

Policy Analysis

The German System of Accreditation

Barbara M. Kehm

International Centre for Higher Education Research (INCHER-Kassel)

Executive summary

The German accreditation policy was introduced in 1998 as a response to the Bologna Process and transition to a new degree structure. The accreditation was expected to ensure minimum quality standards in higher education curricula and to assess labour market relevance of newly established Bachelor and Master programmes in Germany. All new study programmes are expected to be re-accredited every five years.

The structure of the German accreditation system consists of two levels: Accreditation Council and Accreditation Agencies. Accreditation Council defines standards, procedures, and criteria for the accreditation. The Council also accredits individual accreditation agencies, which perform the accreditation in higher education institutions. There are altogether six accreditation agencies in Germany, specialized either by geographical regions or by disciplines.

The accreditation procedure is carried out in three steps. In the first step the higher education institution sends an application for accreditation to an agency. The agency then estimates the costs for the accreditation and proposes the schedule for the accreditation. As the second step, the agency puts together an audit team, nominates peer reviewers, and organizes an on-site visit. As the final step, the team prepares an accreditation report and submits recommendations to the responsible accreditation commission in the agency. The commission makes the final decision about the accreditation, which can be either 'yes', 'no', or 'conditional yes'.

The accreditation system has established a comprehensive, external quality assessment system for teaching and learning in Germany. The policy however suffers several problems: e.g. the accreditation system cannot keep up with the reform and many programmes have had to start without accreditation, and the system does not attract sufficient number of respected peer reviewers. Moreover, the accreditation system is strongly influenced by European policies, which further complicates the system. Germany is a federal system in which responsibility for higher education lies with the 16 German states. This leads to a double layer of decentralised responsibilities (national and European) contributing to the emergence of a super-complex system of quality assurance. Furthermore, a program accreditation is an expensive procedure and the expenses have to be covered by institutions without any additional support.

Introduction: State Approval and Accreditation

Accreditation was introduced in Germany in 1998 as a procedure to ensure minimum standards in terms of the quality of curricular content and to assess the labour market relevance of newly established Bachelor and Master programmes in Germany. Shortly after the Sorbonne Declaration in June 1998 which preceded the Bologna Declaration by one year and was then only signed by the Ministers of Education of France, Germany, Italy, and the United Kingdom, the German higher education framework law was revised enabling higher education institutions to introduce Bachelor and Master programmes in a trial phase.

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 which lasted two and more years in which the Ministry examined

- the compatibility of the proposed new degree programme with respective State planning,
- the availability of resources to establish the new degree programme,
- the compatibility with the examination regulations of the State, and
- the adherence of the proposed new programme to framework regulations for examinations (in particular the envisaged standard period of study, the number of classes in weekly hours per term, and the number of examinations on the subject matter).

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 of the German Ministers for Education and Culture emphasised the functional separation of state approval and accreditation. The responsible State Ministry continued to retain its right 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) adherence to the structural rules and regulations of the State. While the State continues to approve of resources and legal issues, accreditation was established to assess quality and labour market relevance. All newly accredited study programmes have to undergo a process of re-accreditation every five years. The regulations of the Standing Conference also envisage that eventually not only the newly established Bachelor and Master programmes should be accredited but also the already existing traditional *Magister* and *Diplom* programmes which will continue to exist in quite a few cases for the time being because many universities are offering traditional degree programmes parallel to the new degree programmes¹.

Reasons for the Introduction of Accreditation in Germany

The decision to introduce accreditation as an instrument of quality assurance into the German system of higher education was regarded as an important element of modernisation of the system vis-à-vis growing European and international cooperation and competition. The revision of the higher education framework law in 1998 did not only introduce a trial phase for a tiered structure of programmes and degrees but was accompanied by other political decisions as well. The State intended to give up detailed regulation of a number of areas of higher education policy and decision making while at the same time triggering a stronger differentiation of higher education provisions, encouraging profile building and competition among higher education institutions, and allowing more higher education offers by private and also foreign providers.

There were basically four reasons to change the existing system of quality assurance through framework regulations decreed by the Standing Conference of Ministers for Culture and Education of the German States (henceforth shortened to Standing Conference).

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 Bachelor and Master model could not be based on any previous experiences.

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 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 (cf. Standing Conference 2002).

A fourth reason became more obvious once the reform dynamics had picked up speed and an increasing number of new Bachelor and Master programmes were in the making or being introduced. While minimum standards of curricular content were traditionally tied to state regulation of study and examination procedures, thus determining a canon or core curriculum for every degree, accreditation is based on the consensus of peers about the relevant subject matter. In particular at the Master level German higher education as well as higher education in most of the other Bologna signatory states experiences a wealth of newly designed interdisciplinary programmes that can not be closely linked to a single discipline or a clear-cut subject matter and have no established canon. These programmes intend to prepare their students for jobs and professions in the newly emerging knowledge societies that either did not exist before or are going through a process of professionalisation, i.e. requiring a higher academic form of education and training.

The Structure of the German Accreditation System

Accreditation Council and Agencies

The structure of the German accreditation system consists of two levels. The overarching level is the German Accreditation Council under the guidance of which are the actual accreditation agencies as a second level. This actually reflects the German federal system with a framework responsibility of the Federal Government to guarantee equality of opportunities and actual responsibility of the States for all matters in the field of education. The Accreditation Council has 17 members: four representatives from higher education institutions (professors), four representatives from the ministries for education and research of the German States, four representatives from various fields of professional practice (trade unions, large companies, public authorities), two student representatives, two international experts and (in a consultative and advisory function) one representative from the accreditation agencies. Its responsibilities are

- accreditation of accreditation agencies;
- monitoring the work of the accreditation agencies and their periodical re-accreditation;
- definition of standards, procedures and criteria for accreditation procedures.

In its first few years of existence the Accreditation Council also engaged in accreditation of Bachelor and Master degree programmes, thus providing a valuable source for pilot schemes and field knowledge. Since 2003 however, the Accreditation Council is no longer involved in the actual accreditation of degree programmes.

