation of Study Programmes in Germany [...] bears the name “Foundation Accreditation Council”.*”

¹⁶² § 13 (1) sentences 2 and 3 Specimen Decree

Even though the full name of GAC was also adequate before as also system accreditation leads to accredited programmes, the name of the foundation now is more “neutral”. In international contexts and in this self-assessment report, the foundation is referred to as the German Accreditation Council (GAC).

GAC’s website and communications strategies

In 2018/2019, the website of the Accreditation Council was visually and technically renewed. All information on the current accreditation system can now be found there, also in English. The public database (ELIAS) with its different web portals for the different user groups is also linked there.¹⁶³

In March 2020, the Accreditation Council adopted a communication concept in which, in addition to the information offered on the website of GAC and the established forms of communication of the press release, result letters to the stakeholders and FAQs, further proactive communication formats were introduced in the form of a Twitter account and a newly designed newsletter (with a subscriber list of over 1,000 addresses).

13. SWOT analysis

The regular analysis of strengths and weaknesses as well as of chances and risks is part of GAC’s internal quality management. After a SWOT analysis in autumn 2019 in the context of the development of the communication concept of GAC, in spring 2021 staff members, the chair of the Board and the managing director met for another SWOT session. The result is reproduced here unchanged as a “snapshot” of this meeting. The Accreditation Council will intensively discuss and supplement this analysis in the next six months.

¹⁶³ See chapter 4. [History, profile and activities of the agency](#), annex 01 and <https://www.akkreditierungsrat.de/en/foundation-accreditation-council/tasks-german-accreditation-council>.

<p style="text-align: center;">Strengths</p> <ul style="list-style-type: none"> • Communication and exchange with all stakeholders • Digital system • Overview of all study programmes and universities • Secured legal basis • Good teams • Good cooperation between the member groups; no particular interests • Critical reflection • Composition of GAC; students are also heard • Checks and balances • Alternative procedures are an opportunity for innovation • Consistency 	<p style="text-align: center;">Weaknesses</p> <ul style="list-style-type: none"> • Information deficit in the evaluation procedure • Resource issue in programme accreditation, long processing times for accreditation applications • Only limited adaptation of internal structures to growth in size possible • Danger of double evaluation and tendency to more details • Processes outside the database • Full review or random sampling?
<p style="text-align: center;">Opportunities</p> <ul style="list-style-type: none"> • Market power • Design potential regarding Specimen Decree • Possibility of quality development • Direct influence on teaching and learning • Transition to system accreditation saves resources 	<p style="text-align: center;">Threats</p> <ul style="list-style-type: none"> • Less focus on teaching and learning through system accreditation • Undesirable changes in the Specimen Decree • Growing resentment from universities and agencies • GAC is used as scapegoat • Federal system could drift apart • Routine as the enemy of quality development • Accreditation reports need to be improved • Diversification of study programme models

14. Current challenges and areas for future development

2430 GAC has successfully completed a two- to three-year consolidation phase after the current legal basis came into effect. It has created the prerequisites and framework conditions for the application of these legal foundations. After completion of this consolidation phase, GAC is now facing a "regular operation phase". In its Interim Review of 2020,¹⁶⁴ GAC took stock of the first two years. On the other hand, it named main focal points and challenges for the future. In

¹⁶⁴ See https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/interim_review_2020.pdf.

2435 addition to carrying out the ENQA evaluation, it has named handling the “wave” of applications and the systematic reflection on its own activities as priorities for the remaining term of office.

The measures taken by GAC are already having an effect in processing high numbers of applications. ELIAS works well and has become an indispensable tool in the daily work of GAC. With ELIAS, large numbers of applications can be handled efficiently. The Covid-19 pandemic

2440 has played its part in strengthening digital competence in the Accreditation Council and its Head Office. A series of other measures enhances the efficiency of GAC’s processes. This also includes the increased involvement of the substitute members in the Accreditation Council. Staffing has improved significantly during the transition to the current accreditation system.

