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Thematic analysis

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Eva Pietsch, Georg Reschauer

Reflections on the first evaluation procedures according to the Interstate Study Accreditation Treaty in conjunction with the Länder Regulations or the Specimen Decree

1. Introduction

On 01.01.2018, the regulations for the current accreditation system, the State Treaty on the Accreditation of Studies¹ and the individual state regulations based on the model ordinance² came into force. Contracts concluded up to and including 31.12.2017 are to be treated according to the old legal basis for the entire accreditation period; contracts concluded from 01.01.2018 onwards are to be treated according to the current legal basis.

At the beginning of the year 2018, in "The Further Development of the German Accreditation System Following the Resolution of the Federal Constitutional Court",³ the legal bases of the then "new accreditation system" were presented without practical reference due to the lack of procedures carried out: In the accreditation system, a peer review process is also the central element of the evaluation of study programs, with the participation of representatives from science, professional practice and students. The agencies organize the evaluation procedures. The Accreditation Council takes the decision on accreditation. In terms of content, the formal and technical criteria were separated and the examination of the former was assigned to the agencies, while the latter are examined and evaluated by the evaluators. The Accreditation Council sets "grids" for the preparation of accreditation reports, to which the agencies are bound.

2. Question and objective

After the first assessment procedures, a first examination and review of the practical implementation of the current requirements in the AHPGS can now take place. Are the agency's internal processes adapted to the current system? Do the processes and the quality management of the AHPGS ensure the creation of "good" accreditation reports, on the one hand in the sense of complete and meaningful documentation and evaluation of the criteria and on the other hand with regard to the extent of the expert requirements? A further aspect to

¹ "State Treaty on the Organisation of a Joint Accreditation System for Quality Assurance in Studies and Teaching at German Universities" of 12.06.2017

² "Model Law Ordinance pursuant to Article 4 Paragraphs 1 - 4 of the State Treaty on the Accreditation of Studies" Resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany of 07.12.2017

³ Eva Pietsch, Public Health Forum, 2018.

be examined is whether the review procedures were completed within the time-tables agreed with the universities.

The analysis serves the AHPGS-internal use for the follow-up of the processes and equally the members, universities, reviewers and other interest groups for information about the activities of the AHPGS.

3. Data and method

The analysis refers to evaluation procedures of the AHPGS within the framework of program accreditation of study programs, in which the State Treaty on the Accreditation of Study Programs and the respective state ordinance or model ordinance are used as a basis. The data result from courses of study for whose evaluation the contract between the AHPGS and the individual universities was concluded from 01.01.2018. Since only procedures in which at least the self-report has already been submitted are considered for the question, the analysis is limited to these study programs. By 31.12.2019, self-evaluation reports for the evaluation of 61 study programs in 35 (bundle) procedures had been submitted to the AHPGS. Currently, the AHPGS has prepared nine accreditation reports for a total of twelve study programs according to current law.

The analysis first differentiates all submitted self-reports by type of higher education institution, federal state and their distribution in bundle and individual procedures. With regard to the quality of the accreditation reports, the nine accreditation reports prepared are essential, which are reviewed with regard to compliance with formal and technical criteria, the implementation or use of quality improvement loops and the duration of the procedure.

Up to now, the reviewers have been asked informally and unstructured about their experiences with the legal bases, the implementation of the review procedures and the grids. The standardized, annual survey of the experts will only be conducted at the beginning of 2020 and cannot be taken into account in the present analysis.

4. Result

The 61 courses of study to be evaluated in 35 (bundle) procedures are divided according to the type of university into three courses of study at universities, three courses of study at universities of education, one course of study at a university of cooperative education, 52 courses of study at universities of applied sciences and two courses of study at a founding university. Of these, 13 of the evaluation procedures (or bundles if applicable) (29 study programs) are carried out at private, state-recognized universities of applied sciences and 17 (23 study programs) at state-run universities of applied sciences. The contracts on which the procedures are based were concluded with universities in the federal states of Baden-Württemberg, Bavaria, Berlin, Brandenburg, Bremen, Hesse, North Rhine-Westphalia, Rhineland-Palatinate and Saxony, so that the State Treaty on Study Accreditation is applied in conjunction with the respective state ordinance issued and in Berlin and Brandenburg in conjunction with the model ordinance of the KMK. The 61 study programs are divided into 19 individual procedures and 16 bundled procedures. The bundling procedures cover two to four study programs.

In the meantime, six meetings of the Accreditation Council have taken place in which decisions on program accreditations had to be made. The Accreditation Council has also decided on the accreditation of two study programs evaluated by the AHPGS. Presumably another three applications from universities in which the AHPGS has carried out the evaluation procedures were submitted to the Accreditation Council for decision by the end of 2019.

