



Self-Assessment Report (SAR) of AHPGS for the Renewal of its Membership in the European Association for Quality Assurance (ENQA)

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1. Introduction

AHPGS is a German accreditation agency with a specific focus in the area of health and social sciences. Founded under German law in 2001, it is located in Freiburg, southwestern Germany. AHPGS contributes to the quality assurance of study programs and quality assurance systems of higher education institutions (HEIs) in Germany and abroad.

AHPGS was first accredited as an accreditation agency by the German Accreditation Council (GAC) in 2001. It was reaccredited in 2004 and 2009. The most recent renewal of accreditation was granted in 2014 and is valid until March 31, 2019.

With its decision in 2009, the GAC determined that AHPGS meets the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and the membership criteria of the European Association for Quality Assurance (ENQA). On the basis of this assessment, AHPGS was granted membership in ENQA and is registered in the European Quality Assurance Register for Higher Education (EQAR).

The ENQA membership was renewed in 2014 and is currently valid until May 27, 2019; the EQAR registration was also renewed in 2014 and is currently valid until February 27, 2019.

The implementation of the conditions and recommendations immediately implemented by the AHPGS were communicated to the office of the GAC.

On June 18, 2015, the GAC stated that all conditions were fulfilled. This decision was accepted by ENQA and EQAR for renewal of membership.

AHPGS holds membership in other international organizations, for instance in the Network of Central and Eastern European Quality Assurance Agencies in Higher Education's (CEENQA) and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE).

In 2016, the Swiss Accreditation Council authorized AHPGS to conduct procedures of program accreditation and institutional accreditation in Switzerland according to Swiss law (Higher Education Act, HEdA).

Since 2015, AHPGS has been entitled by the Austrian Federal Ministry of Science, Research and Economy to carry out audits at universities and colleges in Austria in accordance with § 22 (2) of the Austrian Quality Assurance Act.

Since 2002, AHPGS has done accreditations of 1,257 study programs and 3 system accreditations for 155 HEIs under German law.

Abroad, AHPGS has done accreditations of 144 study programs and 4 audits at 26 HEIs in 11 countries so far.

On January 1, 2018 the accreditation system in Germany was changed to a “new” legal basis. This was prompted by a ruling by the German Federal Constitutional Court on February 17, 2016. In response, the 16 German states concluded an Interstate Treaty for a new organization of the accreditation system for quality assurance in studies and teaching at German HEIs. The most significant change is that the decisions on accreditations were transferred from the accreditation agencies to a newly constituted Accreditation Council (GAC).

For the regulation of the accreditation procedures, the Standing Conference of the Ministers of Education and Cultural Affairs of the States in the Federal Republic of Germany (KMK) has adopted a specimen decree.

Under the “new” system, the accreditation agencies must be registered by EQAR to be authorized for the accreditation of study programs under German law. The explanatory statement to the Interstate Treaty describes “compatibility with the standards and guidelines agreed at European level for quality assurance in the European Higher Education Area (ESG)” as one of the guiding principles (annex 1).

Hence, German agencies undergo a review with ENQA for renewal of membership and for the renewal of EQAR registration.

AHPGS is the first German accreditation agency to carry out a procedure with ENQA on the basis of the “new” legal basis applicable in Germany.

2. Development of the Self-Assessment Report (SAR)

Our SAR follows the “Guide of Content for the SAR” provided by ENQA. In order to develop and produce the SAR, the executive board of AHPGS e.V. has delegated this task to the managing director of AHPGS e.V. and the managing director of AHPGS Akkreditierung gGmbH together. As a coordinator within the agency, a program manager was nominated to organize the review process.

The managing directors and the coordinator had regular meetings in 2018, during which they developed the SAR and occasionally included further competences and resources of the AHPGS program managers and administration staff.

During the executive board meeting and the shareholders’ meeting on June 11, 2018, the managing directors and the executive board discussed the SAR and agreed on necessary amendments to the statutes during the next general assembly on February 14, 2019. The SAR has been discussed in the meeting of the program accreditation commission on May 15 and July 23/24, 2018.

We hope that our SAR is effective in communicating – especially to our foreign colleagues – an understandable and comprehensive outline of the history and the work of AHPGS in Germany and abroad. Beginning with 2018 and according to German law, we made sure that it is clear to which system we refer. Only the “new” system is in order. From AHPGS’ point of view, it is not necessary to problematize this differentiation because the execution of accreditation procedures remains substantially similar. Only the use of templates for a formal report and review report as well as the decision taken by the GAC have changed. Further questions will be gladly answered.

Freiburg, October 4, 2018

Prof. Dr. med. Jürgen v. Troschke

(Managing Director of AHPGS e.V.)

Georg Reschauer, M.A.

(Managing Director of AHPGS Akkreditierung gGmbH)

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

Higher Education in Germany

According to the German Rectors' Conference, there are currently 397 universities in Germany with a combined student population of approximately 2.8 million. Of these, 115 are universities or similar institutions, 217 are universities of applied sciences (in German "Fachhochschulen"), 57 are colleges of art or music, 8 do not belong to one of these three categories.

HEIs are either state or state-recognized institutions. In their operations, including the organization of studies and the designation and award of degrees, they are both subject to higher education legislation.

Universities including various specialized 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. Universities have the right to confer doctoral degrees and cater for the education and training of the next generation of academics.

Universities of applied sciences concentrate their study programs in engineering and other technical disciplines, business-related studies, social work, and design areas. The common mission of applied research and development implies a distinct application-oriented focus and professional character of studies, which include integrated and supervised work assignments in industry, enterprises or other relevant institutions. Almost a third of students attend universities of applied sciences.

The third major group comprises the colleges of art and colleges of music offering 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. A central characteristic is the uniting of arts teaching, artistic practice and research. There is a clear difference between teaching of arts subjects, and teaching at universities and universities of applied sciences. Their core objective is to allow students to develop as artistic individuals. Two per cent of all students attend a college of arts or music. Almost all colleges of art and music have the right to confer doctoral degrees and the post-doctoral "Habilitation" qualification for the title of "professor".

In total, there are approximately 10,500 different undergraduate programs and a further 9,500 postgraduate degree programs on offer at HEIs throughout Germany. There are essentially two university-level academic qualifications, a Bachelor's degree and a Master's degree. In addition, there are some subject areas in which courses lead to state-certified exams, for example, medicine, law and the training of

teachers. Finally, there are still some remaining degree programs that lead to a “Diplom” qualification.

HEIs are either government-funded or government-accredited.

In spite of the increasing presence of private HEIs, a large number of which have been established in the last few years, public HEIs remain clearly in the majority. There are 279 government-funded institutions of higher education, compared with 108 private. These are predominantly small institutions offering only a very limited range of subjects, e.g. Business Administration, Media Studies, Design. Almost 94 per cent of all students are matriculated at public higher education institutions.

Due to the federal system in Germany, responsibility for education, including higher education, lies entirely with the individual federal states. The states are responsible for the basic funding and organisation of HEIs. Each state has its own laws governing higher education. Therefore, the actual structure and organization of the various systems of higher education may differ from state to state. The management structures of HEIs vary, as do the regulations governing the accreditation of new degree programs. Currently, no fees are charged in the federal states.

However, in order to ensure the same conditions of study and to guarantee mobility within Germany certain basic principles have been agreed on by the federal state ministers for science within the framework of the Standing Conference of the Ministers of Education and Cultural Affairs. State governments must take these into account when formulating their laws and regulations.

HEIs have a certain degree of autonomy as regards organization and in deciding on any academic issues. However, in the last two decades this autonomy has been increasingly broadened to include issues related to human resources and budget control. Germany has recently experienced an increasing financial commitment to the field of higher education at a federal level both in terms of scope and importance. However, this development is restricted by narrow constitutional limitations. The German government can only legislate on issues related to access to higher education and academic qualifications (for more information please see <https://www.hrk.de/activities/higher-education-system/>).

Since 2001, AHPGS has been engaged in quality assurance (QA) in HEIs. Our accreditation agency plays an important role in the promotion of quality in newly developed study programs, mainly in the area of health and social sciences in Germany.

During the last accreditation of AHPGS by GAC (valid from 2014 to 2019), the legal framework in Germany for accreditation changed. Where necessary, a distinction will be made in the SAR between the period up to December 31, 2017 and the period from January 1, 2018 onwards.

For better understanding of the German accreditation system, a brief description of its history may be helpful.

In 1998, the accreditation procedure was started based upon the "peer review principle" which was introduced for study programs in the tiered graduation system. The group of reviewing peers includes scientists, students, representatives of professional practice and international experts. The German Law on the Establishment of a Foundation for the Accreditation of Study Programs in Germany (known as GAC), adopted on February 15, 2005, provided a legal foundation for accreditation. From now on, the objective of accreditation was to ensure content- and discipline-related standards by assessing the conceptual outline of study programs and the academic feasibility of the courses offered, including the assessment of quality in teaching as well as the scrutiny of the professional relevance and the promotion of gender mainstreaming. Generally, accreditation is a prerequisite for introducing and maintaining Bachelor's and Master's study programs.

In addition to the program accreditation, a system accreditation of institutions for higher education was introduced in 2007. The object of system accreditation is the internal quality assurance system of a HEI. A positive system accreditation certifies that the quality assurance system attains the qualification objectives in teaching and learning and therefore ensures the high quality of its study programs, and in so doing applies the ESG, the Guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the German States (KMK) and the criteria set by the GAC(

Legal conditions in Germany until December 31, 2017

In the past, decentralized agencies (under private law) have conducted the accreditation procedures. As the central accreditation body, the GAC has accredited the accreditation agencies periodically and defined the basic requirements for accreditation procedures, which were to be carried out according to the reliable and transparent standards mentioned above. As a basic principle, the GAC ensured that the interests of the entire system, the responsibility of each of the 16 States in Germany, were taken into consideration during accreditation. The accreditation procedures were conducted independently from the States. The GAC also acted as a central documentation agency for the accreditation system and managed the database of accredited study programs and system-accredited HEIs in Germany.

The contracts between the GAC and the agencies defined the rights and obligations of the partner institutions involved in the accreditation system. As part of their contract agreements, the agencies committed themselves to the deployment of the resolutions of the GAC as well as to taking the Common Structural Guidelines of the States into consideration, which were the legal bases for accreditation. Detailed

information about the “old” accreditation system is still available on the [website](#) of the GAC.

Legal conditions in Germany since January 1, 2018

After the North Rhine Westphalian rules were [declared unconstitutional](#) by the Federal Constitutional Court on February 17, 2016, it was necessary to develop a new legally compliant accreditation.

Since January 1, 2018, the “Studienakkreditierungsstaatsvertrag” ([Interstate Study Accreditation Treaty](#)) came into force as the new legal basis for the German accreditation system.

The minister presidents of the 16 German States have signed the above-mentioned Interstate Treaty.

The Standing Conference of the Ministers of Education and Cultural Affairs (KMK) has agreed on a corresponding “Musterrechtsverordnung” ([Specimen Decree](#)) and its implementation at the state level.

The procedures continue to ensure and develop quality in the field of teaching and learning in reference to the quality management system of the HEI (system accreditation) or the quality management system of individual study programs (program accreditation). The innovation is that accreditation procedures are divided into 2 steps, one concerning the agency and the other concerning the GAC: the accreditation agencies are conducting the procedure on the basis of a self-evaluation report of the HEI and prepare, on the basis of a formal report and the review report, the accreditation report of the experts. The concluding accreditation decision is afterwards taken by the GAC – as an administrative act (based on public law) at the request of a HEI.

The above-mentioned specimen decree contains formal and subject-specific criteria and procedure regulations. The (final) accreditation report contains the formal report and an (external) review report in accordance with a predefined by the GAC. The accreditation period is laid down as eight years. The accreditation report and the decision of the GAC have to be published by GAC.

In accordance with the Interstate Treaty (article 5 (3)(5)), the licensing procedure of accreditation agencies is based on the agency’s listing in the EQAR.