Its legal status was originally somewhat unclear but associated to the Secretariat of the Standing Conference which also provided its budget. Since 2004, the Accreditation Council has been given the legal status as a foundation. However, it still remains unclear, how legally binding the decisions of the Accreditation Council are. Finally the Accreditation Council is a member of the international networks for quality assurance, in particular in INQAAHE (International Network for Quality Assurance in Higher Education) and in ENQA

(European Network for Quality Assurance in Higher Education). In this context the Accreditation Council negotiates cooperation agreements with foreign accreditation agencies for mutual recognition of accreditation decisions and degrees (cf. Schade 2005:129f.).

The second level of the German accreditation system consists of the accreditation agencies (cf. Kehm 2005). Only agencies accredited by the Accreditation Council are allowed to accredit degree programmes. However, higher education institutions and departments can choose to get an additional accreditation for a particular degree programme from an international accreditation agency (e.g. a highly reputable American agency) in order to market this as an additional quality feature. There are altogether six accreditation agencies in Germany which are either regionally active and then for all subjects and disciplines or in the whole of Germany and then only for specific subjects or subject groups:

- Agency for Quality Assurance Through Accreditation of Study Programmes (AQAS): general accreditation with focus on North-Rhine Westphalia and Rhineland Palatinate;
- Accreditation Agency for Study Programmes in Computer Sciences, Natural Sciences, and Mathematics (ASIIN): subject specific accreditation;
- Accreditation Agency for Study Programmes in the Field of Health Care and Social Work (AHPGS): subject specific accreditation;
- Institute for Accreditation, Certification, and Quality Assurance (ACQUIN): general accreditation with focus on Bavaria, Thuringia, and Saxony;
- Foundation for International Business Administration Accreditation (FIBAA): subject specific accreditation in Germany, Austria, Switzerland, the Netherlands, and Sweden;
- Central Evaluation and Accreditation Agency (ZEvA): general accreditation with focus on Lower Saxony and Hesse.

The legal status of these agencies varies, the majority is a non-profit organisation. The composition of the decision-making bodies reflects that of the Accreditation Council minus representatives of the State, 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 function or observer status.

Accreditation in Germany follows some basic principles as well as formal and subject related criteria that are the same in all agencies and procedures. There are four premises on which accreditation is based:

- quality assurance,
- proof that the curriculum of a given degree programme can be studied in the envisaged standard period of study,
- enabling diversity,
- creation of transparency.

Accreditation Procedure

The accreditation procedure is carried out in three steps. In the first step the higher education institution sends an application for accreditation to an agency. In some German States the application is examined by the responsible ministry in terms of its compliance to the respective state planning. The agency examines the application in terms of 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 higher education institution about a schedule for the accreditation.

The second step starts as soon as the higher education institution has assured the agency that it is willing to pay the costs for accreditation. Then the application is examined in more detail, audit team is proposed to the responsible accreditation commission within the agency and peer reviewers are nominated. The institution has a right to propose peer reviewers as well. The peer review consists of an on-site visit. Usually the group of peer reviewers also includes representatives of the respective professional field or of employers of graduates in that subject and a representative from the ministry participate. A representative of the agency deciding about the accreditation acts as a rapporteur of the visit. During the visit the review group talks to the dean, to the academic staff responsible for the programme, the teachers and to student representatives. The report is based on the accreditation application and the results of the visit and ends with a recommendation concerning the accreditation. The institution then receives the report and the recommendation and can comment on the report (feedback).

The third step consists of the finalisation of the report and its recommendation which is then submitted to the responsible accreditation commission of the agency. The commission takes the final decision. It can be a clear yes or no or a yes under conditions the fulfilment of which is examined during re-accreditation. Typically, a study programme which has to fulfil further conditions will be accredited for a shorter period than the regular five years, after which a re-accreditation must be carried out.

It might be interesting at this point to take a closer look at the actual accreditation procedure, at the issues the accreditors look at and how they determine academic quality.

The application for a first accreditation of a study programme consists of two main parts. The first part provides context information about the faculty or department as whole, e.g. how many students, how many degree programmes, how many teachers, how many graduates per year, number of rooms and other information about infrastructure. The second part describes the study programme itself which is supposed to be accredited. The guidelines for this part vary somewhat among the accreditation agencies but as a rule they include a detailed description of the study programme, its targeted students, the teachers, the modules, the potential jobs available for graduates of that programme, and the key competences or skills included in the curriculum. The accreditation agency checks the application for completeness and consistency on a formal level while the peers check the content and the quality.

The peer review also consists of two parts. First there is a preliminary analysis of the application among the reviewers during which open questions are noted and topics for the interviews during the on-site visit will be determined. The second part is the actual on-site visit which again consists of several steps (cf. Reuke 2005:148f.):

- (a) Starting discussion with the dean or department head, sometimes representatives from the central institutional management are participating as well. Focus of the discussion:
 - development planning of the institution,
 - importance of the subject in the overall institutional context,
 - profile and perspectives of development of the subject in the view of the central level management,
 - situation of study and teaching in the department or faculty;
 - staff planning,
 - cooperations,
 - perspectives of development,
 - infrastructure,
 - communication and coordination in the department or faculty,
 - role of the study programme to be accredited in the department or faculty,
 - measures and instruments of quality assurance.
- (b) Discussion with the person responsible for the programme. Focus:
 - educational goals,
 - curriculum,
 - course of study,

- teaching content and teaching methods,
 - advice and counselling offered to students,
 - organisation of examinations,
 - study success,
 - labor market relevance of programme (employability of graduates),
 - marketing of the programme
- (c) Discussion with the teaching staff of the programme. Focus:
- curriculum,
 - course of study,
 - content and methods of teaching,
 - advice and counselling offered to students,
 - provision of staff development courses.
- (d) Discussion with students in various stages of the study programme and with representatives of the students' union. Focus:
- educational goals and study programme,
 - organisation and course of studies,
 - examinations,
 - advice and counselling offered to students,
 - study conditions (e.g. access to library, books, computers, state of classrooms, laboratories etc.),
 - opportunities for temporary study abroad,
 - opportunities for work placements and internships,
 - excursions.
- (e) Reviewers are taken through a guided tour of the department or the institution. Focus:
- This should offer opportunities to discuss open questions of the reviewers individually with members of the department or the central level and ask additional questions or request clarifications.
- (f) Closing talk and possibly a first oral feedback with academic staff responsible for the programme and the dean or head of department.

