



Accreditation Agency in Health and Social Sciences

**Self-Assessment Report for ENQA Partial Review
of ESG 3.4 “Thematic Analysis”
of AHPGS**

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INTRODUCTION

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

In order to produce the Self-Assessment Report for ENQA partial review of ESG 3.4 "Thematic Analysis" the Executive Board of AHPGS e.V. has delegated this task to the managing director of AHPGS Akkreditierung gGmbH.

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, 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, 2009 and in 2014.

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 full membership in ENQA and was registered in the European Quality Assurance Register for Higher Education (EQAR).

On January 1, 2018, the accreditation system in Germany was changed to a "new" legal basis. Following a ruling by the German Federal Constitutional Court on February 17, 2016, the 16 (german)states concluded a 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 German Accreditation Council.

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 this system, the accreditation agencies must be registered by EQAR to be authorized for the accreditation of study programs under German law.

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

In February 2018, the AHPGS applied for the renewal of its membership in the European Association for Quality Assurance in Higher Education.

In July 2018, the AHPGS submitted the Self-Assessment Report.

The review panel conducted a site visit at the AHPGS office from the 4th to the 6th of December, 2018.

In the motivation letter of April 5, 2019 to the ENQA President and the ENQA Board, the AHPGS informed about a resolution of the Executive Board of AHPGS on ESG 3.4 which secures the financial and structural processing of ESG 3.4. and contains that the results of the findings and analyses from the accreditation procedures will not only be published internally as before, but they will also be made publicly accessible.

To clarify some aspects with the review panel, in April 2019, the Board of ENQA postponed the decision to June 2019.

In the decision on June 20, 2019, the Board of ENQA confirmed a 'non-compliance' on ESG 3.4 Thematic Analysis.

On August 8, 2019, AHPGS sent a complaint and appeal against the Board of ENQA decision from June 2019.

On November 28, 2019, the Board of ENQA followed in its decision the statement of the complaints Committee and rejected AHPGS' appeal and complaint against a 'non-compliance' on ESG 3.4 Thematic Analysis. It stood by its initial decision not to renew AHPGS membership in ENQA and to designate the agency as "Member under review" for a period of two years starting with June 20, 2019.

In the Board letter dated December 3, 2019, the Agency was told that it will need to undergo a new partial review process at the end of this period, or sooner, if it wishes. The partial review should focus in particular on ESG 3.4 Thematic Analysis.

On December 19, 2019, AHPGS requested the immediate initiation of a partial review of ESG Standard 3.4. in the context of the renewal of the ENQA membership in 2018.

On January 18, 2020, AHPGS submitted the following documents:

- Resolutions of the Executive Board of AHPGS (Annex 2),
- Konzept zur Durchführung thematischer Analysen (Concept for carrying out Thematic Analyses) with the first two analyses (Annex 1):
- "Analyse der ersten Verfahren der AHPGS nach aktuellem gültigem Recht" (Analysis of the first AHPGS procedures according to current valid law) (Annex 3,4),
- "Analysis of procedures in the Kingdom of Saudi Arabia" (Analyse zu den Verfahren im Königreich Saudi-Arabien) (Annex 3, 4).

AHPGS stated that the Thematic Analyses are published on the website of the AHPGS (German page: ahpgs.de/thematische-analysen/ or English page: ahpgs.de/en/thematic-analysis).

COMPLIANCE OF AHPGS WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG), ONLY Standard 3.4.

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.4 THEMATIC ANALYSIS

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

AHPGS has a concept for editing the ESG Standard 3.4 and regularly publishes Thematic Analyses on its website, in relevant scientific journals and edited volumes etc. (Annex 1).

The Thematic Analyses describe and analyze the general findings of the AHPGS quality assurance activities.

The processing of Thematic Analyses is sustainably secured by the resolution of the managing directors of AHPGS e.V. and AHPGS Akkreditierung gGmbH of March 20, 2019 (confirmed by the Executive Board of AHPGS e.V. on May 21, 2019 and by the shareholders' meeting on June 23, 2019) and by the resolution of the Executive Board of AHPGS e.V. and the management of AHPGS Akkreditierung gGmbH on December 16, 2019 (Annex 2).

In order to consistently implement the results of the external evaluation by ENQA, the responsible bodies of the AHPGS have decided on a systematic evaluation, which covers the AHPGS experience with the implementation of accreditation procedures with regard to the requirements of ESG 3.4.

The concept intends that each fiscal year at least one field for comprehensive analysis is defined and processed.

At the beginning of the fiscal year, the Executive Board of the AHPGS decides on the topics to be dealt with in the fiscal year.

The following Thematic Analyses are planned for the first half of 2020:

- Analysis on the proceedings in the Kingdom of Saudi Arabia (Annex 3, 4)
- Analysis of the first procedures of the AHPGS according to current law (Annex 3, 4)

In the second half of 2020, it is planned to publish a further regional analysis of the procedures in Romania.

The findings of the Thematic Analyses are presented and discussed at the annual working meeting of the AHPGS committees in Windenreute.

CONCLUSION

In the context of the ENQA review's result on ESG standard 3.4, both the responsible committees and the employees have dealt intensively with this standard. With the above-mentioned resolutions of the Executive Board of AHPGS, the prerequisites for the implementation and realization of an ESG 3.4 concept were created.

A working paper on the scientific discussion of the topic "Thematic Analyses" has been submitted to the Board of AHPGS, which supported a publication e.g. on the homepage of the AHPGS [ahpgs.de/wp-content/uploads/2020/03/200117-Thematic-Analysis EN.pdf](https://ahpgs.de/wp-content/uploads/2020/03/200117-Thematic-Analysis_EN.pdf).

The first two Thematic Analyses, based on the concept approved by the Board of AHPGS e.V., were prepared and published in January 2020 (Annex 3, 4).

On the homepage of the AHPGS there is a tab "Thematic Analysis", which leads to the previous and the newly created Thematic Analyses.

The AHPGS regularly prepares and publishes explicitly Thematic Analyses based on empirical findings and/or observations gained in the accreditation context. These analyses are also intended to highlight examples of good practice or to identify certain problem constellations and thus challenges for quality assurance. The preparation and publication of reports that are deemed relevant from the point of view of the AHPGS serve in particular the representatives of the HEIs, the (training of) reviewers as well as the members and employees of the AHPGS with regard to the subject Health and Social Sciences.

With regard to the study field of Health and Social Sciences, which is specific to the accreditation procedures of the AHPGS, Thematic Analyses also offer the opportunity to obtain information on current developments in this area in the HEI context and to identify examples of precarious or good practice. In addition, Thematic Analyses can provide findings related to the assessment procedures carried out by the AHPGS, which can be used to further improve accreditation procedures.

In the evaluation procedures carried out by the AHPGS, a wide range of knowledge about the evaluated HEIs, their quality management systems and study

programs is gained. The systematic observation of these findings makes it possible to obtain information on current developments and trends in higher education, academic and vocational training. The AHPGS makes the results of the Thematic Analyses available to the public, to stakeholders in the HEI and in the field of Health and Social Sciences. In addition, the findings from the Thematic Analyses are used for the further development of its own processes.

ANNEXES

- Annex 1 AHPGS concept regarding systematic handling of ESG Standard 3.4
“Thematic Analysis”
- Annex 2 Board Decision December 2019
- Annex 3 Thematische Analysen, Zeitraum 2020/2021 (Stand: 17.01.2020)
- Annex 4 Thematic Analysis, period 2020/2021 (Status: 17.01.2020)

AHPGS concept regarding systematic handling of ESG Standard 3.4 "Thematic Analysis"



In order to consistently implement the results of the external evaluation by ENQA, the responsible bodies of the AHPGS have decided on a systematic evaluation, which covers the AHPGS experience with the implementation of accreditation procedures with regard to the requirements of ESG 3.4.