Contracts between HEIs and accreditation agencies which were concluded till December 31, 2017 can be conducted under the regulations of the “old” system for the whole accreditation period. Contracts concluded after January 1, 2018 fall under the “new” regulations. Various HEIs used the opportunity to sign a contract by December 31, 2017. Therefore, the AHPGS and the other German accreditation

agencies will have to continue to conclude procedures under the “old” conditions in 2018 and 2019.

As the overview shows, the main change is that the GAC assumes the responsibility for the final accreditation decision. The transferring of the responsibility for the accreditation decision from an accreditation agency to the GAC brought the procedure in Germany in line with the practice in other countries. The decision is now a state administrative act.

Accredited agencies carry out accreditation procedures on contract basis for HEIs. Detailed information about the “new” accreditation system will be available on the [website](#) of the GAC.

4. History, profile and activities of the agency

Since the early 1990's, the founders of the later AHPGS were engaged in a number of ways in the academization and development of new study programs for different professions in the area of health and social affairs.

In 2001, the AHPGS as a German accreditation agency was founded by scientific and professional organizations related to the community of nursing, health and social sciences and the German Coordinating Agency for Public Health (DKGW), granted by the Donors' Association for the Promotion of Sciences and Humanities in Germany. In the same year, it was accredited by the GAC. The AHPGS is organized in the legal form of a charitable association (VR 3481). From the beginning, it has been located in Freiburg, Germany. Currently, the association has 42 members (annex 3), including various scientific societies in the area of health and social sciences, the Assemblies of the Faculties of Social Work and of Therapeutic Pedagogy, the Conference for Deans and Directors in Nursing Sciences and Higher Education Institutions.

For liability reasons, an "AHPGS Akkreditierung gGmbH" (as a non-profit, private limited charitable company under German law) was founded by the AHPGS e.V. at the beginning of 2008. AHPGS e.V. is the sole shareholder of the AHPGS Akkreditierung gGmbH, which was entered into the Freiburg commercial register on March 5, 2008 with the number HRB 702141. In the shareholders' meeting the AHPGS e.V. is represented through its executive board. A minimum of an annual meeting is mandatory by law. Shareholders' meetings take place as required, a minimum of an annual meeting is mandatory by law. On behalf of AHPGS e.V., the AHPGS Akkreditierung gGmbH organizes the accreditation procedures at and of HEIs.

AHPGS was most recently accredited in 2014 by the GAC. On June 18, 2015, the GAC decided that all conditions were fulfilled by AHPGS. Thus, AHPGS e.V. is authorized to award the seal of the GAC for program and system accreditation.

The composition and tasks of the bodies of the AHPGS e.V. are laid down in the agency's by-laws (annex 3). The AHPGS e.V. consists of an executive board appointed by the general assembly. The president of the AHPGS e.V. is Prof. Dr. Cornelia Wustmann; the Vice-Presidents are Prof. Dr. Heinz Neuser and Miss Martha Koelman (in a 3 year election period until 2019). The managing director of AHPGS e.V. is Prof. Dr. Jürgen von Troschke (in a 5 year election period until 2021). They were appointed by the general assembly. The responsibilities of the executive board include the appointment of members of the accreditation commissions of the AHPGS e.V. and the examination of complaints regarding the refusal of accreditation. Unless otherwise provided by the by-laws, the executive board also discusses and decides on any matters concerning the association.

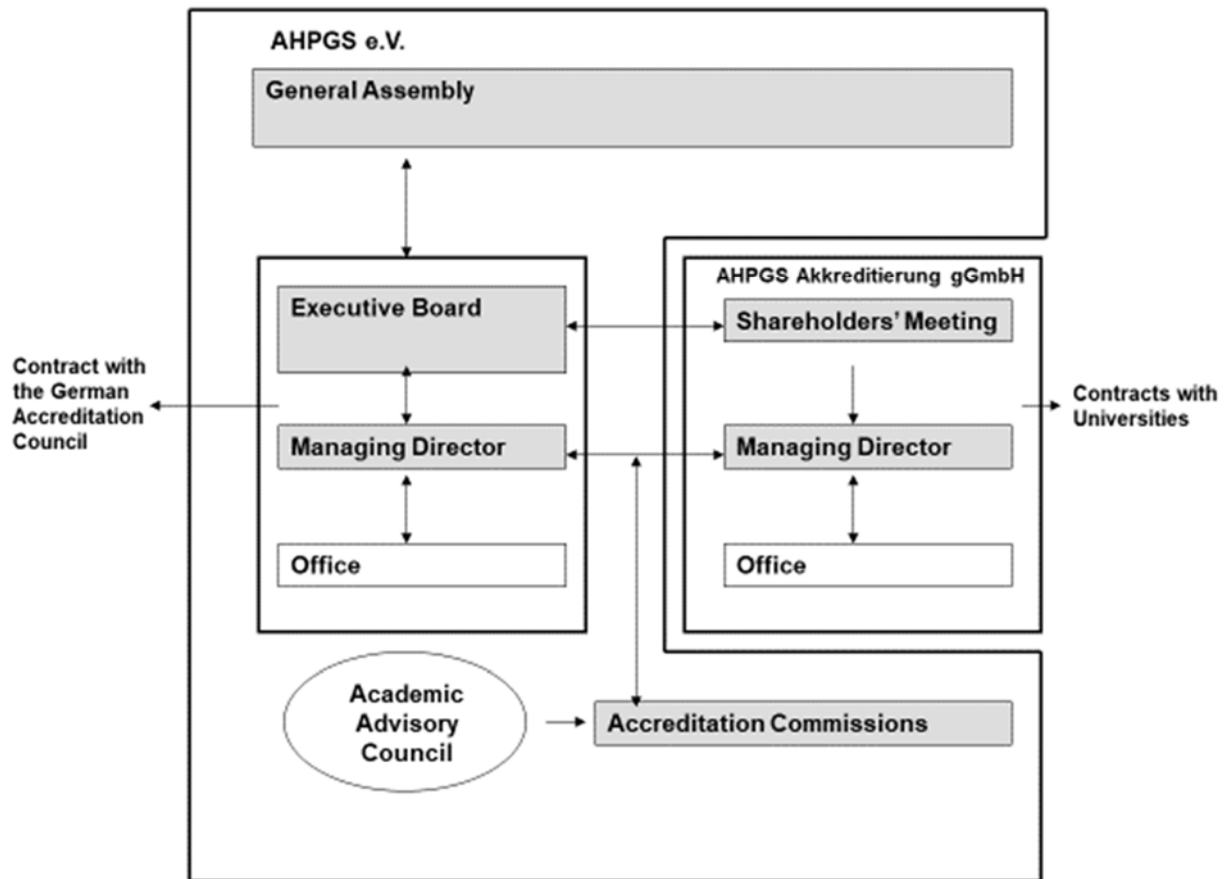


Figure 1 Organizational chart

AHPGS was most recently accredited in 2014 by the GAC. On June 18, 2015, the GAC decided that all conditions were fulfilled by AHPGS. Thus, AHPGS e.V. is authorized to award the seal of the GAC for program and system accreditation.

The AHPGS e.V. currently has 2 accreditation commissions: one commission for program accreditation procedures and one for system accreditation procedures. Under the regulations of the “old” system, the accreditation commissions were the applicants of the accreditation review, procured by the AHPGS Akkreditierung gGmbH and the responsible decision-making bodies with regard to all accreditation procedures. The executive board of AHPGS e.V. holds the power of representation, performs the tasks of the shareholders and constitutes the company general assembly of AHPGS Akkreditierung gGmbH.

The head office of both AHPGS e.V. and AHPGS Akkreditierung gGmbH, is located in Freiburg, Germany. The head office of AHPGS e.V. is run by its respective managing director supported by a part-time employee. The managing director as well as all members of the executive board work on a voluntary basis.

Under the direction of the managing director of AHPGS Akkreditierung gGmbH, the agency employs currently 7 program managers (560 %) and 2 additional employees (150 %) responsible for administration and organization tasks.

The IT infrastructure undergoes comprehensive modernizations on a regular basis. The office equipment includes a network of up-to-date desktop computers, several network printers in addition to a photocopier and scanner in the central office area.

In 2017, AHPGS e.V. generated 46.384,50 Euros of revenues from accreditation procedures (flat administrative fee paid by the AHPGS Akkreditierung gGmbH) and received 7.156,89 Euros from membership fees. The expenditures in 2017 totaled 58.649,00 Euros.

€	2013	2014	2015	2016	2017
Procedural Income	45.475,00	57.298,50	49.113,00	58.208,50	46.384,50
Membership Fees	7.832,00	7.647,50	7.837,50	7.537,50	7.156,89
Committies	23.120,34	26.586,07	39.197,58	35.420,67	30.884,10
Available funds	62.787,23	85.772,46	85.758,96	76.323,68	65.261,48

Figure 2 Financial statement AHPGS e.V.

In 2017, AHPGS Akkreditierung gGmbH registered a balance sheet total of 730.592,23 Euros and a sales revenue of 1.064.100,03 Euros. The net profit for the year amounts to 33.015,44 Euros

€	2013	2014	2015	2016	2017
Revenue (total)	1.074.760,00	1.173.552,83	1.153.099,85	1.075.297,09	1.064.100,03
Revenue (domestic)	980.509,51	867.796,82	973.513,75	828.038,67	754.998,31
Assets	745.570,48	783.969,75	652.621,16	613.014,61	730.592,53

Figure 3 Financial statement AHPGS Akkreditierung gGmbH

Both AHPGS e.V. and AHPGS Akkreditierung gGmbH are recognized as non-profit organizations for German tax purposes.

If requested, we will be happy to provide you during the site visit with financial statements and detailed progress reports of AHPGS in German.

AHPGS is one of 10 accreditation agencies which are accredited by the GAC for carrying out accreditation procedures in Germany. AHPGS has a specific focus in the area of health and social sciences. It conducts its activity alongside various institutions of higher education in Germany and abroad.

Currently, AHPGS has successfully accredited in total more than 1,257 national and international study programs at about 180 HEIs. The following chapter is dedicated to a more detailed overview about the higher education quality assurance activities of the agency in the past 4 years (to be more specific since January 1, 2014 until June 30, 2018), thus covering the agency's activities since the last accreditation.

AHPGS offers workshops on a regular basis in order to inform HEIs about program and system accreditation procedures. In this way, experts for reviewer panels are also trained regularly. Every year in February, AHPGS organizes the so-called "Windenreuter Gremientagung". This is a board meeting where representatives from HEIs as well as experts from reviewers' panels are invited. In this context, current higher education policy and topics from accreditation practice are reported and discussed.

5. Higher education quality assurance activities of the agency

In Germany, the accreditation system was reconstructed in 2017 as a result of a decision of the Federal Constitutional Court which declared that some of the rules of obligation to accredit were unconstitutional. Therefore, the rules and regulations were changed and a “new” law had been passed. Contracts between HEIs and accreditation agencies, which were conducted before the January 1, 2018, have to be respected.

AHPGS promotes the quality and transparency of HEI study courses and HEIs through accreditation and assessment procedures in Germany and abroad. AHPGS’ activities are within the scope of the ESG:

- Accreditation and evaluation procedures of study programs and HEIs in Germany.
- Assessment of accreditation applications of Swiss universities of applied sciences.
- Audits of universities and colleges in Austria.
- Various procedures of accreditation and evaluation of study programs and HEIs abroad.

In total, AHPGS has successfully accredited more than 1,257 national and international study programs as well as 3 system accreditations and 4 Audits in 181 HEIs since 2002.

The following overview shows the activities of AHPGS regarding program accreditation, system accreditation and institutional audits from 2014 to mid-2018 (see activities listed in the TOR).