The following data refer to the evaluation procedures completed by 31.12.2019: Up to this point in time, the AHPGS has finalized nine accreditation reports for a total of twelve study programs. Of these, seven were individual procedures and two were bundled procedures with two and three study programs. In the analysis, therefore, only the grids "single procedure" and "bundle procedure" play a role with regard to program accreditation.

In the procedures, non-compliance with the formal criteria was identified for six study programs and the universities were immediately informed of this. All universities have addressed and remedied the shortcomings identified.

For five study programs, the evaluators found that all subject-related criteria were fully met. For seven courses of study, deficiencies were found on site with regard to the fulfilment of the technical and content criteria. In this context, the

universities have used a quality improvement loop for all study programs with deficiencies in the subject-related content criteria after the on-site assessment. In five study programs, the quality improvement loop led to the complete elimination of the deficiencies, so that the accreditation reports were prepared without the need for expert opinions. Although one edition of an accreditation report (bundle) was edited for two study programs, the second edition (revision of the two module manuals) remained in place, so that the final accreditation report for two study programs contains an expert opinion on each edition.

An evaluation procedure was carried out at a system-accredited university. The quality assurance system there opens up the possibility of having the courses of study externally assessed in accordance with the state regulations. The accreditation report serves as a basis for the university's decision on the (re-)accreditation of the study programs and, as far as is known, has not (yet) been submitted to the Accreditation Council.

The average duration of proceedings in the completed procedures was seven months.

The Accreditation Commission Program Accreditation of the AHPGS has taken note of all test reports. The comments of the Commissioners have been directly taken into account in the further processing as non-compliance with formal criteria or as issues to be discussed on the spot. Six of the accreditation reports prepared were submitted to the Accreditation Commission. Due to lack of time, three reports were not forwarded to the Accreditation Commission in advance, so that the university could submit the initial accreditation of the study program in due time according to the deadline set by the Accreditation Council for dealing with the application at the next meeting.

5. Discussion

The AHPGS has responded to the high demand for advice from the universities in the current accreditation system, which is currently being launched, by taking the following measures: A template for the preparation of the self-reports was developed at the beginning of 2018 and made available to the universities with explanations via the homepage. In several revisions the template was adapted to the new developments in the accreditation system. According to the feedback from the universities, it is being used.

The AHPGS conducts semi-annual workshops (two in 2018 and two in 2019) in relation to the current accreditation system according to the State Treaty on the Accreditation of Studies and the state regulations and addresses the persons in charge of accreditation in the universities at all levels as well as the experts. The workshops were initially attended by persons with the function of deans and university professors who also act as reviewers. In the last workshop, October 2019, the majority of the working level responsible for the coordination or (partial) preparation of self evaluation reports was interested in participating. The feedback from the workshops shows that the participants received the information they had hoped for and many other helpful details for the preparation of the self-reports and the documents. They perceive the AHPGS as a supporting and advisory body. From the point of view of the AHPGS, these persons act as multipliers to the universities and contribute significantly to improving the self-reports with regard to the scope and presentation of the requirements.

The Accreditation Council responded to the need for advice from the universities by publishing "FAQs" on the Accreditation Council's homepage. From the point of view of the AHPGS, this measure has proven to be helpful. If you have any questions in this regard, the AHPGS will gladly refer you to the FAQs.

The immediate feedback to the universities on non-compliance with formal criteria did not represent a 'system change' for the AHPGS. The previous procedure in the old law, i.e. to ask the university "open questions" in response to its application with the aim of completing documents, or to improve or supplement the explanations in order to meet formal criteria, has been transferred to the new system.

The application of the grids provided for the preparation of the accreditation reports immediately revealed potential for improvement: The universities had difficulties with the "data sheet" in which statistical data on the study program are queried. For example, in the question of "study success", the basis for calculation was unclear. On the advice of the AHPGS, the universities referred to the last accreditation period and disclosed the basis of calculation. In the meantime, the Accreditation Council (102nd meeting on 21/22.11.2019) has designed an Excel table for the calculation of the data to be taken into account in the revision of the grids. In the course of 2019, it also became apparent that the reference in the grids to the model ordinance of the KMK is obsolete, as 13

of the 16 state ordinances have already come into force. And finally, the expert opinions were unclear with regard to Section 12 MRVO or Land regulations without subheadings. An additional complicating factor in the case of bundling procedures, for which a separate grid is specified, is that a distinction must be made between overarching and study program-related parts. The AHPGS therefore welcomes, in the sense of transparency and clarity of the reports with which the public can inform itself, a revision of the grids as decided by the Accreditation Council in its meeting on 21/22 November 2019. A corresponding working group has been set up.