The concept intends that each fiscal year at least one field for comprehensive analysis is defined and processed, such as:

- Examination of the re-accreditation data – how many of the study programmes accredited by the AHPGS were due for re-accreditation? How many were accredited with another agency, how many with the AHPGS? Content investigation: e.g. change of course designation, course structure, etc.
- Typical problems of Higher Education Institutions in reaccreditation procedures of study programmes with regard to the evaluation data collected by them.
- Update of the report on the application of the internal quality management system (SIQ) of the AHPGS.

The pool of topics to be dealt with is continuously supplemented. At the beginning of the financial year, the management boards decide on the issues to be dealt with in the financial year.

The results are presented at the annual working meeting of the AHPGS committees, discussed in the AHPGS committees with regard to consequences and then published (e.g. on the AHPGS website).

AHPGS Akkreditierung gGmbH has established a permanent working group for "Working on ESG 3.4 Topics". When granting gratuities and special payments, the participation in the working group has to be taken into account.

Resolution passed by the managing directors of AHPGS e.V. and AHPGS Akkreditierung gGmbH on 20 March 2019, confirmed by the executive board of AHPGS e.V. on 21 May 2019 and by the shareholders' meeting on 23 June 2019.

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**Extract from the minutes of the meeting of the board of the AHPGS e.V.
and the management of the AHPGS Akkreditierung gGmbH on 16/12/2019**

Resolution on ESG 3.4 "Thematic analyses"

With regard to ESG Standard 3.4, Georg Reschauer reports that employees have dealt intensively with this standard.

Dr. Karl Kälble has prepared the topic "Thematic Analyses"; the working paper is submitted to the Board, which thanks for the work and advocates a publication on the homepage of the AHPGS.

In the evaluation procedures carried out by the AHPGS, a wide range of knowledge about the evaluated universities, their quality management systems and study programmes is gained. The systematic analysis of these findings makes it possible to obtain information on current developments and trends in higher education, academic and vocational training. The AHPGS would like to make the results of thematic analyses available to the public, to actors in the higher education system and in the field of health and social affairs. In addition, the findings from the thematic analyses can be used for the further development of the company's own processes and procedures.

The AHPGS will regularly publish results of thematic analyses on the homepage of the AHPGS.

In addition to the already existing resolution of the managing directors of AHPGS e.V. and AHPGS Akkreditierung gGmbH of March 20, 2019 (confirmed by the executive board of AHPGS e.V. on May 21, 2019 and by the shareholders' meeting on June 23, 2019) the executive board decides to publish two thematic analyses per business year.

At the beginning of the financial year, the Management Board members decide on the issues to be dealt with during the financial year.

The following thematic analyses are planned for the first half of 2020:

- Analysis of the proceedings in the Kingdom of Saudi Arabia
- Analysis of the first procedures of the AHPGS according to current law

In the second half of 2020 it is planned to publish a further regional analysis of the procedures in Romania.

The following themes are proposed for 2021:

- Primary qualification programmes / duality
- Imputation, permeability and transitions

The topic pool of the established "AHPGS Working Group for Work on ESG 3.4 Topics" can be continuously supplemented by the offices and committees of the AHPGS.

At the suggestion of the working group, the analyses should, if possible, be structured or broken down as follows:

Thematic analyses should be structured as follows:

- a. Question, goal
- b. Method, data
- c. Evaluation
- d. Discussion
- e. Summary (limitations with regard to representativeness; outlook on possible follow-up studies ...)

Reports on thematic analyses are published on the homepage of the AHPGS.

The AHPGS Akkreditierung gGmbH has to provide up to one FTE-month of a program manager per business year for the work on "Thematic Analyses".

The work plan and the human and financial resources to be made available for this purpose shall be adopted. The managing director of the AHPGS Akkreditierung gGmbH is instructed to provide and show appropriate means.

Akkreditierungsagentur
im Bereich Gesundheit und Soziales



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Thematic analyses

Period 2020 / 2021

Status: 17.01.2020

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1 Concept Thematic analyses of the AHPGS

1.1 Thematic analyses: an ESG standard¹

At the European level, the new version of the "Standards and Guidelines for Quality Assurance in the European Higher Education Area" adopted by the Conference of Education Ministers in Yerevan on 14-15 May 2015 provides,² among other things, binding criteria for the assessment of quality assurance agencies active in higher education and the quality assurance procedures they carry out. This is the only way "to ensure that the agencies in the European Higher Education Area (EHEA) work according to the same principles and that all procedures and methods correspond to the intentions and requirements of their respective contexts," the explanatory statement states (HRK 2015, p. 13). An external review and positive assessment of the agencies against the criteria laid down in the ESG is also a prerequisite for inclusion in the European Quality Assurance Register (EQAR). Similarly, full membership of the agencies in the "European Association for Quality Assurance in Higher Education" (ENQA) is conditional on compliance with the ESG (cf. HRK 2015, p. 13).

Part 3 of the ESG defines the "Standards and guidelines for quality assurance agencies". Quality assurance agencies carry out the external quality assurance procedures (here accreditations) described in Part 2 of the ESG (HRK 2015, p. 35ff.). One of the "standards" for agencies that regularly carry out external (national and international) quality assurance procedures in higher education are so-called "thematic analyses".

Standard 3.4 "Thematic analyses" reads as follows: "Agencies regularly publish reports describing and analysing the general findings they have gained from the implementation of external quality assurance" (HRK 2015, p. 37; see also p. 45).

The "guideline" for this standard is defined as follows: "Through their activities, agencies gain knowledge about study programmes and higher education institutions which is useful beyond the individual procedure and can serve as a basis for structured analyses of the entire higher education system. These findings

¹ The comments under 1.1 "Thematic analyses: An ESG standard for quality assurance agencies" and 1.2 "What are 'Thematic Analyses'?" are essentially based on the contribution of Dr. Karl Kälble "'Thematic Analysis' in the context of accreditation. An ESG standard for quality assurance agencies operating in higher education" (to be published in 2020).

² HRK, Bonn, 2015

can contribute to the reflection and improvement of quality assurance strategies and procedures in the institutional, national and international context. Thorough and careful analyses of these findings highlight developments and trends and draw attention to areas that are characterised by good practice or are characterised by persistent difficulties" (HRK 2015, p. 38).

With regard to the German accreditation system, it should be noted in this context that the publication of analyses on findings from the German accreditation system until the "Study Accreditation State Treaty" came into force on 01.01.2018 (despite the ESG requirement of 2005, which has meanwhile been overtaken in 2015) was primarily a task of the Accreditation Council (which also used findings from the agencies that provided them). Accordingly, the German agencies were not obliged to allocate personnel, financial and time resources to carry out their own thematic analyses (which should also meet scientific standards, if possible) in the national context.

The revised version of ESG 2015 makes the regular preparation and publication of thematic analyses of an agency's findings relating to study programmes and universities by the agencies themselves mandatory. With the entry into force of the "Study Accreditation State Treaty" on 01.01.2018, the provision of corresponding resources for the German agencies has become much easier.

Against the background of this concise starting position, the AHPGS explicitly meets the requirement formulated in the ESG 2015 to prepare and publish initial thematic analyses based strictly on the available data material, using the findings it has gained in evaluation procedures. These analyses are also intended to highlight examples of good practice or to identify certain problem constellations and thus challenges for quality assurance.

1.2 What are thematic analyses?

"Thematic analysis" (TA), one of the variants of qualitative content analysis and methods of data evaluation from the methodological arsenal of qualitative social research, which is conceptually particularly at home in the English-speaking world and is particularly common there, is essentially a (low-threshold and practicable) method for identifying, structuring and analysing patterns in qualitative data, especially in the sense of recording topics (cf. Braun/Clarke 2006, p. 79; Braun/Clarke o. J.; Cameran 2017, Terry et al. 2017). In the words of Braun and Clarke (n.d.): "TA is best thought of as an umbrella term for a set of

approaches for analysing qualitative data that share a focus on identifying themes (patterns of meaning) in qualitative data". The "thematic analysis", which Braun and Clarke (n.y.) now refer to as "reflexive thematic analysis" for the purpose of better differentiation from other approaches, focuses in particular on cross-case, content-related patterns or topics in existing or to be collected data, which must be found and analysed in depth by the respective interpreter on the basis of the existing data material. In the concrete procedure, usually only information from the existing data material is coded, which answers a specific question or problem posed to the data material (thematic coding). Note: TA "is much more than simply summarising the data; a good thematic analysis interprets and makes sense of it". (Maguire/Delahunt 2017, p. 335.3).