Re-accreditation is a more simple procedure and also accompanied by an application. It can be carried out by an external evaluation agency or organisation which has been recognised by the agency. The price for re-accreditation might be somewhat but not considerably lower than the price for accreditation which means that there is a continuing extra financial burden on the institutional budget. An application for re-accreditation must include the following information (cf. Reuke 2005:150):

- description of the current curriculum and explanation of possible changes in comparison to the first accreditation;
- a list of all academic staff involved in teaching the programme with short CVs;
- proof that possible conditions connected to the first accreditation have been fulfilled;
- summary of results of an evaluation of the study success of students, including their success on the labour market;
- results of examinations, final theses (statistics) plus examples of very good and just barely passing theses;
- possibly answering additional questions of the reviewers;
- existing examination regulations;
- a table providing an overview of the modules.

The procedure for a first accreditation described above is an ideal type and would require the reviewers to be on-site for at least a whole day if not longer in order to carry out all the talks with all the target groups. In reality the on-site visit is often much shorter, e.g. half a day, so that the various group discussions take place not individually but with other groups present. Typically the reviewers will only ask to speak to the dean and the students individually. A “cluster” accreditation will basically mean that the reviewers have one or two hours per programme.

German Accreditation Specificities

The framework regulations for the introduction of accreditation in Germany issued by the Standing Conference include a few specificities which are worth mentioning because they are a reflection on the traditional German system of higher education and unique in the sense that the systems of accreditation which have been introduced in recent years in other European countries as well don't have these features.

Although the German *Diplom* degree differentiation between universities and universities of applied sciences (*Fachhochschulen*) was given up with the introduction of Bachelor and Master programmes, i.e. both types of higher education institutions are allowed to offer Bachelor as well as Master programmes, another form of differentiation has been introduced. All accreditation applications for Master programmes have to include information about the issue whether the programme is “research oriented” or whether it is “application oriented”. This is examined in detail during the accreditation procedure.

One would assume now that universities will tend to offer research oriented Master programmes while universities of applied sciences will tend to offer application oriented Master programmes. But they often don't. For universities of applied sciences it was the long hoped for loophole for academic drift. They finally wanted to become more similar to universities. That has led to considerable protest from universities. In fact, the nine biggest technical universitiesⁱⁱ in Germany reacted by forming an association, the “TU 9 Group”, and declaring publicly that there was no such thing as a Bachelor degree in their subjects and that they would only award Master degrees. If students wanted to leave the university after three years of study they would be given a Bachelor degree but not be recognised as properly trained engineers and properly trained engineers were the only graduates that they were producing.

Apart from the debates about this kind of differentiation which experts expect will be dropped sooner or later, German accreditation introduces a second form of differentiation at the Master level. All Master programmes have to be characterised according to the question whether they are “consecutive”, “stand alone” or “continuing academic education” programmes. Consecutive Master programmes are programmes in any given subject that follow more or less on top of a Bachelor programme in the same subject so that students have a choice whether to finish their studies after a Bachelor degree or go right into the Master programme.ⁱⁱⁱ However, most Master programmes, regardless of the type, have defined criteria for admission by now because there is a widespread consensus that a clearly smaller proportion of students than traditionally will and should be accepted into the Master level. Still, many of these Master programmes have been derived with only some curricular change from the previous, i.e. traditional, long cycle university study programmes which all and generally finished with a degree equivalent to a Master degree. In order to implement the Bachelor and Master structure a traditional programme was often just cut in half and, with a few additional contents and qualifications added, the first half became defined as a Bachelor programme while the second half became defined as a Master programme. The second category of Master programmes which I have defined as “stand alone” – following Stefanie Schwarz and Don Westerheijden (2004) in this – are newly developed programmes which frequently do not have a matching Bachelor programme as a basis. They are often particular specialisations which have newly emerged in a given subject or field or interdisciplinary programmes. Frequently students from a broader range of Bachelor programmes than only one particular subject are accepted into such “stand alone” Master programmes. The third category of Master programmes is continuing education programmes, i.e. they are targeting students with two or more years of professional practice who want to upgrade or update their qualifications. Typically those programmes demand tuition fees and have done

so for quite some time while the general introduction of tuition fees (for Bachelor as well as Master programmes) has been politically decided only recently and is starting mostly from 2007 onwards. Only the East German states have decided not to introduce tuition fees.

Finally, another specificity must be considered here which is the fact that a market has been created for accreditation in Germany. The accreditation agencies are actually non-profit organisations and the price they demand for the accreditation of a given degree programme basically covers only the actual costs that are incurred but the agencies compete against each other for customers. That includes also the more regionally oriented agencies which will recruit their customers predominantly from two or three of the German States but they are not restricted to their dominant area of activity.

Accreditation Statistics

According to the accreditation statistics from June 2006 there are altogether 11,667 degree programmes on offer at German higher education institutions. Of these programmes altogether 4,994 (42.8%) have been converted into Bachelor (2,983) and Master (2,011) programmes. At the beginning of June 2006 the agencies had accredited altogether 1,462 study programmes, among them 711 Bachelor programmes, 739 Master programmes and 12 study programmes with traditional German degrees (Diplom/Magister).

This status points at least at two problems which will be analysed in the next section:

- Since 2004 the reform dynamics have gained momentum so that the agencies can't keep up the pace and are clearly lagging behind. Accreditation is currently a serious bottleneck for the implementation of reforms with regard to the changes in the degree and study structure.
- More than two thirds of the newly established Bachelor and Master programmes have started without proper accreditation. This might give rise to student complaints and legal problems.

Problems of Implementation

Concerning the implementation of a system of accreditation in Germany five problems are quite obvious (cf. Teichler 2006; Schade 2004).