The informal survey of the reviewers on the application of the legal bases, the implementation of the review procedures and the application of the grids, which has been carried out informally so far, shows a largely positive trend. The reviewers express in part a streamlining of the documents and the reports and overall a positive perception of the measures taken by the AHPGS for the targeted preparation of the reviewers, such as the written notes supplementing the documents of the university, the telephone information on the role and task of the reviewers prior to the on-site assessment and a presentation on the legal basis on the evening before the on-site assessment. Further and above all differentiated results can only be expected with the annual, standardized survey of the experts at the beginning of the year.

In the overview of the quality improvement loops at the levels of test report and expert opinion, the streamlining of the procedures at the Accreditation Council intended by the legislator appears to have been successful by imposing as few (formal) requirements as possible. In the case of non-compliance with formal criteria, the universities have made improvements up to the on-site assessment. In addition, the universities are very much interested in implementing expert recommendations with regard to the subject-related criteria before they are made binding by the Accreditation Council. A time problem plays a role, especially in the case of initial accreditations, so that in such cases a quality improvement loop is rather dispensed with.

Based on the experience gained with the first decisions of the Accreditation Council, accreditation reports which are not sufficiently meaningful or complete for the decision are returned to the agencies via the universities. In individual cases, agencies were invited to feedback meetings. There is also an exchange

of information at branch level in the event of queries. Two out of three accreditation reports of the AHPGS submitted to the Accreditation Council have been accepted without objections as a basis for decision. In these cases, the Accreditation Council has not made a decision deviating from the expert recommendation. No decision was taken on the third application submitted at the meeting and the university was asked to comment. The AHPGS has not been involved so far. According to information from the university, the Accreditation Council made enquiries about a study variant with additional practical phases. Although this model is not described in the accreditation report but is usually referred to as "dual", it is not in the sense of § 12 Para. 6 of the Bavarian Study Accreditation Regulation (Bayerische Studienakkreditierungsverordnung) or, according to the explanatory memorandum to § 12 Para. 6. All universities of applied sciences are affected by the decision on this issue across all degree programs. The Accreditation Council may wish to proceed in the sense of a decision of principle.

The value of seven months average processing time is not meaningful due to the lack of a relevant number of procedures and does not distinguish between a procedure with or without a quality improvement loop. On the one hand, the fast processing time is due to the time pressure: For initial accreditations, the accreditation report must be uploaded eight weeks before the date of the Accreditation Council meeting in order to ensure that the application is dealt with in the meeting and a decision is reached. For re-accreditations, the discontinuation of "provisional accreditation" increases the pressure to ensure that the study program is accredited without an accreditation gap. On the other hand, the universities were very committed and disciplined in the completed procedures, especially in the quality improvement loops. As a result, it is clear that the average duration of the procedure of nine months, which was communicated to the universities in advance, is correct in order to give the universities planning security for meeting the accreditation deadlines. A reduction of the planning target is not appropriate. An acceleration of the procedures also depends on the involvement of the universities.

From the point of view of the AHPGS, the Accreditation Commission continues to be a fixed component and an important quality feature in the evaluation of study programs, in addition to the appointment of the evaluators. The Accreditation Commission makes a significant contribution to ensuring the consistency and validity of assessments and recommendations for resolutions, which are

both technically adequate and cross-program and cross-procedural. The Accreditation Commission is currently involved in the test report and optionally in the accreditation report. In one case, the inadequate fulfilment of a formal criterion was only dealt with by the university on the basis of a reference from the accreditation commission. Comments of the Accreditation Commission will be taken into account within the scope of the on-site assessments or after the approval of the expert report as notes under 3.1 in the grid.

6. Summary

The AHPGS carried out the first assessment procedures under the new law efficiently, quickly, correctly and without objections. The processes for handling procedures have been fully adapted to the new framework conditions in the AHPGS and will be further optimized. The data situation of the present analysis is only suitable to a limited extent for drawing general conclusions about the quality of the accreditation reports, especially with regard to the completed procedures.

The time dimension of the evaluation procedures must continue to be monitored. A reduction of the planning target of nine months on average is not appropriate due to the unrepresentative number of procedures carried out. Particularly as in the individual cases the involvement of the university and the high time pressure played a significant role.

With regard to the external perception of the review process by the AHPGS, the standardized annual surveys of the reviewers and the universities will provide further and more valid findings.

For further thematic analyses, the following topics are conceivable as a consequence of the reflections on the first evaluation procedures under the new law: Consideration of the type and number of non-compliance with formal and subject-related criteria, the use of quality improvement loops, and an examination of certain characteristics, especially those that are particularly health-related, such as the "dual" characteristic or the implementation of the requirements for cooperative study programs.