Since 2014, there have been accreditations conducted at 111 domestic HEIs and 93 HEIs abroad

Study Programs / Institutional Audits	2014	2015	2016	2017	Mid-2018	Total
Total (domestic and foreign)						
Site visits	55	69	60	58	38	280
Study Programs / Audits	89	108	101	89	80	467
Accreditations	89	109	96	103	43	440
Only foreign						
Site visits	4	6	6	6	5	27
Study Programs	9	16	13	16	16	70
Audits	2	-	1	1	-	4
Accreditations / Recommendations	10	19	11	22	17	79
Audits	1	1	-	2	-	4
Total HEIs which had a study program accredited	2	8	4	6	4	18
System accreditation (domestic)						
Site visits	-	2	-	1	-	3
Accreditations	-	2	-	-	1	3

Figure 4 Activities of AHPGS 2014 to mid-2018

6. Processes and their methodologies

Accreditation and assessment procedures in Germany

In general, the program accreditation procedure in Germany is a multistage procedure which is based upon the principle of peer review. If a HEI applies to an agency for accreditation for one of its study programs, the agency will appoint a group of experts which will reflect both the academic focus and also the specific profile of the study program. The expert group will comprise representatives of all the relevant stakeholders. This will include representatives of the HEIs – namely lecturers and students – and representatives from professional practice.

The assessment of the study program by the expert group takes place in accordance with the rules and regulations for the accreditation of study programs and system accreditation. It generally includes a site visit to the HEI, as well as the analysis of the HEI's application rationale. In this context, the group of experts will conduct interviews with representatives of the management, teaching staff and students of the HEI. Finally, the experts will prepare an expert report with recommendations.

With regard to the "old" law, the accreditation commission was – based upon the expert report and according to the rules and regulations – the decision-making authority. Alternative decisions were "accreditation with or without conditions", "suspension", or "refusal of accreditation". Following the rules and regulations, the agency had to publish its decision, the expert report and the names of the experts in the GAC database. In case of a negative decision, the GAC has to receive a notification.

The system accreditation procedure is also a multistage procedure based upon the principle of peer review. If a HEI applies to an accreditation agency for system accreditation, the agency will initially conduct a preliminary assessment to check whether the prerequisites for admittance to system accreditation are met. If the findings of the agency are positive, it will appoint a group of experts structured according to the profile of the HEI. The group of experts will be made up of at least 3 members who have experience in the field of governance and internal quality assurance in HEIs, a student with experience in self-government in HEIs and accreditation, as well as a member from professional practice. The members of the group of experts must have experience in the presidency of HEIs, in curriculum design and the quality assurance of teaching and learning. One member of the expert group shall be from abroad.

The assessment of the internal quality management systems of HEIs must be based on the rules for the accreditation of study programs and for system accreditation of GAC. It generally includes 2 site visits and an assessment of relevant features of the

design of the study program, its implementation and quality assurance, as well as the analysis of the HEI's documentation for application. The purpose of samples is to check whether the intended actions within the quality management system under review actually occur as part of the study program thus guaranteeing quality in terms of teaching and learning. During the assessment, the group of experts will also conduct site interviews with the presidency of the HEI, those who are responsible for equal opportunities, members of administrative staff, those responsible for quality assurance and, of course, the lecturers and students. Following the site visits and the results of the samples, the experts will prepare an expert report with a recommendation. With regard to the "old" law, the accreditation commission for system accreditation must decide with the alternatives accreditation with or without conditions, suspension or refusal of accreditation. Following the rules and regulations, the agency will publish its decision, the expert report and the names of the experts in the GAC database. In the case of a negative decision, the GAC will receive the appropriate notification.

The aim of program accreditation is to evaluate subject-specific concepts on which study programs are based and to assess the quality of the programs and their teaching. Additional goals are to ensure the quality of the study programs, to promote flexibility and coherence within them, and to improve the transparency of the German higher education system.

The aim of institutional audits is to provide HEIs with the possibility of enhancing their internal mechanisms and quality management processes. It determines whether, and to what extent, higher education structures and control functions serve to achieve their set aims. The procedure also provides an improved tool for the management of the HEI and can be used as a non-binding precursor to institutional accreditation or system accreditation, as well as to increase competitiveness.

The accreditation procedures of AHPGS include assessment of a self-evaluation report by the program or the HEI under evaluation; a formal examination for completeness of the report by a program manager of the accreditation agency resulting in a summary of the application documents for the attention of the expert group; a systematic analysis of the report by the expert group; a site visit by the expert group; the production of the expert report by the expert group; and a final accreditation decision by the accreditation commission based on the aforementioned reports.

The current accreditation system in Germany is regulated by the Interstate Study Accreditation Treaty, the specimen decree and the federal state-specific higher education laws and explicitly based on the ESG. Therefore, AHPGS will continue to perform its accreditation procedures in complete accordance with the ESG. A common uniform methodology of the German agencies is specified, including templates for review reports. The agencies must compile a formal report according

to § 3 to 10 of the specimen decree. In addition, the review report of the expert group covers § 11 to 21 of the specimen decree. All decisions in program as well as system accreditation procedures are taken by the GAC. Thus, there is no follow-up procedure for accreditation agencies.

Accreditation and assessment procedures outside of Germany

Similar to procedures in Germany, the program accreditation or assessment procedure abroad is a multistage procedure based upon the principle of peer review. If a HEI applies for evaluation for one of its study programs, the agency will appoint a group of experts which have to reflect both the academic focus and also the specific profile of the study program. The expert group will comprise of representatives of all the relevant stakeholders.

The AHPGS Guidelines for Self-Evaluation Reports for International Study Programs can found in our "[Handbook for Program Accreditation](#)".

The assessment of study programs by the expert group takes place in accordance with the ESG. Before the site visit, the group of experts fills out an evaluation sheet based on the ESG (annex 5). During the site visit to the HEI, the group of experts will conduct interviews with representatives of the management, teaching staff and students of the HEI. Finally, the experts have to prepare an expert report with recommendations (annex 6). This expert report is based on the results of the visit, the written review of the study programs, and the documents submitted by the HEI. Finally, the expert report is made available to the HEI so that it can issue a response opinion.

The expert report as well as the HEI's response – together with the provided documents – is submitted to the accreditation commission who furthermore takes a decision. The alternatives are accreditation with or without conditions, suspension, or refusal of accreditation. The AHPGS publishes its decision, the expert report and the names of the experts on its [website](#).

A variation of the above-mentioned procedure occurs in countries where:

- In addition to the ESG, also national requirements have to be taken into consideration which leads to an adapted evaluation sheet and draft expert report (annex 5 and 6).
- A national authority of the applicant HEI takes the decision instead of the accreditation commission. Thus, the accreditation commission issues a recommendation.

Moreover, the AHPGS provides services within international reviews, including the implementation of institutional audits, by means of which the quality standards of HEI's or parts of HEI's (e.g. faculties) can be verified. Institutional audits examine

various aspects of the institution, such as planned and current study programs, infrastructure, organizational and management structure. The objective of the institutional audits performed by the AHPGS is to provide HEI's with the possibility of improving their internal mechanisms and quality management processes through an assessment in accordance with the ESG. It determines whether and to what extent higher education structures and control functions serve to achieve the set aims. More information can be found in the AHPGS "[Handbook for Institutional Audits](#)". The expert group will consist of representatives of all the relevant stakeholders. A site visit is a requirement. The expert report concludes with an analysis of strength and weaknesses and a set of recommendations. The accreditation commission takes note of the expert report. All final reports are published on our website.

The different procedures in Germany and abroad are summarized in the following table.

AHPGS Akkreditierung gGmbH wants to highlight that its core business is the execution of accreditation procedures in Germany.

Steps / Procedure	Germany until December 31, 2017	Germany since January 1, 2018	Within Europe	Outside Europe
Basis for application	SER of HEI			
Rules	ESG			
	Rules for the Accreditation of Study Programs and for System Accreditation	Specimen decree	National requirements	
Contract	Between AHPGS and HEI			
Decision	Accreditation commission (AC)	GAC	1. AC 2. National Ministry based on recommendation by AC	AC
Licensing of the agency	AHPGS is licensed since 2001 through GAC.	Formal permission from GAC, based on the agency's listing in the EQAR since 2009.	Based on the agency's listing in the EQAR.	Based on the agency's listing in the EQAR.

Type of procedure	Program and System Accreditation	Program and System Accreditation	Program Accreditation or assessment/ evaluation; Institutional audit/ evaluation	Program Accreditation or assessment/ evaluation
Result	Bewertungsbericht/ Assessment report (consisting of summary, expert report and decision)	Akkreditierungsbericht/ Accreditation report (consisting of the accreditation report and decision)	1. Assessment report consisting of summary, expert report and decision 2. Final report consisting of expert report and decision recommendation	Assessment report consisting of summary, expert report and decision
Publication of the result	by agency	by GAC	by agency	by agency
Example/ countries concerned	Germany	Germany	1. Hungary, Netherlands, Slovenia 2. Austria (§ 22 (2) of the Austrian Quality Assurance Act), Lithuania (Law on Higher Education and Research), Romania (Law of National Education)	Lebanon, Oman, Northern Cyprus, Saudi Arabia, Turkey.
Follow-up procedure	Agency checks if the HEIs prove fulfilment of conditions.	If any, GAC checks if the HEIs prove fulfilment of conditions.	Accreditation does not include awarding of the official seal of the GAC. Agency checks if the HEIs prove fulfilment of conditions. Except in Lithuania and Romania. There is only a decision about recommendation for accreditation. Follow-up procedures are a task of the respective national ministry.	Since accreditation is not mandatory and the decision does not include awarding of the official seal of the GAC, there are only recommendations, no conditions. Thus, HEIs do not have to prove fulfilment of conditions or recommendations.

Figure 5 Procedure overview

7. Agency's internal quality assurance

Regulations in the structures/statutes of the AHPGS

AHPGS e.V. is registered in Germany as a non-profit association. The purpose and objectives are laid down in the by-laws of the association. The members elect a executive board. The executive board manages the business and is obliged to report to the members. The executive board prepares an annual report. The executive board is registered in the register of associations in Germany. Like all committee members, the board of directors is active on an honorary basis. The members ratify yearly the acts of the executive board. The executive board appoints the members of the accreditation commissions. Planned (from 2019) for the future, the executive board appoints the members of the complaints commission.

AHPGS Akkreditierung gGmbH is a non-profit company as well. The purpose and objectives are laid down in the by-laws of the association. The sole company is the AHPGS e.V., which is represented by the board of directors on the shareholders' meeting.

The shareholders' meeting appoints the management of AHPGS Akkreditierung gGmbH, which is notarially registered in the German commercial register. The management prepares an annual report and an annual balance sheet. The balance sheet shall be made public.

Formal content regulations

The AHPGS has an internal quality management system (*annex 7*). This is also published on the website of the AHPGS.

The AHPGS holds since 2002 yearly meetings of the committees with the aim of providing information on current topics and in-depth discussion and information on relevant accreditation topics. The AHPGS takes minutes of all meetings of the committees: the general assembly, the executive board, the accreditation commissions meetings, the shareholders' meeting and the staff meetings.

The AHPGS office practices a documented 4-eye principle in relation to all essential processes.

Since 2005, the AHPGS has conducted annual retrospective questionnaire surveys with all experts involved in accreditation procedures in the past year and with the HEIs involved in the accreditation procedures. The response rate is, on average, over 50 %. The results are regularly [published](#) on the AHPGS website.

Internal implementation of feedback from external institutions

The AHPGS, the association as well as the company are accompanied in tax areas by a tax consulting firm. This controls the timely completion of the corresponding specifications for the AHPGS. For the AHPGS Akkreditierung gGmbH the balance sheet is prepared and published. The charitable status of the association and society is regularly audited and confirmed by the German tax authority. Nationally and internationally, AHPGS' work is based on the ESG and holds registration in the EQAR, admission by the GAC and membership in ENQA as its prerequisites. The AHPGS works accordingly on the basis and the implementation of corresponding guidelines. AHPGS operates in Germany and abroad on the basis of applicable laws and regulations.

Other cooperation partners

Cooperation with HEIs is essential for the work of the AHPGS – cooperation with the HRK and support of committees and conferences is therefore a matter of course. In addition, cooperation with the specialist department meetings in the area of health and social sciences are relevant for us.

The AHPGS regularly conducts training courses for experts and for HEIs submitting applications.

