

Akkreditierungsagentur
im Bereich Gesundheit und Soziales
Accreditation Agency in Health and Social Sciences



Assessment Report

**for the Application of
Bioterra University of Bucharest
for the Accreditation of the Study Program "Law" (part-time education),
Bachelor of Law**

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Decision

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1 Introduction

The Accreditation Agency in Health and Social Sciences (AHPGS) is an interdisciplinary and multi-professional organization. Its mission is to evaluate Bachelor and Master programs in the fields of health and social sciences, as well as in related domains such as medicine or psychology. By conducting accreditation and recommendation procedures, the AHPGS contributes to the improvement of the overall quality of teaching and learning. However, the higher education institutions remain responsible for implementing the quality assurance recommendations made by the AHPGS.

The AHPGS is listed in the European Quality Assurance Register (EQAR) since 2009. Since 2004, the AHPGS has been a member of the European Consortium for Accreditation (ECA). In 2006, the AHPGS joined the European Association for Quality Assurance in Higher Education (ENQA). In 2009, the AHPGS also became a member of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and since 2012 a member of the Network of Central and Eastern European Quality Assurance Agencies in Higher Education (CEENQA). In 2023, the World Federation of Medical Education (WFME) recognized the AHPGS as an agency with recognition status for 10 years.

In carrying out accreditation procedures, the AHPGS follows the requirements of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). In the present case, the decision regarding the accreditation of the study program is carried out by the AHPGS Accreditation Commission based on the following accreditation criteria:

1. Program aims and their implementation
2. Structure of the study program
3. Admission and Feasibility
4. Examination System and Transparency
5. Teaching Staff and Material Equipment
6. Quality Assurance
7. Gender equality and equal opportunities

I. The University's application

The AHPGS verifies the sufficiency of the documents submitted by the University, namely the Self-Evaluation Report and its corresponding annexes. These are to fulfil the assessment spheres as well as the AHPGS standards. With this information, the AHPGS produces a summary, which is to be approved by the University and subsequently made available for the expert group, together with all other documentation.

II. Written review

The main documents are reviewed by the expert group assigned by the Accreditation Commission of AHPGS. This is done in order to verify the compliance of the study program with the applicable accreditation criteria. Consequently, the experts comprise a short summary regarding the study programs.

III. On-site visit (peer-review)

The experts carry out a site visit at the University. During this visit, discussions are held with members of the University, which include University and department administration, degree program management, teachers, and students. These discussions provide the expert group with details about the study program beyond the written documents. The task of the experts during the site visit is to verify and evaluate the objectives of the program and its projected study results, its structure, staff, material resources, course of studies, methods of assessment (selection of students, assessment of achievements, students' support), as well as the program management (program administration, external assurance of study quality).

Following the site visit, the expert group evaluates the fulfillment of the criteria based on the results of the visit and the documents submitted by the HEI. This Assessment Report is based on the results of the visit, the written review of the study programs, and the documents submitted by the University. Finally, the Assessment Report is made available to the University for the opportunity to issue a response opinion.

The Assessment Report as well as the University's response opinion – together with the provided documents – is submitted to the Accreditation Commission of the AHPGS.

IV. The AHPGS accreditation decision

The Accreditation Commission of the AHPGS examines the documentation made available in the process of application, namely the University's self-evaluation report, its annexes, the Assessment Report, as well as the University's response opinion. These documents lay basis for the decision of the Accreditation Commission of the AHPGS regarding the accreditation of the study program.

2 Overview

2.1 Procedure-related documents

The University delegated the task of accrediting the following Bachelor study program to AHPGS: “Law” (full-time and part-time education).

The Self-Evaluation Report for accreditation of the above-mentioned study program (hereinafter the SER) of the “Bioterra” University of Bucharest (hereinafter the University) was submitted to the Accreditation Agency in Health and Social Science (AHPGS) in electronic format on December 16. The decision regarding the accreditation of a study program is carried out by the Accreditation Commission of the AHPGS. The contract between the “Bioterra” University and the AHPGS was signed on the October 26, 2024.

On March 18, 2025, the AHPGS forwarded the open questions and explanatory notes (hereinafter OQ) pertaining to the application for accreditation for the study program to the University. On March 20, 2025, the University submitted the answers to the open questions and explanatory notes (hereinafter AOQ) to the AHPGS in electronic format.

The application documentation submitted by the “Bioterra” University follows the outline recommended by the AHPGS. Along with the application request towards accreditation of the Bachelor study program “Law” (part-time), the following additional documents can be found in the application package (the documents submitted by the University are numbered in the following order for easier referencing):

Specific documents for the study program “Law”

Annex 01	Curriculum
Annex 02	Module Descriptions
Annex 03	Study Program Qualifications Overview
Annex 04	Study Program Learning Goals
Annex 05	Teaching Staff General Numbers
Annex 06	Teacher CVs
Annex 07	Teaching Matrix

Annex 08	Annual Report on the Quality of Faculty Teaching Staff 23-24
Annex 09	Student Numbers
Annex 10	Internship Regulation
Annex 11	Current Job Situation and Career Opportunities
Annex 12	Faculty Strategic Plan 20-24
Annex 13	Faculty Operational Plan 23
Annex 14	Faculty Research Plan 23-24
Annex 15	Faculty Evaluation Results
Annex 16	Students Evaluation Results
Annex 17	Internal Quality Assessment Report 23-24
Annex 18	Internal Audit Report 23-24
Annex 19	Faculty Ethics Commission Report 23-24
Annex 20	Learning Environment Evaluation Results
Annex 21	Diploma Supplement

Alongside the study-program-specific documents, the following documents pertain to all study programs submitted for external evaluation:

Annex A	Admission Regulations 24-25
Annex B	Student Enrollment Regulations
Annex C	Quality Assurance System
Annex D	Study Program Evaluation Regulations
Annex E	Equality Concept

The application, the open questions (OQ) and the answers to the open questions (AOQ) as well as the additional documents build the basis for the present summary. The layout bears no significance, as it solely reflects the agreed standard between the AHPGS and the University.

2.2 Information about the University

“Bioterra” University of Bucharest (BUB) is a private University that was accredited in 2002 by the Romanian Agency for Quality Assurance in Higher Education (ARACIS) by Law no. 480/2002, published in the Official Gazette no. 512/2002. The University was initially part of the “Bioterra” University Foundation Bucharest which was legally established in 1994 following the initiative of leading personalities of the didactic and scientific life in applied bioengineering, economic engineering, rural tourism, industry food, phytosanitary and zoo veterinary control of food, law and legislation.

