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Barbara M. Kehm

General Framework

As is the case for most European countries quality assurance in teaching and learning and in research have been organised in different ways in recent years. While quality assurance of research mostly is done through competitive bidding for funding and peer review of applications and proposals, this contribution will focus on the more complex quality assurance practices in teaching and learning and the mechanisms of accreditation of degree programmes.

Germany is a federalist country consisting of altogether 16 States which are sovereign in educational and cultural affairs. Joint decisions are taken by Standing Conference of the German Ministers for Education and Culture (KMK). In the field of higher education the Federal Ministry for Education and Research is mainly responsible for scholarships, funding research and determining research priorities, negotiating framework agreements, and organising and supporting international exchange in education and research. Traditionally the establishment of new degree programmes at German higher education institutions, including their study and examination regulations, needed the approval of the responsible Ministry of the respective State. This was typically a long and tedious process lasting two and more years. With the advent of the Bologna reforms things changed. The Ministries realised that it was impossible to approve of new degree programmes quickly and with the necessary quality and resource controls when all study programmes had to be changed to the new structure and for every traditional degree programme at least two new ones (a Bachelor and a Master programme) had to be established. This was the advent of accreditation.

In its decision about the introduction of accreditation procedures for newly established degree programmes according to the tiered structure of Bachelor and Master degrees, the Standing Conference (KMK) emphasised the functional separation of state approval and accreditation. The responsible Ministries continued to retain their rights to approve of every new degree programme with respect to three dimensions: (a) a guarantee that the programme to be established had sufficient resources; (b) the compatibility of the new programme with the higher education planning of the respective State; (c) the adherence to the structural rules and regulations of the State. And while the State continued to approve of resources and legal issues, accreditation was established to assess the quality and the labour market relevance of the new degree programmes.

There were basically four reasons to change the existing system of quality assurance through framework regulations decreed by the KMK:

- First, a new quality assurance system was deemed necessary because the far reaching changes to a tiered structure of study programmes and degrees according to the Bologna reforms could not be based on any previous experiences. Up to that point in time all German higher education institutions had only offered one-cycle degrees lasting between four and six years and being considered at Master level.
- Second, there was considerable criticism with regard to the traditional system of state approval and the opportunity was taken to establish a new quality assurance system which was more in line with international, particularly European developments.
- Third, if the German States would have continued to approve of newly established Bachelor and Master programmes according to the traditional procedures, the change to the new structure could not be completed until 2010.
- Fourth, once the reform dynamics had picked up speed (in Germany this happened in 2004) and an increasing number of new Bachelor and Master programmes were in the making or being introduced, a wealth of newly designed interdisciplinary programmes emerged which could no longer be tied to a single discipline or clear-cut subject matter and thus, needed accreditation based on the consensus of peers with regard to their relevance and core curriculum.

The Structure and Practice of the German Accreditation System

The Structure

The structure of the German accreditation system consists of two levels. At the top there is the German Accreditation Council under the guidance and control of which there are the actual accreditation agencies as the second level. The legal framework of the Accreditation Council is that of a foundation under public law. It has 17 members which are jointly appointed by the German Rectors' Conference and the KMK and whose term of office is four years: four representatives from the higher education institutions, four from the responsible State Ministries, four representatives from professional practice, two students, two international experts, and one representative of the accreditation agencies (with advisory capacity only).

When accreditation was newly established in Germany, the Accreditation Council was involved in accrediting degree programmes for a trial period. Nowadays it has three main responsibilities:

- To certify accreditation agencies by monitoring their work and re-accredit them periodically and to determine procedural regulations and criteria for accreditation which the agencies have to follow;
- To further develop the German accreditation system and support higher education institutions in their tasks to improve the quality of teaching and studies;
- To represent the German accreditation system in European and international contexts and to contribute to the development of the European Higher Education Area (cf. www.akkreditierungsrat.de).

The Accreditation Council is a member of all important international networks for quality assurance, in particular INQAAHE and ENQA. In this context it negotiates cooperation agreement with foreign accreditation agencies for mutual recognition of accreditation decisions and degrees (cf. Schade 2005: 129f.).

The second level of the accreditation system consists of the actual accreditation agencies (cf. Kehm 2005). Only agencies, which are accredited by the Accreditation Council, are allowed to accredit degree programmes. Higher education institutions are free to choose by which agency they want to have their degree programmes accredited. Furthermore, they can choose to get an additional accreditation for a particular degree programme from an international accreditation agency (for example, a highly reputed American agency) in order to market this as an additional quality feature. There are altogether ten accreditation agencies certified by the Accreditation Council (eight German, one Austrian, and one Swiss agency). They are either regionally active (e.g. in one or more but not all German States) and then accredit programmes in all subjects and disciplines or they carry out accreditations in all German higher education institutions but then are specialised to accredit certain subject areas and disciplines only.

