

Substantive Change Report

by Accreditation Agency in Health and Social Sciences (AHPGS)

Register Committee

Ref. RC24/C44

Ver. 1.0

Date 3/7/2019

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Decision of:	19/06/2019
Report received on:	28/05/2019
Agency registered since:	07/10/2009
Last external review report:	09/02/2014
Registration until:	27/02/2019 (suspended pending renewal)
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 AHPGS for its letter of 28/05/2019, responding to the Committee's request of 29/4/2019.
2. The Register Committee took note of AHPGS'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 AHPGS 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 – AHPGS 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 AHPGS 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 AHPGS' 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 AHPGS applies the criteria as set out in the Specimen Decree, which replace the accreditation criteria previously set by GAC.
7. While AHPGS 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 AHPGS did not change its practice as regards site visits.
9. The Register Committee noted that no final details on follow-up processes could be provided to date, but understood that the GAC is likely to have a role in the follow-up processes. The Committee underlined that AHPGS retains responsibility for follow-up to take place, even if GAC makes accreditation decisions. This does not exclude that GAC actually implements the follow-up processes, as long as AHPGS has assured itself that this indeed happens.
10. The Register Committee expects that the interaction between GAC and AHPGS, and their respective roles in the follow-up process, will be analysed in the next external review of AHPGS.
11. The Register Committee noted that AHPGS 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 AHPGS 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 AHPGS should analyse whether the new arrangements had any impact on the consistency of applying the accreditation criteria.
14. The Register Committee noted that the reports are published by GAC together with GAC's eventual decision.
15. The Register Committee underlined that AHPGS remains responsible for assuring that all its reports are published, irrespective of whether that is on its own website or elsewhere, and regardless of the fact that GAC takes the final accreditation decisions. In particular, AHPGS should find appropriate ways to ensure that its final reports are also published if the institution does not forward the report to GAC.
16. The Register Committee noted that AHPGS'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
Aarlenstraat 33
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Freiburg, May 28, 2019

Substantive Change Report on New Legal Framework in Germany

Dear Colin,

First of all, I would like to point out that there are no substantial changes to the process or methodology of AHPGS from our point of view as our response shows (see below). The explanations on the individual points 1-6 are part of the Self-Assessment Report and respective annexes prepared for the ENQA review. As I have informed you on May 26, the report is not approved yet and cannot be provided at the moment. In addition, it should also be noted that the procedures of the AHPGS in 2018 were all carried out according to the old law, and in 2019 procedures will continue to be predominantly carried out according to the old law.

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)

The specimen decree contains formal and subject-specific criteria and procedure regulations for accreditation procedures in Germany. Thus, the question should be answered by the German Accreditation Council (GAC).

2. Did AHPGS change its approach to ensuring consistency (ESG 2.5)?

Outcomes of external quality assurance are still based on pre-defined and published criteria, which are interpreted consistently. Hence, it was not necessary for AHPGS to change its approach.

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.

AHPGS did not change its nomination procedure. The nomination follows the requirements of the German Rector's Conference.

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)?

No, there are no changes yet. The use of site visits remains the same. With regard to the publication of reports and follow-up processes, the Interstate Treaty as well as the specimen decree do not provide clear information. Moreover, in the new legal framework the decision is taken by the GAC and, thus, agencies are not part of the decision-making process.


5. Did AHPGS 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)?

No. Notwithstanding the above, the general meeting of the AHPGS has prepared an amendment to the articles of association which provides for an independent complaints committee in the AHPGS after its entry into force.

6. Did AHPGS change its organisational structure in relation to the new legal framework?

No. No changes have been made so far, in particular with regard to the accreditation commissions.

If you have any questions, please do not hesitate to contact me.



Georg Reschauer
Managing Director

Brussels, 29 April 2019

Substantive Change Report on New Legal Framework in Germany

Dear Georg,

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 AHPGS 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 AHPGS 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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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 AHPGS 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 AHPGS 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**.

Since AHPGS has already applied for renewal of registration, there would be no need to make a separate Substantive Change Report if AHPGS submitted the report on the external review of the agency shortly and the report effectively addressed all questions above. Should that be the case, please get in touch with us.

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