The AHPGS cultivates the cooperation with other accreditation agencies in Germany and abroad. In Germany, the accreditation agencies accredited by the GAC regularly hold working meetings (ordinarily 4 in a year).

Members of the AHPGS committees and office are involved in the scientific communities in the field of health and social affairs on a variety of levels. The commitment is diverse and broad and includes advisory board activities, consulting, publications, lectures both in the academic and non-academic sector, especially in the area of health and social affairs in Germany and abroad.

8. Agency's international activities

The AHPGS is connected both nationally and internationally and uses these relationships to maximize the quality of its own work processes. From the very beginning, the AHPGS has made an effort to promote constructive cooperation with national and international organization in the area of public health and social sciences. AHPGS also maintains excellent relations with foreign accreditation agencies as well as the relevant international networks for quality assurance.

Since 2009 AHPGS is a member of ENQA and registered in the EQAR. Moreover, AHPGS is a member of the Network of Central and Eastern European Quality Assurance Agencies in Higher Education (CEENQA) and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). Regarding the activities of AHPGS during the last years, it can be distinguished between site visits and accreditations:

Site Visits

- In 2014, at 4 universities in 4 nations, 4 site visits were conducted, 9 study programs accredited and 2 institutional audits carried out.
- In 2015, at 4 universities in 6 nations, 6 site visits were conducted and 16 study programs accredited.
- In 2016, at 5 universities in 5 nations, 6 site visits were conducted, 13 study programs accredited and 1 institutional audit carried out.
- In 2017, at 5 universities in 6 nations, 6 site visits were conducted, 16 study programs accredited and 1 institutional audit carried out.
- In the first half of 2018, at 4 universities in 4 nations, 5 site visits were conducted and 16 study programs accredited.

Accreditations

- In 2014, at 2 universities in 2 countries, 10 study programs were accredited and 1 institutional audit (Romania) carried out.
- In 2015, at 8 universities in 5 countries, 19 study programs were accredited and 1 institutional audit (Slovenia) carried out.
- In 2016, at 4 universities in 2 countries, 11 study programs were accredited.
- In 2017, at 6 universities in 5 countries, 22 study programs were accredited and 2 institutional audits (Austria and Romania) were carried out.

In the first half of 2018, at 4 universities in 3 nations, 17 study programs were accredited.

More about the AHPGS' international accreditation activities and the methodologies have been illustrated in detail in chapter 5 and 6.

9. Compliance with European Standards and Guidelines (Part 3)

The 9 activities listed in the TOR are within the scope of the ESG. The approach is the same (please see annex 2).

9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance

Standard:

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.

AHPGS undertakes external quality assurance activities as defined in Part 2 of the ESG on a regular basis. The clear and explicit goals and objectives are part of our publicly available [mission statement](#). These are translated into the daily work of the accreditation agency. AHPGS ensures the involvement of stakeholders in its governance and work.

Activities

The scope of our work is to pursue quality assurance in the field of health and social sciences for all types of HEIs. AHPGS predominantly accredits Bachelor's and Master's study programs in Germany (*see part 5*).

By mid-2018, AHPGS accredited 1,257 German study programs at 155 HEIs in 16 German States and 144 study programs in eleven foreign countries. In Germany, the AHPGS has successfully carried out 3 system accreditations and, abroad, 4 institutional procedures.

Currently, AHPGS has to carry out the contracts, conducted until December 31, 2017. Accreditation procedures under the "new" law will be carried out beginning in the second half of 2018.

Policy and processes for quality assurance

To ensure the meaningfulness of external quality assurance, the goals and objectives of quality assurance activities are described and published on the AHPGS website. It contains all relevant information and documents regarding the organizational structures and the binding proceedings for accreditation procedures (*see part 6*) according to the "old" and "new" law. All the necessary documents for program and system accreditation can be downloaded from this website.

The customer- and service-oriented approach is an important principle of our everyday work. AHPGS supports the HEIs prior to the implementation of the procedures by providing them with the opportunity for a preliminary consultation. Once the conditions are clear for all parties, the HEI and AHPGS conclude the contract (*annex 8*). Services to be provided by both parties as well as the costs and the payment details are laid down with binding effect. The procedures in program and system accreditation are based on the usual multi-tiered approach. The cost structure and payment modalities were substantially regulated. In 2018, we adapted the draft contracts for procedures in Germany in relation to the Interstate Treaty (see *also annex 8*).

The program accreditation commission includes eleven members, including 1 student representative and 3 representatives from the professional practice. The system accreditation commission includes 6 members, also including 1 student representative and 2 representatives from the professional practice. To increase the international expertise, 1 member is from abroad. The majority of the commission members are scientists from HEIs.

AHPGS promotes gender equity; currently, 7 out of the 17 members of the accreditation commissions and 4 out of the 7 program managers are women. When the accreditation commission selects experts, gender equity is respected.

Due to the current law, the GAC will overtake decisions the accreditation decisions both for program and system accreditation. Thus, the accreditation commissions will no longer take decisions for accreditation procedures in Germany.

Still, looking at procedures outside of Germany, it is necessary to uphold the work of the accreditation commission. This is necessary, too, for verifying the fulfilment of conditions and the finalizing of contracts according to the "old" law in Germany.

9.2 ESG Standard 3.2 Official status

Standard:

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

AHPGS has an established legal basis and is formally recognized as quality assurance agency by the competent public authorities.

The agency

AHPGS is a German accreditation agency with a specific focus in the area of health and social sciences. It was founded in 2001 under German law and is located in Freiburg, Germany. AHPGS contributes to the quality assurance of study programs

and quality assurance systems of HEIs in Germany and abroad. For more details on the history, profile and activities of the agency please *refer to part 4* of this SAR.

AHPGS received accreditation as an accreditation agency by the German Accreditation Council (GAC), at first in 2001. AHPGS was reaccredited in 2004 and 2009. The most recent renewal of the accreditation was granted in 2014 and is valid until March 31, 2019.

The agency is organized in the legal form of a charitable association, which was founded in 2001. A non-profit private limited company under German law (AHPGS Akkreditierung gGmbH) was founded at the beginning of 2008 for liability reasons. Its sole shareholder is the AHPGS e.V. It was entered in the Freiburg commercial register on March 5, 2008.

Relations to authorities in Germany

Since 2001, AHPGS has been accredited by the GAC as a German accreditation agency. In 2008, AHPGS was also authorized by the GAC to carry out procedures for system accreditation. Until the end of 2017, the GAC, in its role as the central accreditation body, accredited the accreditation agencies periodically and defined the basic requirements for accreditation procedures, which were to be carried out according to reliable and transparent standards. AHPGS is 1 of 7 German decentralized agencies (under private law) that conduct the accreditation of study programs (program accreditation) and of quality assurance systems of HEIs for teaching and learning (system accreditation). Looking at the expert groups involved in program and system accreditation procedures, AHPGS attaches importance to conducting the procedures with relevant stakeholders. AHPGS pays attention to the fact that the experts are represented in adequate numbers as is required by the standards. The AHPGS by-laws provide that the accreditation commissions must include student members.

AHPGS continue to uphold its standards which are in line with the requirements of the ESG and the Interstate Study Accreditation Treaty.

Regarding the Interstate Study Accreditation Treaty AHPGS seek the renewal of membership and registration as base for the licensing in Germany.

Relations to authorities in Germany and abroad

AHPGS became a member of ENQA and EQAR in 2009.

Since 2015, AHPGS has been entitled to carry out audits at universities and colleges in Austria in accordance with § 22 (2) of the Austrian Quality Assurance Act.

Since 2016, AHPGS has been authorized by the Swiss Accreditation Council to assess accreditation applications of Swiss universities of applied sciences.

Thus, when carrying out external quality assurance, AHPGS will ensure that the outcomes of the process are accepted within the higher education system of the respective institution, by the state, the stakeholders and the public. Looking at institutions located outside of Germany, in European and Non-European areas, AHPGS consults its legal advisor when drawing up a contract – especially with regard to the criteria of assessment.

9.3 ESG Standard 3.3 Independence

Standard:

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.

AHPGS is independent and acts autonomously. We have full responsibility for our operations and the outcomes of those operations without third party influence.

The agency

AHPGS e.V. and AHPGS Akkreditierung gGmbH have a charitable status, which emerges from § 3 of the respective by-laws. The charitable status was last confirmed by the German tax authorities on February 16, 2016 for the AHPGS e.V. and on April 12, 2016 for the AHPGS Akkreditierung gGmbH. In order to prove the charitable status of both legal entities, the respective certificates issued by the German tax authorities can be provided.

The general assembly adopts the annual cash report as part of the work report of the AHPGS e.V. after having duly performed the necessary cash audit. An accounting firm is entrusted with the professional drawing up of accounts and tax processing. The AHPGS Akkreditierung gGmbH is entered in the commercial register. The financial statements of the agency are drawn up on an annual basis and published in the German Federal Gazette (Bundesanzeiger). According to the agency's statements, the general assembly convenes at least once a year. The AHPGS is exclusively self-financed and carries out its activities in a cost-effective and sustainable manner.

In § 2 paragraph 3 of the by-laws of the AHPGS e.V., it is determined that the organization acts independently from any influence from HEIs and their respective organizations, trade and professional associations, and other stakeholders. In particular with regard to the accreditation commissions, § 12 of the by-laws stipulates that they are independent in making their decisions.

In addition to the [“Procedure of the AHPGS for the regulation of objections, dissenting opinions and complaints”](#) and in order to improve the process further,

since 2018, AHPGS has been charging an organ to deal with complaints which is independent from both the accreditation commission and the executive board (*for details see 10.7*).

Although AHPGS is accredited by the GAC, the accreditation procedures in Germany have been conducted independently from the state up until this point (*for details see part 3*). As mentioned before, the GAC will take over the decision-making for accreditation in Germany.

The experts

With regard to the independence of the experts, we refer to a [declaration of impartiality](#) that has to be signed by the experts. Experts are nominated by the accreditation commissions according to their disciplinary-related expertise; with regard to their recommendations, the experts are independent i.e. not subject to instructions. In preparation of the site visit, experts have a meeting with the program manager. AHPGS has developed an expert nomination procedure in 2008 (see *annex 4*).

9.4 ESG Standard 3.4 Thematic analysis

Standard:
Agencies should regularly publish reports that describe and analyze the general findings of their external quality assurance activities.

Although it is not a statutory purpose, and not foreseen in the careful use of agencies’ funds in general, AHPGS deems the analysis of its activities to be important. Therefore, and within the framework of the provided possibilities, AHPGS regularly publishes assessment reports on its website. They describe and analyze the general findings of our external quality assurance activities. In addition, contributions to books and journals are listed on our website. Furthermore, AHPGS organizes a yearly board meeting (“Windendreuter Gremientagung”). In the last years, there was an explicit focus on Health and in the social field, especially in the academization of medical and social care professionals.

Contract and rules

In the contract between AHPGS and HEIs, it is stipulated that any resolution adopted by the accreditation commission has to be published. Moreover, looking at cl. 1.1.9 of the AR Rules for program and system accreditation, the publication of the decision of the agency, the expert report and the names of the included experts is a requirement. All reports are published. Aside from the assessments of German HEIs, AHPGS publishes all reports from assessments abroad on its website.

Due to the “new” system, the so-called “accreditation report” and the “decision of the GAC” have to be published by the GAC (*see part 3*).

Templates

So far, AHPGS has worked with its own template for expert reports and the “Standards for expert reports in accreditation procedures” (*see part 6*), which was developed jointly by the German accreditation agencies.

In the “new” system, the template for so-called review reports will be stipulated by the GAC.

9.5 ESG Standard 3.5 Resources

Standard:

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

AHPGS has adequate and appropriate resources, both human and financial, to carry out our work:

Human resources

The executive board of the AHPGS e.V. has been elected for 3 years, until 2019; the managing director of the AHPGS e.V. has been appointed by the general assembly for a 5 year period, until 2021. The managing director as well as all members of the executive board work on a voluntary basis. The head office of the AHPGS e.V. is run by the managing director supported by a part-time employee.