- ACQUIN: Accreditation, Certification and Quality Assurance Institute (regional)
- AHPGS: Accreditation Agency for Study Programmes in Health and Social Sciences (disciplinary)
- AKAST: Agency for Quality Assurance and Accreditation of Canonical Study Programmes (disciplinary)
- AQA: Austrian Agency for Quality Assurance (regional)
- AQAS: Agency for Quality Assurance by Accreditation of Study Programmes (regional)
- ASIIN: Accreditation Agency for Degree Programmes in Engineering, Informatics/Computer Science, the Natural Sciences and Mathematics (disciplinary)
- Evalag: Evaluation Agency Baden-Württemberg (regional)
- FIBAA: Foundation for International Business Administration Accreditation (disciplinary)
- OAQ: Center of Accreditation and Quality Assurance of the Swiss Universities (regional)
- ZEvA: Central Evaluation and Accreditation Agency Hannover (regional).

The legal status of these agencies varies, but the majority are non-profit organisations. The composition of the decision-making bodies reflects that of the Accreditation Council minus

representatives of the State (except for the state regulated professions), i.e. higher education institutions, students, professional fields/employers. In some agencies representatives of the trade unions play a role, in others representatives of the respective ministries have an advisory or observer status.

Accreditation Procedures

The accreditation procedure in Germany is carried out in three steps. First, the higher education institution sends an application for accreditation to a chosen agency. There are detailed rules and regulations what kind of information and documentation such an application must include. In some German States the application is examined by the responsible Ministry in terms of its compliance to the respective state planning for higher education. The agency examines the application in terms of its completeness of forms and information and in terms of the question whether the study programme to be accredited is conceptualised in such a way that it fulfils the basic requirements at a formal level. The agency then determines the costs for the accreditation and agrees with the institution about a schedule for accreditation.

The second steps starts after the institution has signalled that it is willing to pay the costs. Then the application is examined in more detail, an audit team is proposed and (peer) reviewers are nominated to carry out an on-site visit. The reviewer group typically also includes representatives of the potential employers of the graduates of the respective programme, possibly a representative of the Ministry, and a student representative. A representative of the accreditation agency accompanies the review group for control of the procedures and note taking. During the on-site visit the reviewers look at resources (including classrooms, qualification of teachers, available funding, laboratory equipment or library and IT provisions) and carries out interviews with the dean, some teachers, and student representatives. After the on-site visit, the reviewer group writes a report including a recommendation to the agency whether to accredit the programme or not. The higher education institution receives the report plus recommendation for comment and feedback.

The third step consists of the finalisation of the report and its recommendation, which is then submitted to the responsible accreditation agency. An agency commission takes the final decision which can be a yes, a no, or a conditional yes. In the latter case the fulfilment of conditions is monitored after two years. Regular re-accreditation takes place every five years with a somewhat less complex procedure.

Costs of Accreditation

Depending on the subject, the accreditation of a single degree programme will incur costs for the institution at a level ranging from 8,000 up to 15,000 Euros. Re-accreditation is less costly. Since higher education institutions are free to choose an accreditation agency this leaves room for bargaining. However, it should be kept in mind that a medium-sized German university (approximately between 15,000 and 30,000 students might offer between 60 and 100 different degree programmes. Since traditional degree programmes were mostly turned into a Bachelor and a Master programme plus frequently one or more “stand alone” Master programmes, the number of programmes to be accredited more than doubled and accreditation can easily incur costs of one million Euros or more. A rough estimate of the President of one medium-sized German university assumed that accreditation costs amounted to about ten percent of the overall institutional budget. And despite the fact that German universities are public institutions and there are no tuition fees, the States responsible for their funding did not provide additional money for accreditation.

In order to save costs, it has become common practice in Germany to carry out so-called “cluster accreditations”, i.e. to have all degree programmes in a department or faculty accredited at once in the framework of one site visit and with a somewhat enlarged reviewer group.

Other Mechanisms of Quality Assurance

The implementation of accreditation into the German system of higher education is not the only quality assurance mechanism targeting teaching and studies. It added an external approach to the already existing quality assurance measures.

For quite a number of years already all higher education institutions are obligated to carry out regular student surveys about the quality of teaching. These are typically student satisfaction questionnaires which are then analysed for individual classes and as an aggregate to determine the teaching quality of a given department or faculty. Results are mostly confidential and only accessible by the individual teacher and the vice-dean for studies and teaching quality. If a particular teacher is not evaluated very well by his or her students the vice-dean might have a talk with the person and ask him or her to improve the teaching skills. However, there are mostly neither negative nor positive sanctions. The only incentive available to departments and faculties to honour teaching excellence is to use part of the performance related salary components for professors. For a whole department there might be target agreements to improve or positive and negative sanctions might be issued via performance related resource allocation.