Basically, there are at least two (but also other) possibilities of category formation: the deductive and the inductive approach. In the deductive approach (top-down), the categories are established and defined before the data material is analysed. With the inductive approach (bottom-up), the categories are not created before the material is viewed, but are derived directly from the material without reference to previously used theoretical concepts (see Braun/Clarke 2006; Braun/Clarke n.d.; Mayring 2010, p. 65).

Within the methodological discourse on "Thematic Analysis", there are different positions on the question of whether it should be given the status of an independent method at all (Boyatzis 1998, p. 4ff.; Terry et al. 2017). In their fundamental article, Braun and Clarke (2006) emphasize that "Thematic Analysis" is characterized, among other things, by its flexibility, which is neither fixed on a certain theoretical basic position nor necessarily aims at the formation of a plausible theory verifiable on the basis of the data, and can accordingly be applied in many disciplines. A further advantage is that the method can be used for evaluation independently of a survey method, even if the data material already exists. Its main aim is a detailed description and condensation of the data. Thus, it represents an adaptable and useful instrument that can potentially serve for the qualitative analysis of complex and detailed data in all areas (Braun/Clarke 2006, p. 78). The approach of "Thematic Analysis" described by Braun and Clarke attempts on the one hand not to restrict the freedom and flexibility inherent in the method, but nevertheless wants to clearly delimit it by describing clear decisions on action and implementation steps. Accordingly, this approach is " arguably the most influential approach, in the social sciences at

least, probably because it offers such a clear and usable framework for doing thematic analysis", according to Maguire and Delahunt (2017, p. 335.3).

Braun and Clarke (2006, n.d.) propose the following six steps for the interpretation of existing data material in order to conduct a thematic analysis (see also Terry et al. 2017, pp. 23ff.; with examples): 1. familiarising yourself with your data, 2. Generating initial codes, 3. searching for themes, 4. reviewing themes, 5. defining and naming themes, 6. producing the report.

The final report/text should normally be structured as follows: Cover page with logo, (abstract and keywords; optional for scientific publications), introduction, methodology, results, discussion (with references to limitations), conclusion (with or without outlook; if necessary reference to follow-up studies).

Maguire (2019) gives, with reference to the "Thematic Analyses" required in the accreditation context, among others the following general indications on questions to be basically clarified by an agency:

- "Strategy – what purpose(s) do your agency's thematic analyses serve? Beyond demonstrating compliance with 3.4!
- Internal QA of agency and its methods?
- System learning within HE?
- Policy impact (government, civil society)?
- Planning follows strategy – is TA just annual, cyclical, or is it responsive? How is this planning governed?"

1.3 Aim of the thematic analyses of the AHPGS

The processing of thematic analyses is sustainably secured by the resolution of the managing directors of AHPGS e.V. and AHPGS Akkreditierung gGmbH of March 20, 2019 (confirmed by the executive board of AHPGS e.V. on May 21, 2019 and by the shareholders' meeting on June 23, 2019) and by the resolution of the executive board of AHPGS e.V. and the management of AHPGS Akkreditierung gGmbH on December 16, 2019.

Beginning with the year 2020, the AHPGS regularly prepares and publishes explicitly thematic analyses based on empirical findings and/or observations gained in the accreditation context. These analyses are also intended to highlight examples of good practice or to identify certain problem constellations and

thus challenges for quality assurance. With the preparation and publication of the reports relevant from the point of view of the AHPGS, especially for representatives of the universities, for (the training of) reviewers as well as for members and employees of the AHPGS in relation to the study field of health and social affairs, the AHPGS fulfils a requirement of the "European Standards and Guidelines" (ESG) for agencies. With regard to the study field of Health and Social Sciences, which is specific to the accreditation procedures of the AHPGS, thematic analyses also offer the opportunity to obtain information on current developments in this area in the university context and to identify examples of precarious or good practice. In addition, "Thematic Analyses" can provide findings related to the assessment procedures carried out by the AHPGS, which can be used to further develop the implementation of procedures. The findings are presented and discussed at the annual working meeting of the AHPGS committees in Windenreute.

1.4 Thematic analyses in the field of activity of the AHPGS

It is necessary for the AHPGS to compile topics for analyses which can be worked on and analysed in the next few years against the background of a fundamental objective. The "Thematic Analyses" will focus on "Academicisation and Professionalisation in Health and Social Affairs".

The following topics, among others, are suitable and will be concretized if necessary:

- Survey of experts on the basis of a questionnaire to be developed in relation to the current accreditation system
- Survey of universities on the basis of a questionnaire to be developed in relation to the current accreditation system
- Recognition of extramural competences (target group-specific, e.g. social work, study programmes for nursing professions, etc.)
- Experiences with the new Nursing Professions Act with regard to courses of study leading to primary qualifications (in perspective)
- Presentation of the personnel situation (e.g. in further education Master's programmes)
- Achievement of qualification level 7 in Master programmes with heterogeneous admission requirements

- Experience with accreditation in an international context (e.g. using the example of specific countries, requirements, recommendations, etc.)
- Experience with cooperative study programmes (e.g. using the example of specific subjects)
- Experience with dual study programmes (e.g. using the example of specific subjects)
- Analysis of expert recommendations for the fulfilment of formal or subject-related criteria in degree programmes (e.g. using the example of specific subjects)
- Quality assurance of study programmes by universities / Experience with system accreditation
- Experience with the new accreditation system

1.5 Publication of the Thematic Analyses

The thematic analyses of the AHPGS are published. places where thematic analyses and/or the results of such analyses are published and presented:

- Homepage of the AHPGS,
- relevant scientific journals and edited volumes, contributions to edited volumes dealing with quality assurance in a national and international context, etc.
- Meeting of the committees of the AHPGS, technical report days especially of the members, presentations, lectures, meetings

"Thematic analyses" should be structured or broken down as follows, where possible:

1. question, objective
2. method, data
3. evaluation
4. discussion
5. summary (limitations on representativeness; outlook for possible follow-up studies, etc.).

1.6 Topics for the years 2020 / 2021

At the beginning of the financial year, the Management Board members decide on the issues to be dealt with during the financial year.

For the first half of 2020, the Executive Board has planned the following topics for consideration in "Thematic Analyses" at its meeting on 16 December 2019:

- Analysis of the first procedures of the AHPGS according to current law
- Analysis of the proceedings in the Kingdom of Saudi Arabia

In the second half of 2020 it is planned to publish a further regional analysis of the procedures in Romania.

The following topics are planned for 2021:

- Primary qualification programmes / duality
- Imputation, permeability and transitions

The pool of topics for work on "Thematic Analyses" can be continuously supplemented by the offices and committees of the AHPGS.

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2 Thematic analyses AHPGS 1st half of 2020

Eva Pietsch, Georg Reschauer

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

1. Introduction

On 01.01.2018, the regulations for the current accreditation system, the State Treaty on the Accreditation of Studies³ and the individual state regulations based on the model ordinance⁴ came into force. Contracts concluded up to and including 31.12.2017 are to be treated according to the old legal basis for the entire accreditation period; contracts concluded from 01.01.2018 onwards are to be treated according to the current legal basis.