The **first** problem is the fact that accreditation considerably lags behind in the face of the ongoing reform dynamics. Many new study programmes have been developed and are starting or have started already without being accredited. Not only is the process of application for accreditation immensely work intensive for those responsible for the programmes, e.g. for the application alone a dossier has to be put together comprising statistics that are often not readily available and descriptions and arguments have to be submitted that blow up the paper work to 40 pages and more. For the visit of the reviewers, the discussion of the report and recommendations, and the possible fulfilment of conditions for final accreditation eats up valuable time of academic teachers and researchers. Furthermore, the accreditation agencies themselves are more and more often in need for reviewers. Applicants can propose subject specific reviewers for the accreditation of their programme but whether the proposed reviewers are willing to find the time to do the job is another question altogether. In the beginning many well-reputed professors might have accepted a request from the accreditation agency to act as reviewer out of curiosity. But the process is time consuming and there is no honorarium attached to it. As a consequence the agencies – at least in some subjects – are desperately seeking for subject specific experts willing to do the peer review job. It happens more and more often that applicants are confronted with reviewers whom they do not consider as their proper peers. For example, a newly established or designed study programme at a well reputed university might be confronted with reviewers from the *Fachhochschule* sector who then start prescribing how to design the programme properly. That will not

only cause a reaction of outrage but there are already the first cases of universities which have decided to refuse to go through such an accreditation, in particular as the costs of accreditation have to be borne by the institutions themselves.

The **second** problem which can be observed is the fact that the accreditation agencies are independent in their judgement while the Accreditation Council is not. The Accreditation Council is not allowed to decide about structural guidelines and regulations as well as about the assessment of programmes without agreement of state representatives. As Serrano-Velarde (2006, p.9) put it, “the history of accreditation (in Germany) is to be read as a constant fight for organisational independence against regulative attempts on behalf of the federal states.” The Accreditation Council is in several ways dominated by the policy of the Standing Conference of the Ministers for Culture and Education of the German States (KMK). The KMK is responsible for educational policy making and planning in Germany and is the main financier of the Accreditation Council. In addition, KMK representatives constitute more than half of the members of the steering committee of the Accreditation Council. The Council is supposed to take up the KMK resolutions and forge them into legally binding framework regulations for the work of the accreditation agencies. The agencies themselves are constantly fighting for their independence and thus the Accreditation Council finds itself in the uncomfortable position between the rather powerful political body of the KMK and relatively independent accreditation agencies (cf. *ibid.*).

The **third** problem is a consequence of the second one: Accreditation in Germany does not substitute state approval of curricula altogether. Although the states and the Federal Ministry by having decided to set up a system of accreditation have reduced close state control in this field there continues to be a double structure of accreditation and state approval of degree programmes.

As mentioned in the previous section, a **fourth** problem is constituted by the fact that accreditation lags behind the establishment of new degree programmes and many programmes have started without accreditation. A few cases have occurred by now in which programmes have started and the accreditation was refused. In order not to have wasted students’ time (and possibly money) the accreditation was stopped mid-way, new discussions were started and before it could come to a definitive rejection of the peer reviewers and the responsible commission in the accreditation agency the reviewers formulated a number of conditions which had to be fulfilled by the university and the person responsible for the programme before a new accreditation procedure was started in which the programme was then accepted. This also shows that programmes having started but then not being accredited not only run the danger of being taken to court by the students but that the whole situation concerning a possible rejection of accreditation is legally not properly clarified yet. So far no accreditation agency has rejected a new degree programme outright but the accreditation process was usually stopped and requirements were formulated which had to be fulfilled before a new accreditation procedure was started.

The **fifth** problem in the implementation process has to do with costs (cf. also section 6). Accreditation has sometimes been characterised as being a successful money generating machine. Accreditation as part of quality assurance services should therefore be regarded as a market in the neo-institutionalist sense of a “contextualised zone of interaction” (Serrano-Velarde 2006). The higher education institutions have to come up with the money for accreditation themselves. No additional government funding is being provided. That has led to cost cutting measures by the higher education institutions. The most favoured form in this respect is the so called “cluster accreditation”. Usually any given department or faculty in the sense of the basic organisational unit of an institution of higher education offers several degree programmes. In addition, a faculty may consist of several departments or a department of several subject groups each of which offers more than one degree programme as well. In those cases in which a department or faculty decides to change all its existing degree programmes into the new Bachelor and Master structure at once there will be several new programmes to be accredited. An application is then prepared and submitted to the chosen accreditation agency requesting to organise the procedure in such a way that all programmes can be accredited at the same time, preferably in the framework of one peer review as well. The group of peer reviewers just has to be somewhat larger and include specialists for the subject matter of the programmes to be accredited. Naturally, the institution will ask for a reduction of the price per programme accreditation and the request is normally

granted. The problem here is that the peer review and in particular the on-site visit is cut short for the individual programme because the accreditation of several programmes within the framework of a “cluster accreditation” will not take much longer or be more intensive than the accreditation of a single programme. Accrediting several programmes at once therefore tends to be a more superficial procedure.

The Impacts of Accreditation: Strengths and Weaknesses

Although the system of accreditation is still relatively new in Germany – apart from the pilot period accreditations at a larger scale have been carried out since 2004 only – a few strengths and weaknesses can be identified already at this point in time.

It should certainly be noted as strength that Germany for the first time has established a comprehensive and external quality assessment system geared towards the organisation of teaching and learning. Accreditation in Germany looks at the existence of minimum standards comparable to European criteria and provides the new programmes with one of the preconditions to achieve state approval, i.e. “the right to exist” as it is frequently formulated in the relevant literature.

However, apart from the problems enumerated in the previous section which could also be interpreted as weaknesses, one of the main problems having been identified so far is the fact, that there is a multitude of quality assessment procedures emerging in Germany (accreditation, state approval of curricula, external evaluation, internal evaluation) which tend to overlap and make the whole quality assurance system in German higher education overly complex, in some cases even sending out contradictory signals (cf. Teichler 2003 and 2006 and Schade 2004 and 2005). Schade (2004), in particular, emphasizes the problem that there is no national institution to coordinate evaluation activities in teaching and learning – just a wealth of local and regional initiatives – and that there is no link between these decentralised evaluation activities and accreditation (ibid., p. 191). The super-complexity (Teichler 2003) of the emerging quality assurance system in German higher education does not only make it onerous for the departments and faculties involved – all this gathering of data and writing of reports which all need to be detailed and put together in a different way for the different occasions – it is also not very economical. The time and cost factors will soon become too high for the institutions. Schade (2004:191) points out that “if the strict division of evaluation and accreditation were to be maintained, there would additionally be a danger that the quality assurance system could disintegrate into two parts: one for comparability and the other one for quality improvement.” In the long run, therefore, Germany needs to develop an integrated system of quality assurance in higher education (ibid., p. 193).