For the first time, all accreditation decisions are issued by one institution, which provides the

2445 opportunity for consistent decisions and comparison across HEIs.

However, the timely and consistent application of the criteria is demanding, especially due to the high number of procedures and the dynamic development of the higher education landscape.

GAC will take on the task of reflecting on its own activity and on the objects to which its accreditation activity relates, i.e., study programmes and quality management systems.

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In the area of programme accreditation, a diversification of study programme models can be observed, which leads to higher demands on the expertise of the accreditors.

Regarding system accreditation, GAC’s experience is still in an initial phase due to the low number of applications. An open question is how the equivalence of the procedures across the

2455 system-accredited HEIs and to the study programmes accredited by way of external programme accreditation can be guaranteed.

Finally, alternative procedures offer the opportunity for innovation in the accreditation system and strengthen the HEI’s own responsibility. However, they are very resource-intensive, especially if, as is currently the case, GAC carries out the procedures itself.

2460 In summary, it can be stated, that the change in the legal tasks has changed the self-image of GAC: It is clearly more operationally oriented. However, it is now even more the task and responsibility of GAC to contribute to ensuring that accreditation strikes a balance between higher education autonomy, compliance with regulations and quality development.

2465 **Glossary of terms**

The following tables contain the information already contained in the [List of Abbreviations](#) as well as the terms for which there are no abbreviations as well as links, if available. The first table is sorted by the English terms, the second by the German terms.

2470

English term	German equivalent	Acronym	Link
Accreditation Agency for Study Programmes in Engineering, Informatics, Natural Sciences and Mathematics	Akkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, Informatik, Naturwissenschaften und Mathematik	ASIIN	https://www.asiin.de/en/about-asiin.html
Accreditation Council	Akkreditierungsrat		
Act Establishing the Foundation Accreditation Council (Accreditation Council Act)	Gesetz über die Stiftung Akkreditierungsrat (Akkreditierungsratsgesetz)		https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Akkreditierungsrats-gesetz_eng.pdf
Agency for Quality Assurance and Accreditation Austria	Agentur für Qualitätssicherung und Akkreditierung Austria	AQ Austria	https://www.aq.ac.at/en/
Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany	Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland	AKAST	https://www.akast.info/?lang=en
Agency for Quality Assurance through Accreditation of Study Programmes	Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen e.V.	AQAS	https://www.aqas.de/
Assessment agency; assessment agencies; agencies	Agentur; Agenturen		
Basic Law	Grundgesetz		https://www.gesetze-im-internet.de/englisch_gg/
Board	Vorstand der Stiftung Akkreditierungsrat		
Central Evaluation and Accreditation Agency	Zentrale Evaluations- und Akkreditierungsagentur	ZEVA	https://www.zeva.org/english-version
CHEA International Quality Group		CIQG	https://www.chea.org/
Cluster accreditation	Bündelakkreditierung		
Council for Higher Education Accreditation		CHEA	https://www.chea.org/
Database of External Quality Assurance Results		DEQAR	https://www.eqar.eu/ga-results/search/by-institution/

