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External Review Report

on the application for reaccreditation of *Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland e.V.* (AKAST – Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany) dated 22 June 2017

– presented on 09.11.2018 –[1]

I. Executive summary

AKAST has developed very positively since its establishment ten years ago, further professionalising its work on an ongoing basis and, in the impression of the review panel, commanding high regard among all stakeholder groups in the field of Catholic theology. Discussions held during the site visit highlighted the competence and commitment of the Agency's Head Office; the members of the Board and of the committees were likewise seen to be well-informed, interested and dedicated.

In this external review report, AKAST is explicitly reviewed for compliance with the European Standards and Guidelines (ESG) for the first time. The ESG have nonetheless always been taken into account in the Accreditation Council's criteria and accreditation rules. Overall, the review panel gained a highly positive impression of AKAST.

The work of AKAST faces imminent changes in both its statutory and its canon law framework, as described in the following. For accreditations under the prior statutory framework (which are now coming to an end), the review panel recommends to the Accreditation Council that the scope of activities under the contractual agreement with AKAST should continue to be restricted to Catholic, single-subject theology study programmes and study programmes having canonical value. Regarding AKAST's future work under the new legal framework, there is latitude for widening the scope of activities.

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[1] In accordance with the Guidelines for ENQA Agency Reviews (see section 6.4, page 18 of the Guidelines), this external review report solely includes information that was available at the time of the site visit or was made available subsequently on the basis of requests made by the Accreditation Council review panel in the course of the site visit.

II. Procedural framework

II.1. Legal mandate

Under Section 2 (1) 1 of the Act Establishing a Foundation for the Accreditation of Study Programmes in Germany *(Gesetz zur Errichtung einer Stiftung zur Akkreditierung von Studiengängen in Deutschland)*, the Accreditation Council Foundation has the task of accrediting accreditation agencies. It grants, for a fixed period, the right to accredit study programmes or the internal quality assurance systems of higher education institutions by awarding the foundation's seal.

The accreditation decisions issued by the Accreditation Council *(Akkreditierungsrat)* and the procedure for accrediting an accreditation agency are based on the Rules of the Accreditation Council for the Accreditation of Agencies adopted by resolution on 8 December 2009 and amended on 23 September 2016.[2] In order to help secure the international recognition of decisions of the Accreditation Council and the accreditation agencies it accredits, the Accreditation Council incorporated in its criteria the current Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), as adopted by the ministers of higher education at the May 2015 Bologna Follow-Up Conference in Yerevan. The Accreditation Council also added supplementary criteria that are solely of relevance to agency accreditation in Germany.

II.2. Compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area

In order to be recognised as a member of the European Association for Quality Assurance in Higher Education (ENQA) or to be included in the European Quality Assurance Register for Higher Education (EQAR), an agency must demonstrate in an external review that it complies with the ESG. For EQAR, full membership of ENQA is considered prima facie proof of compliance with the ESG.

Accreditation by the Accreditation Council includes a review against the ESG, thus avoiding duplication in external review. The Accreditation Council follows the Guidelines for external reviews of quality assurance agencies in the EHEA.

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[2] *Regeln des Akkreditierungsrates für die Akkreditierung von Agenturen.* The application of the amended rules was agreed between the Agency and the Accreditation Council after commencement of the accreditation procedure.

II.3. Significant results from the previous accreditation/ENQA review/EQAR registration

AKAST was accredited in 2013 subject to four conditions. The reviewers additionally made a number of recommendations. All of these are addressed in the findings on compliance with the ESG (section IV) and the national supplementary criteria (section V).

The Agency was not seeking to apply for ENQA membership or EQAR registration.

II.4. Review process

AKAST submitted its application to the Accreditation Council for accreditation as an accreditation agency by letter dated 22 June 2017. The Agency submitted a self-evaluation as rationale for the application along with further documents by electronic mail dated 9 May 2018. Additional documents were requested by electronic mail dated 24 July 2018 and received by letter dated 3 September 2018.

The Accreditation Council nominated the following reviewers by resolution of 27 October 2017[3]:

- Prof. Dr. Sigrid Müller, Chair of Theological Ethics, Department of Systematic Theology and Ethics, University of Vienna (Chairperson)
- Prof. DDr. Norbert Lüdecke, Chair of Canon Law, Faculty of Catholic Theology (higher education representative)
- Prof. Dr. Monika Jakobs, Chair of Religious Education and Head of the Institute of Religious Education, University of Lucerne (international expert)
- Berno Schuckart-Witsch, ver.di (United Services Trade Union), Department of Health, Social Services, Welfare and Churches (professional practice representative)
- Lucas Dinter, doctoral student, Ludwig Maximilian University, Munich (student representative)

The review panel was supported by Agnes Leinweber from the Head Office of the Foundation for the Accreditation of Study Programmes in Germany. Professor Dr. Reinhold R. Grimm supervised the review for the Accreditation Council. Due to scheduling reasons Professor Grimm was not able to take part on the site visit.

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[3] The Accreditation Council appointed Prof. Müller and Mr. Schuckart-Witsch at its 93rd meeting on 27 September 2017. The remaining reviewers were appointed on behalf of the Council by the Board on 27 October 2017.

A panel briefing was held in Bonn on 27 April 2018 to present and explain the Accreditation Council's current criteria and the ESG. The briefing also served to further familiarise the reviewers with the procedure and their role in the accreditation process. Mr. Schuckart-Witsch, who was unable to attend the panel briefing due to other commitments, was separately briefed by Head Office.

Self-evaluation report

The self-evaluation is informative and focuses on the key points. The Agency also submitted the necessary documentation together with the report or subsequently. In a separate section of the self-evaluation report, the Agency describes the implementation of the recommendations from the last reaccreditation. It also attached its response to the Accreditation Council's progress report.

Site visit

A site visit was held at the Agency's Head Office in Ingolstadt from 20 to 21 September 2018, preceded by an advance meeting of the review panel on 19 September 2018. The review panel interviewed the Agency's management, representatives of the German Bishops' Conference, members of the Agency's Accreditation Committee, Head Office staff, Agency reviewers, and representatives of higher education institutions where the Agency has already carried out accreditations. The site visit schedule is shown in Appendix 1.

By unanimous vote, the review panel submitted this external report on 09.11.2018 taking AKAST's statement dated 06.11.2018 into account.

This external review report is based on the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) of May 2015 and the resolution of the Accreditation Council, Rules of the Accreditation Council for the Accreditation of Agencies, dated 8 December 2009 and amended on 23 September 2016.

III. Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland e.V. (AKAST)

III.1. Establishment

Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland e.V. (AKAST – Agency for Quality Assurance and Accreditation of Canonical Programmes of

Studies in Germany) was established in 2008 by representatives of the Association of Faculties of Catholic Theology (KThF), the associations of theological disciplines *(theologische Arbeitsgemeinschaften)* and ten theological faculties and schools of philosophy and theology, and is formally recognised as an independent regional agency of the Vatican evaluation agency, *Agenzia della Santa Sede per la Valutazione e la Promozione della Qualità delle Università e Facoltà Ecclesiastiche* (AVEPRO).

III.2. Organisation

The governing bodies and organisational structure of AKAST are laid down in its Statutes (Annex 2). Its governing bodies are the Board and the General Meeting.

The Board comprises the Chairperson, the First Vice-Chairperson and the Second Vice-Chairperson. The Chairperson must be a professor or retired professor of a faculty of Catholic theology. The Chairperson also chairs the Accreditation Committee and the Advisory Board. In accordance with c. 317, §1 read in conjunction with c. 312, §1 (2) of the Code of Canon Law (CIC), the Chairperson has to be confirmed by the German Bishops' Conference (Annex 6). The Board is elected by the General Meeting for a period of five years and remains in office until the next election. The Board conducts the day-to-day business within the bounds set by resolutions of the General Meeting. It reports to the General Meeting and presents the draft budget and annual accounts. A representative appointed by the Commission for Science and Arts (Commission VIII) of the German Bishops' Conference attends its meetings in an advisory capacity.

The membership of the General Meeting includes:

- Individuals who are members of the Catholic Church;
- Legal entities – primarily schools and faculties of theology that apply for admission;
- The Association of Faculties of Catholic Theology (six representatives: the Chairperson, the Deputy Chairperson and the four members of the Advisory Board of the Association of Faculties of Catholic Theology for the duration of their term of office), the spokesperson of the associations of theological disciplines[4] for the duration of his or her term of office; and
- Two representatives of German (arch-)dioceses appointed by the German Bishops' Conference.