At the beginning of the year 2018, in "The Further Development of the German Accreditation System Following the Resolution of the Federal Constitutional Court",⁵ the legal bases of the then "new accreditation system" were presented without practical reference due to the lack of procedures carried out: In the accreditation system, a peer review process is also the central element of the evaluation of study programs, with the participation of representatives from science, professional practice and students. The agencies organize the evaluation procedures. The Accreditation Council takes the decision on accreditation. In terms of content, the formal and technical criteria were separated and the examination of the former was assigned to the agencies, while the latter are examined and evaluated by the evaluators. The Accreditation Council sets "grids" for the preparation of accreditation reports, to which the agencies are bound.

³ "State Treaty on the Organisation of a Joint Accreditation System for Quality Assurance in Studies and Teaching at German Universities" of 12.06.2017

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

⁵ Eva Pietsch, Public Health Forum, 2018.

2. Question and objective

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

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

3. Data and method

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

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

Up to now, the reviewers have been asked informally and unstructured about their experiences with the legal bases, the implementation of the review

procedures and the grids. The standardized, annual survey of the experts will only be conducted at the beginning of 2020 and cannot be taken into account in the present analysis.

4. Result

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

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

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

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

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

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

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

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

5. Discussion

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

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

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

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

The application of the grids provided for the preparation of the accreditation reports immediately revealed potential for improvement: The universities had

difficulties with the "data sheet" in which statistical data on the study program are queried. For example, in the question of "study success", the basis for calculation was unclear. On the advice of the AHPGS, the universities referred to the last accreditation period and disclosed the basis of calculation. In the meantime, the Accreditation Council (102nd meeting on 21/22.11.2019) has designed an Excel table for the calculation of the data to be taken into account in the revision of the grids. In the course of 2019, it also became apparent that the reference in the grids to the model ordinance of the KMK is obsolete, as 13 of the 16 state ordinances have already come into force. And finally, the expert opinions were unclear with regard to Section 12 MRVO or Land regulations without subheadings. An additional complicating factor in the case of bundling procedures, for which a separate grid is specified, is that a distinction must be made between overarching and study program-related parts. The AHPGS therefore welcomes, in the sense of transparency and clarity of the reports with which the public can inform itself, a revision of the grids as decided by the Accreditation Council in its meeting on 21/22 November 2019. A corresponding working group has been set up.

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

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

especially in the case of initial accreditations, so that in such cases a quality improvement loop is rather dispensed with.

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

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

planning target is not appropriate. An acceleration of the procedures also depends on the involvement of the universities.

From the point of view of the AHPGS, the Accreditation Commission continues to be a fixed component and an important quality feature in the evaluation of study programs, in addition to the appointment of the evaluators. The Accreditation Commission makes a significant contribution to ensuring the consistency and validity of assessments and recommendations for resolutions, which are both technically adequate and cross-program and cross-procedural. The Accreditation Commission is currently involved in the test report and optionally in the accreditation report. In one case, the inadequate fulfilment of a formal criterion was only dealt with by the university on the basis of a reference from the accreditation commission. Comments of the Accreditation Commission will be taken into account within the scope of the on-site assessments or after the approval of the expert report as notes under 3.1 in the grid.

6. Summary

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

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

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

For further thematic analyses, the following topics are conceivable as a consequence of the reflections on the first evaluation procedures under the new law: Consideration of the type and number of non-compliance with formal and

subject-related criteria, the use of quality improvement loops, and an examination of certain characteristics, especially those that are particularly health-related, such as the "dual" characteristic or the implementation of the requirements for cooperative study programs.

2.2 Accreditation Procedures in the Kingdom of Saudi Arabia – Analysis of the general recommendations

1 Introduction

The AHPGS (Accreditation Agency in Health and Social Sciences) is an interdisciplinary and multiprofessional organization which concentrates on the accreditation of Bachelor and Master programs, as well as internal quality control and assurance systems, at universities and other institutions of higher education especially in Germany but also in foreign countries. The AHPGS works with special competence in the fields of health and social sciences, as well as in other adjacent and related disciplines. From the beginning, the agency has been located in Freiburg, Germany.

Within the framework of the quality assurance procedures, which have been nationally and internationally supported by ESG since 2015, the AHPGS gains a wide range of knowledge about the development of the study landscape and the evaluated study programs in the field of health and social sciences. The systematic analysis of these findings beyond the respective review process offers the opportunity to identify current developments in higher education and in the study landscape of health and social studies, which can be just as helpful for universities and the further development of their study programs as for the development of new study programs. These findings contribute to the reflection and improvement of quality assurance strategies and procedures. In this sense, in 2019 the AHPGS started systematic thematic analyses according to the new version of the "Standards and Guidelines for Quality Assurance in the European Higher Education Area" adopted in 2015.

Since 2011, the AHPGS carries out accreditation procedures in the Kingdom of Saudi Arabia (KSA). Recommendations imposed by the experts are differentiated between general and study program-specific recommendations. The general recommendations mainly concern structural aspects and aspects that are relevant for all study programs. The present report presents the results of an analysis of the general recommendations made by the experts in the accreditation procedures conducted in Saudi Arabia to date, in order to give an overview

of recommendations which apply to all universities the AHPGS has worked with. In KSA, the accreditation procedures by foreign accreditation agencies are executed on a voluntary basis and can be seen as an additional assessment to the national accreditation. The AHPGS helps universities to improve their study programs in terms of international recognition and increase of competitive power in academic accomplishments, research activities and teaching performance. Furthermore, the AHPGS focuses on the social and medical relevance of the study programs' profile as well as the employability potential of their graduates.

Some of the universities in KSA accredited by the AHPGS are currently preparing for re-accreditation. In addition, the AHPGS regularly receives inquiries from interested universities in KSA which request basic information about the procedure and application. The basis for this is the regularly updated Handbook for Program Accreditation of the AHPGS. Furthermore, the recruitment of new experts, who never participated in accreditation processes is another important aspect. For the preparation of the experts involved in the accreditation procedures, the AHPGS uses country-specific documents/materials that represent the particularities and the respective educational system.

The aim of the following analysis is to provide answers to the following questions:

For which criterion were the most recommendations made?

Are there any recurring recommendations?

Are there any changes over the period from 2011 to 2019 with regard to the recommendations made?

Are there changes over time in relation to the recommendations made at the same universities?

The knowledge gained in this analysis will be incorporated into the revision of the handbook and provide orientation for higher education institutions in Saudi Arabia that are seeking accreditation or re-accreditation, or help to identify potential problem areas as early as the preparation of applications and, if possible, to remedy them in advance. The results are also of interest and helpful for new reviewers in terms of good preparation for on-site visits.

2 Methodology

In the accreditation procedures, study programs are evaluated according to certain criteria. Therefore, the AHPGS developed a Handbook for Program Accreditation which inter alia contains the applied criteria during the accreditation procedures. The Criteria are "Aims and Implementation", "Structure of the Study Program", "Admission and Feasibility", "Examination System and Transparency", "Teaching Staff and Material Equipment", "Quality Assurance" and "Gender Equality and Equal Opportunities" (see also chapter 3). After the on-site visit, the expert group issues an expert report based on the results of the visit and the documents submitted by the universities. For the qualitative development of the study programs, the experts make recommendations to the universities.

Data and information from the AHPGS internal database were used for the analysis. This internal database provides facts about the executed accreditation procedures in KSA. Using this database, it is possible to get an overview of how many procedures have been executed, when and where they were carried out, which study programs have been accredited and which experts accompanied the agency during the procedures. From 2011 until now, the AHPGS conducted 10 accreditation procedures at 8 Universities with 42 study programs in the Kingdom of Saudi Arabia. The first accreditation procedure took place at the King Saud University in Riyadh. In this procedure, 10 study programs at the College of Applied Medical Sciences and the College of Nursing were reviewed. The Bachelor study programs were "Biomedical Technology – Instruments", "Clinical Laboratory Sciences", Clinical Nutrition", "Dental Hygiene", "Health Education", "Nursing" (BA and MA), "Optometry", "Physical Therapy" and "Radiological Sciences". At this University, the Nursing study program was, up to now, the only Master program accredited by the AHPGS in KSA. All other study programs were Bachelor programs, despite titles that suggest something else e.g. "Doctor of Pharmacy" which is also a Bachelor program qualifying for a specific field of action in the area of pharmacy.