The decision taken at the national level to allow universities as well as universities of applied sciences (*Fachhochschulen*) to establish Master programmes has led to a blurring of boundaries between these two distinct types of higher education institutions. However, the signals produced by the guidelines of the Standing Conference of the Ministers for Culture and Education (KMK) for accreditation are somewhat contradicting each other. On the one hand the distinction between research oriented and professionally oriented Master programmes could be interpreted to reproduce the distinction at another level. On the other hand all new degrees (Bachelor as well as Master degrees) have to provide proof of the competences and skills they offer to enable graduates a smooth transition into the labour market. Due to the phenomenon of academic drift, the universities of applied sciences are including in their Bachelor and Master programme curricula more academic and theoretically oriented elements in order to provide opportunities for their graduates to continue studying at a university or get access to a doctoral programme, while the universities re-forced to include more practical and labour market oriented skills and qualifications into their curricular in order to provide proof that their graduates have the required competences for the transition into the world of work.

At the same time current higher education reforms in Germany at a more general as well as national level aim at a higher degree of institutional differentiation. This differentiation does no longer follow the traditional divide between universities and universities of applied sciences but more along the lines of competition for excellence, i.e. a more strictly vertical differentiation. It thus remains an open question

whether standardised procedures of accreditation will contribute to this development or be an impediment. Standardised procedures and peer review will tend to keep to the mainstream rather than allowing for innovative and unorthodox perspectives.

A final weakness is the unfamiliarity of the labour market with the qualifications of the graduates of the new degrees. There are a few initiatives to welcome Bachelor graduates on the labour market and the signals coming from potential employers of higher education graduates are generally positive. But the fact remains that Bachelor graduates from universities and Master graduates from universities of applied sciences are an unknown species and given the inherent conservatism of personnel managers and recruitment departments the transition might not be all that smooth for all graduates. Until now the number of graduates entering the labour market with the new degrees are still too small for large scale surveys and analyses of the transition period but there are plans to observe this issue closely. Concerning this problem or weakness it could also be stated that the absorption of higher education graduates into the labour market has basically always been more supply led than demand led in Germany and the link between higher education and the world of work has always been more a loose coupling than a tight one in order to provide necessary flexibility. Therefore it can be assumed that once the potential employers of graduates become more familiar with the qualifications of graduates with the new degrees the problem will go away by itself.

Who Bears the Costs of Accreditation?

As mentioned in previous sections all new degree programmes which are established according to the Bachelor and Master structure must be accredited and the higher education institutions have to come up with the costs themselves. In a country in which there are no tuition fees yet and higher education institutions are almost exclusively state funded this constitutes a heavy burden on the institutional budget. In particular, since the institutions have experienced a continuous reduction of their state funding for several years now and accordingly feel to be in a permanent financial crisis. There is no overview how much the institutions are actually paying for the accreditation of their programmes and it is difficult to get information on prices.

Depending on the subject the accreditation of single degree programme will incur costs for the institution at a level between 8,000 and 15,000 Euros (10,000 to 19,000 US Dollars). Prices per programme accreditation will be somewhat less in the framework of a “cluster accreditation”. However, these latter prices are negotiated between the higher education institution and the accreditation agency. Since institutions are free to choose an agency this leaves room for competition and bargaining. However, it should also be kept in mind that a medium sized German university (medium-sized is between 15,000 and 30,000 students) might offer between 60 and 100 different degree programmes. Since the traditional degree programmes ended at the Master level the majority of these programmes will now be turned into one Bachelor and one Master programme plus additional “stand alone” Master programmes. So the change of all existing degree programmes into the Bachelor and Master structure at a medium-sized university can easily incur costs of one million US Dollars and more. A rough estimate of the President of one of the medium-sized German universities assumed that accreditation costs amount to about 10 percent of the overall institutional budget.

In the majority of those German states which have introduced performance contracts between the responsible ministry and the individual institutions of higher education^{iv}, the introduction of Bachelor and Master degrees and programmes are part of the performance indicators. However, as a rule the institutions do not receive any additional financial means, e.g. an incentive, but rather agree to the changes in the form of a self-commitment. Such a contract will stipulate among other things that the respective higher education institution will change all or a negotiated number of its existing degree programmes into the Bachelor and Master structure in a given period of time. Generally the introduction of the new degree structure takes place gradually so that the costs will not become too high in a given year.

In the year 2000, the German Science Council, an important buffer body making policy and planning recommendations in the field of higher education, was give the task by the German states and the Federal

Ministry to include private higher education institutions into the accreditation system. There are currently 53 private and 44 church affiliated higher education institutions in Germany compared to 333 public or state approved higher education institutions. The proportion of students studying at private and church affiliated institutions of higher education as compared to all students is only 3.3 percent. However, in contrast to the accreditation of programmes in the public sector it was decided to have institutional accreditation in the private sector. In addition, institutional accreditation by the Science Council follows a different procedure than programme accreditation by the agencies. Institutional accreditation 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 quality assurance system in place. If that is answered positively in the process of accreditation then the institution is autonomous to set up any degree programme it wants. This approach is actually shared by quite a number of individual actors in the field of programme accreditation and evaluation and some of the accreditation agencies as well. Institutional accreditation, in Germany often called “process” accreditation in contrast to “programme” accreditation, would certainly reduce the current complexity of the system and its procedures but it might also require changing the system of additional state approval of programmes and its strong links to educational planning at state level. The advantage of institutional 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 22,000 and 35,000 US Dollars (18,000 to 28,000 Euros).