Basically all universities have a central unit, which provides services with regard to the improvement of the teaching quality. It usually offers workshops, seminars, or individual coaching. Generally, such services are requested by junior academic staff or new faculty. Students with academic problems or problems taking examinations successfully can avail themselves of the services of counselling and advisory units.

Another mechanism is prize for excellence in teaching. These were established in a number of German States to counterbalance research based rankings and assessments and emphasise the importance of teaching quality. Although an academic career continues to be made on the basis of research output, teaching skills are increasingly evaluated in the framework of recruitment procedures for academic staff.

Overall, it is possible to say that most of these other mechanisms of quality assurance are internal, individualised, and often ex ante. Through performance related resource allocations and student satisfaction surveys additional instruments have been introduced over time which are ex post and aggregate, although they frequently lack the power to seriously change or improve the teaching quality.

Recent Developments: From Programme to Institutional Accreditation

Programme accreditation constituted a considerable bottleneck at the beginning of the Bologna reforms in Germany. Not only had new accreditation agencies to be established and appropriate procedures to be developed, there also was a problem of finding a sufficient number of peers and experts to get involved in the process (reading the application and related documents, participating in the site visit, writing the report and coming up with recommendations). Therefore, pretty soon after programme accreditation had been established discussions about a switch to institutional accreditation began.

Already in 2000 the German Science Council, an important buffer body making policy and planning recommendations in the field of higher education, was given the task by the KMK, and the Federal Ministry for Education and Research, to include private higher education institutions into the accreditation system. Among the 333 higher education institutions in Germany there are 53 states recognised private and 44 church affiliated higher education institutions. However, private higher education institutions in Germany enrol less than five percent of the overall number of students and therefore are treated often as a negligible quantity. However, in contrast to the accreditation of degree programmes in the public sector it was decided to have institutional accreditation in the private sector. In addition, institutional accreditation by the Science Council followed different procedures than programme accreditation by the agencies. Institutional accreditation, which is called “process accreditation” in Germany, is guided by the principle that not individual degree programmes are assessed but the core object of assessment is the question whether the institution as a whole has an adequate and well-functioning quality management system in place. If that can be confirmed in the process of accreditation then the institution is autonomous to set up any degree programme it wants.

Currently there is an intensive debate going on among actors in the field of German accreditation whether the highly complex programme accreditation should not be replaced by process or institutional accreditation. A few pilot institutions have started to embark on this by formulating and implementing a comprehensive institutional quality management system and the agencies are discussing procedural rules and criteria for the assessment. However, the general introduction of process accreditation would also require a change of the system of additional state approval of

programmes and its strong links to educational planning at state level. The advantage of institutional or process accreditation would be that the costs would be considerably lower than they are for programme accreditation. The Science Council has proposed to price an institutional accreditation between 18,000 and 28,000 Euros.

Conclusions

The German accreditation policy is a significant attempt by the government to ensure the quality of education at German higher education institutions. However, the policy has imposed considerable transaction costs. This is not so much due to the fact that policy transfer and implementation has been coercive and accreditation implemented against the wishes of the higher education institutions; on the contrary, the German Rectors' Conference played an influential part in the establishment of the Accreditation Council. The transaction costs were related to the fact that the whole system of quality assurance in German higher education of which accreditation is only one, albeit an important element is decentralised and its various elements are not properly linked to each other.

The German States can influence the accreditation business through their membership in the agencies and the Accreditation Council. However, the German accreditation sector itself is rather incrementalist and not very coherent. In addition, accreditation is not properly integrated with other quality assessment and assurance activities, especially those established by and within the higher education institutions. This leads to a lack of transparency and to fragmentation, which eventually might influence recognition.

Overall, Teichler (2003: 213-216) has characterised German quality assurance in higher education as a super complex system due to the fact that there are multiple practices of quality assurance – old and new ones – in place. This does not only lead to an overkill in terms of procedures but also to a particular form of tension related to the double function of quality assessment. On the one hand reflections about quality of teaching and learning by internal and external actors and experts are supposed to lead to activities in terms of quality improvement. On the other hand quality assessment in form of evaluation and accreditation makes a judgement, which might lead to positive or negative sanctions by funders, users, or policy makers. If the quality assurance and improvement agenda becomes subordinated to the accountability agenda, quality in higher education will be replaced by discipline and punishment.

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