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[4] This grouping now bears the name *Vereinigung der Arbeitsgemeinschaften für katholische Theologie* and is headed by a chairperson and a deputy chairperson.

Under Section 6 (5) of the Statutes, the General Meeting adopts resolutions on, among other matters, amendments to the Statutes, dissolution of the Agency, and guidelines for implementation of its purpose. It passes resolutions on the budget and formally adopts the annual accounts. Further key tasks of the General Meeting comprise the election of the Board, those members of the Accreditation Committee who are not members ex officio, and the Advisory Board. Its duties also include accepting the annual audit report, formally approving the actions of the Board, and accepting the report of the Board and of management. Resolutions on procedural guidelines require its consent.

AKAST's central decision-making body is the Accreditation Committee. Composed of experts, the Accreditation Committee makes accreditation decisions, adopts resolutions on procedural guidelines, and nominates review panels. Its members are elected by the General Meeting for five years in consultation with the Association of Faculties of Catholic Theology (KThF), the associations of theological disciplines, the German Seminary Rectors' Conference *(Deutsche Regentenkonferenz)* and the Association of Theology Students (AGT). They require the consent of the German Bishops' Conference. In accordance with the Statutes, the Accreditation Committee comprises the following ten members and substitute members, who are either elected or ex-officio members:

- The Chairperson;
- Four professors (one of whom should be from abroad if possible) and for the event of unavailability two professors as substitute members;
- One expert in quality assurance and accreditation matters;
- One member from the Commission for Science and Arts (Commission VIII) of the German Bishops' Conference;
- Two members from professional practice, of whom one is a rector of a seminary[5];
- One student member and a substitute for the event of unavailability.

The student member and substitute student member are elected for two years and all other members for five years.

The Accreditation Committee is quorate when more than half of its members, including the Chairperson, or in the event of the Chairperson's absence the Vice Chairperson, are in attendance. Resolutions are passed by a majority of those present and require a majority of professor members. In the event of a tie, the Chairperson of the Accreditation Committee, or if the Chairperson is unavailable the Vice Chairperson, has the casting vote. Accreditation decisions require the consent of the member from the Commission for Science and Arts (Commission VIII) of the German Bishops' Conference.

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[5] The term 'rector' relates here to the head of a seminary – an institution where candidates for ordination are housed and receive additional elements of their training alongside their studies.

Section 8 of the Statutes lays down the duties and procedures of the Advisory Board. This comprises a Chairperson and four experts in quality assurance and accreditation matters and monitors the quality of the Agency's work in an advisory capacity.

Its members are elected for five years. Re-election is permitted. The Advisory Board is quorate when more than half of its members, including the Chairperson, or in the event of the Chairperson's absence the Vice Chairperson, are in attendance. Resolutions are passed by a majority of those present. In the event of a tie, the Chairperson has the casting vote.

III.3. Funding

In addition to proceeds from accreditations, AKAST is financed by an annual grant from the Association of German Dioceses (VDD), the legal entity for the German Bishops' Conference. The Head Office is staffed by an administrator (full-time) and a secretary (50% part-time). Under a cooperation agreement with the Catholic University of Eichstätt-Ingolstadt, the Head Office utilises premises in Ingolstadt.

III.4. Activities

Since AKAST was first accredited in 2008, the Accreditation Council, noting that the Agency does not comply with the criterion requiring accreditations to be carried out on a full-cost basis, has restricted the Agency's activities to those study programmes which in any case fall within its exclusive remit as stipulated in the KMK *Eckpunkte* Resolution of 13 December 2007 ("Key Points for the Structure of Studies in Study Courses Involving Catholic and Protestant Theology/Religion":

> "(2) The Agency's accreditation is restricted to those theological study programmes, as defined in para. 3 of the 'Key Points for the Structure of Studies in Study Courses Involving Catholic and Protestant Theology/Religion' of 13 December 2007, which qualify students for the office of pastor or priest or for the profession of lay pastor ('single-subject theology degrees'), and to Bachelor's and Master's study programmes at German higher education institutions whose degrees have canonical value."

As well as single-subject study programmes in theology, the Agency is also able to accredit other study programmes that have canonical value. These can include Bachelor's and Master's study programmes (such of Bachelor of Arts in Philosophy at Sankt Georgen Graduate School

of Philosophy and Theology, Frankfurt am Main)[6] or ecclesiastical degrees such as the Baccalaureate, Licentiate and Doctorate[7] as stipulated in Article 47 of the Apostolic Constitution *Sapientia Christiana* of 15 April 1979. The study programmes falling within the Agency's remit are listed in Appendix 3 to this report. As they do not include any joint degree programmes, the Agency does not carry out accreditations under the European Approach.

Since its establishment, AKAST has carried out 35 accreditations, in most cases as individual accreditations and in some as cluster accreditations. The Accreditation Committee has made 43 accreditation decisions (as of January 2018); to these are added findings with regard to the fulfilment of conditions and notifications of changes. The study programmes accredited by AKAST are listed on the Agency's website (www.akast.info).

In addition to the accreditation of study programmes, AKAST has developed a peer-reviewed institutional evaluation procedure that can be carried out at the request of faculties of Catholic theology or schools of philosophy and theology within the ambit of the German Bishops' Conference. The Agency has compiled the requirements, main elements and procedural outline of peer-reviewed institutional (quality development) evaluations and published them in a set of guidelines (Annex 16). An institutional evaluation concludes with recommendations for structural and substantive quality development in research, education, study, and knowledge transfer, but without a formal decision. No institutional evaluation has yet been carried out (self-evaluation report, page 12).

III.5. Development of the legal framework for AKAST

AKAST faces imminent changes in both its statutory and its canon law framework. In statute law, there are changes resulting from the entry into force, on 1 January 2018, of the Interstate Treaty on the organisation of a joint accreditation system to ensure the quality of teaching and learning at German higher education institutions (*Studienakkreditierungsstaatsvertrag*, referred to in the following as the Interstate Treaty). Under the prior accreditation system, AKAST was one of ten agencies regularly accredited by the Accreditation Council in a five-year cycle, taking into account agreements governing relations between the state and the churches as laid down in the KMK *Eckpunkte* ('Key Points') resolution.

From January 2018, under Article 5 (3) 5 of the Interstate Treaty, the tasks of the newly established Accreditation Council Foundation include authorising agencies for the conduct of programme and system accreditations. As a condition for authorisation, according to Article 5 (3)

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[6] A list of canonical study programmes in Germany is provided in Annex 1.
[7] Under Article 50 of *Sapientia Christiana*, the Licentiate enables the holder to teach in a major seminary or similar school. The Doctorate is the academic degree which enables the holder to teach in a Faculty.

5 of the Interstate Treaty, an agency must prove that it is reliably able to exercise the tasks of assessment and of preparation of the review report; this is refutably assumed for agencies that are listed in the European Quality Assurance Register for Higher Education (EQAR). According to the second sentence of Article 3 (2) and the comments on Article 3 in the explanatory memorandum to the Interstate Treaty, agency accreditation is to be discontinued in favour of a formal authorisation procedure, based as a rule on an EQAR listing. Under an Accreditation Council resolution of 20 February 2018 on the authorisation of agencies in the German system, authorisation can take place on the basis of registration by EQAR or a periodic evaluation of compliance with the European Standards and Guidelines (ESG). With the present reaccreditation application, AKAST can obtain reaccreditation under the prior legal framework up to 2023. At the end of the reaccreditation period, AKAST has the option of evaluation against the ESG. It is free to choose which institution conducts that evaluation.

Under the prior legal framework, criteria and rules of procedure for accreditation were adopted by the Accreditation Council. In the new accreditation system, under Article 4 of the Interstate Treaty, this task falls to the German *Länder*. The *Länder* have agreed and laid down details in a Specimen Decree (*Musterrechtsverordnung*, or MRVO), on the basis of which they each issue decrees of their own. One by one, they have proceeded to issue such decrees since the KMK adopted the Specimen Decree on 7 December 2017.

The following legal provisions apply to AKAST: Article 17 (2) of the Interstate Treaty stipulates that the Interstate Treaty is without prejudice to provisions and agreements under the law governing relations between the state and the churches. Under Section 3 (3) of the Specimen Decree, theological study programmes that qualify students for the office of pastor or priest or for the profession of lay pastor do not have to be tiered. The comments on this passage in the explanatory memorandum cite the KMK *Eckpunkte* resolution ('Key Points'). The second sentence of Section 24 (1) of the Specimen Decree specifies AKAST as the agency which accredits single-subject Catholic theology study programmes while also mentioning that AKAST is authorised by the Accreditation Council for programmes in Germany. Under Section 22 (4) of the Specimen Decree, single-subject Catholic theology study programmes are solely accredited by way of programme accreditation. In future, single-subject theology study programmes will be accredited by the Accreditation Council on the basis of a review by AKAST.