The managing director of the AHPGS Akkreditierung gGmbH is appointed by the AHPGS e.V., represented by the executive board. Under his direction, the agency currently employs 7 program managers, 2 employees responsible for organizational and administrative tasks and several assistants.

All program managers are part of the core business: program accreditation procedures in Germany. One program manager serves and supports the accreditation commissions, 1 program manager is tasked with system accreditation procedures, 2 program managers manage international procedures abroad (in English language). All aforementioned program managers as well as the other 3 program managers are responsible for the execution of procedures and preparation of experts. There is no standard allocation of study programs or HEIs to specific program managers. The take-over of such tasks depends on the workload.

The AHPGS has a stable personnel base. Since the contracts of the employees become permanent after 6 months, the fluctuation of staff members is low. The

managing director of the AHPGS Akkreditierung gGmbH, 4 program managers and 1 of the organizational and administrative staff members are employed on a full-time basis. 3 program managers and 1 organizational and administrative staff member are employed on a part-time basis. Since the previous accreditation in 2014, the number of program managers in charge of managing the accreditation procedures has decreased from 9 to 7. In addition, 1 program manager is currently on parental leave. The staff members obtain further training by taking part in the annual meeting in Windenreute as well as conferences, meetings and workshops; the contents of these events are also discussed during the weekly staff meetings. In recent years, the program managers have participated in an European Foundation for Quality Management (EFQM) assessor training and a moderation workshop as in-house events. In addition, individual training measures are used and supported.

Premises

The head offices of the AHPGS e.V. and the AHPGS Akkreditierung gGmbH are located in Freiburg, Germany, near the train station. Hence, they are easily accessible with public and private transport and adequately equipped. The infrastructure of the offices is continuously adapted to the current requirements. All work stations are equipped with a telephone and desktop computer and connected via LAN to e-mail, internet and to the server. The IT infrastructure undergoes modernization on a regular basis. The office equipment includes several network printers in addition to a photocopier and scanner in the central office area. Looking at the changes in the German accreditation system which will probably lead to solely electronic procedures, we state that our agency is adequately equipped for the transition into the "new" system.

Financial resources

The AHPGS Akkreditierung gGmbH is exclusively self-financed and carries out its activities in a cost-effective and sustainable manner. It also refunds any expenses incurred by the AHPGS e.V. for organizing and carrying out the accreditation decisions through its bodies (*for details see 9.3*).

The resources enable AHPGS to organize and run our external quality assurance activities in an effective and efficient manner. Furthermore, the resources enable us to improve, to reflect on our practice and to inform the public about our activities. Still, due to the number of agencies approved for accreditation procedures, there is a competition between the agencies in Germany. HEIs are not obligated to one agency, they are free to choose any agency. Due to an extended time validity of accreditations to 8 years in the current system, the need for reaccreditation of those programs has decreased. This is also the case when HEIs increasingly decide on system accreditation. Any additional activities abroad are subject to significant

fluctuations with regard to the number of inquiries and contracts as well as regarding the associated labor.

Self-Assessment Reports can be send to AHPGS any time. There are no fixed dates for submission. Security of planning is ensured through concluded contracts.

9.6 ESG Standard 3.6 Internal quality assurance and professional conduct

Standard:

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

AHPGS has processes in place for internal quality assurance related to defining, assuring and enhancing the quality and integrity of our activities.

Internal quality assurance

Since AHPGS has a formalized internal quality management system (*see part 7 for details*). The main objective of our internal quality assurance is the continuous review and refining of internal processes in order to ensure effective and efficient achievement of the tasks and objectives of the AHPGS. The system includes both internal and external feedback processes that lead to a continuous improvement within the agency. The policy ensures that any activities carried out and material produced are in line with the ESG. Moreover, it allows for the establishment of the status and recognition by our affiliate.

Further information on the work of AHPGS is included in the document which illustrates the internal quality management of the agency (*see part 7*). The bodies and tasks of both legal entities are described, as is the division of roles between the e.V. and the gGmbH with regard to the implementation of accreditation procedures. The rules of procedure are clearly regulated, authorized from the members meeting, outlines the structures ruling the cooperation between the AHPGS e.V. and the AHPGS Akkreditierung gGmbH.

Professional conduct

Our internal quality assurance policy which is also available on our website ensures that all persons involved in our activities are competent and act professionally as well as ethically. Our policy guards against of any kind of intolerance and discrimination.

9.7 ESG Standard 3.7 Cyclical external review of agencies

Standard:

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

From the very beginning, AHPGS has gone through external reviews at least every five years in order to demonstrate its compliance with the ESG.

ENQA and EQAR

AHPGS became a member of ENQA and EQAR in 2009. In order to renew its membership, AHPGS went through an external review in 2014, thus demonstrating that it abides by the ESG and proving that we continue to adhere to the principles enshrined in the ESG. AHPGS is accredited till 2019 and has again applied for renewal of membership by ENQA and renewal of registration by EQAR.

GAC

AHPGS was accredited by the GAC in 2001, 2004, 2009 and 2014.

Due to the reconstruction of the German accreditation system, the accreditation of accreditation agencies will be arranged through registration by the EQAR in the future.

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

The 9 activities listed in the TOR are within the scope of the ESG. The approach is the same (*please see annex 2*).

10.1 ESG Standard 2.1 Consideration of internal quality assurance

Standard:

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

AHPGS as an accreditation agency takes note of and promotes the responsibility of HEIs regarding the quality of their study programs and other offers. Thus, AHPGS has developed respective guidelines for all procedure formats taking into account on the one hand the Rules for the Accreditation of Study Programs and for System Accreditation for accreditation procedures in Germany as well as the ESG part 1. The latter is in particular important for accreditation procedures, i.e. evaluations in other European countries and abroad.

In order to assess the effectiveness of internal quality assurance in HEIs, AHPGS uses guidelines for its external quality assurance procedures, which are also published on the AHPGS website (*see part 6*):

External quality assurance in Germany

Information on quality assurance both under “old” and “new” laws regarding program accreditation procedures in Germany is available as a guideline via the AHPGS website. The document contains information about the German Accreditation System and accreditation of study programs in general. Moreover, there is a description of the accreditation agency and of the process of accreditation.

The process under the “old” law is structured into the steps:

1. Examination of the received documentation regarding completeness.
2. Site visit of the expert group.
3. Compilation of a review report.
4. Decision taken by the accreditation commission based on the expert report and the application documents.
5. Publication of the results by the agency.

According to the “new” law, the process is structured into the following steps:

1. Examination of the received documentation regarding completeness.
2. Compilation of a formal report by the agency and the possibility for the HEI to go through an enhancement loop.
3. Site visit of the expert group.
4. Compilation of a review report.
5. Accreditation decision taken by the GAC at the request of HEI based on the accreditation report of the agency.
6. Publication of the decision and the accreditation report issued by the GAC.

The requirements with regards to the self-evaluation report of HEIs (both according to the “old” and “new” laws) are clearly presented through a template available via our website. In addition, the necessary annexes as well as hyperlinks to relevant documents and rules such as the Lisbon Recognition Convention and the ESG are available publicly.

Corresponding guidelines and information are available on our website for system accreditation procedures.

External quality assurance in Germany and abroad

Focusing on our international work (i.e. the accreditation of Bachelor and Master study programs and the implementation of institutional audits) we have published general information about the quality assurance procedures.

The provided information is further distinguished into guidelines for a) program accreditation and b) institutional audits. They contain again an overview about the steps of a procedure and a template for the self-evaluation report. In contrast to the procedures in Germany, AHPGS highlights the 2 options with regard to the criteria of the assessment.

Option 1: In this case, Accreditation Criteria developed by AHPGS are used. These criteria have been developed in close accordance with the criteria and requirements valid in the Federal Republic of Germany and based on the ESG. The procedure ends with the final decision made by the accreditation commission.

AHPGS has gained experience, for instance, in Saudi Arabia, which revealed that assessment procedures based on the ESG are considered as “nice to have” for HEIs. Although accreditation procedures performed have no formal consequence, since accreditation per se is not an issue in Saudi Arabia, the evaluation and the exchange between experts from different countries is seen as an enrichment for the HEI and its future development. This includes the connectivity of study programs and the possibility for students to take part in an exchange program abroad.

Option 2: It considers the opportunity to carry out quality assurance procedures in other European countries based on the national law where the HEI is located. Hence, the respective national criteria serve as bases for the external quality assurance procedure. In this case, the procedure ends with the expert report, which votes for or against accreditation and the accreditation commission formally agrees with the vote of the expert group. The expert report serves as a recommendation, which the HEI may use and send to its respective national authority. AHPGS has made good experience with this option for instance in Romania. We have been notified that the Romanian Ministry of Education, Research, Youth and Sport has accepted and followed the recommendations issued by the expert group.

Looking at institutional audits, AHPGS has also developed guidelines stipulating criteria which have been developed in close accordance with the ESG. The general and the specific information are published on the AHPGS website, along with a template for the self-evaluation report. The objective of the institutional audit performed by the AHPGS is to provide HEI's with the possibility of improving their internal mechanisms and quality management processes. The AHPGS determines whether and to what extent higher education structures and control functions serve to achieve the aims, which are set by the HEI. The procedure also provides an organizational tool for the management of the HEI and can be used as a precursor to institutional accreditation or system accreditation, as well as to increase competitiveness.

Expert reports for national and international procedures (be it on a program or institutional level) are publicly available via the AHPGS website.

10.2 ESG Standard 2.2 Designing methodologies fit for purpose

Standard:

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.

Stakeholders of HEIs and, as the special area of our interests, of institutions relating to health and social sciences, were engaged as founders of the AHPGS, work in our boards and commissions and serve as experts in accreditation procedures.

AHPGS has defined goals and purposes of the different procedures in its guidelines, which are published on the AHPGS website. As indicated in standard 2.1, the objective of the (international) institutional audit performed by the AHPGS is to provide HEIs with the possibility of improving their internal mechanisms and quality management processes. The same is true for system accreditation procedures in Germany.

To go more into detail, one can take the program accreditation as an example.

On the program level, AHPGS aims at different angles:

The leading questions are: Does the institution have processes for the design and approval of their programs – and do they meet the objectives set for them, including the intended learning outcomes? Is the qualification resulting from a program clearly specified and communicated, and does it refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area? Are the programs delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach? Does the HEI consistently apply predefined and published regulations covering all phases of the student “life cycle”, e.g. student admission, progression, recognition and certification? How is the competence of the teachers assured? And hence, are fair and transparent processes for the recruitment and development of the staff applied? Does the HEI have appropriate funding for learning and teaching activities and does it ensure that adequate and readily accessible learning resources and student support are provided? Does the HEI ensure that it collects, analyses and uses relevant information for the effective management of its programs and other activities? All information about their activities, including programs, which is clear, accurate, objective, up-to date and readily accessible? Does the HEI monitor and periodically review its programs to ensure that they achieve the objectives set for them and respond to the needs of students and society? Do these reviews lead to continuous improvement of the program and are planned or taken actions communicated to all those concerned?

In order to verify the effectiveness of HEI’s internal quality assurance, AHPGS’ external quality assurance is designed for the examination of the above-mentioned aspects relevant for quality assurance.

AHPGS has developed processes and their respective methodologies (*see part 6*): The accreditation procedures include a self-evaluation report by the program or the HEI under evaluation; systematic analysis of the report by the expert group; a site visit by the expert group; the production of the expert report by the expert group; and a final accreditation decision by the accreditation commission based on the aforementioned expert report.

The expert group is appointed by the accreditation commission. Experts are appointed according to their disciplinary-related expertise; with regard to their recommendations, the experts have to be independent. Looking at the independence of the experts, we refer to the declaration of impartiality that has to be signed in advance by the experts (*see part 9.3*). The agency’s accreditation commissions are appointed by the executive board, the AHPGS e.V. (*see part 4*).

Finally, it has to be noted that the current accreditation system in Germany does not offer any creative possibilities for agencies with regard to the execution of accreditation procedures. Clearly regulated procedures are foreseen. Aside from representatives from HEIs, students, ministries and representatives from professional practice were part of the development of the specimen decree.