English term	German equivalent	Acronym	Link
German Academic Exchange Service	Deutscher Akademischer Austauschdienst	DAAD	https://www.daad.de/en/
Electronic Information and Application System	Elektronisches Informations- und Antragssystem	ELIAS	https://antrag.akkreditierungsrat.de/
Estonian Quality Agency for Higher and Vocation Education		EKKA	https://ekka.edu.ee/en/
European Association for Quality Assurance in Higher Education		ENQA	https://www.enqa.eu/
European Higher Education Area		EHEA	
European Quality Assurance Register for Higher Education		EQAR	https://www.eqar.eu/
Federal Ministry of Education and Research	Bundesministerium für Bildung und Forschung	BMBF	https://www.bmbf.de/en/index.html
Foundation Council	Stiftungsrat der Stiftung Akkreditierungsrat		
German Accreditation Council	Stiftung Akkreditierungsrat	GAC	https://www.akkreditierungsrat.de/en/welcome-german-ac-creditation-council
German Council of Science and Humanities	Wissenschaftsrat	WR	https://www.wissenschaftsrat.de/DE/Home/home_node.html
German Jordanian University		GJU	http://www.gju.edu.jo/
German Rectors' Conference	Hochschulrektorenkonferenz	HRK	https://www.hrk.de/home/
German Research Foundation	Deutsche Forschungsgemeinschaft	DFG	https://www.dfg.de/en/index.jsp
Head Office	Geschäftsstelle der Stiftung Akkreditierungsrat		
Higher Education Compass	Hochschulkompass		https://www.hochschulkompass.de/en/study-in-germany.html
Higher Education Framework Act	Hochschulrahmengesetz	HRG	https://www.gesetze-im-internet.de/hrg/
Higher education institution; higher education institutions		HEI; HEIs	
International Network for Quality Assurance Agencies in Higher Education		INQAAHE	https://www.inqaahe.org/

English term	German equivalent	Acronym	Link
Interstate Treaty on the organization of a joint accreditation system to ensure the quality of teaching and learning at German higher education institutions (Inter-state study accreditation treaty)	Staatsvertrag über die Organisation eines gemeinsamen Akkreditierungssystems zur Qualitätssicherung in Studium und Lehre an deutschen Hochschulen (Studienakkreditierungsstaatsvertrag)		https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begrundung_Englisch.pdf
Land; State; Länder; States	Land, Länder		
National Center for Educational Quality Enhancement		NCEQE	https://eqe.ge/en
National Institution for Academic Degrees and University Education		NIAD-UE	https://www.niad.ac.jp/english/
Plan-Do-Check-Act		PDCA	
Project Quality Assurance of Cross-border Higher Education		QACHE	https://qache.wordpress.com/
Quality Assurance	Qualitätssicherung	QA	
Rules of Procedure for Alternative Accreditation Procedures	Verfahrensordnung Alternative Akkreditierungsverfahren	RPAAP	https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Rules%20of%20Procedure%20for%20Alternative%20Accreditation%20Procedures.pdf
Self-Assessment Report	Selbstbericht	SAR	
Specimen Decree	Musterrechtsverordnung	MRVO	https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf
Standards and guidelines for quality assurance in the European Higher Education Area		ESG	
Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany	Kultusministerkonferenz	KMK	https://www.kmk.org/kmk/information-in-english.html
Swiss Agency for Accreditation and Quality Assurance	Schweizerische Agentur für Akkreditierung und Qualitätssicherung	AAQ	https://aaq.ch/en/
The Accreditation, Certification and Quality Assurance Institute	Das Akkreditierungs-, Zertifizierungs- und	ACQUIN	https://www.acquin.org/en/

English term	German equivalent	Acronym	Link
	Qualitätssicherungs-Institut		
Universities of Applied Sciences	Fachhochschulen/Hochschulen für Angewandte Wissenschaften	FH/HAW	

German term	English equivalent	Acronym	Link
Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen e.V.	Agency for Quality Assurance through Accreditation of Study Programmes	AQAS	https://www.aqas.de/
Agentur für Qualitätssicherung und Akkreditierung Austria	Agency for Quality Assurance and Accreditation Austria	AQ Austria	https://www.aq.ac.at/en/
Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland	Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany	AKAST	https://www.akast.info/?lang=en
Agentur; Agenturen	Assessment agency; assessment agencies; agencies		
Akkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, Informatik, Naturwissenschaften und Mathematik	Accreditation Agency for Study Programmes in Engineering, Informatics, Natural Sciences and Mathematics	ASIIN	https://www.asiin.de/en/about-asiin.html
Akkreditierungsrat	Accreditation Council		
Bündelakkreditierung	Cluster accreditation		
Bundesministerium für Bildung und Forschung	Federal Ministry of Education and Research	BMBF	https://www.bmbf.de/en/index.html
Das Akkreditierungs-, Zertifizierungs- und Qualitätssicherungs-Institut	The Accreditation, Certification and Quality Assurance Institute	ACQUIN	https://www.acquin.org/en/
Deutsche Forschungsgemeinschaft	German Research Foundation	DFG	https://www.dfg.de/en/index.jsp
Deutscher Akademischer Austauschdienst	German Academic Exchange Service	DAAD	https://www.daad.de/en/
Elektronisches Informations- und Antragssystem	Electronic Information and Application System	ELIAS	https://antrag.akkreditierungsrat.de/
Fachhochschulen/Hochschulen für Angewandte Wissenschaften	Universities of Applied Sciences	FH/HAW	