Study programmes with canonical degrees, such as Baccalaureate, Licentiate and Doctorate, do not come under the Specimen Decree and, under the new accreditation system as under the old, can only be accredited by AKAST with the award of the agency seal.[8]

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[8] This relates to a very small number of cases, as can be seen in Appendix 3. Unless otherwise stated, these study programmes are included in the following with regard to accreditation.

With regard to the canon law framework, the Apostolic Constitution *Veritatis Gaudium*, published on 29 January 2018, revises canon law as it applies to Catholic institutions of higher education, thus affecting ecclesiastical universities and faculties as well as degrees having canonical value.

5   In its accompanying letter dated 29 January 2018, the Congregation for Catholic Education notes that, on account of the need for consultation between the state and the churches under the law governing relations between the two in Germany, the Decree on Faculties of Catholic Theology in State Faculties within the Ambit of the German Bishops' Conference dated 1 January 1983 (*Akkommodationsdekret – Decretum* 234/78), issued to accommodate the Apostolic

10   Constitution *Sapientia Christiana* and its annexed *Ordinationes*, will remain in force until revised in cooperation with the German Bishops' Conference.

IV. Compliance with the European Standards and Guidelines (ESG)

The review panel gained a highly positive impression of the Agency's work and determined that the requirements under the ESG are fully implemented.

Over the course of the review, the review panel gained an understanding of how the unique architecture and special status of AKAST follow from the fact that Catholic theology in higher education is a joint responsibility of the state and the Church and from associated stipulations under the law governing relations between the two. Because of this, AKAST is unable to meet certain aspects of the Accreditation Council's national criteria, as outlined later in Section V.

The main problems identified by the review panel with regard to the national criteria relate to accreditation on a full-cost basis (Criterion 3.3) and to accreditation across all types of higher education institutions (Criterion 3.4). For accreditations under the prior legal framework, the restriction of the Agency's activities to single-subject theology study programmes and to Bachelor's and Master's study programmes leading to canonical qualifications – as stipulated in the first accreditation – should therefore be retained in the contractual agreement between the Accreditation Council and AKAST. In future, because Article 5 (3) 5 of the Interstate Treaty stipulates the ESG as the sole criteria for authorisation of an agency in Germany, the national criteria will cease to apply and the restriction of the scope of activities will be rendered obsolete.

3.1 Use of external quality assurance procedures for higher education

STANDARD:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

GUIDELINES:

To ensure the meaningfulness of external quality assurance, it is important that institutions and the public trust agencies.

Therefore, the goals and objectives of the quality assurance activities are described and published along with the nature of interaction between the agencies and relevant stakeholders in higher education, especially the higher education institutions, and the scope of the agencies' work. The expertise in the agency may be increased by including international members in agency committees.

A variety of external quality assurance activities are carried out by agencies to achieve different objectives. Among them are evaluation, review, audit, assessment, accreditation or other similar activities at programme or institutional level that may be carried out differently. When the agencies also carry out other activities, a clear distinction between external quality assurance and their other fields of work is needed.

Previous accreditation recommendations/conditions

Condition 3: AKAST, in the make-up of the Accreditation Commission, regularly accommodates for the commissioning of a further person of professional practice in addition to the one rector of a seminary set in the statutes regarding the variety of occupational areas for theologians already planned for in the statutes of association (Criterion 2.2.2).); compliance determined by Accreditation Council resolution of 18 June 2015.

Recommendation 3: AKAST should make arrangements to ensure representation, in particular, of professional practice and the student body among the membership of the Accreditation Committee (see Criterion 2.2.2).

Evidence

AKAST's quality philosophy is publicly documented on the Agency's website (www.akast.info) and, in particular, is set out in its Mission Statement (Annex 5), according to which "accreditation is designed to facilitate the national, international and ecclesiastical certification of canonical study programmes and degrees. Simultaneously it aims at providing orientation for universities, students, employers, and responsible Church authorities towards the quality of programmes and their correspondence with the relevant ecclesiastical guidelines according to the 'Key Points for the Structure of Studies in Study Courses involving Catholic and Protestant Theology/Religion' (Annex 1) amended by the Standing Conference of the Ministers of Education and Cultural Affairs (KMK) December 13th, 2007." (Self-evaluation report, page 7). In addition to the Mission Statement, the AKAST website cites as additional objectives the improvement of university didactics and the exchange of information about recent developments. Asked about this, the Agency made reference to the impending revision of its basic documents in line with the new statutory and canon law framework. In the course of this, the Agency said, it also plans to revise its Mission Statement and website. With regard to improving higher education didactics, the Agency reported that it has provided workshops in recent years. The Agency also said it is already active with regard to the exchange of information on recent developments.

The tasks and objectives of AKAST are set forth in the Statutes (Annex 2) and translate into the daily work of the Agency. Their primary focus within external quality assurance in higher education is as follows:

- Promotion of faculties and other institutes of Catholic theology;
- Quality assurance of canonical study programmes in accordance with the Apostolic Constitution *Sapientia Christiana* of 15 April 1979 (Annex 18a) and the annexed *Ordinationes* (Annex 18a);
- Accreditation of canonical study programmes and award of the Accreditation Council seal (see also the self-evaluation report, page 7 et seq.).

<u>Stakeholder involvement</u>

Regarding stakeholder involvement, AKAST makes reference on page 9 of its self-evaluation report to the composition of the General Meeting and the Accreditation Committee. The General Meeting currently comprises 30 members, including state universities, ecclesiastical colleges, theological faculties of state or ecclesiastical universities, and two delegates from the German Bishops' Conference. In addition to university educators, the Accreditation Committee also includes two individuals from professional practice (one of whom is the head of a seminary). The Accreditation Committee further includes a student member who is supported by a substitute member (for the tasks of the General Assembly and Accreditation Committee, see section 2.3 Organisation).

<u>Concerning Recommendation 3:</u> Section 7 (2) of the Statutes provides for two substitute members for the professor members of the Accreditation Committee, and a substitute member must also be nominated for the student member. There is no provision for a substitute member for the two representatives of professional practice.

Under a resolution on procedures and criteria for the nomination of reviewers at AKAST (Annex 21), the programme accreditation review panel includes two members from professional practice (one rector of a seminary and one member from outside priestly training) and one student member.

In accordance with the guidelines for institutional evaluation, the review panels for institutional evaluation procedures likewise include one member from professional practice and one student member (Annex 16, page 22).

Analysis

In its capacity as the independent regional agency of AVEPRO in Germany, providing programme accreditation of single-subject Catholic theology study programmes and study programmes having canonical value, it is the impression of the review panel that AKAST enjoys clear recognition in the field of Catholic theology. The review panel ascertained that the representatives of higher education institutions in attendance value AKAST as an informed service provider and a neutral agency (see also ESG Standard 3.4).

The quality philosophy underlying AKAST's 2009 Mission Statement emphasises the autonomy of higher education institutions and academic freedom and is compliant with ESG Standard 3.1. The objectives set forth in the Mission Statement and the Statutes are mutually consistent and, in the impression of the review panel, are implemented in the Agency's work. The review panel welcomes AKAST's announced plans to revise its Mission Statement and website with regard to the presentation of its objectives. The Agency could possibly incorporate the promotion of higher education didactics into its Mission Statement; in any case, it is the impression of the review panel that the events offered by AKAST in this area are well received.

Under the new statutory and canon law framework, the review panel, AKAST and the representatives of the German Bishops' Conference also see latitude for considering a future extension of the Agency's activities. AKAST could, for example, supplement its portfolio with Bachelor's and Master's study programmes in which theology is combined with other subjects. In interviews, higher education institutions said they were open to such a broadening of the agency's activities, as many of them offer combined study programmes in addition to a single-subject theology degree programme and would thus be able to use AKAST in future as the sole accreditation agency for all such programmes. In the interests of efficiency, such accreditation procedures are currently linked together under the cooperation agreement with ACQUIN.

The inclusion of members from professional practice and students in the Accreditation Committee and the membership of state and ecclesiastical higher education institutions along with two representatives of the German Bishops' Conference in the General Meeting ensures that the most important stakeholders are involved in drafting procedural documents and in the daily work of the Agency. Stakeholders are also adequately represented in the review panels, both in programme accreditation and in institutional evaluation. Recommendation 3 from the previous accreditation has been implemented with the establishment of a substitute student member of the Accreditation Committee.