Currently, the University has four faculties: the Faculty of Agrotourism Management, the Faculty of Law, the Faculty of Food Control and Expertise, and the Faculty of General Medical Assistance.

The University offers four Bachelor programs, which include “Engineering and Management in Public Food and Agritourism”, “Law”, “Food Control and Expertise”, and “General Medical Assistance”.

Moreover, three Master programs are offered: “Investigation of Acts of Terrorism and Public Security”, “Performing Management in Public Food, Agritourism and Consumer Protection”, and “Inspection, Expertise and Legislation on Food Safety, Environmental Protection and Consumer Protection”.

For the academic year 2023/2024, there is a total of 2,738 students enrolled at BUB, 2,118 students are studying in Bucharest, including 230 students in a Master’s degree, and 620 students study at the Buzau branch.

The Faculty of Law offers three study programs in total. “Law” in full-time and part-time education, both conducted in Romanian (SER 1.1.1) and the study program “European and International Law”, conducted in Romanian and English. The current number of students in the part-time program “Law” for the academic year 2024-2025 is 299 (SER 3.2.3).

For the study program Law, the curricula is structured in eight semesters of 14 weeks each. The 8th semester includes a two-week full-time period for the specialized internship and a two-week extracurricular period for the preparation and writing of the bachelor's thesis (SER 1.1.1). In the part-time study program, the students complete 30 CP per semester, like in the full-time study program. Instead of attending lectures, like in the full-time program, students work through the content

using written study material. The seminars are held face-to-face at the University mostly on weekends.

After graduation, students can continue their studies at the University in the Master's program "Investigation of Acts of Terrorism and Public Security" (SER 1.1.1).

2.3 Structural data of the study program

University	Bioterra University of Bucharest
Faculty/Department	Faculty of Law
Title of the study program	Law
Degree awarded	Bachelor of Law
Organizational structure	Part-Time education, seminars are held face-to-face (mostly on weekends), the content of lectures is studied with written material
Language of Studies	Romanian
Period of education	Eight semesters
Credit Points (CP) according to the European Credit Transfer System (ECTS)	240 CP
Hours per Credit	25 Hours/CP
Workload	Total: 6,000 hours Contact hours: 1,142 hours Individual work: 4,858 hours Practice (included in contact hours): 56 hours
Credits for the final paper/project	10 CP (for the Bachelor thesis)
Launch date of the study program	Winter semester 1999/2000
First accreditation	2012
Time of admission	Winter semester
Number of available places on the program	75 per year
Number of currently enrolled students in the program	299 (2024-2025)

Number of graduates since launch date of the study program	5,146
Tuition fees	€800 per year

Chart 1: Structural data of the study program

3 Expert Report

The site visit was carried out on April 9-11, 2025, according to the previously agreed schedule. Representatives from the head office of AHPGS accompanied the expert group.

The expert group met on April 9, 2025, for preliminary talks prior to the site visit. They discussed the submitted application documents and the results of the written evaluation as well as questions that had been raised prior. Furthermore, they prepared the plan of the site visit at the University.

During the site visit, experts conducted discussions with the University management, representatives of the Faculty of Law, the chair, vice chair and the teaching staff of the program “Law” as well as with students currently studying in the program and alumni. Furthermore, they inspected the learning premises, such as lecture halls, seminar classrooms, library, and computer classes. Moreover, experts had the opportunity to examine the equipment and the capacity of the laboratories.

The Assessment Report is structured in compliance with the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (ESG), established by the European Association for Quality Assurance in Higher Education (ENQA). The study program will be described and analyzed in a comprehensive manner below. The documents submitted by the University, the experts’ feedback to the documents, the observations made during the site visit, the results of discussions with the representatives of the University and the Faculty of Law serve as the foundation for the statements made in the Assessment Report.

3.1 Program aims and their implementation

The study program focuses on specific qualification objectives. These objectives cover professional and interdisciplinary aspects and particularly refer to the domain of academic or artistic competences, competences necessary for a qualified employment, skills of social commitment and personal development.

Summary

The study program “Law” aims to train competent specialists in the legal field, who have a good knowledge of Romanian law, European law and, in general,

international law, specialized doctrine and national and international jurisprudence and who can occupy a wide range of jobs according to the National Register of Qualifications (SER 3.2.1).

The main objective of the Bachelor study program "Law" is to train specialists with higher training in the legal field. As a training objective, the program aims to prepare students to apply the law with professional excellence and commitment to fairness, justice, compassion and the highest ethics, to develop in its own students the knowledge and skills that will enable them to discern and succeed in a range of careers. Moreover, from the goal's perspective, the objective of the program is to prepare students to serve the community, especially the disadvantaged, with dedication to human dignity and the common good. Students will be prepared to appreciate the interactions between law and other disciplines and professions, to live, learn and work in a diverse, multicultural and globalized environment (SER 1.3.1).

The objective of the study program is to train specialists with higher training in the legal field. As a training objective, the program aims to prepare students to apply the law with professional excellence and commitment to fairness, justice, compassion and the highest ethics, to develop in its own students the knowledge and skills that will enable them to discern and succeed in a range of careers. Moreover, the objective of the faculty is to prepare students to serve the community, especially the disadvantaged, with dedication to human dignity and the common good. Students will be prepared to appreciate the interactions between law and other disciplines and professions, to live, learn and work in a diverse, multicultural and globalized environment (SER 1.3.1).

Consequently, the general competencies that the students must develop are:

- the development of critical thinking;
- defining and describing the basic notions, precepts, processes and phenomena, explaining their genesis and evolution;
- identifying the appropriate legal reasoning;
- analyzing and interpreting legal norms;
- manipulation of data obtained through theoretical research, as well as analysis of the recorded results;
- the use of information and communication technology for information collection and the analysis that will follow;

- supporting solutions based on the corroboration of information from different sources, of a dynamic, scientific and awareness-raising nature in the legal field;
- application of multi- and interdisciplinary principles in approaching the legal field (SER 1.3.2).

Graduates of the program can access the labor market as lawyers, either within private entities or within public institutions, and regardless of the field of activity. They can also access the liberal legal professions, in accordance with the rules of organization and activity of each profession. Thus, graduates of the program can opt for a career in the magistracy, for the profession of judge or prosecutor by passing the entrance exam in the profession (SER 1.4.1).