Most of the study programs are located in the field of health professions and medical services; the range is comparable with the situation in Germany (Figure 2). The expert reports for every study program are also stored in this database. In this analysis, all of the general recommendations of every single accreditation procedure since 2011 were considered. The first step is to compose a list of all given general recommendations (see Appendix 1). By collecting the general

recommendations and in the second step summarizing them under the applied criteria (see Appendix 2), it is possible to recognize which recommendations are repetitive and therefore, stand for a need for action for the AHPGS, whether by adapting the relevant documents or by sensitizing the universities as well as the experts for certain topics or criteria.

In order to get a feeling for the different study programs that have already been accredited by the AHPGS, these were summarized in terms of subject and illustrated in percentages.

3 Applied Criteria and Specialties in KSA

The following criteria of the AHPGS are implemented for the accreditation of study programs at foreign higher education institutions. The AHPGS developed the Handbook for program accreditation procedures based on its abundance of experience in national procedures. Furthermore, these criteria are in accordance with the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (ESG) established by the European Association for Quality Assurance in Higher Education (ENQA).

Aims and Implementation (in Accordance with ESG 1.2)

Standard: Institutions should have processes for the design and approval of their programs. The programs should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a program should be clearly specified and communicated and 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.

Specialty: All study programs in KSA have to be accredited by the National Commission for Academic Accreditation and Assessment (NCAAA). NCAAA is an independent legal entity with administrative and financial governance that acts as the authority responsible for academic accreditation and quality assurance in higher education of public and private institutions and programs in Saudi Arabia. In general, Higher Education Institutions in Saudi Arabia are non-private, governmental founded Universities. The learning objectives of the study

programs are based on the National Qualification Framework (NQF) of the Kingdom of Saudi Arabia and are categorized in 'Knowledge skills', 'Cognitive Skills', 'Interpersonal Skills and Responsibility', 'Communication, Information Technology and Numerical Skills' and 'Psychomotor Skills'.

Structure of the Study program (in Accordance with ESG 1.3)

Standard: Institutions should ensure that the programs are 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.

Specialty: Usually, the standard study period is longer than in Europe due to general mandatory subjects such as Islamic culture in the first year of study (Preparatory Year). The Preparatory Year is common for all programs of one faculty. It also contains English language skills, Arabic language skills and communication skills, as well as basic science courses. Higher education in Saudi Arabia lasts four years in the field of humanities and social sciences, and five to six years in the field of medicine, engineering and pharmacy. Based on contact hours, the Saudi credit system suggests 15 credit hours per semester as a full-time undergraduate load, and 30 credit hours in an academic year. A maximum of 18 credit hours can be recognized for studies in any one semester. Credit hour calculations are based on a formula in which one 50-minute lecture, or two or three 50-minute laboratory or tutorial sessions over a 15-week teaching semester are regarded as one credit hour. Most classes are worth three credits. Higher education programs in professional fields often include periods of fieldwork or internship at the end of the study program. These may or may not be assigned credit hours.

Another specificity of the curricula in Saudi Arabia is that the (Bachelor or Master) thesis is not a requirement. Instead, there are so-called "final projects" to prove the ability of scientific work.

Admission and Feasibility (in Accordance with ESG 1.4)

Standard: Institutions should consistently apply pre-defined and published regulations covering all phases of the student "life cycle", e.g. student admission, progression, recognition and certification.

Specialty: The English proficiency is important at Saudi universities. In general, all science-based programs are taught entirely in English. Therefore, admission criteria include an English exam, so students seeking to join Saudi universities need to be prepared by having a high level of English language skills.

In addition to that, admission requirements in Saudi Arabia normally include a Saudi Secondary School Certificate or its equivalent. Moreover, passing a general aptitude test as well as a scientific scholastic admission test for medical programs is condition for admission. Furthermore, all newly admitted students are required to complete the so-called Preparatory Year program before starting their undergraduate studies. Passing this year, students get an orientation and are approved to the study programs depending on their desire, available seats and their Grade Point Average (GPA).

Saudi nationals are not charged tuition fees. Instead, students receive monthly governmental stipends until they graduate. Where applicable, postgraduate programs in foreign countries are also financially supported by the KSA.

Students with disabilities and chronic illnesses, can only be admitted to most of the study programs in the medical and health care area if they are “physically and mentally fit”.

Examination System and Transparency (in Accordance with ESG 1.8)

Standard: Institutions should publish information about their activities, including programs, which is clear, accurate, objective, up-to-date and readily accessible.

Specialty: Based on their GPA (Grade Point Average), the workload is reduced individually. The GPA is a number representing the average value of the accumulated final grades earned in courses over time. A student’s grade point average is calculated by adding up all accumulated final grades and dividing that figure by the number of grades awarded. This calculation results in a mathematical average of all final grades.

Teaching Staff and Material Equipment (in Accordance with ESG 1.5 and in line with ESG 1.6)

Standard: Institutions should assure themselves of the competences of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff. Institutions should have appropriate funding for learning and teaching activities and ensure that adequate and readily accessible learning resources and student support are provided.

Specialty: The teaching staff often consists of Saudi staff as well as people from neighboring countries as Egypt, Iraq etc.

Quality Assurance (in Accordance with ESG 1.1. and 1.10, in line with ESG 1.7 and taking into consideration ESG 1.9)

Institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders. Institutions should ensure that they collect, analyze and use relevant information for the effective management of their programs and other activities. Institutions should monitor and periodically review their programs to ensure that they achieve the objectives set for them and responds to the needs of students and society. These reviews should lead to continuous improvement of the program. Any action planned or taken as a result should be communicated to all those concerned. Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.

Specialty: The National Commission for Academic Accreditation and Assessment developed a set of Standards for Quality Assurance in Higher Education in 2009. These standards are to be applied to all higher educational programs in Saudi Arabia. The NCAAA requires that every institution has to create its own quality assurance mode.

Gender Equality and Equal Opportunities

The University's actions on the provision of gender equality and promotion of equal opportunities for students with particular living circumstances are implemented in a transparent manner.

Specialty: No schooling educational institution in KSA allows men and women to attend the same classes. Segregation of men and women's education has

been part of Saudi Arabia's culture for much of the twentieth century. Women and men study separately, at different colleges. The curricula are identical.

4 Findings and Discussion

From 2011 to 2019, in 10 procedures a total of 8 universities have been accredited. At least one and at most 11 study programs have been accredited per procedure. A total of 74 recommendations have been made. In every procedure, between two and 16 recommendations were stated.

Appendix 2 can now be used to answer the questions asked at the beginning.

For which criterion were the most recommendations made?

In terms of criteria, most recommendations were made on "Structure of the Study program" and "Gender Equality and Equal Opportunities". Eight different recommendations were made for the criterion Structure of the Study program, some of which were multiple answers (see next question). The recommendations range from earlier patient contact at the beginning of the study to an introduction to the thesis at the end. In addition, increased mobility of students is recommended 6 times, since e.g. no semesters abroad are currently planned or practiced. Furthermore, Appendix 2 shows that the number of courses is an often-discussed issue in the different procedures. Therefore, the experts suggested in 6 out of 10 procedures to combine the courses into larger units or modules that are completed with a single examination.

Are there any recurring recommendations?

As mentioned before, an extended national and international mobility for the students enrolled in the programs e.g. through exchanges are encouraged six times. The recommendation to combine the individual courses into modules was made just as often. Another often-discussed issue was the modernization of the female campus. Compared to the male campus, the equipment as well as the buildings are inferior. In connection with this, it was recommended that the communication possibilities between the female and male campuses should be fully exploited. Another important issue were the admission requirements. It was mentioned four times, that the universities need to specify requirements and selection criteria implied under the aspect of "physical fitness". Therefore, the universities should adopt official regulations for students with special needs

on the institutional level in order to guarantee a consistent and transparent approach in matters of academic, health and social support. The universities claim to react individually regarding students with chronic illnesses or disabilities.