The same may be said about procedures in Austria and Switzerland. Being authorized to execute accreditation procedures in Austria and Switzerland means that one is obligated to respect national requirements.

Other procedures abroad (e.g. in Saudi Arabia) can be adapted to the specific needs of a HEI fairly easy. The specifics are stipulated in the contract. The agreed upon methodologies are agreed with the respective accreditation commission. In those cases, accreditation procedures are not mandatory according to national legislation. In any case, the procedure is based on the ESG.

10.3 ESG Standard 2.3 Implementing processes

Standard:

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

The procedures are following the “old” and the “new” laws in Germany and the reliable procedures abroad:

The different steps are defined in our guidelines (*see part 6 and 10.2*) and in any contract between the accreditation agency and a HEI. Detailed information about our accreditation procedures is also available via our website.

The external quality assurance includes:

1. A self-evaluation report with annexes (for example curricula).
2. A site visit with an expert group.
3. An expert report.
4. A decision (or recommendation) taken by the accreditation commission.

Procedures following the “new” law are in general very similar – with the exception that the responsibility for making the accreditation decision is transferred from the agency to the GAC.

There are three types of decision: 1. accreditation without conditions, 2. accreditation with conditions, and 3. denial of accreditation.

AHPGS is a customer- and service-oriented accreditation agency that appoints a program manager to every accreditation procedure who carefully examines all the documents provided by a HEI in advance of the site visit.

If the self-evaluation report and the annexes do not comply with certain formalities, the program manager sends the HEI a document containing "Open Questions" which need to be clarified in advance, as well as, where required, a list of missing documents. This step is necessary for the completion of the self-evaluation report. If the program manager does not receive a satisfying reply, the HEI will be contacted again. Problematic key points will be highlighted. If they cannot be removed or are not explicable, the HEI has the possibility to withdraw its application. If the program manager receives satisfying answers, he or she will compile a summary based on the HEIs' "Answers to the Open Questions" and all the documents received in order to get a clear picture of the study program to be accredited.

From the experts' as well as the accreditation commissions' points of view, it may be necessary to set one or more conditions for accreditation. These conditions must be fulfilled within 9 months. Otherwise the accreditation will be withdrawn. The accreditation commission will decide about the fulfillment of conditions. It is possible for the HEI to enter an objection against the decision(s) of the accreditation commission (*see part 10.7*). In case of major changes in the accredited study program during the accreditation period, the agency has to make efforts to document and evaluate them.

Before the end of the accreditation period, the HEI is informed by AHPGS and receives a new offer for the reaccreditation procedure. Regarding the 321 study programs that were due for reaccreditation in 2014 to mid-2018, 178 (81,6 %) were reaccredited by AHPGS. 59 study programs phased out. 57 study programs have been reaccredited by another agency or the HEI has decided to undergo system accreditation (concerned 27 study programs).

Reaccreditation	2014	2015	2016	2017	2018	Total
Upcoming reaccreditations	70	73	88	90	87	321
AHPGS	35	42	43	58	54	178
Discontinued programs	13	10	27	9	13	59
Other agencies	20	9	10	18	7	57
Superseded by System accreditation	2	12	8	5	13	27

Figure 6 Reaccreditation overview

According to the “new” law, the HEI will also be informed by AHPGS about any aspects which could compromise the procedure. The formal report will only be compiled if the agency sees all formal requirements as fulfilled. Thus, the appointed experts will receive a package of documents which is prepared at its best and can assess the professional content. Hence, the documentation is evaluated both in form and content before the site visit. The site visit gives the expert group an opportunity to ask further questions and to enter into a dialogue. The results will be summed up in their review report. The HEI has the possibility to correct factual errors and to comment on the report in a separate document. Regarding the “new” law, the GAC will make the final decision and set conditions when needed.

10.4 ESG Standard 2.4 Peer-review experts

Standard:

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

External quality assurance procedures coordinated by AHPGS are regularly carried out by groups of external experts, including a student member. AHPGS has a binding and defined procedure for selecting and briefing experts with appropriate skills who are competent to perform accreditation-related tasks. For more information about the evaluation process, please also see standards 2.2 and 2.3. In addition, our procedure is in accordance with the new HRK [guidelines](#).

Since AHPGS started its work, it has compiled a large pool of experts, who are competent in different fields ensuring that the assessment of all areas relevant for the review of a program (e.g. professional aspects, study-related structural and formal aspects, social aspects) are respected. During an accreditation procedure, the relevant interest groups, particularly representatives of the sciences, students and practitioners from the profession, are part of the expert group.

The precise data for the last accreditation period are:

- 2014: 199 experts, first participation in 107 cases, 55 site visits, 89 procedures.
- 2015: 254 experts, first participation in 119 cases, 71 site visits, 110 procedures.
- 2016: 190 experts, first participation in 98 cases, 67 site visits, 108 procedures.
- 2017: 194 experts, first participation in 83 cases, 64 site visits, 99 procedures.
- First half of 2018: 167 experts, first participation in 65 cases, 38 site visits, 80 procedures.

The accreditation commissions nominate student experts in all accreditation procedures using its own data pool as well as the “Studentischer Akkreditierungspool” (student accreditation pool). About 50 % of the involved student experts participated for the first time in an accreditation procedure.

In program and system accreditation procedures, German speaking representatives from Austrian or Swiss HEIs are integrated on a regular basis. Nevertheless, it is more important that AHPGS is often asked to help finding experts from Germany who are interested in participating in accreditation procedures in Germany and abroad.

With regard to the independence of the experts, we refer to the declaration of impartiality that has to be signed by the experts. Experts are appointed by the accreditation commissions according to their disciplinary-related expertise; with regard to their recommendations, the experts are independent i.e. not subject to any kind of instructions (*see standard 2.2 and 3.3*).

In order to ensure the work of the experts, AHPGS is organizing regular meetings with each expert group. This briefing is obligatory for all experts to take part in the site visit. It is also necessary to build consensus regarding the procedure and the content of the documents received. Moreover, it helps to guarantee that the experts have fully understood the accreditation criteria to be applied.

10.5 ESG Standard 2.5 Criteria for outcomes

Standard:

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.

Any outcomes or judgements made in the expert report as the result of external quality assurance procedures are based on explicit criteria that are applied consistently, irrespective of whether the process leads to a formal decision or recommendation. Depending on the nature of the assessment, be it on a program or institutional level, national or international level, the proper method and criteria for the process will be agreed between the accreditation agency and the HEI. The jointly agreed upon assessment criteria and procedural steps will be stipulated in a contract.

The criteria for outcomes of external quality assurance take into account the interests of equity and reliability. They are interpreted consistently and evidence-based.

In Germany, the criteria for program and system accreditation following the “old” law are specified by the GAC (*see part 5 and 10.1*).

The procedures under the “new” law are based on the Interstate Treaty and the specimen decree and the legal ordinances issued by the German States.

Our international work, i.e. the accreditation of Bachelor and Master study programs and the implementation of institutional audits abroad, are either based on our guidelines stipulating criteria which have been developed in close accordance with the ESG or in case of quality assurance procedures in other European countries, based on the national law where the HEI is located (*see part 6 and 10.1*).

All experts receive in every procedure all necessary criteria and information. In all procedures, program managers contact experts and have talks with them to explain their role and answer any questions regarding the assessment criteria. Additionally, in advance to every site visit, there is an intensive discussion between experts during an internal reviewer panel meeting which is accompanied by at least one program manager.

10.6 ESG Standard 2.6 Reporting

Standard:

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.

The guidelines, criteria and procedural documents are published and can be downloaded from our website. In international procedures (Europe and abroad) the experts fill out an evaluation sheet (based on the criteria in the expert report) before the site visit takes place. This step guarantees a thorough analysis of the application dossier and is a first step to drafting the expert report based on 1. A written assessment prior to the site visit, 2. The results of the site visit.

The expert report contains the complete review regarding the external quality assurance procedure. If the accreditation commission takes any formal decision based on the expert report, the decision is also published as part of the expert report. The final report is published in full length and is thus clear and accessible to the academic community, external partners and other interested individuals.

Expert reports provide a clear distinction between recommendations and conditions. The deviations from the experts’ suggestions regarding recommendations and conditions in the accreditation commission’s decisions are founded and documented.

In the current German accreditation system, there is a common template for review reports. The use of this template is a requirement for external quality assurance procedures in Germany (*see part 6 and 10.3*).

The outline of expert reports written in international procedures depend on the agreed-upon criteria. They are either structured with regard to our criteria based on the ESG or the criteria based on the respective national law. In both cases, there is a clear distinction between recommendations and conditions. AHPGS attaches great importance to the concise structure and language of an expert report. It has also been proven to be extremely useful for procedures to prepare a summary before the site visit, as a first step to the actual expert report. Following the “new” law, this step will be substituted by a formal report (*see part 6 and 10.3*). Irrespective of the nature of the assessment procedure (be it on a program or institutional level, national or international level), an expert report contains, as a matter of principle, the following information:

1. A description of the procedure and criteria,
2. A list of all experts involved,
3. A context description that locates the HEI in its specific context,
4. A description of the current status for each criterion, supplemented with evidence and examples and followed by the analysis and findings of the experts and their drawn conclusions.

The assessments result in recommendations for follow-up actions, and in case that a criterion is not fulfilled or only partly fulfilled, the experts will formulate explicit conditions. The factual accuracy of the report is improved by the opportunity given to the HEI to point out errors of fact before the report is finalized.

10.7 ESG Standard 2.7 Complaints and appeals

Standard:

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

The particular organizational form of the AHPGS ensures appropriate handling of complaints. Nevertheless, AHPGS has an appeals and complaints procedure adopted in 2009 that gives HEIs the opportunity to state their dissatisfaction about the conduct of the process or those carrying it out. The procedure is stipulated in a guideline [“Procedure of the AHPGS for the regulation of objections, dissenting opinions and complaints”](#) (Resolution of the accreditation commission of May 25, 2009). It was approved in 2009 during the accreditation of AHPGS by the GAC and ENQA. The complaints and appeals process is clearly defined as part of the design of external quality assurance processes. It is mentioned in the contract between accreditation agency and the HEI and also available on our website (*see also 9.3*).

Since the guideline has been adopted, it has proven to work well for resolving complaints. The AHPGS monitors such complaints closely and of course acts on the matter as and when required.

There is a 2-week time window for complaint submission. HEIs generally consider the 2-week time limit to be sufficient because they prefer a final decision that has been carried out speedily. In case of any kind of complaints, HEIs can moreover mention their dissatisfaction for whatever reason in our annual questionnaire.

In the past complaints and appeals procedures were never an issue between AHPGS and a HEI.

Nevertheless, AHPGS has discussed with its members and the executive board to enshrine a complaints committee in its updated by-laws according to international standards. This complaints committee will be assigned the duties that were formerly located with the executive board. The executive board will propose to the members the amendment of the attached by-laws (*see annex 3*).

11. Information and opinions of stakeholders

On a regular basis, AHPGS uses the information and feedback provided by its committee structure and its connections in the area of health and social sciences. They are taken up, analyzed and used for further development. Aside from the feedback of the community and the HEIs, this includes, above all, the feedback from the experts involved in accreditation procedures.

Furthermore, since 2005, AHPGS has been asking annually for the satisfaction of its clients (i.e. the HEIs) and the experts. In order to ensure the comparability of the results, the same questionnaire is always used. Over the years, the response rates for both universities and reviewers have always been above 50 %.

Mean values are calculated and compared for the evaluation. The results are presented in summary form and discussed by the employees of the office and the AHPGS committees in order to regularly review the quality of the work performed and identify approaches for targeted improvement measures (PDCA cycle).

The open questions serve to formulate suggestions for improvement, although these are mainly used for positive feedback.

Results of the survey of experts

The work of AHPGS has been rated very positively by the experts over the years. AHPGS has obviously succeeded in providing the necessary support to the experts in the various phases of the accreditation procedures. The suggestions for improvement ("Please make the documents available three weeks before the appointment"; "The numerous documents") are examined and implemented as far as possible. Results of the years 2013 to 2017 are available on the AHPGS [website](#).