The Faculty of Law conducts a study with its own graduates, in order to know their current situation, to establish their present status and the field in which they carry out their activity. The information is collected through phone conversations and direct discussions with graduates who continue their studies within the University's master programs. Based on this study, the Faculty found that over 60% of its graduates work in legal fields, fields that are connected to such activities, or in security and public order institutions, entities (SER 1.4.2).

The University states that there is a need for magistrates (judges or prosecutors), lawyers, notaries, mediators, legal advisers, intellectual property advisers, bailiffs, civil servants, European civil servants, detectives, etc. on the central, regional and local labor market (SER 1.4.2).

Judgment

The experts inquire about the developments since the last accreditation in 2019. The University states that in recent years, for example, it has invested in its facilities to improve the conditions for student-centered teaching as well as for learning. The University explains that the demand for places in the study programs "Law" full-time and part-time are currently high, which the experts view as positive. The part-time program is suited especially for students who are already working.

From the experts' point of view, the Bachelor study program "Law" focuses on specific qualification objectives. These objectives cover professional and interdisciplinary aspects and particularly refer to the domain of academic competences,

competences necessary for a qualified employment, skills of social commitment and personal development.

The University also offers a Bachelor study program in “European and International Law”, which is a good addition to the range of study programs on offer. Currently no postgraduate programs are offered in the field of Law. The University explains that the majority of students prepare for the entrance exam into the legal professions (bar exam) and a smaller number are continuing their education with a Master program.

Decision

From the experts’ point of view, the requirements of this criterion are fulfilled.

3.2 Structure of the study program

The study program aims to provide students with specialized and interdisciplinary knowledge as well as professional, methodological and general competences. The study program has a modular structure that is closely linked to the European Credit Transfer System (ECTS)¹ and a course-related examination system. Descriptions of the modules contain all necessary information, as required in the ECTS User’s Guide (particularly with regard to the details about learning content and outcomes, methods of learning, prerequisites for the allocation of ECTS credits, workload).

The combination and succession of the modules of the study program are consistent with the specified qualification objectives (described earlier).

It is assured that students receive the support and guidance they need for the organization and accomplishment of assignments and the learning process in general.

The arrangement of internships in the study program allows acquisition of ECTS credits. Provided that the program offers exchange mobility gaps, they will be integrated into students’ curriculum.

Study programs with special profile requirements (e.g. dual, part-time, occupational or distance learning study programs) comply with particular aspects that are

¹ http://ec.europa.eu/education/tools/docs/ects-guide_en.pdf

considered as appropriate and proportionate. These particular aspects are continuously observed in the study program.

Summary

The program comprises 68 modules, out of which 56 are obligatory (42 compulsory and 14 optional modules) and 12 are facultative modules.

The optional and facultative modules are carried out at the request of a minimum of 25 students (SER 1.2.1). There are between seven and ten modules provided in total provided for each semester. All modules have to be completed within one semester.

The amount of CP for the compulsory modules (required modules + optional modules) is 30 CP/semester. The non-compulsory modules (facultative modules) and the bachelor's degree exam are additionally credited. The number of credits allocated for the bachelor's exam is 10 CP, which are added to the total of 240 CP (SER 1.1.2). The total number of compulsory credits is 240, to which the credits of the optional and facultative modules are added.

A limited number of modules like accounting, economics or computer science are offered by other faculties (SER 1.2.3).

The list of modules offered:

No.	Title	Sem.	CP
Semester 1			
Compulsory Disciplines			
1	General Theory of Law	1	4
2	Constitutional Law and Political Institutions I	1	4
3	The History of Romanian Law	1	4
4	Civil Law (General Part)	1	5
5	Roman Law I	1	4
6	Foreign Languages I	1	3
7	Legal Doctrines	1	3
Optional Subjects (1 out of 2)			
13	Economy or	1	3

	The History of European Legal Thought		
Facultative Subjects			
17	Physical Education I	1	1
19	Informatics	1	3
			34
Semester 2			
Compulsory Disciplines			
8	Constitutional Law and Political Institutions II	2	4
9	Civil Law (Persons)	2	5
10	Roman Law II	2	5
11	Organization and Ethics of Legal Professions	2	4
12	Foreign Languages II	2	3
Optional Subjects (3 out of 6)			
14	Management or Public Relations	2	3
15	Legal Sociology or Legal Philosophy	2	3
16	Legal Logic or Rhetoric	2	3
Facultative Subjects			
18	Physical Education II	2	1
20	Specialized Practice	2	3
			34
Semester 3			
Compulsory Disciplines			
1	Civil Law (Real Rights)	3	5
2	Criminal Law – General Part I	3	5
3	International Public Law I	3	5

4	Administrative Law I	3	5
5	European Union Law I	3	5
Optional Subjects (2 out of 4)			
12	International Protection of Human Rights or Organizations and International Relations	3	3
14	General Accounting or The International Law of Social Protection	3	2
Facultative Subjects			
15	Physical Education I	3	1
17	Foreign Languages I	3	2
			33
Semester 4			
Compulsory Disciplines			
6	Civil Law (General Theory of Obligations)	4	5
7	Criminal Law – General Part II	4	5
8	Public International Law II	4	5
9	Administrative Law II	4	5
10	European Union Law II	4	5
11	Environmental Law	4	2
Optional Subjects (1 out of 2)			
13	Criminology or Real Estate Advertising	4	3
Facultative Subjects			
16	Physical Education II	4	1
18	Foreign Languages II	4	2
19	Specialized Practice	4	3
			36
Semester 5			

Compulsory Disciplines			
1	Civil Law – Special Contracts	5	6
2	Criminal Law – Special Part I	5	6
3	Criminal Procedural Law I	5	6
4	Financial and Fiscal Law	5	5
Optional Subjects (2 out of 4)			
9	Diplomatic and Consular Law or Humanitarian Law	5	4
10	Transport Law or Notarial Law	5	3
Facultative Subjects			
13	Mediation of Conflicts in Law	5	2
			32
Semester 6			
Compulsory Disciplines			
5	Civil Law – Succession	6	6
6	Criminal Law – Special Part II	6	6
7	Criminal Procedural Law II	6	6
8	Family Law	6	5
Optional Subjects (2 out of 4)			
11	Intellectual Property Right or Insurance Law	6	4
12	Custom Law or Ethics and Academic Integrity	6	3
Facultative Subjects			
14	Specialized Practice	6	3
			33