Two recommendations were also made with a view to the future. Firstly, in eight out of ten procedures, the universities were encouraged to introduce follow-up Master's programs. The second recommendation related to the expansion of research activities at the university - both in terms of teachers and students. This was addressed in four out of ten procedures.

Are there any changes over the period from 2011 to 2019 with regard to the recommendations made?

The most dominant criteria were discussed continuously from 2011 to 2019. No improvements could be observed over this period.

Are there changes over time in relation to the recommendations made at the same universities?

The AHPGS carried out two accreditation procedures with two on-site visits at two universities each. This was firstly Umm Al Quara University in 2014 and 2016 and secondly the University of Hail in 2017 and 2019.

In Umm Al Quara two general recommendations were made in 2014 and seven in 2016. The two recommendations in 2014 were

Further scientific engagement for the teaching staff should be encouraged and enabled. Regarding the development of the research activities, the experts recommend teachers to encourage research already among Bachelor students of the programs.

The University should offer continuing academic study opportunities for students by introducing master programs.

In 2016, seven recommendations were made. They addressed the offering of graduation diplomas, establishing career centers, initiation of national and international exchanges, determination of the self-study hours and the total workload, establishing official regulations for students with special needs, the equal access to existing learning resources for both female and male group of students and a concept of gender equality in an official document.

The recommendations of 2014 and 2016 show that different aspects were addressed by the experts during the two on-site visits. It is plausible that the recommendations of 2014 have been realized by the University and were therefore not addressed by the experts in 2016.

In Hail, 8 general recommendations were made in 2018 and 3 in 2019.

The recommendations in 2018 addressed the introduction of research skills earlier in the curriculum, the development of Master programs, student-centered study programs, a greater variety and flexibility in examination methods, more qualitative evaluations, the elimination of differences between male and female campuses and the communication possibilities between the male and the female campuses.

In 2019, the recommendations were the revision of the module manual, the reduction of the number of examinations, the implementations of a thesis and of compensation measures regarding students with disabilities and chronic illnesses.

In Hail, the self-evaluation report including the relevant annexes 2019 showed a significant improvement over the previous year. The recommendations of 2018 were partially addressed and realized, e.g. the elimination of differences between male and female campus. Furthermore, the documents were well prepared, so that few open questions had to be asked in advance.

Regarding the recommendations given for the individual criteria, the following statements can be made (see Appendix 2):

In all procedures, there were no general recommendations made regarding the criteria Aims and Implementations. They are clearly specified and communicated and refer to the correct level of the national qualifications' framework for higher education and also to the Framework for Qualifications of the European Higher Education Area.

The Structures of the Study Programs appear very detailed and therefore, not fully modularized, which also leads to a high number of examinations. To improve the comparability of study programs within KSA to study programs in Europe, it should be clearly emphasized that it is recommended to combine courses to larger modules.

Regarding the Admission and Feasibility there is still a need for improvement with regards to students with disabilities and chronic illnesses. Normally, the accredited universities have individual regulations and therefore, no official regulations for students with special needs on the institutional level in order to guarantee a consistent and transparent approach in matters of academic, health and social support.

The main topic within the criteria Examination System and Transparency is the high amount of examinations based on the different understanding of the modularization of curricula. Besides that, the universities accredited by the AHPGS document and publish information regarding the study program (study plan, process of education, admission requirements, examination regulations) and its various activities in a clear, accurate, objective, up-to-date and readily accessible way.

The Teaching Staff and Material Equipment at the accredited universities assure the successful implementation of the study program. The skills labs comply with high standards (even higher than in German skills labs) which are positively noted by the experts.

The non-Saudi personnel normally gets one-year contracts which are extended every year. During the talks with the non-Saudi personnel on site, the contracts are regularly discussed.

Regarding the Quality Assurance at the universities accredited by the AHPGS, it has to be noted that they carry out internal and external quality assurance procedures on a cyclical basis. The Quality systems are well implemented and include an effective management, perpetual monitoring and review of the study programs, to guarantee the continuous development of both the study programs and the University in general.

Regarding Gender Equality and Equal Opportunities and with respect to the female campus, following the European understanding and the understanding of the AHPGS, is an important issue to guarantee gender equality within the cultural boundaries. Therefore, the AHPGS makes sure that a sufficient number of female and male experts are evaluating the conditions for female and male students on-site. Compensation measures for students with disabilities or chronic illnesses are generally implemented at the university. Due to the specific field

of health science programs of the agency, it is usually required to be mentally and physically healthy (see also admission requirements).

5 Conclusion

In summary, the following findings were obtained: The most discussed issues on-site were in relation to the criteria "Structure of the Study program" and "Gender Equality and Equal Opportunities". With regard to the "Structure of the Study program", the most important aspect is the small curriculum and the resulting high examination density. Furthermore, the initiation of opportunities for students' and teachers' mobility with Saudi Arabian and international higher education institutions are a further point of criticism. The experts recommend the college to start with short-term exchange programs for its students. Under the criterion of Gender Equality and Equal Opportunities, the unequal equipment of the women's campus and the men's campus was usually addressed.

In the course of time, no changes in the recommendations given at the various universities could be observed. In one case, however, the second accreditation showed a progression in the preparation of the documents and on site.

Above all, this analysis was able to identify the main points of discussion with accreditations at universities in Saudi Arabia in order especially focus on these aspects during re-accreditations. Nevertheless, it became clear that mid-term follow-ups will be necessary and appropriate in the future in order to better understand the development of the universities after accreditation. The knowledge gained can also be useful for universities seeking initial accreditation.

The AHPGS is planning to prepare a paper for new customers, so that they can counteract possible shortcomings even before the application is submitted. The AHPGS hopes that this will lead to an improvement in the preparation of the documents, as has already happened once before, and thus reduce the workload of the quality assurance consultants by the AHPGS and the experts. Finally, the effort for the university is also reduced, since fewer open questions have to be asked after reviewing the documents. In addition, newly acquired experts can be sensitized to the recurring aspects. The already existing country-specific documents for the experts are to be adapted accordingly.

Feedback on optimization proposals from experts and universities are taken into account in the ongoing process and incorporated into the existing documents.

For further analyses, it would be conceivable to look at the course-specific recommendations instead of the general recommendations in order to be able to draw conclusions about course-specific differences.

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Appendix 1: General Recommendations

University	Study Program	Recommendations
King Saud University (2011)	Biomedical Technology – Instruments	<ol style="list-style-type: none"> 1. On the medium term, the introduction of Master and PhD programs should be considered. They should be built upon the existing Bachelor programs and should offer learning at higher academic levels. 2. Research should be extended at the College, maximizing the benefit of students on all levels of education. A clear internationalization strategy might help to build up strong research networks with partners within and outside Saudi Arabia. 3. The opportunities emerging from an interdisciplinary approach should be further exploited. For that purpose, a strong, target-oriented collaboration between the various departments of the College is encouraged. This holds also true for collaboration with other departments of the King Saud University. 4. It is proposed to initiate student-patient contacts as early as possible in the curriculum. Patient attendance strategies and supervision may be adapted to meet this precondition. 5. An extension of the optional courses available during the study period is suggested. This concerns especially study-program specific parts, as it represents a way for students to further develop their strengths in a more specialized area of the field. 6. A clear competence-oriented strategy for all study programs is suggested. In this sense, the course may be compiled in overarching modules, which articulate the competencies to be developed by the students during the modules. The adjoining exams may also follow this goal and evaluate its achievement. 7. The co-optation of internationally reputed and associated personnel is suggested as a future approach. This suggestion pertains to all study programs and shall aid in strengthening the University’s position and recognition in the international context. 8. With regards to the teaching personnel, the selection criteria should be adapted to meet with internationally established standards and practices. 9. The future strategy for the continuous professional development of the faculty might be oriented toward an enhancement of mobility of teachers. As a result,
	Clinical Laboratory Sciences	
	Clinical Nutrition	
	Dental Hygiene	
	Health Education	
	Nursing (BA, MA)	
	Optometry	
	Physical Therapy	
	Radiological Sciences	