Results of the survey of HEI's

The satisfaction of the HEI's is of decisive importance for the work of AHPGS. The results of the survey of the cooperating universities show that it has been possible to meet mutual expectations in the professional, expert implementation of procedures. The suggestions for improvement are carefully examined ("More attention should be paid to the special features of the HEI"; "If recommendations are made, practical examples would be helpful") and implemented as far as possible immediately. Results of the years 2013 to 2017 are available on the AHPGS [website](#).

Implementation of re-accreditation procedures

Stakeholder satisfaction is also reflected in the high rate of reaccreditation. Disposals are due to the discontinuation of programs or the carrying out of a system accreditation.

Complaints of the involved experts

Since the beginning of the implementation of accreditation procedures by AHPGS in 2002, neither the AHPGS offices nor the AHPGS bodies have received complaints from the experts involved in the accreditation procedures.

Complaints of the HEI's

Since the beginning of the implementation of accreditation procedures by AHPGS in 2002, no complaints about the accreditation procedures carried out have been submitted either to the AHPGS offices or to the bodies of AHPGS by the commissioning HEI.

Complaints following the GAC Monitoring

In the past GAC was responsible for the monitoring of the agencies accredited in Germany ("Procedure of the German Accreditation Council (GAC) for the monitoring of accreditation undertaken by the agencies"):

1. ad-hoc monitoring (there were no occasions)
2. regular monitoring in relation to the period under consideration (from the annual reports)

2014: In the implementation of the "Procedures of the Accreditation Council for the supervision of the accreditation procedures carried out by the agencies according to § 2 para. 1 no. 4 Accreditation Foundation Act" of September 21, 2006 in the version of December 8, 2009, 2 random checks were carried out.

It was criticized that in a procedure (AHPGS as national partner) of a joint degree a written contract was not deposited. AHPGS has amended the procedure as follows: the basis for all activities is a written contract.

In another procedure, documents on the success of the studies were part of the documents, but were not explicitly acknowledged in the expert opinion. AHPGS has amended the procedure (checklist for the four-eye principle) to guarantee that all documents are subject of the expert assessment.

2015: As part of the monitoring, a topic-related random sample (franchising), a feedback meeting with a commissioning HEI and process support for program accreditation were carried out.

In particular, the franchise has been discussed and refurbished by the GAC. With regard to the specific procedure, the consequences have been waived and the continuation of the selected AHPGS procedure has been approved.

2016: No measures were taken as part of the monitoring.

2017: As part of the monitoring, the instrument "Cross-sectional requirements" as well as a feedback discussion with a system accredited HEI by AHPGS were carried out.

The measures implemented by the GAC in the "Procedure of the Accreditation Council for monitoring the accreditation procedures implemented by the agencies" have been consistently reviewed by the GAC and the reports published.

The results have been evaluated in AHPGS and have been incorporated into daily work practice.

Complaining through EQAR

In 2014/15, a complaint in connection with the activities of AHPGS at a private HEI in Lithuania was raised.

In this case, a variety of arguments were exchanged – especially with regard to the responsibility for the procedures and the publication practice.

Finally, the Register Committee confirmed: "no ground to fundamentally question the integrity of AHPGS' reviews and their results". For that reason, the 2014 complaint resulted in a formal warning, with the Committee clearly advising "that AHPGS needs to be mindful about the quality of its reports especially when clustering the review of several study programs at the same time. The issues identified should also be addressed in future external reviews of AHPGS".

AHPGS will adapt its appeal and complaining procedure to the future circumstances.

12. Recommendations and main findings from previous review(s) and agency's resulting follow-up (for second and subsequent reviews only)

The last review of AHPGS carried out by the GAC in the 2014 accreditation, came to the conclusion that AHPGS substantially meets the ESG and ENQA membership criteria.

Regarding the GAC criteria, there were 2 conditions and 9 recommendations.

According to the expert report, the following 13 standards/ENQA membership criteria are complied with: 2.1, 2.2, 2.3, 2.4, 2.6, 2.7, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8 and criterion 8. 2 standards are substantially complied with: 2.5 and 3.1. One standard is partially complied: 2.8.

On June 18, 2015 GAC decided that all conditions were fulfilled by AHPGS.

AHPGS wants to point out that the quoted conditions and the recommendations refer to the GAC criteria and do not correspond to any of the ESG recommendations.

This SAR is designed for the ENQA review regarding compliance with the ESG.

Notwithstanding the above, AHPGS want to come back to previously made ESG recommendations and demonstrate how the agency has followed-up on them.

The first recommendation was: "The review panel recommends charging an organ to deal with complaints which is independent from both the accreditation commission and the executive board (Standard 2.3; standard 3.7)".

Reaction of the AHPGS: After extensive discussions of the recommendation within the committee, AHPGS has decided to continue their proven method at present in order to deal with complaints. The particular organizational form of AHPGS ensures appropriate handling of complaints. The guideline "Procedure of the AHPGS for the regulation of objections, dissenting opinions and complaints" (Resolution of the accreditation commission of June 25, 2009) has been approved in 2009 during the accreditation procedure of AHPGS with the GAC and ENQA. Since then, the guideline has proven to work well for resolving complaints. Nevertheless, AHPGS is going to watch the issue closely and will of course act on the matter as and when required.

AHPGS has a proven procedure for objections, contradictions and complaints which differentiates between

1. opposition / objection related to procedural steps (accreditation commission)

2. complaint against the accreditation decision of the accreditation commission (executive board).

Re 1)

a) Contradiction "appointment of experts": there were no objections.

b) Opposition to the "appraisal of the site visit within the framework of the accreditation procedure": there was one objection to appraisals and conditions (accreditation commission September 22, 2016); Remedial decision of March 8, 2017; the complaint was admissible and justified.

Re 2)

There were no complaints to the executive board against a decision of the accreditation commission.

The second recommendation was: The review panel recommends expanding the time limit for lodging and substantiating a complaint (Standard 2.3; standard 3.7).

Reaction of AHPGS: After intensive discussions within AHPGS and with representatives from several universities, we decided to continue their proven method and management in order to deal with complaints. The 2-week time for complaints has never been an issue before – not even in the annual questionnaire filled out by the universities. Moreover, the universities prefer a final decision that has been carried out speedily. Therefore, they generally consider the 2-week time limit to be sufficient. Nevertheless, a prolongation of the time limit for appeal is not an issue for AHPGS.

At the request of the universities, we would like to adhere to this principle. An extension on request is of course possible.

The third recommendation was: The review panel recommends to constantly enlarge the pool of experts (for instance by increasingly including more medical experts) and to ensure larger diversity and transparency when selecting student experts (Standard 2.4).

Reaction of AHPGS: The AHPGS is accustomed to enlarging the pool of experts, ensuring the assessment of all areas relevant for the review of a program constantly (e.g. professional aspects, study-related structural and formal aspects, social aspects). The relevant interest groups, particularly representatives of the sciences, students and practitioners from the profession, are part of the expert group.

As explained in standard 2.4, AHPGS increases its expert pool on a regular basis. In the past few years, approximately 50 % of the involved experts participated for the first time in an accreditation procedure of AHPGS.

In all accreditation procedures, AHPGS nominates student experts using its own data pool as well as the German "Studentischer Akkreditierungspool". About 50 % of the involved student experts also participated for the first time in an accreditation procedure. Students are nominated like all other experts by the accreditation commission.

Regarding the recommendation for "including more medical experts," we have to mention that study programs in medicine, dentistry and pharmacy are by law not subject to accreditation in Germany. Of course, medical experts are nominated for accreditation procedures of medicine, dentistry and pharmacy programs outside of Germany. As a matter of course, AHPGS includes suitable health professionals in all health-related study programs.

In institutional audits regarding faculties of medicine, medical scientists of course outweigh the expert group.

AHPGS receives recommendations from experts regarding suitable and interested colleagues and students on a regular basis. The German "Studentischer Akkreditierungspool" is also a source of supply. In addition, AHPGS also considers unsolicited applications as well as recommendations of student reviewers already active. It has been formalized that offers are presented to the responsible accreditation commission for approval.

The pool of experts is constantly being expanded. Relevant is the presence of AHPGS representatives at events (e.g. department days), which are used for the mutual approach as well as the recommendation and positive word-of-mouth propaganda of experts already working for us. Increasingly, AHPGS is being asked for support from other agencies, particularly in the health sector, in the appointment of experts.

The fourth recommendation was: "The review panel recommends the intensification and further improvement of the training provided by the agency based on the actual demand. This training may be held during the annual conference in Windenreute. Furthermore, the agency should advertise them and also provide special training seminars for experts in system accreditation (Standard 2.4)".

Reaction of AHPGS: Since its foundation, AHPGS has intended to offer trainings during the annual conference (in Windenreute/Freiburg). The lectures are addressed to committee members, invited experts and invited representatives from HEI's.

As an example: On the occasion of the 14th annual conference in February 2016 the following subjects have been discussed: "Internal and external experience with system accreditation", "the German qualification framework in the European context", "Differences between the German Qualification Framework (DQR) and the Framework of Qualification for German Degrees (QRDH)", "Recognition of externally achieved credits", "Innovations in the psychotherapists law, Innovation in the nursing profession law".

Following the recommendation of ENQA, we have conducted trainings. Thus, the following offers were published on the AHPGS website in 2017:

- Workshop regarding System Accreditation,
- Reconstruction of the German accreditation system,
- Innovation in the nursing profession law,
- First steps in accreditation for "new" reviewers and persons in charge of accreditation in HEIs.

With regard to the reconstruction of the accreditation system in Germany, AHPGS also offers information and consultancy. This aspect has been discussed during the annual conferences in 2017 and 2018. In addition, AHPGS offers regular workshops, for instance

- In May 2018, there was an expert training for quality managers from HEIs,
- In June 2018, members of AHPGS presented information about the "new" system during the Faculty Day of Social Work,
- Further events are planned with the specialist department days supporting the AHPGS.

The fifth recommendation was: "The expert reports shall be adapted and published in such a way that the experts' decision recommendation provides a clear distinction between recommendations and conditions; furthermore, the rationale of the accreditation commission shall clearly indicate possible derogations from the experts' recommendations (Standard 2.5)".

Following the recommendation all AHPGS expert reports provide a clear distinction between recommendations and conditions. The deviations from the experts' suggestions regarding recommendations and conditions in the accreditation commission's decisions are founded and documented. The GAC determined in its resolution to the AHPGS' fulfillment of conditions, dated April 2, 2014 and June 18, 2015 that the required clear distinction between recommendations and conditions is implemented in the experts' resolution suggestions. At the same time, the GAC states that the procedure of documenting deviating decisions by the accreditation commission is regulated and ensured.

Regarding ESG, the sixth Recommendation was: “The review panel recommends continuing and possibly expanding the much appreciated publications of the agency on topics such as the academization of health and nursing professions (Standard 2.8)”.

Reaction of AHPGS: AHPGS members, members of the AHPGS bodies and AHPGS staff (being academics) do publish, besides their work for the agency, on topics of accreditation and academization in the area of health and social sciences. Information about current publications can be found on the AHPGS website.

Executive board and Committee members, members and program manager of the AHPGS participate continuously in the scientific discourse on questions concerning the academization, professionalization and quality assurance of studies and teaching in the health and social sciences. In addition, 2 employees of AHPGS also belong for example to the editorial staff of the Public Health Forum. The journal serves the exchange of information between science and public health practice. Over the last years, it has dealt regularly with the academization and professionalization in the area of health and social sciences.

Regarding ESG, the seventh Recommendation was: “Since part of the accredited programs are still at in the concept stage and some of the HEIs are still in the course of formation at the time of accreditation, Recommendations of the expert group the experts recommend providing a systematic analysis of the sustainability of the courses offered (Standard 2.8)”.