Semester 7			
Compulsory Disciplines			
1	Civil Procedural Law I	7	6
2	Labor Law and Social Security I	7	5
3	Commercial Law I	7	5
4	International Trade Law	7	6
5	Private International Law	7	6
Optional Subjects (1 out of 2)			
12	Crime Investigation Methodology or Stock Market Legislation	7	2
Facultative Subjects			
15	Organization of the Judicial System	7	2
			32
Semester 8			
Compulsory Disciplines			
6	Civil Procedural Law II	8	6
7	Commercial Competition Law	8	3
8	Forensics	8	5
9	Labor Law and Social Security II	8	5
10	Commercial Law II	8	4
11	Specialized Practice	8	3
	Optional Subjects (2 out of 4)		
13	Forensic Medicine or The Right of Communications and New Technologies	8	2
14	Legal Psychology or Banking Law	8	2
	License Exam	8	10
			30 + 10

	Total:		264 + 10
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Table 2: module overview

The module descriptions cover the following aspects: Module Number, Module Title, Person responsible for the Module, Skill Level, Semester, Type, Credit Points (CP), Total Workload, Time allocated, Duration and Frequency, Attendance Conditions, Language, Qualification Objectives, Module Content, Forms of Teaching for Course Activities, Forms of Learning for Seminar Activities, Usability of the Module, Form of Examination, and Bibliography.

As mentioned above, the course hours are compensated by individual study hours in the part-time program. The training strategy used in the evaluated program focuses on increasing the level of student training; implementing new methods and training procedures for individual study, technical support (digital methods) and the Internet for educational purposes, use of adequately equipped laboratories.

The study program pursues the mission of acquiring and deepening legal knowledge in the field of public and private law in the conditions of continuous reform of the Romanian and European legal system, as well as in terms of developing intellectual and analytical skills in the field of analysis, synthesis and the role it has in the activity of ensuring social order and justice (SER 1.3.1).

The aim is to offer students modern ways of acquiring legal norms in the field of public and private law, including subjects whose treatment is also intended to develop students' capacities for analysis and intellectual synthesis and to expand practical skills, in relation to the place and role that Romania has in the process of reform as a European Union member state (SER 1.3.1).

Traditionally, the teaching mission of the Faculty of Law is to train specialists for the legal and administrative life of Romania. Thus, the Faculty has had an educational offer that covers the classical spectrum of legal disciplines meant to ensure the acquisition of basic theoretical and practical knowledge for future legal specialists (magistrates, lawyers, arbitrators, legal advisors, notaries, bailiffs, etc.) or other categories of specialists from the public or private sector (SER 1.3.1).

Romania's integration into the EU at the beginning of 2007 implies the development of the educational framework aimed at training specialists with a wealth of knowledge and skills adapted to the requirements of the European market and, in

this context, imposes the challenge of preparing legal education in Romania for future lawyers and civil servants, able to cope with the new professional demands imposed by European standards (SER 1.3.1).

Fourth year students are required to complete a 56-hour practical training stage over a full-time duration of two weeks in the 8th semester (SER 1.2.1). Students obtain 3 credit points (CP) in accordance with the number of ECTS required by national legislation (SER 1.2.6).

The internship topics are established by the supervising teacher, together with the person in charge designated by the internship partner, depending on the field of activity and the characteristics of the internship partner, being included in the internship program, annexed to the Practical Training Framework-Agreement.

At the Faculty of Law, internships can take place at local and central courts (court-houses, tribunals, courts of appeal and the High Court of Cassation and Justice), at the prosecutor's offices attached to these courts, but also at law offices, notary offices, bailiffs, police stations, inspectorates or in penitentiary units, as well as in commercial companies or non-profit foundations (SER 1.2.6).

The University states that the teaching staff in the study program "Law" are actively and permanently involved in the research activity. The staff have been involved in international research, development and innovation projects through competition, contract or grant. Furthermore, the Faculty of Law organizes scientific sessions, symposia, conferences, round tables with professors, researchers, students and graduates. The communications are published in journals and books dedicated to scientific events, registered with ISBN or ISSN, as well as in dissertation works by master's students. (SER 1.2.7).

The Faculty of Law plans to place special emphasis on scientific research through:

- participation in tenders for research, development and innovation projects within national and international programs;
- stimulating individual and team research at the faculty;
- establishing research partnerships with other universities in the country and abroad, with local or other educational institutions, etc.;
- publish the results of the research of the specialist teams from the Faculty of Law and associated organizations through publications, specialized conferences, workshops, etc. (SER 1.2.7).

The results of the students' scientific research will be published in the journal Scientific Informative Bulletin, a biannual publication, or in the University's Annals Volume (SER 1.2.7).

The curriculum aims to address subjects that study international law, both in the public and private sectors. As far as public law is concerned, disciplines such as Public International Law (MI), Diplomatic and Consular Law (MO), European Union Law (MI), International Protection of Human Rights (OM) are studied. These subjects try to enable students to deepen the fundamental principles and notions of public international law, the basic notions of legal relations between states, those between intergovernmental organizations, and those related to the law of treaties, the organization and functioning of the legal systems of Europe, America and Asia, as well as matters related to the courts, in different legal systems (SER 1.2.8).

In the field of private law, specialized disciplines such as Private International Law (MI), International Trade Law (IM) are studied. These subjects involve the in-depth assimilation by students of the Romanian and international regulations regarding the determination of law applicable to various legal relationships of private law with foreign elements, the resolution of conflicts of laws and conflicts of jurisdiction, problems regarding the status of foreigners in Romania, the manner of organizing and conducting domestic and international arbitration, as well as contracts subject to international trade law (SER 1.2.8).

The University states that particular attention is paid to the study of European Union Law, both in terms of the European Union institutions and primary legislation, as well as the Statute of the European Civil Service and the Free Market, within the discipline of European Union Law (MI). Subjects such as International Protection of Human Rights (IM) focus on the European Convention on Human Rights and refer primarily to the civil and political rights guaranteed by it, but also to some fundamental economic and social rights, rights protected at European level to the extent that they are guaranteed as legitimate rights, with the aim of highlighting the legal and institutional aspects essential for the legal system of promotion and protection specific to Europe (SER 1.2.8).