With regard to the involvement of relevant stakeholders in the review process, see Standard 2.2.

Recommendations

– None –

Panel conclusion:

Fully compliant with Standard 3.1.

3.2 Official status

STANDARD:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

GUIDELINES:

In particular when external quality assurance is carried out for regulatory purposes, institutions need to have the security that the outcomes of this process are accepted within their higher education system, by the state, the stakeholders and the public.

Previous accreditation recommendations/conditions

– None –

Evidence

In order to operate as the regional agency of AVEPRO within the ambit of the German Bishops' Conference in accordance with the AVEPRO Statute and the Apostolic Constitution *Sapientia Christiana*, AKAST was established with the agreement of the Holy See as *Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland e. V.* (Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany), an incorporated public association under canon law in accordance with CIC, cc. 116, 301 § 3 and 312, by resolution of the Autumn Plenary Assembly of the German Bishops' Conference on 22 to 25 September 2008 (Annex 2). The association has its registered office in Bonn (Annex 3). AKAST was formally recognised by the Congregation for Catholic Education as a regional agency *(articolazione territoriale)* of AVEPRO by letter of 9 August 2013 (Annex 7).

AKAST was first accredited as an accreditation agency by resolution of the Accreditation Council of 31 October 2008. The subsequent reaccreditation is valid until 31 December 2018. Subject to the Accreditation Council passing the resolution on 6 December 2018, it is possible for accreditation under the prior legal framework to be granted until 31 December 2023.

Analysis

AKAST's legal status is secure for the long term and the Agency is formally recognised by the competent ecclesiastical and state bodies. The review panel was able to ascertain that AKAST carries out accreditations under the legal framework in effect at the time of entry into contract. This also ensures the consistent application of procedures during the transition to the new statutory and canon law framework.

Recommendations

– None –

Panel conclusion:

Fully compliant with Standard 3.2.

3.3 Independence

STANDARD:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

GUIDELINES:

Autonomous institutions need independent agencies as counterparts.

In considering the independence of an agency the following are important:

• Organisational independence, demonstrated by official documentation (e.g. instruments of government, legislative acts or statutes of the organisation) that stipulates the independence of the agency's work from third parties, such as higher education institutions, governments and other stakeholder organisations;

• Operational independence: the definition and operation of the agency's procedures and methods as well as the nomination and appointment of external experts are undertaken independently from third parties such as higher education institutions, governments and other stakeholders;

• Independence of formal outcomes: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Anyone contributing to external quality assurance activities of an agency (e.g. as expert) is informed that while they may be nominated by a third party, they are acting in a personal capacity and not representing their constituent organisations when working for the agency. Independence is important to ensure that any procedures and decisions are solely based on expertise.

Previous accreditation recommendations/conditions

Recommendation 7: Due to the formal recognition of AKAST as a regional agency of AVEPRO, the caveat in accreditation certificates that accreditation decisions can be revoked by AVEPRO should be removed (see Criterion 2.3.3).

Evidence

AKAST explains on page 14 of the self-evaluation report that, as an entity of higher education institutions established by theological faculties, schools of philosophy and theology, representatives of the Association of Faculties of Catholic Theology (KThF) and the associations of theological disciplines *(theologische Arbeitsgemeinschaften)*, AKAST is free from state influence. In accordance with the KMK *Eckpunkte* ('Key Points') resolution, AKAST exercises sovereign rights of the Church and, under canon law, is subject to the vigilance of the German Bishops' Conference (CIC, cc. 305 and 312–320).

According to the Agency's Statutes (see Annex 2), the German Bishops' Conference has the following scope for influencing AKAST's decisions:

- Section 3 (1): Consent for the admission of members to the association;
- Section 5 (1): Confirmation of the individual assuming the office of Chairperson of the Board, the Accreditation Committee and the Advisory Board;

- Section 6 (4): Approval of General Meeting resolutions regarding amendments to the Statutes or the dissolution of the association;
- Section 7 (3): Consent for the nomination of members of the Accreditation Committee; and
- Section 7 (6): Approval of each accreditation decision.

Under Section 5 (3), a representative appointed by the German Bishops' Conference attends Board meetings in an advisory capacity. The Accreditation Committee includes one member from the Commission for Science and Arts (Commission VIII) of the German Bishops' Conference (Section 7 (2) of the Statutes).

Under Section 11 of the Statutes, the association, in accordance with canon law, is subject to the vigilance of the German Bishops' Conference (CIC, cc. 305 and 312–320).

Other ecclesiastical institutions are also involved in appointments to AKAST's committees. Under Section 7 (3), the members of the Accreditation Committee are elected for five years, and the student members for two years, in consultation with the Association of Faculties of Catholic Theology (KThF), the associations of theological disciplines, the German Seminary Rectors' Conference and the Association of Theology Students (AGT).

The Agency has presented a declaration to be signed for the purpose of documenting the impartiality and confidentiality of all elected committee members and permanent guests (see Annexes 28–30). Reviewers likewise sign a declaration of no-conflict-of-interest (Annex 31).

Members of the Accreditation Committee are not allowed to take part in an accreditation if they have been involved in the last five years, or continue to be involved, in the higher education institution concerned (Annex 30). On page 14 of its self-evaluation review, the Agency states that the Committee's independence in deciding individual cases also applies to the member from the Commission for Science and Arts (Commission VIII) of the German Bishops' Conference. The stipulation in the Statutes that decisions are subject to the Commission VIII member's consent, by making this member party to the decision-making process, helps ensure that there is no conflict between accreditation decisions and the subsequent ecclesiastical approval required under canon law. That approval is granted by the respective diocesan bishop, or in the case of colleges affiliated with religious orders, directly by the Holy See, and not by the Commission for Science and Arts (Commission VIII) of the German Bishops' Conference. There is no relationship of authority in this connection.

AKAST has presented a confirmation from the Congregation for Catholic Education stating that the Agency is formally recognised as an *articolazione territoriale* in accordance with Article 4 (1) of the Statute of AVEPRO. It is noted, however, that the *Regolamento* has yet to be approved by the Vatican Secretariat of State. There is also a draft of the *Regolamento*

governing the working relationship with AVEPRO. This mostly consists of reporting obligations and the right of AVEPRO to nominate a member of its *Consiglio direttivo* for membership of the AKAST Advisory Board.

On page 7 of its self-evaluation report, AKAST states that Recommendation 7 has been implemented and that accreditation certificates no longer contain a caveat that decisions can be revoked by AVEPRO. AKAST has submitted a sample certificate in this connection.

With regard to the impartiality of reviewers, see Standard 2.4.

Analysis

In the impression of the review panel, AKAST is regarded as an independently operating agency. However, the fact Agency's structure as a public association under canon law – which is also reflected in the Statutes – means that the German Bishops' Conference is able to exercise influence in various ways even though AKAST has independent legal personality. At the level of organisational independence, therefore, the review panel does not conclude that the Agency is fully independent, while noting that the agency's structure reflects the situation of Catholic theology in Germany with the Roman Catholic Church having rights under the law governing relations between the state and the churches. Inquiring on this point, the reviewers were told that in the ten years of the Agency's work, the rights of the German Bishops' Conference with regard to confirming elected members and consenting to new members have never resulted in any conflict.

Being established as a public association under canon law enables AKAST institutionally to make decisions on behalf of the Roman Catholic Church. This is necessary most of all because, under Paragraph 8 of the KMK *Eckpunkte* resolution ('Key Points') and the fifth sentence of Section 25 (1) of the Specimen Decree, accreditation decisions require the consent of the German Bishops' Conference. Whereas other agencies ensure the granting of such consent by involving a Church nominee in external reviews and the preparation of external review reports, in AKAST's case this is delegated to the member for the German Bishops' Conference on the Accreditation Committee. The review panel notes that formal recognition of qualifications within the Catholic Church is in the nature of study programmes having canonical value. Ecclesiastical consent for the quality assessment of an AKAST-accredited study programme is therefore not external and not a third-party matter. Canonical value is a fundamental feature of study programmes relevant to AKAST and an inseparable guaranteed quality. It therefore makes sense – also, and especially, in the light of the ESG – to integrate this element of quality assessment into the accreditation process. As with the other rights, the requirement for the consent of the member for the German Bishops' Conference on the Accreditation Committee does not result in any conflict in practice. In the impression of the review panel, the

member for the German Bishops' Conference tends in practice to serve within the Accreditation Committee in more of a moderatorial and advisory capacity. There is therefore independence in the performance of accreditations.