European Developments and Models for the German System of Accreditation

Accreditation is one of a number of quality assurance instruments. Certainly the concern about quality in higher education is not new. It probably can be said that it has moved into the focus of Western European higher education policy since the mid-1980s (cf. Schwarz and Westerheijden 2004:6) and by now has become a global phenomenon. The quality assurance instruments, however, have varied over time and preferences have also been determined by institutional and systems cultures. In Europe accreditation of degree programmes has been introduced only recently, that is after the Bologna Declaration of 1999. In order to make the European higher education systems more attractive to students from non-European countries and at the same time to make the systems more competitive and in order to ease and increase intra-European student and staff mobility, the Bologna Declaration aims to create a European Higher Education Area by the year 2010. One of the most important elements of this common space is the creation of a comparable and transparent degree structure at the higher education institutions characterised by two main cycles of studies: undergraduate and graduate (finishing with a Bachelor and a Master degree respectively).

Westerheijden observes that after the Bologna Declaration quite a number of national governments in the European countries decided with notable speed to have all their study programmes accredited (Westerheijden 2005:98). He goes on to state that in this process three possible alternatives were excluded (ibid., p. 98f.):

- (a) Quality assessments of study programmes as they had been implemented during the 1990s in most Western European countries because the reports did not provide sufficiently transparent information.
- (b) Quality assessments at institutional level because they did not provide information about the actual quality of study programmes.
- (c) An accreditation system like in the USA because this was based on a general institutional accreditation in the sense of minimum standards for institutional recognition and complemented by an accreditation of programmes in highly professionalised fields (like medicine, nursing, law, engineering and teacher training).

- (d) The establishment of quality assurance bodies at the European level because there was no need to introduce an additional layer of bureaucracy in the European higher education area and thus lose in national sovereignty.

At the first Bologna Follow-up Conference in Prague in 2001^v, the European Network of (national) Quality Assurance Agencies (ENQA^{vi}) was given the responsibility for the further development of quality assurance in the Bologna Process. ENQA had originally emerged from a pilot project funded by the European Commission. Today, ENQA has 42 members and is a professional network of quality experts rather than a political body (cf. Schwarz and Westerheijden 2004:6). Membership fee is 2,000 € per year. Although ENQA quickly took over a central position for quality assurance and accreditation, in particular with regard to the definition of standards and procedures, the representatives of national governments insisted that mechanisms of quality assurance and assessment remained at the national level. However, at the second Bologna Follow-Up Conference in Berlin in 2003 the Ministers of the signatory states decided that all Bologna signatory states should establish a national accreditation system or an equivalent until 2005 (Westerheijden 2005:99).

Thus, accreditation was introduced in Europe clearly later but spread much faster than evaluation. Only Denmark and Greece have not (yet) introduced a national accreditation system. Denmark did not introduce accreditation because it has deliberately decided against it and keeps up its state approval of study programmes; Greece did not (yet) because it lags somewhat behind the reforms.

Despite the attempts, through ENQA, to develop comparable structures of quality assurance mechanisms at the European level, current accreditation systems in Europe continue to be relatively diverse. In some countries the unit of analysis is the study or degree programme (e.g. in the Czech Republic, in Germany, Hungary, Italy, the Netherlands, Norway, Poland, etc.) in other countries it is the institution of higher education (e.g. in Austria, in the Czech Republic, in Norway, and Sweden). In some countries the state retains the right to approve of new degree programmes in addition to accreditation, in others it does not. In some countries several accreditation agencies are operating, in others there is only one national accreditation agency. In some countries evaluation and accreditation are similar processes carried out by one and the same body or agency, in other countries evaluation is carried out either by the institutions of higher education themselves or by national/regional bodies not necessarily identical to those responsible for accreditation.

By and large, however, according to Westerheijden (2005) two basic approaches to accreditation can be distinguished in Europe: centralised accreditation systems and open accreditation systems.

Centralised accreditation systems can be found predominantly in the Central and eastern European countries but also in Norway and in Spain, though the accreditation system is different in the latter two. In the majority of Central and Eastern European countries accreditation is directed at study or degree programmes. As a rule a national accreditation agency – often established by the government – establishes a set of standards for the input (infrastructure, teaching staff, curriculum, planning etc.) of all programmes in a discipline or field of knowledge. The standards are typically defined by consulting the academic oligarchy. Each programme is controlled whether it conforms to the standards or not by the national agency. Output, in particular employability of graduates which is high on the European agenda, is not part of accreditation. This approach has led to conformity rather than diversity of study programmes. In Spain and Norway there is only one accreditation agency as well which is responsible for the procedure and the process of accreditation. However, in contrast to the accreditation in the majority of Central and eastern European countries it is more output oriented. Both agencies have also been involved in the formulation of a European qualification framework, the so-called Dublin Descriptors^{vii}, from which national qualification frameworks will be derived (cf. Westerheijden 2005:102ff).

Open accreditation systems can be found in particular in the Netherlands and in Germany. In both countries there is one national agency or body responsible for the regulation and coordination of accreditation procedures. But both bodies are not monopolistic. Quality or accreditation agencies having been recognised by the national body can carry out accreditations and also include foreign accreditors in the procedures. Institutions or degree programmes are free to choose by which agency they want to be accredited. This

freedom includes to be accredited in addition (multiple accreditation) by an accreditation agency from another country. In fact, some Germany programmes, especially MBA programmes (e.g. by the European Foundation for Management Development: efmd) and a few engineering programmes have gone through accreditation procedures by foreign agencies (American ones among others) in order to increase their reputation and market value. However, there is also some kind of market regulation insofar as the national body, the Accreditation Council in Germany, decides which agencies are recognised on the market (ibid., p. 104ff.).