Although the focus of study is the Romanian legal system, the subjects with general applicability such as legal logic (MO), legal sociology (MO) are also deepened on the basis of the international bibliography, being constantly updated and aligned with relevant international information (SER 1.2.8).

The international collaborative relations of BUB are regulated by bilateral agreements concluded with universities and scientific institutes abroad. Also, based on the Erasmus Higher Education Program, the University has bilateral agreements with foreign partners in the respective field:

- National Research Institute (CNR) Pisa, Italy;
- International Institute of Mediterranean Agriculture in Chania, Maich, Greece;
- Higher Institute of Specific Studies, El-Giza, Cairo; Egypt;
- Gedik International University, Istanbul, Turkey;
- Benghazi International University, Libya;
- State University of Moldova, Chisinau, Republic of Moldova (SER 3.2.4).

Judgment

The Bachelor study program “Law” (part-time education) has a course-based structure and a course-related examination system. The descriptions of the courses contain information on module number, module title, person responsible for the module, skill level, semester, type, credit points (CP), total workload, time allocated, duration and frequency, attendance conditions, language, qualification objectives, module content, forms of teaching for course activities, forms of learning for seminar activities, usability of the module, form of examination, and bibliography. The experts acknowledge the very detailed course files with its contents and aims, which allows a high level of transparency. In the experts’ opinion, the structure of the curriculum seems to make the workload manageable.

From the experts’ point of view, the structure of the “Law” program at Bioterra University of Bucharest is designed to provide students with a comprehensive understanding of law, through integrating theoretical knowledge with practical training. The program’s curriculum reflects a balanced approach, aligning with international standards while also addressing local needs. According to the experts, the curriculum covers philosophical, sociological and historical foundations of law as well as different areas of national and European and international law. The experts recommend to include recent developments like environmental and consumer law. The main objective of the study program is to prepare students for the bar exam, which is the entrance exam to legal professions such as lawyer or judge.

The arrangement of the internship in the study program allows acquisition of credits. Students are required to complete a 56-hour practical training over a full-time

duration of two weeks in the 8th semester. Students obtain 3 credit points (CP) and the internships are usually completed at local courts, law offices, police stations or in commercial companies. The experts welcome the practical elements of the program, but also recommend that the University expand this aspect if national regulations allow. Besides the internship, the study program also contains practical exercises like moot courts, which the experts welcome.

During discussions on site, the experts inquire about interdisciplinary work at Bio-terra University. The University explains that legal issues of commons interest are taught by the law faculty in the law program as well as in other departments, for example environmental protection, medical law or commercial law. The experts support the University in their efforts of interdisciplinary exchange as both, teachers and students, would benefit from the cooperation. The experts recommend teaching common topics in shared modules to further foster interdisciplinarity.

According to the Faculty of Law, the teaching staff is involved in research projects, for example, with an institution in Bulgaria, the police academy and the economic academy on legal aspects of agriculture and the transposition. Yet, the experts note that the curriculum of the study program does not include research. The experts recommend involving students systematically in research at the University.

The combination and succession of the courses of the study program are consistent with the specified qualification objectives (described earlier). The program "Law" contains a final thesis, which is located in the last semester of study. The thesis comprises ten credit points, which are not part of the official workload of 240 CP.

The internationalization of the University and the study program is also discussed. The experts acknowledge the internationalization strategy already in place. Unfortunately, the University currently doesn't have incoming or outgoing students from abroad. The experts encourage the University to participate in the Erasmus network and also recommend expanding the possibilities of going abroad through short-term stays as well. Shorter periods abroad, for example within the scope of an internship or summer school, could be more attractive and easier to finance for students. Furthermore, the experts recommend finding creative ways of internationalization, for example, online conferences or guest lectures, to include their students in the international scientific community. In an effort to attract international students, the experts recommend updating the information on the English website.

Decision

From the experts' point of view, the requirements of this criterion are fulfilled.

3.3 Admission and Feasibility

The admission requirements and, if applied, student selection procedures are specified. They correspond to the standards of the study program.

Feasibility of the study program is guaranteed. The amount of student workload is appropriate.

Student support services, as well as specialized and general consultations, are provided by the University in a sufficient and appropriate manner.

As a whole, the organization of the education process ensures the successful implementation of the study program.

Summary

Admission to the Bachelor program during the August/September sessions is carried out in accordance with the specific admission procedure, which states that only high school graduates with a baccalaureate diploma can register for the admission contest. Age, gender, ethnicity, religion, race, affiliation to a political or legal organization (whose activity does not violate the laws of Romania) or chronic diseases (that do not represent a risk to the community) are not criteria for the selection/tie-breaking of candidates (SER 1.5.1).

The University states that it fully respects and promotes the rights of students with physical disabilities in carrying out academic activities. Students with physical disabilities have access to most University spaces, but to all spaces intended for teaching and learning. All University students are treated fairly. Exploitation is not allowed, whether direct or indirect (SER 1.5.2).

At the level of the Faculty of Law, there are Student Counseling and Professional Guidance (C.O.P.S.) services that carry out specific activities. Furthermore, offers the University financial help in the form of social and study scholarships (SER 1.2.3). Within the Faculty, students are advised by their professors, especially by the Dean. Students can contact each of their teachers directly through the consultation program, which allows at least two hours per week for each teacher (SER 1.2.4).

According to the University, Bioterra University of Bucharest does not follow the Lisbon Convention on Recognition (SER 1.5.3).

Judgment

The admission policies and procedures along with the requirements are properly documented and made publicly available. The experts determine the admission procedures and requirements to be appropriate, as they correspond to the standards of the study program.

The experts draw attention to the relatively high number of exams to be passed during both of the study programs. The University states that the system is determined by the Ministry of Education and Research. In order to prepare students for the level of difficulty and volume of exams, the type as well as the time of the different examinations is defined and communicated to the students transparently through the course calendar at the beginning of each course.

The experts confirm that the University takes good measures to guarantee the feasibility of the study programs despite the high workload. The organization of the education process ensures the successful implementation of the study programs. The experts appreciate the fact that students with disabilities or chronic illness are offered compensatory measures when writing exams, such as extra time or writing the exam in another room.

On site, it became obvious that the teaching staff follows an “open-door-policy”. In the first week of each year, students undergo an orientation which familiarizes them with available support services and where the colleges and departments are introduced.