Other than the rights of the German Bishops' Conference as described, the Agency's decisions are not subject to third-party influence. The formal recognition of AKAST as an *articolazione territoriale* of AVEPRO has not proceeded any further since the last reaccreditation in 2013, a fact that AKAST attributes to preparations for the Apostolic Constitution *Veritatis Gaudium* within the relevant offices of the Vatican. The draft *Regolamento* gives AKAST the right to act autonomously and under its own responsibility within its regional ambit and does not make any provision for revocation of AKAST decisions by AVEPRO. Accreditation certificates no longer contain a caveat regarding revocability. Recommendation 7 from the previous accreditation has thus been followed. There is independence with regard to formal outcomes.

The review panel recommends that all involved continue to exercise their joint responsibility sensitively. The recognition of AKAST and its standing in Catholic theology in Germany fundamentally depend on AKAST being seen to be independent and neutral.

Recommendations

– None –

Panel conclusion:

Substantially compliant with Standard 3.3.

3.4 Thematic analysis

STANDARD:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

GUIDELINES:

In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts.

A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty.

Previous accreditation recommendations/conditions

Recommendation 1: AKAST should more clearly communicate the processes for passing on findings from accreditation work to the German Bishops' Conference and the Association of

Faculties of Catholic Theology, and should raise its profile as a communication platform for the improvement of study programmes within its remit (see Criterion 2.1.1).

Evidence

AKAST refers on page 15 of its self-evaluation report to the Agency's special status within its field. This, it says, serves as a basis for structured analysis with a view to enhancing the quality of canonical study programmes in the national context. AKAST's activities in this regard are almost entirely discursive, as this provides an appropriate and useful way of passing on findings and lessons learned.

AKAST presents its findings in various forms, such as by participating in working groups, organising workshops, holding information meetings, giving presentations and publishing regular reports. The feedback places special focus on quality assurance and quality development of study programmes in Catholic theology (self-evaluation report, page 15).

As an example of participation in working groups, AKAST describes on page 15 of its self-evaluation report the Agency's involvement in the evaluation of guidelines by the Association of Faculties of Catholic Theology on the recognition of study and examination credits in modular single-subject Catholic theology degree programmes (Annex 18b). This was occasioned by problems with recognition of the *externitas*, an obligatory year that candidates for ordination take at a university other than their own. AKAST reported on accreditation conditions and recommendations so far issued that have a bearing on the *externitas*. The outcome was a circular by the Association of Faculties of Catholic Theology dated 22 July 2015 on the *externitas* in modular single-subject theology study programmes (Annex 18b).

AKAST likewise mentions the Agency's involvement in evaluation of the KMK *Eckpunkte* resolution. Here, AKAST took part in a German Bishops' Conference working group whose findings were presented and discussed in a conference with all relevant stakeholders (self-evaluation report, page 16).

In 2015, AKAST was involved in the evaluation by the German Bishops' Conference of the *kirchliche Anforderungen* (ecclesiastical requirements) (Annex 18b). AKAST's contribution consisted of identifying areas where there is a conflict in accreditation between the ecclesiastical requirements and the Rules for the Accreditation of Study Programmes (Annex 18b). The main outcomes related to the award of ECTS points, modularisation, final examination design, the generation of overall grades and the timing of modules within the various programme segments (self-evaluation report, page 16).

AKAST regularly organises workshops, which are one-day information and discussion events on topics relating to the reform of study programmes in Catholic theology. They are directed at potential reviewers, students, or heads of faculties and higher education institutions, and

those in charge of study programme and quality development at Catholic theology faculties and ecclesiastical higher education institutions. Fifteen such events were held during the reporting period, including twelve workshops for students, among other things for the information of potential new student reviewers (Annex 37). Two workshops were held for member higher education institutions and member faculties: one on competency-based examination, including module examinations and final examinations, and one on reorganisation of the accreditation system. For members of the Accreditation Committee and the Advisory Board, a workshop was organised on the accreditation of a distance learning study programme in Catholic theology (self-evaluation report, page 16 et seq.).

AKAST also regularly reports to the German Bishops' Conference, primarily to the Commission for Science and Arts (Commission VIII), and semi-annually to the Congregation for Catholic Education and AVEPRO. AKAST states that it has stepped up its activities in the area of ESG 3.4 since the previous accreditation in order to act on Recommendation 1. In future, AKAST plans to provide more materials on activities in the area of ESG 3.4 on its website (self-evaluation report, page 15).

Analysis

During the site visit, AKAST rightly pointed out that it is confronted with the ESG requirements for the first time in this reaccreditation and therefore has not placed a focus on written thematic analyses in the past. This is also understandable given that the AKAST Head Office essentially consists of the Administrator.

The external interviewees on the site visit confirmed that AKAST is perceived as a helpful service provider that provides findings from analyses of its own work at various levels, such as conferences of faculties, working groups and other event formats. The analyses on the *externitas*, for example, were positively received by the professional community (see also ESG 3.1).

In the opinion of the review panel, AKAST already substantially met ESG Standard 3.4 in the past. However, the Agency should give greater weight in future to documenting such outcomes for the public. This could take the form, for example, of position papers by Agency committees or the written outcomes of workshops where, as is indeed the case, they include description and analysis of findings from AKAST's own accreditation work. AKAST could also make use of the oversight of individual accreditations by a member of the Accreditation Committee or the Advisory Board to gather and record findings on cross-institutional higher education matters and to collect topics for cross-sectional analysis.

Recommendations

1. AKAST should publish more findings from analyses of its own work in future. At the same time, the neutral observer viewpoint should be preserved in tried and tested manner in order to avoid pre-empting university policy bodies such as the Association of Faculties of Catholic Theology.

Panel conclusion:

Substantially compliant with Standard 3.4.

3.5 Resources

STANDARD:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

GUIDELINES:

It is in the public interest that agencies are adequately and appropriately funded, given higher education's important impact on the development of societies and individuals. The resources of the agencies enable them to organise and run their external quality assurance activities in an effective and efficient manner. Furthermore, the resources enable the agencies to improve, to reflect on their practice and to inform the public about their activities.

Previous accreditation recommendations/conditions

– None –

Evidence

According to Annex 10, the Agency expects revenue of €253,208 in 2018, with the Association of German Dioceses (VDD) contributing €138,000. Revenue of €60,000 is expected to be generated from accreditation work. The Head Office is staffed by an administrator (full-time) and a secretary (50% part-time).

According to page 18 of the self-evaluation report, the Agency maintains an office in Ingolstadt with administrative support from the Catholic University of Eichstätt-Ingolstadt (KUE) under a cooperation agreement (Annex 11). The university provides the necessary material resources and premises for the office and bills AKAST for the operating costs (rent, cleaning, postal mail, telephone, etc.). Under the prevailing grant agreement, the staffing costs are directly refunded to KUE by VDD, but are shown in the budget and the annual accounts. The cooperation with KUE is regularly evaluated by AKAST; a recent report is available and comes to a positive assessment.

According to page 18 of the self-evaluation report, both AKAST staff have an office with the usual resources at their disposal. The office also has a meeting room and an archive. Other meeting rooms can be used under the cooperation with KUE (see Annex 11). Remuneration is governed under a further cooperation agreement between KUE and VDD.

5

Analysis

The expert group considers the human and material resources to be appropriate for all work areas. The Agency has also been able in the past to reflect on its own practice and organise events to inform the (professional) public (see ESG 3.4). Interviews during the site visit confirmed the impression that AKAST is an institution which is approved by the German Bishops'

10 Conference and whose funding by VDD can be considered secure.

Making use of the services of KUE for purely administrative tasks such as the appointment of staff and reimbursement of travel expenses is a reasonable option given the small size of the organisation. In the impression of the review panel, the workload for the two members of staff is manageable. The review panel welcomes the de facto stand-in arrangement for the Admin-

15 istrator that exists by virtue of the cooperation with ACQUIN, at least for the event of illness during site visits.

Recommendations

– None –

Panel conclusion:

20 **Fully compliant with Standard 3.5.**

3.6 Internal quality assurance and professional conduct

STANDARD:
Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

GUIDELINES:
Agencies need to be accountable to their stakeholders. Therefore, high professional standards and integrity in the agency's work are indispensable. The review and improvement of their activities are ongoing so as to ensure that their services to institutions and society are optimal.