German term	English equivalent	Acronym	Link
Geschäftsstelle der Stiftung Akkreditierungsrat	Head Office		
Gesetz über die Stiftung Akkreditierungsrat (Akkreditierungsratsgesetz)	Act Establishing the Foundation Accreditation Council (Accreditation Council Act)		https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Akkreditierungsratsgesetz_eng.pdf
Gewerkschaftliches Gutachter/innen Netzwerk		GNW	https://www.gutachternetzwerk.de/startseite/
Grundgesetz	Basic Law		https://www.gesetze-im-internet.de/englisch_gg/
Hochschulkompass	Higher Education Compass		https://www.hochschulkompass.de/en/study-in-germany.html
Hochschulrahmengesetz	Higher Education Framework Act	HRG	https://www.gesetze-im-internet.de/hrg/
Hochschulrektorenkonferenz	German Rectors' Conference	HRK	https://www.hrk.de/home/
Kultusministerkonferenz	Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany	KMK	https://www.kmk.org/kmk/information-in-english.html
Land, Länder	Land; State; Länder; States		
Musterrechtsverordnung	Specimen Decree	MRVO	https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf
Qualitätssicherung	Quality Assurance	QA	
Schweizerische Agentur für Akkreditierung und Qualitätssicherung	Swiss Agency for Accreditation and Quality Assurance	AAQ	https://aaq.ch/en/
Selbstbericht	Self-Assessment Report	SAR	
Staatsvertrag über die Organisation eines gemeinsamen Akkreditierungssystems zur Qualitätssicherung in Studium und Lehre an deutschen Hochschulen (Studienakkreditierungsstaatsvertrag)	Interstate Treaty on the organization of a joint accreditation system to ensure the quality of teaching and learning at German higher education institutions (Interstate study accreditation treaty)		https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begründung_Englisch.pdf
Stiftung Akkreditierungsrat	German Accreditation Council	GAC	https://www.akkreditierungsrat.de/en/welcome-german-accreditation-council
Stiftungsrat der Stiftung Akkreditierungsrat	Foundation Council		

German term	English equivalent	Acronym	Link
Verfahrensordnung Alternative Akkreditierungsverfahren	Rules of Procedure for Alternative Accreditation Procedures	RPAAP	https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Rules%20of%20Procedure%20for%20Alternative%20Accreditation%20Procedures.pdf
Vorstand der Stiftung Akkreditierungsrat	Board		
Wissenschaftsrat	German Council of Science and Humanities	WR	https://www.wissenschaftsrat.de/DE/Home/home_node.html
Zentrale Evaluations- und Akkreditierungsagentur	Central Evaluation and Accreditation Agency	ZEVA	https://www.zeva.org/english-version

List of annexes

- 2475
- Annex 01: System architecture of ELIAS
- Annex 02: Quality report of 2020 (in German only)
- Annex 03: PDCA-cycle
- Annex 04: Statement of the HRK
- 2480
- Annex 05: Results thematic analyses
- Annex 06: Mapping grid ESG part 01
- Annex 07: Binding Guidelines for the Nomination of University Teachers for Expert Groups according to Art. 3 Para. 3 State Treaty on Study Accreditation
- Annex 08: Guidelines on the appointment of experts and the composition of expert groups for accreditation procedures
- 2485
- Annex 09: Progress report of GAC to ENQA
- Annex 10: Annual budget for the last years