

## Substantive Change Report

### by Swiss Agency of Accreditation and Quality Assurance (AAQ)

Register Committee

Ref. RC24/C41

Ver. 1.0

Date 3/7/2019

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Decision of: 19/06/2019

Report received on: 24/05/2019

Agency registered since: 08/05/2012

Last external review report: 01/07/2016

Registration until: 31/07/2021

Absented themselves from decision-making: n/a

Attachments:

1. [Substantive Change Report](#)
2. [Request of 29/04/2019](#)
3. [Mapping of criteria to ESG Part 1 \(by GAC\)](#)

1. The Register Committee thanked AAQ for its letter of 24/05/2019, responding to the Committee's request of 29/4/2019.
2. The Register Committee took note of AAQ's view that there were no substantive changes to report. The Committee considered that the fundamental change to the legal basis of the agency's work in Germany, the new set of criteria and the fact that the agency no longer makes accreditation decisions constitute substantive changes. The Committee further underlined that changes to activities should in principle be reported when the relevant official documentation is adopted, and not only when the first activities have been implemented in practice.
3. The Register Committee therefore considered the response as a Substantive Change Report and thanked AAQ for having responded nevertheless to the specific questions.
4. The Register Committee took note of the changes brought about by the [Interstate Treaty](#) between the German federal states, which entered into force in 2018, and the related [Specimen Decree](#). The main change lies in the fact that – for accreditation in Germany – AAQ no longer takes accreditation decisions itself, but prepares an assessment report on the basis of which the German Accreditation Council (GAC) takes a decision; the way in which AAQ carries out these assessments remains largely similar to the pre-2018 system.
5. The Register Committee underlined that agencies themselves remain responsible for the alignment of their activities with the ESG, even if they work based on third-party processes and criteria. As an EQAR-registered agency it is AAQ's responsibility to assure itself that the

frameworks under which it decides to operate are compatible with the ESG.

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6. The Register Committee took note of the fact that AAQ applies the criteria as set out in the Specimen Decree, which replace the accreditation criteria previously set by GAC.
7. While AAQ did not explain how the new criteria correspond to Part 1 of the ESG, the Committee took into account the mapping table elaborated by the GAC (attached), which was submitted by several agencies.
8. The Register Committee noted that AAQ did not change its practice as regards site visits.
9. The Register Committee understood that AAQ did not change its follow-up processes and welcomed that AAQ will continue to implement its own, established follow-up processes irrespective of any possible follow-up implemented by GAC.
10. The Register Committee expects that the interaction between GAC and AAQ, and their respective roles in the follow-up process, will be analysed in the next external review of AAQ.
11. The Register Committee noted that AAQ did not change the composition, selection and appointment of review panels, as its established practice is in line with the nomination procedure adopted by the German Rectors' Conference (HRK).
12. The Register Committee noted that AAQ did not change the way in which it assures consistency of reports and continues to rely on the existing committees/working structures in that regard.
13. The Committee nevertheless underlined that the next external review of AAQ should analyse whether the new arrangements had any impact on the consistency of applying the accreditation criteria.
14. The Register Committee noted that AAQ continues to publish the full expert reports on its own website, in addition to the report being published by GAC together with its eventual decision. AAQ thus discharges its responsibility to ensure that all its reports are published and the Committee welcomed that commitment to transparency.
15. The Register Committee noted that AAQ's appeals procedures were not changed. The Committee understood that institutions thus retain the possibility to both complain about procedural errors, etc., or to appeal the report, i.e. specific statements or conclusions in the report.



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EQAR

Colin Tück, Director  
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Bern, May 21, 2019

### **Substantive Change Report on New Legal Framework in Germany**

Dear Colin,

In your letter of 29 April 2019, you ask for a Substantive Change Report according to §6.1 of EQAR Procedures for Application. At this time, we see no justification for a Substantive Change Report, as neither our methodology nor our organizational structure have changed.

Firstly, the system accreditation procedures we carry out currently are still in accordance with old law. We have only just initiated procedures under the new law, i.e. the Interstate Treaty, but not yet implemented them.

Secondly, we see no reason to make any adjustments to the processes or our organizational structure in the future. Parts of the procedure for which we previously had the authority or responsibility are now regulated in the Interstate Treaty (procedural rules and criteria; guidelines of the agency are no longer permissible) or by the German Rectors' Conference (compilation of the expert group) and the decision on accreditation is taken by the Akkreditierungsrat (GAC). These changes we do not see as a substantive change of the agency but as a substantive change of the system. The Länder have made these changes without involving the agencies; the agencies cannot bear the responsibility to justify these changes. If the Register needs assurance that the changes in the German system are compatible with the ESG, we suggest that the Register seeks the dialogue with its member Germany.

With regard to the six questions you pose in your letter, we would like to add that:

- Question 1 can only be answered by the Accreditation Council;
- AAQ has not made any changes regarding ESG 2.5;
- AAQ will implement the Rectors' Conference's requirements without changes;
- AAQ is not planning any changes with regard to site visits, publication of reports and follow-up processes;

- AAQ has an appeals & complaints process that applies to all procedures of all formats and shall not be changed;
- AAQ has not made any adjustments to the organisation, as the reports must be approved by the AAQ Commission before they are submitted to the Akkreditierungsrat (GAC) for decision.