Agencies apply an internal quality assurance policy which is available on its website. This policy ensures
- that all persons involved in its activities are competent and act professionally and ethically;
- includes internal and external feedback mechanisms that lead
to a continuous improvement within the agency;
- guards against intolerance of any kind or discrimination;
- outlines the appropriate communication with the relevant authorities of those jurisdictions where they operate;

- ensures that any activities carried out and material produced by subcontractors are in line with the ESG, if some or all of the elements in its quality assurance activities are subcontracted to other parties;
  - allows the agency to establish the status and recognition of the institutions with which it conducts external quality assurance.

Previous accreditation recommendations/conditions

Condition 4: AKAST presents a published systematisation of internal quality assurance, on the basis of the experiences of the first accreditation period, which incorporates all committees, and defines targets, measures, and feedback cycles (Criterion 2.5).

Recommendation 4: It should be ensured that Head Office is able to reinforce or replenish its capabilities with regard to internal quality assurance in higher education (see Criterion 2.2.3).

Recommendation 8: The Advisory Board should perform the internal quality assurance function beyond participation in meeting of the Accreditation Committee and should document its work. If it continues to exist as a separate body, it should elect a chairperson from among its number in order to be independent in terms of personnel from the Accreditation Committee and the latter's Chairperson (see Criterion 2.5).

Evidence

AKAST submitted a document, *Das System der internen Qualitätssicherung von AKAST e.V.* (The internal quality assurance system of AKAST e.V.), which is published on the Agency website.[9] In this document, AKAST sets out internal quality assurance objectives based on the quality philosophy which it applies in its own work and which follows from the responsibility of higher education institutions for the quality of their study programmes. The internal quality assurance system also describes steps in the study programme accreditation/reaccreditation process with reference to templates. It also goes into the preparation of reviewers and of the agency's internal bodies such as the Accreditation Committee and the Advisory Board.

The Advisory Board also performs tasks relating to internal quality assurance. The members of the Advisory Board regularly report in meetings of the Accreditation Committee on matters such as recent international developments in accreditation. With regard to Recommendation 8, the Agency reports that Advisory Board matters have been added as an agenda item in the standard agenda of meetings of the Accreditation Committee and Advisory Board (Annex 26). The work of the Advisory Board is now explicitly recorded in meeting minutes (Annex 26a). The Chairperson of the Board is also the Chairperson of the Advisory Board (self-evaluation report, page 8).

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[9] See http://www.akast.info/DieAgentur/Qualit%C3%A4tssicherung/tabid/111/language/de-DE/Default.aspx, viewed 4 October 2018.

From the Agency's point of view, the practice of the Accreditation Committee and the Advisory Board holding joint meetings has proved useful and is valued, partly because of the limited amount of time that members of the two bodies are able to make available (self-evaluation report, page 10).

5   For internal and external feedback, provision is made as a rule for each accreditation to be evaluated. Both the reviewers involved in the accreditation and the higher education institutions or faculties concerned give their assessment for this purpose (Annexes 33 and 34). A summary of the results is available for the period summer semester 2014 to summer semester 2016 (Annex 35). The higher education institutions reported that they greatly value the size

10   and composition of the review panels. Discussions during site visits were described as effective and appropriate. The feedback from the reviewers was likewise positive.

Intolerance and discrimination: On page 22 of the self-evaluation report, AKAST explains that under Article 10 (4) of the Foundation Charter of the Catholic University of Eichstätt-Ingolstadt (KUE), all employees are obliged to recognise and respect the ecclesiastical mission and the

15   Catholic character of KUE and to guard against or eliminate intolerance and discrimination (self-evaluation report, page 22). By way of the cooperation agreement, the staff of AKAST are formally employees of the University.

Ensuring compliance with the ESG: Under the cooperation agreement with ACQUIN (Annex 13), administrative oversight of accreditation procedures can be performed by ACQUIN.

20   AKAST states that compliance with the ESG is also ensured in such cases due to the fact that ACQUIN is accredited by the Accreditation Council and authorised by the European Quality Assurance Register for Higher Education (EQAR) (self-evaluation report, page 22). The cooperation is regularly evaluated in a report. The report for the period 2014 to 2018 is available and documents intensive contact and information exchange. An annex also lists accreditations

25   conducted jointly by the two agencies.

With regard to Recommendation 4, AKAST has submitted a list of professional development activities engaged in by the Administrator, the majority of which consist of conference attendance and literature studies.

Analysis

30   The internal quality assurance system presented by AKAST defines suitable objectives and mechanisms for monitoring the quality of the Agency's day-to-day work. By surveying reviewers and higher education institutions following the completion of each accreditation, AKAST gathers appropriate feedback and uses it for purposes such as identifying topics for workshops. The design of the internal quality management system takes into account the specific charac-

35   teristics of the agency with two members of staff and a limited area of activities.

In the impression of the review panel, the supervision of accreditation procedures by members of the Accreditation Committee is generally well received where their role is limited to observing the procedure. In isolated cases, an individual with observer status was seen to be involved in substantive debate. For feedback in this regard, the review panel recommends adding an item to the guided interview conducted with higher education institutions following completion of accreditation. Reviewers could also be asked at the end of an accreditation what they particularly liked about the accredited study programmes, in order to compile good practice examples for higher education in Catholic theology.

Compliance with the ESG continues to be guaranteed when ACQUIN is assigned the administrative oversight of accreditations as the procedural steps set forth in the cooperation agreement are consistent with the ESG. The higher education institutions interviewed greatly valued the option, made possible by the cooperation with ACQUIN, of having canonical and non-canonical study programmes accredited jointly.

Recommendation 8 has not been implemented. In the impression of the review panel, the working practices of the Advisory Board essentially correspond to the status as of the last reaccreditation with only one difference comprising the report of the Advisory Board being added as a standard item on the Accreditation Committee agenda. The members of the Advisory Board continue to take part in meetings of the Accreditation Committee but have neither meetings of their own nor a phase of internal reflection as a body in their own right. The members of the Advisory Board are thus, *de facto*, valued advisory members of the Accreditation Committee, although the tasks and procedures of the Advisory Board are described differently in Section 8 of the Statutes. As noted at the last reaccreditation, it would undoubtedly enhance the independence of the Advisory Board and its benefit for the Agency if the Advisory Board were to hold meetings of its own. At minimum, however, the stipulations in the Statutes should be brought into line with practice.

The list of professional development activities engaged in by the Administrator shows that issues relating to internal quality assurance in higher education are taken into account in accordance with Recommendation 4.

Recommendations

2. In the forthcoming revision of the Agency's basic documents, either the Statutes should be brought into line with the Advisory Board's working practices or the Advisory Board should also hold meetings as a separate body.

Panel conclusion:

Substantially compliant with Standard 3.6.

3.7 Cyclical external review of agencies

STANDARD:
Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.
GUIDELINES:

A periodic external review will help the agency to reflect on its policies and activities. It provides a means for assuring the agency and its stakeholders that it continues to adhere to the principles enshrined in the ESG.

Previous accreditation recommendations/conditions

5 – None –

Evidence

AKAST was first accredited as an accreditation agency in October 2008. The last reaccreditation by the Accreditation Council was in 2013.

Analysis

10 With the reaccreditation now underway, AKAST meets the requirement under ESG Standard 3.7.

Recommendations

– None –

Panel conclusion:

15 **Fully compliant with Standard 3.7.**

2.1 Consideration of internal quality assurance

STANDARD:
External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

GUIDELINES:
Quality assurance in higher education is based on the institutions' responsibility for the quality of their programmes and other provision; therefore it is important that external quality assurance recognises and supports institutional responsibility for quality assurance. To ensure the link between internal and external quality assurance, external quality assurance includes consideration of the standards of Part 1. These may be addressed differently, depending on the type of external quality Assurance.

Previous accreditation recommendations/conditions

– None –

Evidence

AKAST carries out accreditation under the prior legal framework for single-subject study pro-
grammes in theology and study programmes leading to qualifications having canonical value
in accordance with the published *Leitfaden für die Programmakkreditierung* (Guidelines on
Programme Accreditation).[10]

This is based on the resolution of the Accreditation Council, Rules for the Accreditation of
Study Programmes and for System Accreditation, as amended. In adopting these rules, the
Accreditation Council complied with the current ESG and, in particular, incorporated the re-
quirements formulated in Part 1. An overview in the form of a table is provided in Annex 19 to
the self-evaluation report.

The review criteria that AKAST is to apply in future for accreditation under the new statutory
framework are based on the Interstate Treaty and the Specimen Decree in accordance with
Article 4 (1) to (4) of the Interstate Treaty. A guiding principle in the Interstate Treaty is com-
patibility with the ESG. The provisions of the Specimen Decree are based on the ESG. This
ensures that the ESG are also complied with in accreditations by AKAST with regard to pro-
gramme accreditation under the new statutory framework (self-evaluation report, page 23).