The experts ask about the option to transfer credit points, since the University stated in the SER that they do not follow the Lisbon Convention. The University refers to the document “Regulation for the application of ECTS credits” which is applicable for all study programs. It does give further information regarding the transfer of credit, but doesn’t specify the number of credits that can be transferred or give students information on how the process is organized. The document must therefore be revised in order to guarantee the application of the Lisbon Convention.

Decision

From the experts’ point of view, the requirements of this criterion are substantially fulfilled.

The regulations for the transfer of credit points must be revised to reflect the Lisbon Convention.

3.4 Examination system and transparency

Examinations serve to determine whether the envisaged qualification objectives have been achieved. These examinations are focused on students' knowledge and competences. The requirements to students' performance in examinations are regulated and published. The frequency of examinations, as well as their organization, is appropriate.

The University guarantees that students with disabilities or chronic illnesses receive compensation with regard to time limits and formal requirements of the study process, as well as all final and course-related performance records.

Information concerning the study program, process of education, admission requirements and the compensation regulations for students with disabilities are documented and published.

Summary

According to the University, the examination system aims to verify whether the targeted qualification objectives have been achieved by the students. Each didactic activity, including the specialized internship, require a final evaluation. The evaluation results are expressed in grades from 1 to 10, expressed in whole numbers; the minimum passing grade is 5, for the internship colloquium the minimum passing grade is 6 (SER 1.2.3).

The forms of evaluation provided in the curriculum are the exam and the colloquium (written or oral). The 2023-2024 curriculum of the Faculty of Law includes 39 exams and 17 colloquia (SER 1.2.3). The exams are held at the University.

In application courses, the evaluation methods can be the following: knowledge testing, problem solving, practical applications (legal cases), participation in interactive dialogues, elaboration of reports on case studies and application projects. Furthermore, students' participation during the semester can constitute a percentage of the final evaluation (SER 1.2.3).

For each module, students may be examined during pre-sessions or exam sessions as follows:

- students can repeat the exam twice if they have not passed the first time in the same academic year;
- if the student does not pass the first verification, he/she can request re-evaluation during the study program.

The periods of time scheduled during the academic year, in which students can participate in exams included in the curricula are: winter session, summer session; autumn session for arrears. The examinations are planned to allow students a balance between study time and rest. Exam requirements are regulated and published. All exams are held on the University campus (SER 1.2.3).

The University states that the Bachelor's degree exam at the end of the studies is a written exam. In order to increase the efficiency of the evaluation of fundamental and specialized knowledge, the Faculty of Law offers its students a package of summaries to prepare for the Bachelor's exam, an activity carried out at least six months before the established written exam.

The Bachelor's exam is evaluated by a specialized commission on a scale of 1 to 10, calculated as the average of the commission's members' scores. The Bachelor's exam is considered passed if the student obtains a minimum grade of 6 (six). After passing the exam, the student obtains 10 additional credit points (CP), in addition to the mandatory 240 credits related to the Law degree program (SER 1.2.3).

According to the rules for students with physical disabilities and chronic diseases, students have the possibility to get extra time during exams or assistance by tutors, for example in writing.

Judgment

The University uses a continuous assessment process to ensure the quality of education for its students. The study programs have a course-related examination system. Its implementation, including the grading system, course load regulations, repetition of courses and exams is regulated and transparent for the students. From the experts' point of view, the examination serves to determine whether the envisaged qualification objectives have been achieved. These examinations are focused on students' knowledge and competences. Nevertheless, in the experts' opinion, the study programs include a very high number of exams which causes a high workload not only for students but also for the teaching staff.

An examination can be repeated once within the same academic year. If the examination is failed twice, students must redo the course in the following semester. Thus, the experts conclude that the examinations, although numerous, serve to determine whether the envisaged qualification objectives have been achieved or not and are focused on students' knowledge.

The requirements to students' performance in examinations are regulated and published in the course calendar. The frequency of examinations, as well as their organizations, is appropriate. The University guarantees that students with disabilities or chronic illnesses receive compensation regarding time limits and formal requirements of the study process, as well as all final and course-related performance records.

From the experts' point of view, the relevant information concerning the study program, the process of education, the admission requirements and compensation regulations are documented and published. A Diploma Supplement, developed by the Council of Europe, European Commission and UNESCO, is provided in addition to the graduation certificate.

Decision

From the experts' point of view, the requirements of this criterion are fulfilled.

3.5 Teaching staff and material equipment

Professionalism and a sufficient number of human resources assure the successful implementation of the study program. Qualifications of the teaching personnel correspond to the requirements of the study program. Recruitment and appointment of teaching positions are appropriate. Interdisciplinary links to other study programs are taken into consideration.

Measures for the professional and personal development of the teaching personnel are provided.

Qualitative and quantitative sufficiency of the equipment and space resources assures the successful implementation of the study program.

Summary

The teaching staff of the Faculty of Law is composed of 26 teaching staff members, of which 19 are full-time employees and seven are associates: six full-time university professors, four full-time associate professors, 12 full-time university lecturers, four lecturers. All 26 teachers hold the title of a Doctor of Science (SER 2.1.1). There are no further employees at the Faculty of Law (SER 2.2.1).

The ratio between the number of teachers involved in the teaching process at the Faculty of Law and the number of students for the academic year 2023-2024, is $299 \text{ students} / 26 \text{ teachers} = 11.5 \text{ students} / \text{teachers}$.

At the University vacant teaching or research positions are filled for a definite or indefinite period, only by public competition, according to the Higher Education Law no. 199/2023, the Framework Methodology for filling vacant teaching and research positions in higher education as subsequently amended and added and this Internal Competition Methodology for filling vacant teaching and research positions (SER 2.1.2).

The University states that all teaching and learning activities take place on campus. Faculties, including the Faculty of Law, use the common resources available at the University. The study program "Law" uses four classrooms, each with a capacity appropriate to the specific standards of the field of legal sciences and ten seminar rooms, each equipped with projectors and computers for the teaching activity (SER 2.3.1).

The Faculty of Law has its own forensic laboratory, where students carry out part of their practical activity. They participate in simulation trials and can perform a range of activities specific to judicial bodies, which helps them understand forensic methods, procedures and tactics (SER 2.3.1).