We hope that our explanations are useful.

Kind regards,



Laura Beccari  
International relations



Christoph Grolimund  
Director

Brussels, 29 April 2019

## Substantive Change Report on New Legal Framework in Germany

Dear Laura,

On 1 January 2018, a new legal framework for accreditation entered into force in Germany, i.e. the [Interstate Treaty](#) between the German federal states accompanied by the related [Specimen Decree](#). As AAQ operates as part of the official accreditation system in Germany we understand that your agency is directly affected by those changes.

As a registered agency you are required to notify EQAR about substantial changes to your process or methodology (see §6.1 of the [EQAR Procedures for Applications](#)).

According to the EQAR Guide for Applicants, “changes should be reported as soon as the changes are sufficiently clearly defined to allow providing comprehensive information on their nature and impact” and we are confident that this is the case by now.

We therefore kindly request that you **make a Substantive Change Report, using the official [reporting form](#)**.

In order to streamline your report and ensure comparability with other agencies' reports, we kindly ask you to address the following questions (instead of the aspects i. to viii. as listed on the form):

1. Please explain the changes in the accreditation criteria and how ESG 1.1 – 1.10 are reflected in the new criteria (ESG 2.1).
2. Did AAQ change its approach to ensuring consistency (ESG 2.5)?
3. Please explain if and how the composition, selection and appointment of review panels (ESG 2.4) changed, in particular with reference to the new nomination procedure for external experts according to Article 3 (3) of the Treaty / §25 (4) of the Specimen Decree.

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EQAR Founding Members:

4. Does the new legal framework lead to any changes as regards the use of site visits (ESG 2.3), the publication of reports (ESG 2.6) or follow-up processes (ESG 2.3)?
5. Did AAQ change its appeals process (ESG 2.7) in light of the fact that the agency does not make final accreditation decisions, but reports forwarded to the German Accreditation Council (GAC)?
6. Did AAQ change its organisational structure in relation to the new legal framework?

I wish to draw to your attention that we have addressed identical questions to all EQAR-registered agencies operating within the official accreditation system in Germany, i.e. AAQ, ACQUIN, AHPGS, ASIIN, AQAS, AQ Austria, evalag, FIBAA and ZEvA. It is at your discretion whether to coordinate your response with some or all other agencies.

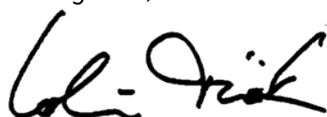
If there are **other changes** to your organisational structure or external quality assurance activities, i.e. not related to the new legal framework in Germany, please kindly include them in the same report. For those activities please follow the usual questions and instructions.

We kindly ask you to make your report **by 29 May 2019**.

Please also note that this request will be published together with the final decision on your Report.

I shall be at your disposal if you have any further questions or inquiries.

Kind regards,



Colin Tück  
(Director)

## Comparison between ESG 2015 and rules and criteria of German Accreditation System

July 2018

**Comparison between part 1 of ESG 2015 and the German accreditation rules and criteria, mainly determined in parts 2 and 3 of the specimen decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treaty**

ESG 2015	Programme accreditation	System accreditation
1.1 Policy for quality assurance	§ 14 Academic success	§ 17 Concept of the quality management system (goals, processes, instruments)
1.2 Design and approval of programmes	§ 11 Qualification goals and qualification level; § 12 Coherent study programme concept and adequate implementation; § 13 Subject-content organisation of the study programmes	§ 17 Concept of the quality management system (goals, processes, instruments)
1.3 Student-centered learning, teaching and assessment	§ 12 Coherent study programme concept and adequate implementation (paragraph 1); § 15 Gender equality and compensation of disadvantages	§ 17 Concept of the quality management system (goals, processes, instruments)
1.4 Student admission, progression, recognition and certification	§ 5 Admission requirements and transitions between different courses; § 6 Qualifications and qualification designations; § 12 Coherent study programme concept and adequate implementation (paragraph 1); § 14 Academic success	§ 17 Concept of the quality management system (goals, processes, instruments)

1.5 Teaching staff	§ 12 Coherent study programme concept and adequate implementation (paragraph 2)	§ 17 Concept of the quality management system (goals, processes, instruments)
1.6 Learning resources and student support	§ 12 Coherent study programme concept and adequate implementation (paragraph 3)	§ 17 Concept of the quality management system (goals, processes, instruments)
1.7 Information management	§ 14 Academic success	§ 18 Measures to implement the quality management concept, see paragraph 3
1.8 Public information	Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states	§ 18 (paragraph 4); Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states
1.9 On-going monitoring and periodic review of programme	§ 14 Academic success	§ 18 Measures to implement the quality management concept
1.10 Cyclical external quality assurance	§ 26 Period of validity for the accreditation; extension	§ 26 Period of validity for the accreditation; extension