To date, the Guidelines on Programme Accreditation have also been used for canonical study
programmes with ecclesiastical degrees such as the licentiate. In the course of revising the
current documents, AKAST will consider developing separate guidelines for this purpose.

AKAST also performs institutional evaluations upon request. The guidelines are available on
the Agency website;[11] there is a table showing how the standards in ESG Part 1 are complied
with.

Analysis

In the impression of the review panel, the submitted overview of the previous review criteria
and the information provided on accreditation under the new legal framework ensure that ESG
Part 1 is adequately taken into account in accreditation. The requirements of ESG Part 1 are
also reflected in AKAST's own guidelines for institutional evaluation.

Recommendations

– None –

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[10] See http://www.akast.info/LinkClick.aspx?fileticket=s2jL7pp8fjI%3d&tabid=58&language=de-DE, viewed 4 October 2018.
[11] See http://www.akast.info/LinkClick.aspx?fileticket=iI4pgrsK7vE%3d&tabid=62&language=de-DE, viewed 22 June 2018.

Panel conclusion:

Fully compliant with Standard 2.1.

> **2.2 Designing methodologies fit for purpose**
>
> **STANDARD:**
> External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.
>
> **GUIDELINES:**
> In order to ensure effectiveness and objectivity it is vital for external quality assurance to have clear aims agreed by stakeholders.
>
> The aims, objectives and implementation of the processes will
> • bear in mind the level of workload and cost that they will place on institutions;
> • take into account the need to support institutions to improve quality;
> • allow institutions to demonstrate this improvement;
> • result in clear information on the outcomes and the follow-up.
>
> The system for external quality assurance might operate in a more flexible way if institutions are able to demonstrate the effectiveness of their own internal quality assurance.

5

Previous accreditation recommendations/conditions

Condition 1: AKAST provides evidence, in the form of a model contract that the Agency shall in future be a contracting partner of the HEIs in processes of accrediting study programmes, even if ACQUIN is providing administrative support (Criterion 2.2.1). Compliance determined

10   by resolution of the Accreditation Council of 7 September 2014.

Condition 2: AKAST provides evidence for the adjustment of its documents of the accreditation procedure to satisfy the current grounds for a decision of the Accreditation Council (Criterion 2.2.1). Compliance determined by resolution of the Accreditation Council of 18 June 2015.

Recommendation 2: AKAST should involve the chair of the review panel when determining

15   compliance with conditions or resuming suspended accreditation procedures (see Criterion 2.2.1).

Evidence

In its self-evaluation report, AKAST states that programme accreditations, in accordance with its mission statement, are geared to the strategic objectives of the higher education institution

20   and the national and international standards to be complied with (self-evaluation report, page 23) and refers for this purpose to its guidelines.

The review criteria that AKAST is to apply in Germany in future for accreditation under the new statutory framework of single-subject Bachelor's and Master's study programmes in theology

having canonical value are based on the Interstate Treaty and the Specimen Decree in accordance with Article 4 (1) to (4) of the Interstate Treaty (self-evaluation report, page 23) and no longer require separate guidelines compiled by the Agency. AKAST has submitted a process sequence for such accreditations under the new statutory framework (Annex 23; see also ESG 2.2). A revision of the documents is currently in progress with a view to adoption by resolution of the General Meeting in 2019.

Institutional evaluations, too, follow the principle that they are geared to the strategic goals of the faculty/higher education institution and are directed at improving its quality as an academic community (Annex 16, page 12). The institutional evaluation procedure is likewise based on the purposes of a faculty/higher education institution as enshrined in Article 3 of *Sapientia Christiana*.

The guidelines for institutional evaluation were adopted by the AKAST General Meeting and the AKAST Accreditation Committee in January/March 2013. According to Section 7 of the Statutes, the Accreditation Committee includes representatives from the academic community, students and professional practice.

In its self-evaluation report, AKAST explains that it provides applicant higher education institutions with briefings at the beginning of an accreditation and all relevant documents (self-evaluation report, page 24).

With regard to stakeholder involvement, AKAST states that educators, practitioners and students are included both in the Accreditation Committee and the review panels (Annex 21).

Regarding the implementation of Recommendation 2, the Agency explains that it has retained its previous practice of solely involving the Accreditation Committee's observer and not the chair of the review panel when verifying compliance with conditions. It states that it prepares observers to be as neutral as possible in the performance of their duties. Higher education institutions reportedly welcomed in their feedback the fact that, in addition to the Administrator and the observer, a further individual took part in the site visit, verification of compliance with conditions and the resumption of accreditation procedures (self-evaluation report, page 21).

Analysis

The Guidelines on Programme Accreditation and the procedural documents under the prior legal framework were highly praised by external interviewees during the site visit. They clearly set out the objectives of accreditation procedures carried out by AKAST. Looking at the recently commenced first accreditations under the new statutory framework, the review panel was able to satisfy itself that they are based on the Specimen Decree, the corresponding decrees issued by the *Länder* and the Accreditation Council's accreditation report matrices.

Working has already begun on a corresponding revision of the basic documents such as the Statutes.

Stakeholders were involved in the development both of the Accreditation Council's criteria and of the Specimen Decree either as members of committees or via the opportunity to submit written comments, and the procedural documents used by AKAST comply with the standard in this respect.

Regarding follow-up, see ESG Standard 2.3.

Recommendations

3. AKAST should commence the process of revising the relevant documents in line with the new statutory and canon law framework as soon as possible and should combine this with the revision of the website.

Panel conclusion:

Fully compliant with Standard 2.2.

2.3 Implementing processes

STANDARD:
External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include
• a self-assessment or equivalent;
• an external assessment normally including a site visit;
• a report resulting from the external assessment;
• a consistent follow-up.

GUIDELINES:
External quality assurance carried out professionally, consistently and transparently ensures its acceptance and impact.

Depending on the design of the external quality assurance system, the institution provides the basis for the external quality assurance through a self-assessment or by collecting other material including supporting evidence. The written documentation is normally complemented by interviews with stakeholders during a site visit. The findings of the assessment are summarised in a report (cf. Standard 2.5) written by a group of external experts (cf. Standard 2.4).
External quality assurance does not end with the report by the experts. The report provides clear guidance for institutional action. Agencies have a consistent follow-up process for considering the action taken by the institution. The nature of the follow-up will depend on the design of the external quality assurance.

Previous accreditation recommendations/conditions

– None –

Evidence

The procedural steps under the Guidelines on Programme Accreditation (prior legal framework) are as follows:

• A self-evaluation/self-documentation in which the higher education institution or faculty describes compliance with the predefined and published evaluation criteria;

• A site visit by the review panel, review of the submitted documentation and separately held interviews with programme heads, educators, students and the institution's management;

• An external review report – including proposed recommendations – which, together with the higher education institution's self-evaluation forms the basis of the AKAST Accreditation Committee's decision and is published following completion of accreditation;

• Follow-up in the form of verification of compliance with conditions and the higher education institution's contractual obligation to notify the Agency of any material changes. As accreditations are granted for a limited time period, institutions generally undergo reaccreditation (self-evaluation report, page 23).

Accreditations under the new statutory framework are subject to the Specimen Decree or the corresponding decree issued by the *Land* in which the higher education institution is located. These documents are published on the Accreditation Council website.

Programme accreditations – under the new statutory framework – comprise:

- A self-evaluation/self-documentation in which the higher education institution or faculty describes compliance with the predefined and published evaluation criteria;

- An Agency review report on compliance with the formal requirements;

- A site visit by the review panel, review of the submitted documentation and separately held interviews with programme heads, educators, students and the institution's management;

- An accreditation report on the external review, comprising the review of the documentation and the reviewers' report, if applicable with suggestions for conditions. The accreditation report, together with the higher education institution's self-evaluation, forms the basis of the Accreditation Committee's decision and is published following completion of the accreditation;

- Systematic follow-up in the form of verification of compliance with conditions and the higher education institution's contractual obligation to notify the Agency of any material changes. As accreditations are granted for a limited time period, institutions generally undergo reaccreditation (self-evaluation report, page 26, and Annex 23).

AKAST provides detailed schedules for programme accreditations of canonical study programmes under the prior and the new statutory framework (Annexes 22 and 23). These are published on the Agency website. Annex 24 also shows sample schedules for site visits.