Reaction of AHPGS: German accreditation agencies are non-profit organizations and for that they do not provide resources for the recommended systematic analysis of the sustainability of study programs that were accredited in the concept state. The size and differentiation of the German higher education system as well as the federal responsibilities (e.g. for the launching of “new” study programs and the implementation of accreditation procedures) impede a system wide overview. Moreover, this task has not been considered as one of the agencies’ tasks. Nevertheless, AHPGS is involved in the scientific discourse of the communities of social work, nursing and health professions and publishes articles regularly (see *Recommendation 6*).

The study program enhancement, and in this context also the possibilities for success in studies, are as a rule part of the evaluation procedure of a study program during accreditation. The HEI has to take on responsibility for quality assurance of its study programs and has to prove this during the accreditation procedure. Nevertheless, and following the recommendations of ENQA, AHPGS takes note of the continuity of study programs which have been accredited by AHPGS. AHPGS documents those

programs which are no longer re-accredited by AHPGS. It is differentiated whether these study programs are accredited by another agency or by system accreditation or whether no accreditation is sought.

In addition, as stated earlier, Executive Board and Committee members, members and program manager of AHPGS are members of different boards and committees in the area of health and social science and affairs.

The eighth recommendation was: “The review panel recommends translating the established common practice into a binding decision according to which members of the accreditation commissions do not participate in deliberations when these concern procedures in which said members have been involved as experts or if they hold any position at the university in question (Standard 3.6)”.

Reaction of AHPGS: The executive board of AHPGS immediately passed an appropriate resolution (committee`s resolution as from January 27, 2014): Given the case that an accreditation commission`s member participated in a site visit or that his/her home HEI or one of his/her home HEI`s study program is to be accredited, this member has to leave the room for the period of time during the accreditation commission`s session in which the respective study program is discussed and a decision is taken.

The ninth and last recommendation was: “The review panel recommends systematically and continuously analyzing the communication between the head office and all parties involved in the accreditation procedures in order to determine which procedure-related aspects may be improved (Standard 3.8)”.

Reaction of AHPGS: There is an exchange of information with the experts regarding arrangements and preparations concerning the procedure. Moreover, personal details such as accommodation, meals and travel organization are addressed in advance. Annual enquiries through questionnaires allow us to determine and evaluate systematically the feedbacks concerning the implementation of an accreditation procedure. The questionnaires are sent to the experts as well as to the HEIs. AHPGS gives also room to verbal exchange with the experts to identify weak points and to implement improvements. The evaluations of the questionnaires are summarized on our website.

To conclude, AHPGS wants to mention that following the ENQA recommendations, it has reviewed where we can create more transparency with regard to its documents, procedures and processes. Consequently, AHPGS has relaunched its website in 2016 with a more user-friendly design and optimized menu. Important

aspects such as the quality assurance, access to published expert reports and the possibility for unsolicited applications for reviewers are now easily and quickly available. AHPGS has improved the aspect of further training for its employees in order to guarantee professional development. As an example, program managers have taken part in a workshop in moderation and conversation technique as well as in a training course in content management system and search engine optimization.

Individual further training/support is possible and is supported by the AHPGS wherever possible.

13. SWOT analysis

The SWOT analysis is differentiating between strength, weakness, opportunities and threats.

Strengths are:

- Broad experience and an excellent network in the area of science in public health and social sciences in Germany,
- Long experience (since 2002) with the performing of accreditations in Germany and abroad,
- High reputation and excellent network with HEI in Germany, which are engaged in study programs for health and social sciences,
- Excellent reputation of AHPGS as an accreditation agency with high standards in quality assurance,
- Qualified interdisciplinary team with high expertise and experience,
- Excellent pool of experts for accreditation procedures,
- Sound financial basis.

Weaknesses are:

- Seniority of the committee members,
- Relatively small size of the organization,
- Lack of financial support by external sources.

Threats are:

- Lowering of the demand for program accreditation in Germany, as a result of the increasing of system accreditation and the prolonged accrediting period from 5 to 8 years,
- Increasing international competition between the accreditation agencies.

Opportunities are:

- Increasing demand for program accreditation in the area of health and social sciences in Germany,
- Increasing demand for system accreditation in HEI, engaged in the area of health and social sciences abroad.

14. Current challenges and areas for future development

Building on the SWOT analysis, we can describe our current challenges and the areas for the future development of AHPGS. Corresponding to the background of its history (*see part 4*) and in the context of current conditions (*see part 3*), the AHPGS is excellently positioned to meet the challenges of the future. The organizational structures meet the requirements; AHPGS has the legal status of an association and a limited liability company. The statutory safeguarding of goals and purposes as well as the separation between content-strategic (e.V.) and business implementation responsibility (gGmbH) has proven itself stable and successful.

Accreditation commissions

The resolutions of the accreditation and evaluation procedures by accreditation commissions (since the 2001 program accreditation and since the 2009 system accreditation), which are independent in their decisions, have also proved their worth. Due to the system change in 2018, both accreditation commissions are to be merged in 2019 (based on the foreseen amendment to the by-laws of the association).

General assembly

The statutory decision-making authority for the interests of the association lies with the general assembly, which is usually held annually.

Executive board

The executive board implements the resolutions of the general assembly and represents the association in the annual shareholders' meeting of the AHPGS Akkreditierung gGmbH.

Organizational framework

The business premises rented by the AHPGS meet the needs and requirements, are centrally and quietly located near the train station. The lease is secured for the long term.

Organization size

The size of the organization corresponds (in terms of personnel and space) to the requirements. AHPGS is a relatively small organization. Approximately 65 procedures with 110 study programs to be accredited are carried out annually. The association has 42 members. The association has an administrative employee. The executive board and managing director are active on a voluntary basis.

The AHPGS Akkreditierung gGmbH has a managing director, 7 program managers, 2 employees responsible for organizational and administrative tasks and several assistants.

Order and financial situation

The order situation and sales have remained stable and at a comparable level in recent financial years. The financial situation is solid.

Development prospects for AHPGS

There is much to suggest that AHPGS can use its strengths to maintain its current status (particularly in terms of organizational structures, order situation and earnings). The current equipment and earnings situation correspond optimally to the demand. An enlargement would be as inappropriate as a reduction. The aim is to establish AHPGS also under the conditions of the "new" legal framework and to occupy newly emerging fields of activity, e.g. consulting of HEIs.

Challenges ahead

Potential challenges can be foreseen in relation to the social framework conditions (the "external origin") and the internal structures (the "internal origin") of AHPGS.

Risks in the "external origin", i.e. externally specified working conditions:

Need for program accreditation (in Germany)

- The politically prescribed conditions for the accreditation of study programs in Germany, Europe and non-European countries can be changed. Starting from 2018 there has been a system change in Germany, and the ensuing "new" system in Germany is still developing. Conditions in Europe and outside Europe could, of course, also be changed. AHPGS will be able to adapt just as successfully to this as to the current changes in Germany.
- The fundamental reduction of the need for program accreditations due to the increase in system accreditations of German HEIs. Since AHPGS does most of its business with program accreditations, this would be a serious problem. At present, there is much to suggest that the HEIs in Germany cooperating with AHPGS do not aim for system accreditation but prefer to remain with the external program accreditation.
- The fundamental reduction of the need for program accreditations by extending the periods of accreditation of study programs. This will inevitably result in a reduction in reaccreditations, which could be compensated for, if necessary, by the concept accreditation of new degree programs in the dynamically developing area of health and social affairs.

Need for system accreditations in Germany

Unresolved higher effort and cost for the HEIs and a basic pressure through the reduction of earnings due to falling prices/fees for the implementation of accreditation procedures.

Competition with other accreditation agencies

Growing competition with other accreditation agencies in Germany triggered by 8 year accreditation deadlines, as well as a simultaneous increase in competition between internationally active accreditation agencies, present a challenge for AHPGS.

Risks in the “inner world”, i.e. potentially risky, internal “weaknesses” of AHPGS:

Size of the organization

AHPGS is a relatively small specialized agency in a defined self-chosen field of action. The number of employees corresponds to the order volume. There is no sense to plan a continuous expansion of the order volume and thus an enlargement of the organisation. The current status quo should be taken as a benchmark for the near future (i.e. until the next renewal).

Limited financial resources

AHPGS is a non-profit organization operating mainly in Germany. The amount of the reserves is limited by law and appropriate provisions.

“Ageing” of the committees

The average age of the committees of AHPGS is high. There is a “need for rejuvenation”, in such a way that younger and sufficiently experienced colleagues are appointed and the exchange of experience and knowledge are supported.

Partially “outdated” organizational structures

Some of the organizational structures that make sense in the founding phase no longer meet current requirements and will therefore be changed by resolution of the general assembly.

Special strengths of the AHPGS:

Extensive networking in the field of action

AHPGS is very well networked in its fields of activity through its supporting organisations, the position holders, the cooperating HEIs and experts. This ensures participation in internal information as well as in actual decisions and processes.

Excellent reputation in the community

The reputation with customers (the commissioning HEIs and the experts involved in the procedures) is very good overall:

- in Germany (order situation and annual customer surveys)
- in other European countries (order situation)
- in non-European countries (order situation)

High quality of contract services

Comprehensive regulations for continuous quality management are laid down in writing, decided by the responsible committees, are implemented throughout and regularly evaluated (including through annual written surveys of the commissioning HEIs and the participating experts). The evaluation results are discussed with the employees, presented to the executive board, the accreditation commissions and finally to the general assembly and discussed with regard to necessary consequences. Conclusion: there was no complaint to be dealt with by the executive board.

Consequences:

Preservation of the proven

The AHPGS is determined to continue along the path we have taken so far. The resources built up are to be used to meet the challenges of the future as successful as they have been in the past.

With regard to the risks mentioned, AHPGS see the following tasks in the short and medium term.

Short-term changes

Amendment of the by-laws of the association in relation to

- Deletion of the scientific advisory board,

- Replacement of the managing director of the association by a secretary (transfer of the tasks of the managing director to the executive board),
- Consolidation of the accreditation commissions.

Medium-term measures

Rejuvenation of the committees through new appointments is necessary. Using the network relationships we will ensure that older executives are replaced by younger, experienced experts continuously.

Securing market shares

AHPGS will continue the efforts – using proven structures – to maintain and, where possible, expand the high level of service we provide.

Networking

AHPGS will maintain and further expand the good contacts with the HEIs cooperating with us.

AHPGS will continue to ensure that our experts are satisfied with the participation in the accreditation procedures, mainly because they appreciate the effort to achieve the highest possible quality standards.

To sum up, we are convinced that AHPGS will master all the challenges in the future, just as AHPGS has done successfully in the past.

Glossary of Terms

AHPGS – Accreditation Agency in Health and Social Science

Program AC – Accreditation commission for program accreditation

System AC – Accreditation commission for system accreditation

GAC – German Accreditation Council

AR Rules for program and system accreditation – Rules of the Accreditation Council for the Accreditation of Study Programs and for System Accreditation in the version adopted on February 20, 2013

EHEA – European Higher Education Area

ENQA – European Association for Quality Assurance

EQAR – European Quality Assurance Register for Higher Education

ESG – Standards and Guidelines for Quality Assurance in the European Higher Education Area

HEI – Higher Education Institution

KMK – Standing Conference of the Ministers of Education and Cultural Affairs of the States

KMK Structural Guidelines – Common Structural Guidelines of the German States for the Accreditation of Bachelor's and Master's Study Programs, KMK resolution in the version adopted on February 4, 2010

Annexes

Annex 1 Comparison between ESG and “new” law provided by GAC

Annex 2 Comparison between ESG and AHPGS (criteria and procedures)

Annex 3 Statues of AHPGS

- a) List of Members
- b) By-laws,
 - AHPGS e.V.
 - AHPGS Akkreditierung gGmbH

Annex 4 Expert Nomination Procedure

Annex 5 Evaluation sheets

- a) Program (Europe and abroad)
- b) External Institutional Evaluation
- c) Romania

Annex 6 Draft expert report

- a) Program (Europe and abroad)
- b) External Institutional Evaluation
- c) Romania

Annex 7 Internal Quality Management

Annex 8 Contract

- a) Program accreditation/assessment (Europe and abroad)
- b) External Institutional Evaluation (Europe and abroad)
- c) German and English version for the “new” law