		<p>the internationality of the study programs will be enhanced, as will the teacher interaction at international level.</p> <ol style="list-style-type: none"> 10. The expert group welcomes the upcoming relocation of the female campus and, along with this, the ongoing modernization of the corresponding material and technical resources and the exchange/sharing of equipment with the male campus. 11. An extended mobility and international connecting for the students enrolled in the programs is encouraged. Summer Schools offered at King Saud University or elsewhere may offer a viable solution to foster international experiences of students and staff. 12. An external assessment (validation process) of the examination system may enhance its efficiency and effectiveness. 13. The data collected in the frame of the internal quality management system should be more widely used. In this sense, this data may assist not only the further development of the study programs, but also for the steering of the College and of the University.
<p>Umm Al Quara University (2014)</p>	<p>Clinical Nutrition Health Services Management Laboratory Medicine Physical Therapy Nursing Anesthesia Technology Emergency Medical Services</p>	<ol style="list-style-type: none"> 1. Further scientific engagement for the teaching staff should be encouraged and enabled. Regarding the development of the research activities, the experts recommend teachers to encourage research already among Bachelor students of the programs. 2. The University should offer continuing academic study opportunities for students by introducing master programs.
	<p>Medical Bachelor and Bachelor of Surgery</p>	<ol style="list-style-type: none"> 1. The University should consider to provide an additional and official document to all successful graduates, which detail the specific program courses and the medical competences obtained throughout the medical studies to accompany the graduation diplomas 2. The University should increase its preparatory support to students during the critical transition period from the academic to professional health care sphere by establishing a Career Center and encouraging individual Colleges and departments to organize regular events and consultation opportunities, where students can meet representatives from various health care sectors and professions to learn about the specific needs and expectations of prospective employers.

<p>Umm Al Quara University (2016)</p>	<p>Dentistry</p> <p>Bachelor of Pharmacy</p> <p>Doctor of Pharmacy</p>	<ol style="list-style-type: none"> 3. The University should initiate national and international short-term exchange opportunities for their academic staff and senior students of the program within the framework of “summer schools”. 4. The University should explicitly determine the amount of self-study hours and of the total workload of the study programs in a transparent manner. By means of questionnaires, it should assess and plan the number of hours students need to accomplish various tasks. Based on the obtained results, the University should compare and accordingly adjust the expected workload to the experience and learning capacities of students. 5. The University should adopt official regulations for students with special needs on the institutional level in order to guarantee a consistent and transparent approach in matters of academic, health and social support. These institution-wide equal opportunity regulations should determine specific units and persons responsible for the organization of support measures for students with disabilities. Furthermore, these regulations should include program-specific exemptions concerning the general physical fitness of students. 6. The University should offer equal access to the existing learning resources for both female and male group of students. Female and male students must always have the same timeframe and opportunities for example to study and work at a particular library important for the study program. 7. The University should develop and publish a concept of gender equality in the form of an official document. This document should serve as a clear and transparent statement that both female and male students and members of the teaching staff, as well as other stakeholders of the University, are provided with equal opportunities and conditions to study and work at the university.
		<ol style="list-style-type: none"> 1. Further scientific engagement for the teaching staff should be encouraged and enabled. Regarding the development of the research activities, the experts recommend teachers to encourage research already among Bachelor students of the programs.

<p>Najran University (2015)</p>	<p>Clinical Laboratory Sciences</p> <p>Nursing</p> <p>Physiotherapy</p> <p>Radiological Sciences</p>	<ol style="list-style-type: none"> 2. The University should offer continuing academic study opportunities for students by introducing master programs. 3. Closer and more interactive contacts with other higher education institutions within and outside of Saudi Arabia should be established. This includes student exchange opportunities, exchange of teaching experience through visiting professors, organization of conferences, workshops and discussions among students and teachers from partner universities. 4. The curriculums should offer more optional courses. 5. The currently applied credit system should be reviewed in terms of the self-study time dedicated to program-specific and general study content and the arrangement of the program courses within larger modules with a set amount of credit value and workload hours, which enables students to correlate the exchange studies accomplished in different universities and also to obtain credits for specialization-related courses offered by other departments within the same universities. 6. The University should consider the employment of the teaching staff based on long-term contracts. The length of a contract might be, for instance, determined by the criterion of belongingness to the University. The advantage of such a system is that it could enable the realization of continuous and long-lasting projects and scientific experiences, which require a certain period of time for preparation, implementation and subsequent analyses. 7. With regard to the admission procedure, the University should specify its requirements and selection criteria implied under the aspect of "physical fitness". The relevant information should be publicly available, for instance through the official website of the University. 8. As a recommendation for further enhancement of research activities, the experts emphasize that primarily teachers themselves should actively encourage and trigger bachelor students' interest in scholarly work. Course teachers can do so, for instance involving students in their own projects, practical experiments or social initiatives. 9. The University should ensure that the results of evaluation questionnaires completed by students are
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		<p>properly communicated to all stakeholders, including students themselves. By doing so, the University should guarantee transparency and effectiveness of quality assurance procedures implemented in the program as well as within the University in general.</p>
<p>King Abdul Aziz University (2015)</p>	<p>Clinical Nutrition Physical Therapy Diagnostic Radiology</p>	<ol style="list-style-type: none"> 1. The University should consider the organization of possibilities for students and the faculty members to study or work at partner higher education institutions within Saudi Arabia. Given the cultural aspects, it could be an option to start with short-term exchange periods e.g. summer schools. For the initiation of internationality, the faculty administration should also contemplate upon the arrangement of visit and specialty-related studies and teaching possibilities for students and members of the teaching staff at foreign higher education institutions. 2. The experts recommend the departments' administration to rethink the examination scope and the size of the programs' courses, each completed with a respective examination, which leads to a high level of examination load for students. In this regard, the experts suggest combining the courses into larger units like modules that are completed with a single examination. 3. The experts advise the faculty to award more credit hours for research projects and reports required in the study programs. By doing so, the faculty would reinforce the importance of scholarly work and of individual academic engagement in the education process. 4. The faculty should maintain communication with its graduates, and it should also attentively follow their career paths in order to determine insufficiencies and development potentials of each study program. 5. The respective department should continuously evaluate the current workload of students and of the teaching staff and consequently compare obtained results with the initially intended amount of working hours. 6. With regard to the admission requirement of "physical fitness", the experts strongly recommend to prepare a program-specific definition of the criterion of physical fitness according to the learning and training content of each study program.