To summarize it can be said that the development of a German system of accreditation has been strongly influenced by policies and developments at the European level. Westerheijden (2005:99) describes that ENQA was established at the first Bologna Follow-Up Conference in Prague in 2001 and continues to describe this body as the “spider in the net” for the further development of quality assurance in the framework of the Bologna Process. While ENQA became a central contact point for quality assessment and accreditation agencies at national level, the ministers also made sure that the mechanisms of quality assurance remained a national affair. In other words we find here a process of “policy transfer” (cf. Pratt 2004) which is not simply the copy of an existing model but rather the use of one or more possible models which were put forward by ENQA as intellectual and political stimulus for innovation and their adaptation to reflect national circumstances (ibid., 112f.). The fact that quite a number of the Bologna signatory states decided to introduce a system of accreditation was strongly related to a higher degree of competition among higher education institutions within the European higher education area and the need to provide more transparency to ease recognition of study achievements abroad under conditions of proven quality. While ENQA took over the role of an elite network of experts and brokers with international experience – which national agencies either joined or could address for help in establishing the national accreditation systems – the national systems themselves which were established had to incorporate into their procedures and criteria the standards developed at the European level. In addition, national governments and in Germany the responsible state ministries could also use the “detour” via the European level to overcome possible national resistance against the implementation of the new policy of accreditation.

Conclusions

The German accreditation policy is a significant attempt by the government to ensure the quality of education in German universities; however, the policy has imposed quite high transaction costs on the higher education system. This is not so much due to the fact that the policy transfer has been “coercive” and accreditation has been implemented against the wishes of the higher education institutions; on the contrary, the German Rectors’ Conference was an influential participant in the establishment of the Accreditation Council. It has more to do with the fact that the whole system of quality assurance in higher education of which accreditation is only one, albeit an important, element is decentralised and its various elements are not properly linked. The German States can influence the accreditation business through their membership in the agencies. The accreditation sector itself is rather incrementalist and not very coherent. In addition, accreditation is not properly integrated with other quality assessment and assurance activities. This leads to less transparency, possibly even to less recognition within Germany eventually, and to a fragmentation of the quality assurance system which then requires even more control, audit and accountability.

But transaction costs are high on the European level as well. First of all, as Serrano-Velarde (2006) rightly points out, accreditation and evaluation is an emerging market in which not only quite a bit of money can be made but a market which is prone to international (or European) competition of agencies as well. Secondly, Van Damme (1999) in his report on behalf of the European Association of University Presidents pointed out as early as 1999 that this market might be open to fraud and the operation of agencies of dubious quality. ENQA then proposed to establish a European register of recognised accreditation agencies which should be allowed to operate in all of the signatory states (cf. ENQA 2005). This proposal was turned down

by the Ministers at the Bologna Follow-Up Conference in Bergen in 2005 because they wanted to keep authority and control in the field of higher education quality assessment and assurance in their own countries and not transfer this power to a supra-national agency (cf. Serrano-Velarde 2006). Thus and thirdly, at the European level as well we have differing quality assurance and accreditation systems in each of the Bologna signatory state, a situation which is not conducive to increased transparency, mobility and recognition.

But the situation has a further policy implication since no overarching conventions can be found at the European level and that is the fact that national accreditation markets basically tend to become “closed shops” and national governments will determine the rules of the game. Even where international accreditation is possible – and there are a few cross-border agreements in place – accreditation by a foreign agency will either have to be done in addition to national accreditation for which there is only rarely an incentive due to the extra costs involved, or foreign accreditation agencies will have to seek recognition of national governments (in the case of Germany of the national Accreditation Council) of those countries in which they wish to operate and play the game according to the national rules. For the time being, however, the creation of a European market for quality assurance and accreditation which would include an element of European consumer protection seems to be out of reach (Serrano-Velarde 2006). Whether this will prevent the achievement of a European Higher education Area altogether must currently remain an open question.

Note of the author: I thank Kathia Serrano-Velarde for providing me with her (as yet unpublished) paper and thus contributing not only additional information but also some of the ideas and perspectives which have been included in this analysis. However, all possible mistakes and misinterpretations are those of the author.

Resources: Useful Papers and Websites

Dublin Descriptors:

<http://www.jointquality.org/content/ierland/Result%20Draft%20Dublin%20Descriptors%203%20cycles.doc>

European Association for Quality Assurance in Higher Education (ENQA):

<http://www.enqa.eu>

German Accreditation Council: <http://www.akkreditierungsrat.de>

German Accreditation Agencies (recognised by the German Accreditation Council):

- ACQUIN: <http://www.acquin.org>
- AHPGS: <http://www.ahpgs.de>
- AQAS: <http://www.aqas.de>
- ASIIN: <http://www.asiin.de>
- FIBAA: <http://www.fibaa.de>
- ZEvA: <http://www.zeva.uni-hannover.de>

German Rectors' Conference: <http://www.hrk.de>

Science Council: <http://www.wissenschaftsrat.de>

References

Accreditation Statistics (2006): Overall Report June 2006

URL: http://www.hochschulkompass.de/kompass/xml/akkr/akkr_stat_a.htm (accessed 4 June 2006)

Bologna Declaration (1999): The Bologna declaration of 19 June 1999. Joint Declaration of the European Ministers of Education.

URL: http://www.bologna-berlin2003.de/pdf/Bologna_declaration.pdf (accessed 4 June 2006)

Bretschneider, Falk, Wildt, Johannes (eds. (2005): *Handbuch Akkreditierung von Studiengängen. Eine Einführung für Hochschule, Politik und Berufspraxis* (Handbook Accreditation of Study Programmes. An Introduction for Higher Education Institutions, Policy Makers, and Professionals). Bielefeld: Bertelsmann

ENQA (2005): Standards and Guidelines for Quality Assurance in the European Higher education Area. Helsinki.

http://www.bologna-bergen2005.no/Docs/00-Main_doc/050221_ENQA_report.pdf

HRK (ed.) (2006): Statistische Daten zur Einführung von Bachelor- und Masterstudiengängen. Sommersemester 2006 (Statistical Data About the Introduction of Bachelor and Master Degree Programmes. Summer Semester 2006). Statistiken zur Hochschulpolitik 1/2006. Bonn: HRK

URL: http://www.hrk.de/download/dateien/HRK_Doku1_2006_Sose2006.pdf (accessed on 8 June 2006)

Kehm, Barbara M. (2005): „Akkreditierungsagenturen in Deutschland“ (Accreditation Agencies in Germany). In: Bretschneider, Falk, Wildt, Johannes (eds. (2005): *Handbuch Akkreditierung von Studiengängen. Eine Einführung für Hochschule, Politik und Berufspraxis* (Handbook Accreditation of Study Programmes. An Introduction for Higher Education Institutions, Policy Makers, and Professionals). Bielefeld: Bertelsmann, p. 131-144

