

Decision on the Application of the Accreditation Agency for Study Programmes in Health and Social Science (AHPGS) dated 7 November 2012 for Accreditation and Assessment of the Compliance with 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)

The Accreditation Council's Resolution adopted on 25 February 2014

I.

The Foundation for the Accreditation of Study Programmes in Germany ("Foundation"), in accordance with § 2 para. 1 no. 1 of the German Law on the establishment of a foundation "Foundation for the Accreditation of Study Courses in Germany", accredits the Accreditation Agency for Study Programmes in Health and Social Science (AHPGS) subject to the following provisions, thus granting it the entitlement to accredit study programmes and internal quality assurance systems of higher education institutions by awarding the Foundation's seal.

II.

The resolution as per item I above shall come into effect on 25 February 2014. It shall cease to be effective if the Agency does not sign an agreement by 31 March 2014, pursuant to § 3 of the German Law on the Establishment of a Foundation "Foundation for the Accreditation of Study Programmes in Germany" in the version adopted by the Accreditation Council on 20 February 2013.

III.

The accreditation and the right, as per item I above, are granted for a duration of five years; revocation is reserved as per item V below. According to section 3.2.1 of the resolution "Rules for the Accreditation of Agencies" of 8 December 2009, in the version adopted on 10 December 2010, the accreditation will expire on 31 March 2019.

IV.

The Accreditation Council notes that AHPGS does not meet some of the quality requirements. These defects are to be remedied by the agency within six months according to section 3.1.3 of the resolution "Rules for the Accreditation of Agencies" of 8 December 2009 in the version adopted on 10 December 2010. The accreditation is therefore granted subject to compliance with the following conditions:

Condition 1: In order to ensure the qualified assessment of study programmes outside the agency's own professional area, the expert groups for programme accreditation procedures, which have to assess study programmes which do not fall within the agency's disciplinary profile, should include an additional expert with relevant discipline-related expertise. Furthermore, the accreditation commission shall be supplemented with representatives from the respective disciplines (criterion 2.2.3).

Condition 2: The expert reports shall be adapted and published in such a way that the experts' decision recommendation provides a clear distinction between recommendations and conditions; furthermore, the rationale of the accreditation commission shall clearly indicate possible derogations from the experts' recommendations (criterion 2.7).

The Accreditation Council shall refer expressly to the recommendations contained in the report.

V.

Should AHPGS not prove compliance with these conditions within the respective time limit or should such conditions prove not to have been fulfilled on expiry of the respective time limit, the Foundation may revoke the accreditation according to section 3.5.3 of the resolution "Rules for the Accreditation of Agencies" of 8 December 2009 in the version adopted on 10 December 2010.

VI. Motivation

In general:

On the basis of the expert report and in consideration of the agency's comment, the Accreditation Council has come to the conclusion that the Accreditation Agency for Study Programmes in Health and Social Science (AHPGS) substantially meets the criteria set out in

chapter 2 of the resolution "Rules for the Accreditation of Agencies" of 8 December 2009 in the version adopted on 10 December 2010.

Notwithstanding the recommendations given by the expert group in their report, the Accreditation Council does not impose any conditions concerning the following aspects:

- Along with the statement, the agency submitted a resolution adopted by the governing body according to which the agency will continue to proceed on the basis of the requirements laid down in the document "Selection of experts in programme accreditation" (annex 12 of the application for re-accreditation) and "Procedures and criteria for selecting and qualifying experts in system accreditation" (annex 13 of the application for re-accreditation). Since, from the resolution submitted, it is apparent that the governing body considers the above mentioned documents to be binding, the condition proposed by the experts under no. 1 is obsolete and will thus be deleted.
- Together with the statement, the agency also submitted a resolution adopted by the governing body, according to which a new student representative has been appointed to the system accreditation commission. According to the information provided by the statement, the student expert has been enrolled in a Master's study programme at the University of Jena since the winter term 2013/2014; this means that the system accreditation commission includes a currently enrolled student and that the condition proposed by the experts under no. 2 is hence obsolete and will be deleted.
- Along with the statement, the agency also submitted an additional resolution adopted by the governing body. This establishes how to deal with cases in which members of an AHPGS accreditation commission, who participate at on-site visits as a guest or whose study programmes at their own HEI or their HEI in general are subject to accreditation by the AHPGS, attend meetings of the accreditation commission at which this procedure is discussed. The agency decided that these members should leave the room while the commission discusses and decides on the relevant agenda item. The condition proposed by the experts under no. 3 is hence obsolete and will be deleted.

The accreditation council issues an additional condition to ensure the expertise of all the persons involved in the assessment of study programmes which do not fall within the agency's disciplinary profile (new no. 1) (for the motivation behind this, see the statements in the section entitled "Concerning Condition 1").