The University has a central library available to both students and teaching staff. Additionally, the Faculty of Law has its own library section, which is located inside the central library. The total library collection – for all faculties within the University is approximately 23.934 volumes and 4.030 book titles, of which 60% are more recent than 10 years. (SER 2.3.2). The study materials for the part-time Law study program can be consulted both in the library and in online format. Summaries, conclusions, illustrative examples, self-control tests as well as clear recommendations to guide the student in completing the presented learning resource are available.

The central library is open daily, from Monday to Friday and additionally on Saturdays during the examination sessions. It has both, printed books as well as electronic sources. Both students and teachers of the Faculty of Law can use the reading room inside the central library, as well as the reading room for the Faculty of Law (SER 2.3.2).

The University has an e-learning system, the UMS and Alumni platform, accessible to all students enrolled at the "Bioterra" University of Bucharest and to professors/secretariat, which also serves the Faculty of Law. To increase the responsibility of teachers and students in the instructional-educational process, to promote ethics and academic integrity, the University has an anti-plagiarism program and a digital system appropriate for this activity (SER 1.2.5).

Judgment

New teaching staff is thoroughly briefed about the programs and their teaching responsibilities before they start teaching. Students evaluate the performance of all teaching staff periodically.

The experts find the amount of human resources allocated to the program to be sufficient to carry out its functions for the current number of students. The teaching staff is well qualified and in possession of academic and technical credentials and experience adequate to their tasks. The student-teacher ratio is good.

The University informs its employees about opportunities for personal and professional development transparently, and actively encourages their participation in workshops, training courses and conferences intended to improve their abilities. This is confirmed during the talks with the staff on site.

The experts visited the premises of the Faculty of Law. As a whole, it was ascertained by the experts that the Bachelor study program has ample teaching facilities at its disposals.

During the discussions with the University, the experts ask about access to databases. The University explains that there is currently limited access to databases but the library can be accessed online. The experts consider access to the latest publications and scientific findings to be important for the high quality of student education and strongly recommend that the University provide access to these resources.

Decision

From the experts' point of view, the requirements of this criterion are fulfilled.

3.6 Quality assurance

The University has developed and documented a concept of quality assurance in education process, teaching and research, which serves as the basis for the quality-oriented development and implementation of the study program.

The results of the internal quality assurance management are applied for the continuous development of the study program. In doing so, the University takes into close consideration the quality evaluation results as well as the analyses of students' workload, their academic accomplishments and feedback from graduates.

Summary

The system of quality assurance of educational services at Bioterra University of Bucharest is the set of university policies and strategies, procedures, competences and responsibilities, adopted by the University senate. The policy of Bioterra University of Bucharest, to ensure high quality of the educational process in the institution, aims to concentrate the synergic effect of all human resources - management and teaching staff, teaching and administrative staff - to develop a culture of quality in planning, organizing, conducting, controlling and guiding, as appropriate, all activities, at the level of standards, benchmarks and performance indicators, as well as / or those of excellence.

The **Rector** proposes to the University Senate its own policy for quality assurance and continuous quality improvement, accompanied by draft internal regulations, and monitors their implementation.

The **University Senate** reviews and approves policies, strategies and procedures for quality assurance.

The **Commission for Quality Assessment and Quality Assurance** participates in the implementation and development of a culture of quality education at Bioterra University of Bucharest, in accordance with national / international standards in the field. The Commission collaborates with all departments and faculties of the University. It coordinates the application of quality assessment and quality assurance procedures and methodologies approved by the Senate of the University.

According to the Faculty of Law, the study program is periodically monitored and evaluated in order to correspond to the dynamics of the university qualifications market and requirements formulated by the studies' beneficiaries. In terms of quality assurance, the University tries to focus especially on academic achievements, feedback from students and graduates, but also on recommendations made by the teaching staff of the faculty regarding increasing the quality of education and scientific research (SER 1.6). With regard to the transparency of the quality assurance policies and developments, the University issues an annual report on the quality of educational services in the University and proposes new measures to increase quality. This annual report is sent to the Senate.

The University has an internal quality management system in which students take part; they are required to fill out course evaluations and provide feedback on the teaching performance. The results are processed by the Quality Assessment and Quality Assurance Committee, which then integrates the final recommendation into its report. The results of the teaching staff assessments are presented annually in the Senate, where student representatives take part.

Students evaluate teachers through questionnaires filled out at the end of the semester. The assessment results allow the University to improve the teaching process and provide students with the most useful information and learning methods (SER 1.2.4).

The teacher self-evaluates on the basis of the *Teacher's Self-Evaluation Sheet* and the *Peer Evaluation Sheet*. The performance of the teaching staff is classified according to the skills and achievements in teaching, research and service activities brought to the institution and the academic community. For the promotion of teachers, the achievements of the evaluation at all levels, respectively students and peers, are taken into account.

Judgment

From the experts' point of view, the University has a well-structured system of quality assurance spread across all of its units. The University has developed and documented a concept of quality assurance in the education process, teaching and research, which serves as the basis for the quality-oriented development and implementation of the study program "Law".

The University consistently monitors and periodically reviews its programs to ensure alignment with established objectives, responsiveness to the evolving needs

of students and society, and the facilitation of continuous program improvement. These systematic reviews are integral to the University's commitment to maintain the relevance of the study programs and fostering a supportive and effective learning environment for students. The evaluation process encompasses various aspects, including the regular examination of program content in light of the latest research in the discipline, consideration of changing societal needs, assessment of student workload, progression, and completion rates, evaluation of the effectiveness of procedures for student assessment, collection of feedback on student expectations, needs, and satisfaction regarding the program, and examination of the suitability of the learning environment and support services for the program's objectives.

The University possesses a robust data collection system and gathers comprehensive data on its study programs and other activities. The information gathered depends, to some extent, on the type and mission of the University.

Various Key Performance Indicators (KPIs) are captured by the University. A range of information regarding study programs and activities is consistently captured by the University. Student progression, success rates, and dropout rates are inherent considerations in the University's analytical processes. With an established feedback mechanism, the University regularly measures student satisfaction with their programs, the learning resources and the available student support. The University also actively tracks and analyzes the career paths of its graduates. The institution seamlessly integrates the collected information into its existing internal quality assurance system. Mechanisms are in place to ensure that the perspectives of students and staff are considered in decision-making processes.