<p>Majma'ah University</p>	<p>Medical Laboratory Sciences Physical Therapy Diagnostic Radiology</p>	<ol style="list-style-type: none"> 1. The experts encourage the program administration to introduce research competences as early as possible in the program, in order to initiate students' involvement in academic writing and science-oriented activities starting with the early stage of their education. 2. The experts advise the college and the departments to upgrade their requirements to students' research reports, in order to make them more scientific both in terms of content and form. Consequently, this will enable the teaching staff to award more credit hours for students' research projects and reports. By doing so, the University would reinforce the importance of independent scientific work and of individual academic engagement in the study programs. 3. The experts encourage the University to promote students' engagement in research through competition. They believe that competitions will motivate students to more actively participate in scientific and research-oriented events of the college and the University in general. This will consequently contribute to the academic image of the University. 4. The experts strongly encourage the College of Applied Medical Sciences to initiate opportunities for students' and teachers' mobility with Saudi Arabian and international higher education institutions. The experts recommend the college to start with short-term exchange programs for its students, for instance in summer schools, which usually last for only several weeks. At the same time, the experts encourage the University to provide equal promotion opportunities and equal treatment for all members of the institution, irrespective of their national background and gender. 5. The experts strongly support the wishes of the administration of the female campus to extend bachelor study programs for female students in areas such as nutrition, health education, occupational therapy, epidemiology and other. By doing so, the University can prepare more female medical graduates with very good employment opportunities, thus meet the needs of the society for female health care specialists and, at the same time, expand the labor market for female employees. 6. The experts suggest the academic staff of the college to combine the courses into larger units or
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		<p>modules that are completed with a single examination and that pursue compatible and coherent learning objectives. By doing so, the University could reduce the workload pressure on students, foster cooperation of teachers across disciplines, and make learning outcomes as well as the examinations more competence-oriented. Furthermore, integration of courses into larger coherent entities would enhance the interdisciplinary capacities of the study program and of the college in general.</p> <ol style="list-style-type: none"> 7. The experts underline that the college administration should take into account not only the contact hours but also the self-study hours of students, which also belong to the total workload of the program. This would enable the academic staff to organize the learning and teaching processes in a more practical and objective way, when knowing the actual amount of workload students and teachers need to accomplish their respective tasks. 8. The experts strongly recommend the academic staff of the college to consider the assignment of credit hours for the internship. This will encourage students to perform better in their clinical training and thereby to improve their cumulative GPA at the end of studies. 9. The experts believe that the admission requirement of physical fitness could be applied in a more adequate and objective manner in medical programs, if the specific characteristics of each specialization are taken into account. Hence, they recommend the college to prepare a program-specific definition of the criterion of physical fitness according to the learning and training content of each study program. 10. The experts encourage the University and the college to offer more time as well as workshops and conferences in the English language in order to enable the participation of all teachers and lecturers in the academic life and professional development opportunities offered by institution. 11. The experts believe that female students of the college should be provided with more periodicals and journals related to their study programs. 12. With regard to the facilities and equipment, the experts point out that the same laboratories can be used by both female and male students of the College of Applied Medical Sciences at different time
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		<p>intervals. Such approach would enable the University to save a considerable amount of resources because there will be no need to acquire the double quantity of every detail necessary in the study program. At the same time, this way the University could guarantee equal learning opportunities as well as equal access to training equipment for all students, female and male.</p> <p>13. The experts recommend the University to illustrate the contribution of different stakeholders to quality assurance in a more distinct and transparent manner, for instance through actual feedback examples and the consecutive improvement plans.</p> <p>14. The expert group urges the University to use the full potential of communications possibilities between the male and the female campuses of the University in a transparent and effective manner, also for external visitors.</p> <p>15. The experts believe that the introduction of common regulation regarding the compensation measures for students with disabilities and chronic illnesses may contribute to fairness and transparency in dealing with such delicate and complicated issues on the institutional level.</p> <p>16. The material equipment and other facilities of the College of Applied Medical Sciences (e.g. wheelchairs, electric cables) should be repaired on time and should be appropriately maintained in a state that allows their full utilization.</p>
<p>University of Ha'il (2018)</p>	<p>Nursing Physical Therapy</p>	<ol style="list-style-type: none"> 1. Research skills should be introduced earlier in the course of studies and a bachelor thesis as a final prove of academic competences should be implemented. 2. Further academic qualification options, such as Master programs should be developed. 3. The idea of a student-centered study program, encouraging students to take an even more active role in creating their own education process and developing a scholarly attitude, should be developed and implemented. 4. A greater variety and flexibility in examination methods as well as a competence-oriented examination design should be implemented. 5. More qualitative dimensions and evaluations should be applied

		<ol style="list-style-type: none"> 6. Student participation at the University should be expanded. 7. Differences between the male and the female campus should be eliminated and same standards and quality in equipment and facilities for male and female students should be assured along with the further development of the University's implementation 8. The full potential of communication possibilities between the male and the female campuses of the University and the possibilities of exchange of experiences and ideas for the further development of the study program should be used.
University of Ha'il (2019)	<p>Clinical Laboratory Sciences Clinical Nutrition Diagnostic Radiology Dental Surgery Doctor of Pharmacy</p>	<ol style="list-style-type: none"> 1. The module manual should be revised and the number of examinations should be reduced, e.g. through combination of modules. 2. A bachelor thesis as a final proof of academic competencies should be implemented. 3. Compensation measures regarding students with disabilities and chronic illnesses should be implemented.
Sulaiman Al Rajhi Colleges	<p>Medical Bachelor and Bachelor of Surfery</p>	<ol style="list-style-type: none"> 1. The quality of learning material in the anatomy lab should be improved by modern preserved anatomical and histological specimen. Including new technologies, such as "virtual anatomy", should be considered in order to guarantee high quality teaching in the anatomy lab. 2. The University should provide more information and support for applying and recognition procedures abroad.
Princes Sattam Bin Abdulaziz University	<p>Biomedical Technology Medical Laboratory Sciences Nursing Radiology and Medical Imaging Physical Therapy and Health Rehabilitation</p>	<ol style="list-style-type: none"> 1. Research skills should be introduced earlier in the course of studies and a Bachelor thesis as a final proof of academic competences should be implemented. 2. Differences between the male and female campus should be eliminated and same standards and quality in equipment and facilities for male and female students should be assured along with the further development of the University's implementation. 3. The module manual should be revised and the number of examinations should be reduced, e.g. through combination of modules. 4. A greater variety and flexibility in examination methods should be implemented, thus, focusing more on the development of competencies.

		<ol style="list-style-type: none">5. Compensation measures regarding students with disabilities and chronic illnesses should be implemented.6. Didactic abilities of the teaching staff should be ensured through mandatory participation in the offered workshops and trainings (e.g. didactic methods).7. A position which is responsible for the maintenance, operation and safety of the equipment in the laboratories to guarantee a smooth execution of the practical modules should be established.8. The University should exploit the full potential of communication possibilities between the male and the female campuses in order to promote the exchange of experiences and ideas for the further development of the study program.
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Appendix 2: Recommendations made in relation to the criteria applied

Criterion	Recommendation
Aims and Implementation	
Structure of the Study Program	<ul style="list-style-type: none"> - Interdisciplinary approach - Earlier student patient contacts - Extend optional courses (2)* - combining the courses into larger units like modules (6) - expanding mobility / exchanges (6) - consider the assignment of credit hours for the internship - student-centered study program - bachelor thesis should be implemented (2)
Admission and Feasibility	<ul style="list-style-type: none"> - Establishment of a Career Center - specify its requirements and selection criteria implied under the aspect of "physical fitness" (4)
Examination System and Transparency	<ul style="list-style-type: none"> - external assessment of the examination system - determine the amount of self- study hours and the total workload in a transparent manner (2) - greater variety and flexibility in examination methods (2)
Teaching Staff and Material Equipment	<ul style="list-style-type: none"> - Co-optation of internationally reputed and associated personnel - Selection criteria should be adapted - Mobility (3) - Long-term contracts - Didactic abilities of the teaching staff should be ensured through mandatory participation in the offered workshops and trainings (e.g. didactic methods) - A position which is responsible for the maintenance, operation and safety of the equipment in the laboratories to guarantee a smooth execution of the practical modules should be established.
Quality Assurance	<ul style="list-style-type: none"> - ensure that the results of evaluation questionnaires completed by students are properly communicated - guarantee transparency and effectiveness of quality assurance procedures (2) - follow up with graduates - continuously evaluate workload of students and teaching staff - More qualitative dimensions and evaluations should be applied
Gender Equality and Equal Opportunities	<ul style="list-style-type: none"> - modernization of female campus (5) - official regulations for students with special needs (2)

	<ul style="list-style-type: none">- equal access to existing learning resources (2)- official concept of gender equality- use the full potential of communications possibilities between the male and the female campuses (3)- compensation measures regarding students with disabilities and chronic illnesses should be implemented (2)
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*number