Concerning Condition 1:

In accordance with criterion 2.2.3, the competence of those involved in the procedures, with regard to all areas relevant for the assessment procedures of programme accreditation or system accreditation, must be ensured by appropriate selection procedures and briefing. According to the results of the expert group of the Accreditation Council, the agency accredits its business study programmes and programmes in other disciplines (for instance tourism; communication design; media and communication management; architecture; intercultural communication) which do not fall within the agency's disciplinary profile. The accreditation commission for programme accreditation does not cover these disciplines since its members are mainly professorial representatives from health and social sciences. In addition, the commission includes one student of health economics and one representative of professional practice with a university degree in education science. The range of discipline-related expertise offered by the accreditation commission was already addressed during the previous procedure for accreditation. As a result and based on the fact that the content of most programmes was related to business studies, the experts issued the condition that the accreditation commission should be supplemented with at least one business economics expert. At that time, the agency had proven having appointed a professor for business economics and health care management to the programme accreditation commission. According to the agency, however, this member has since left the commission in the meantime and has still not been replaced. In fact, the accreditation commission does not have to carry out its own specific assessment of study programmes in the case of programme accreditation. A commission should, however, be able to evaluate discipline-related aspects independently and to express opinions diverging from those expressed by the expert groups in order to ensure, among other things, consistency when issuing conditions or suspending procedures. Furthermore, it must be possible to develop solutions in controversial cases, for example where obvious contradictions arise between the assessment and the opinion expressed by the experts. As a result - and contrary to the opinion expressed by the experts - the commission no longer possesses a sufficient range of discipline-related expertise.

The Accreditation Council has accepted in two cases - the OAQ procedure in 2008 and the procedure for programme accreditation certification of the AQA in 2010 - a commission with a narrow range of discipline-related expertise, in view of a broader-ranged commission appointed for procedures for programme accreditation that included at least three acknowledged experts with relevant academic qualifications. When accrediting AQ Austria in 2013, the Accreditation Council issued a condition concerning this aspect. By including more experts, a wider range of opinions is ensured already during the assessment stage, with the result that potential dependencies or misjudgements of single experts are countered. The decision was taken by the Council in view of the fact that both agencies focus on procedures

for system accreditation or planned to do so at the time of accreditation. Being an agency that focuses on the accreditation of study programmes in a specific field of disciplines, i.e. programmes in health and social sciences, the Accreditation Council sees the need to support both the competent bodies and the expert groups with members who have a proven record of relevant knowledge when the AHPGS carries out assessments of study programmes which do not fall within its disciplinary profile.

Concerning Condition 2:

According to criterion 2.7, the agency should provide and publish a sufficiently detailed description of its procedures and appraisal criteria. This requirement was interpreted in the resolution adopted by the Accreditation Council on 23 September 2011, according to which the published expert report should also include the decision recommendations of the expert groups and the rationale of the accreditation commission in the case of any derogations from the decision recommendation. So far, the agency has published only extracts of the expert report and the names of the experts. According to the Council's experts, the link list they were provided with proves that since the meeting of the accreditation commission in July 2013 the agency in fact publishes the complete assessment reports for the first time. However, the decision recommendations issued by the expert groups in the linked reports do not yet provide a clear distinction between recommendations and conditions. Furthermore, it is not sufficiently clear which criteria are fulfilled or not fulfilled according to the experts' view and which conditions they suggest to issue. Contrary to the requirements set by the Accreditation Council, the expert report does hence not include the decision recommendations issued by the experts. Furthermore, the reports do not include clear statements explaining for which reasons the accreditation commission might follow the opinion expressed by the experts or not. The agency in fact submitted a resolution adopted by the governing body along with the statement which requires the head office to see to it that the experts clearly distinguish their recommendations and conditions in their reports. The resolution also requires the information for experts to include relative instructions on this aspect. The accreditation commissions are expected to clearly highlight in their decisions if there are derogations from the experts' view and to provide substantial motivation. By doing so, the agency in fact created the prerequisites for fulfilling the requirements set by the Accreditation Council, but nevertheless the agency is also required to prove that any necessary modifications have actually been made and that the expert reports are published as required. This may be done by submitting a list containing links to the published expert reports.

VII. Compliance with 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)

The Accreditation Council has determined that AHPGS substantially 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).

The following 13 standards/ENQA membership criteria are met: Standards 2.1, 2.2, 2.3, 2.4, 2.6, 2.7, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8 of the ESG, criterion 8 of the ENQA membership criteria

The following two standards have been substantially met: Standards 2.5, 3.1 of the ESG

The following standard has been met partially: Standard 2.8 of the ESG