Regular program reviews and revisions are conducted, actively involving students and other stakeholders in the process. The information collected from these reviews undergoes analysis, and program adaptations are made to ensure the program is up-to-date. Any actions planned or taken as a result of these reviews are communicated to all relevant stakeholders. Furthermore, the University ensures the publication of revised program specifications, fostering transparency and keeping stakeholders informed of changes resulting from the systematic review process.

During the site visit, the students confirm that their feedback is taken seriously by the University. Suggestions and adjustments are implemented by the University.

Decision

From the experts' point of view, the requirements of this criterion are fulfilled.

3.7 Gender equality and equal opportunities

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

Summary

The University states that it has shown a constant concern in identifying students with financial problems, resorting to various forms of support, among which are those of social and study scholarships. Additionally, there are Student Counseling and Professional Guidance services at the Faculty of Law (SER 1.2.3).

The Faculty of Law fully respects and promotes the rights of students with physical disabilities and chronic diseases in the performance of academic activities. Students with physical disabilities have adequate access routes to the University premises. All University students are treated equally. The University states that it does not allow discrimination or exploitation, whether directly or indirectly, and supports the idea that justice is based on the fair and equitable division of rights and duties (SER 1.2.3).

The University adopts firm measures of non-discrimination and equal opportunities in terms of access to education, employment and programs, elimination of conflicts of interest, preventing and combating all forms of corruption, favoritism and nepotism. Age, gender, ethnicity, religion, race, affiliation to political or legal organizations (whose activity does not violate Romanian laws), chronic diseases (that do not represent a risk to the community) are not criteria for the admission of students to the study program (SER 1.2.3).

Judgment

The University demonstrates its commitment to the provision of equal opportunities for all students and shows openness for diversity and social development. Overall, the experts conclude that the University's actions on the provision of gender equality and promotion of equal opportunities for students with particular living circumstances are implemented transparently.

Decision

From the experts' point of view, the requirements of this criterion are fulfilled.

4 Conclusion

The experts have conducted discussions with the University and gained an impression of the structures of the Bioterra University of Bucharest as well as the Bachelor study program “Law” (part-time education). The experts appreciate the positive development of the University over the last five years since the last accreditation of the study program “Law”. The part-time program is a good addition for students who are already working and have different needs. The program provides students with a legal education rooted in the principles of Romanian law, while also offering exposure to key areas of international and comparative law. The curriculum covers core disciplines such as constitutional law, civil law, criminal law, administrative law, and procedural law, with the development of legal reasoning skills.

The study program “Law” at Bioterra University of Bucharest is attractive and the number of students is increasing. Practical components in the form of an internship in the eighth semester are part of the curriculum. Moot courts are held to apply theoretical knowledge in realistic contexts.

Nevertheless, the students should be further involved in research at the Faculty of Law and the internationalisation efforts should be pushed forward. In order to gain a broader international reputation, the internationalization efforts should be expanded and cooperations for student exchange created.

Based on the information from written documents and the results of the site visit, the experts came to the conclusion that the study program “Law” offered at the Bioterra University of Bucharest substantially fulfils the above-described criteria. Hence, the experts recommended that the Accreditation Commission of AHPGS make a positive decision regarding the accreditation of the study program.

Based on these observations, the experts recommend the accreditation of the study program on the following conditions:

- The regulations for the transfer of credit points must be revised to reflect the Convention on the recognition of qualifications concerning higher education in the European region (Lisbon 1997).

From the perspective of the experts, these conditions can be fulfilled within twelve months after the announcement of the accreditation decision.

For the continuous development of the study program, the experts have outlined the following recommendations:

- Recent developments like environmental and consumer law should be included in the curriculum.
- The hours of practical training should be expanded, if national regulations allow.
- Shared modules should be introduced to further foster interdisciplinarity.
- Students should be involved systematically in research at the University.
- The University should participate in the Erasmus network and also expand the possibilities of going abroad through short-term stays as well.
- Creative ways of internationalization should be sought, for example, online conferences or guest lectures, to include students in the international scientific community.
- The information on the English website should be updated.
- Access to the latest publications and scientific findings should be guaranteed, as this is important for the high quality of student education.

5 Decision of the accreditation commission

Decision of the accreditation commission July 22, 2025

This resolution of the Accreditation Commission of the AHPGS is based on the University's application, as well as the expert review and the site visit covered in the Assessment Report. The Accreditation Commission has also taken the response opinion of the University regarding the study program into account.

The site visit of the University took place on April 9-11, 2025, according to the previously agreed-upon schedule.

The accreditation procedure is structured according to the Accreditation Criteria developed by the AHPGS. The Accreditation Criteria are developed by the AHPGS in close accordance with the existing criteria and requirements valid in the Federal Republic of Germany and based on the "Standards and Guidelines for Quality Assurance in the European Higher Education Area" (ESG), established by the European Association for Quality Assurance in Higher Education (ENQA).

The Accreditation Commission of the AHPGS discussed the procedural documents and the vote of the expert group regarding the Assessment Report.

The Bachelor study program requires the obtainment of 240 credit points according to the European Credit Transfer System. The regulated study period in the program "Law" is four years. The study program comprises 68 courses, of which 56 are mandatory and 12 are facultative. The language of instruction is Romanian. The Bachelor study program "Law" is completed with awarding of the academic degree "Bachelor of Law". Admission takes place every winter semester. The first cohort of students was admitted to the study program in the academic year 1999/2000.

The Accreditation Commission of the AHPGS considers that the Accreditation Criteria are substantially fulfilled and adopts the following decision:

The Bachelor study program "Law" is accredited for the duration of five years until September 30, 2030.

Based on the Assessment Report the Accreditation Commission outlines the following condition:

1. The regulations for the transfer of credit points must be revised to reflect the “Convention on the Recognition of Qualifications concerning Higher Education in the European Region” (Lisbon 1997).

The evidence that the formulated conditions have been fulfilled by the study program “Law” must be provided by July 22, 2026. According to the Accreditation Criteria developed by the AHPGS, in case of non-fulfillment of the conditions the accreditation of the study program will be revoked.

For further development and enhancement of the study program, as well as of the University as a whole, the Accreditation Commission of the AHPGS supports the recommendation articulated in the Assessment Report.

An appeal against this decision may be filed within two weeks of its notification. The appeal must be submitted in writing or recorded at the office of AHPGS Akkreditierung gGmbH, Sedanstraße 22, 79098 Freiburg, and must include a statement of reasons.