Pratt, John (2004): The Accreditation Model and Policy Transfer. In: Pratt, John (ed.): *The 'Accreditation Model'. Policy Transfer in Higher Education in Austria and Britain*. Oxford: Symposium Books, pp. 107-127

Reuke, Hermann (2005): Das Akkreditierungsverfahren (The Accreditation Procedure). In: Bretschneider, Falk, Wildt, Johannes (eds. (2005): *Handbuch Akkreditierung von Studiengängen. Eine Einführung für Hochschule, Politik und Berufspraxis* (Handbook Accreditation of Study Programmes. An Introduction for Higher Education Institutions, Policy Makers, and Professionals). Bielefeld: Bertelsmann, p. 145-150

Schade, Angelika (2004): “Shift of Paradigm in Quality Assurance in Germany: More Autonomy but Multiple Quality Assessment.” In: Schwarz, Stefanie, Westerheijden, Don (eds.): *Accreditation and Evaluation in the European Higher Education Area*. Dordrecht, Boston, London: Kluwer, p. 175-196

Schade, Angelika (2005): „Der Akkreditierungsrat“ (The Accreditation Council). In: Bretschneider, Falk, Wildt, Johannes (eds. (2005): *Handbuch Akkreditierung von Studiengängen. Eine Einführung für Hochschule, Politik und Berufspraxis* (Handbook Accreditation of Study Programmes. An Introduction for Higher Education Institutions, Policy Makers, and Professionals). Bielefeld: Bertelsmann, p. 125-130

Schwarz, Stefanie, Westerheijden, Don (eds.) (2004): *Accreditation and Evaluation in the European Higher Education Area*. Dordrecht, Boston, London: Kluwer

Serrano-Velarde, Kathia (2006): „The Politics of Quality Assurance.“ Paper presented at the third EUREDOCS Conference, 16-18 June 2006 in Kassel (unpublished manuscript)

Sorbonne Declaration (1998): Sorbonne Joint Declaration on harmonisation of the architecture of the European higher education system.

URL: http://www.bologna-berlin2003.de/pdf/Sorbonne_declaration.pdf (accessed 8 June 2006)

Standing Conference of the Ministers of Culture of the German States (2002): “Decision about the future development of quality assurance in German higher education.” Bonn 1 March.

URL: http://www.akkreditierungsrat.de/KMK_Qualitätssicherung.pdf, (in German) accessed 3 June 2006

Teichler, Ulrich (2003): Die Entstehung eines superkomplexen Systems der Qualitätsbewertung in Deutschland (The emergence of a super-complex system of quality assessment in Germany). In: Mayer, Evelies, Daniel, Hans-Dieter, Teichler, Ulrich (eds.): *Die neue Verantwortung der Hochschulen* (The new responsibility of higher education institutions). Bonn: Lemmens, pp. 213-215

Teichler, Ulrich (2006): Akkreditierung in Europa (Accreditation in Europe). In: Simonis, Georg, Walter, Thomas (eds.): *LernOrt Universität. Umbruch durch Internationalisierung und Multimedia* (University as a Place of Learning. Changes Through Internationalisation and Multimedia). Wiesbaden: VS Verlag für Sozialwissenschaften, pp. 131-151

Van Damme, Dirk (1999): Internationalisation in Quality Assurance – Towards Worldwide Accreditation? Report commissioned for the IAUP XIIth Triennial Conference in Brussels, 11-14 July 1999. <http://www.ia-up.org/>

Westerheijden, Don (2005): „Akkreditierung im europäischen Kontext. Neuere Entwicklungen der Qualitätssicherung im europäischen Hochschulraum“ (Accreditation in the European context. New developments in quality assurance in the framework of the European higher education area). In: Bretschneider, Falk, Wildt, Johannes (eds. (2005): *Handbuch Akkreditierung von Studiengängen. Eine Einführung für Hochschule, Politik und Berufspraxis* (Handbook Accreditation of Study Programmes. An Introduction for Higher Education Institutions, Policy Makers, and Professionals). Bielefeld: Bertelsmann, p. 97-111

Endnotes

- ⁱ The reason for this is a constitutional law that all students have the right to finish their degree programme under the same conditions which were in place when they started it so no student can be forced to switch from a traditional to a new programme in the middle of his or her course of study.
- ⁱⁱ Technical universities have the highest number of study programmes awarding the degree of *Diplom* which is the usual one subject study programme in most of the technical and engineering sciences, but also in economics and social sciences. Basically the *Diplom* was/is the degree in all professional subjects. Universities of applied sciences also award or awarded a *Diplom* but with the additional letters FH in brackets behind the degree (for *Fachhochschule*) to denote the difference between the two types of institutions.
- ⁱⁱⁱ For non-German readers it should be mentioned here that the idea of defining a Master programme as “postgraduate” is not very widespread in Germany. The traditional university degree programmes all finished at the level of a Master degree from which the issue of getting a doctoral degree was clearly separated. This also holds true for the majority of graduate schools or graduate centres emerging currently in Germany. Most of them are clearly targeted towards doctoral students and apart from a few exceptions which have explicitly adopted the American model, German graduate schools do not accept students aiming for a Master degree.
- ^{iv} Performance contracts are now more and more in use to determine the annual budget provided by the responsible state for a given higher education institution located in that state.
- ^v The Ministers of Science and Education of those countries having signed the Bologna Declaration meet every two years in the framework of so-called follow-up conferences in order to discuss progress made and possibly add to the reform agenda or correct it if developments go into an unwanted direction.
- ^{vi} The original name of ENQA was: European Network of Quality Assessment Agencies. It is now: European Association for Quality Assurance in Higher Education.
- ^{vii} The Dublin Descriptors (named after the city where the Joint Quality Initiative – an informal group of experts for quality assurance from a variety of European countries – met to formulate them) are a short list of competences which can be expected from Bachelor and Master graduates and from Ph.D. candidates independent of their particular field of study. Also see section 9.