The elements named in the Guidelines on Institutional Evaluation (Annex 16) are as follows:

5
- Internal evaluation of the faculty or higher education institution;

- External evaluation;

- Follow-up (description and concrete implementation of resulting measures) (Annex 16, page 7 et seq.).

Regarding follow-up, the Guidelines state that the faculty or higher education institution gen10 erally reports to the Agency after three years about the concrete implementation of the measures resulting from an institutional evaluation. The follow-up takes the form of a written report or an interview with faculty or institution management. The form and scope are agreed at the beginning of the evaluation (Annex 16, page 24).

Analysis

15 The submitted procedural documents and the Specimen Decree – for both the prior and the new legal framework – contain all procedural steps referred to in ESG 2.3. The process sequences for accreditations reflect an efficient structure and provide a good basis for consistent implementation. Institutional evaluation likewise incorporates all elements referred to in ESG 2.3.

20 With the fulfilment of conditions in programme accreditation, follow-up is well and fully provided for. The review panel can appreciate that follow-up is naturally more flexible in institutional evaluation.

Recommendations

– None –

25 **Panel conclusion:**

Fully compliant with Standard 2.3.

2.4 Peer-review experts

STANDARD:
External quality assurance should be carried out by groups of external experts that include (a) student member(s).

GUIDELINES:
At the core of external quality assurance is the wide range of expertise provided by peer experts, who contribute to the work of the agency through input from various perspectives, including those of institutions, academics, students and employers/professional practitioners.

> In order to ensure the value and consistency of the work of the experts, they
> - are carefully selected;
> - have appropriate skills and are competent to perform their task; are supported by appropriate training and/or briefing.
>
> The agency ensures the independence of the experts by implementing a mechanism of no-conflict-of-interest.
> - The involvement of international experts in external quality assurance, for example as members of peer panels, is desirable as it adds a further dimension to the development and implementation of processes.

Previous accreditation recommendations/conditions

– None –

Evidence

Programme accreditation: For programme accreditation, AKAST has submitted a procedure with criteria for reviewer nomination (Annex 21), which is published on the Agency website. According to this, a programme accreditation review panel generally consists of four professors corresponding to the four theology subject groups, one rector of a seminary, a further representative of professional practice and a student representative. The reviewers have relevant specialist expertise. AKAST also ensures that the reviewers from higher education have expertise in accreditation and/or evaluation (in particular knowledge of the procedures, the ecclesiastical and statutory framework, the German higher education system and the Bologna Process) as well as expertise in study programme development and quality assurance. Reviewers are also recruited from different types of higher education institution. In reaccreditation, AKAST aims to include at least one member from the review panel for the initial accreditation. The reviewers are appointed by the Accreditation Committee (self-evaluation report, page 26 et seq., and Annex 21).

As part of its workshops, AKAST also offers information events for reviewers and schedules time for a preliminary meeting of the review panel within site visits (Annex 24). In addition, each reviewer receives the Guidelines on Programme Accreditation (Annex 15) and the relevant ecclesiastical and statutory documents (Annexes 18a and 18b).

Institutional evaluation: According to the Guidelines on Institutional Evaluation, the review panel in this type of procedure usually consists of three experienced professorial representatives from faculty or institution management, one of whom may be from abroad. Professional practice and students are each represented by one additional reviewer (Annex 16, page 22).

To prepare the reviewers, the Guidelines state that all reviewers should receive the self-evaluation report from the higher education institution and submit a preliminary assessment of strengths and weaknesses. Reviewer preparation for an institutional evaluation further comprises a substantial meeting on the eve of the site visit and written materials, as the agency stated in interviews during the site visit.

<u>Independence:</u> All reviewers sign a declaration stating that they are independent and free of external influence (Annex 31).

Analysis

The reviewer nomination procedure for programme accreditation submitted by AKAST is fit for purpose and contains suitable criteria for reviewer selection. It complies with the guidelines for reviewer appointment under the new legal framework for the accreditation system, comprising the resolution of the German Rectors' Conference (HRK) General Assembly of 24 April 2018, which was adopted by the Foundation Council of the Accreditation Council Foundation in accordance with Article 3 (3) of the Interstate Treaty. Under that resolution, AKAST is to add an opportunity at the beginning of the procedure for higher education institutions to submit suggestions regarding the professional profile for reviewers.

The review panel welcomes the Agency's practice in programme accreditation of appointing a further reviewer from professional practice alongside the rector of a seminary in order also to cover non-ecclesiastical professions. In the impression of the review panel, however, there is scope for including a greater range of such professions. For example, with the aid of higher education alumni associations, the Agency could specifically target theologists in the charities, non-profit or policy consulting sectors.

The provision for reviewer preparation in programme accreditation and institutional evaluation is reasonable. In interviews during the site visit, the AKAST reviewers said they were satisfied with the preparation they received in the form of written materials and the detailed briefing. They also highly valued the workshops as an additional source of information. The students interviewed gave a very positive assessment of the workshops offered by the AKAST Head Office at general assemblies of the Association of Theology Students (AGT). In the course of these, they reported, a document was compiled in collaboration with the Administrator to explain the Guidelines for Programme Accreditation for students who are unfamiliar with accreditation and quality assurance. The review panel considers this an example of acting on input from the Agency's peers.

Recommendations

4. When nominating the second representative from professional practice, AKAST should include theologists from a greater variety of non-ecclesiastical professions.

Panel conclusion:

Fully compliant with Standard 2.4.

2.5 Criteria for outcomes

STANDARD:
Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

GUIDELINES:
External quality assurance and in particular its outcomes have a significant impact on institutions and programmes that are evaluated and judged.

In the interests of equity and reliability, outcomes of external quality assurance are based on pre-defined and published criteria, which are interpreted consistently and are evidence-based. Depending on the external quality assurance system, outcomes may take different forms, for example, recommendations, judgements or formal decisions.

Previous accreditation recommendations/conditions

– None –

5   **Evidence**

With regard to programme accreditation, AKAST makes reference to the published Guidelines and the prevailing statutory and ecclesiastical requirements (see also ESG Standard 2.2), which are likewise published on the Agency website (self-evaluation report, page 27 et seq.). The Agency also has published guidelines for institutional evaluation (Annex 16).

10   Regarding consistent application of the criteria, AKAST explains that this is ensured by the multi-stage procedure with review by the review panel and:

- under the prior legal framework, the decision of the Accreditation Committee;
- under the new legal framework, the Accreditation Committee's proposal on determining compliance with the applicable criteria

15   (Annex 22).

For full and consistent evaluation against the accreditation rules, AKAST has so far used a report template (Annex 25). For accreditations under the new legal framework, the Accreditation Council specify a uniform report outline for all agencies. AKAST's practice of involving members of the Accreditation Committee or Advisory Board as rapporteurs in the interests of

20   internal quality assurance and the four eyes principle in the oversight of accreditation procedures has the purpose of ensuring consistent application of the criteria. In another feature serving the purpose of consistency, the Agency states that the Administrator has had the organisational oversight of all programme accreditations conducted by AKAST since its establishment (self-evaluation report, page 27 et seq.).

Analysis

The Agency's guidelines contain concrete and appropriate criteria for the conduct of its procedures. The outline of accreditation reports (AKAST's own template for the prior framework and that of the Accreditation Council for the new framework) likewise helps ensure that the reports

5   are well structured and hence that the criteria are consistently applied.

The review panel understood that oversight of accreditations by members of the Accreditation Committee or the Advisory Board also contributed to the formation of a collective memory on matters such as the design of study programmes in Catholic theology and thus to consistency in the Agency's decisions. The Agency could possibly do more to record such findings in writ

10   ing, resulting in a form of documented decision-making practice.

Recommendations

– None –

Panel conclusion:

Fully compliant with Standard 2.5.

15

2.6 Reporting

STANDARD:
Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

GUIDELINES:
The report by the experts is the basis for the institution's follow-up action of the external evaluation and it provides information to society regarding the activities of an institution. In order for the report to be used as the basis for action to be taken, it needs to be clear and concise in its structure and language and to cover
• context description (to help locate the higher education institution in its specific context);
• description of the individual procedure, including experts involved;
• evidence, analysis and findings;
• conclusions;
• features of good practice, demonstrated by the institution;
• recommendations for follow-up action.

The preparation of a summary report may be useful.

The factual accuracy of a report is improved if the institution is given the opportunity to point out errors of fact before the report is finalised.

Previous accreditation recommendations/conditions

– None –

Evidence

In all programme accreditations under the prior legal framework, AKAST publishes the external review report including the Agency's decision on its website and in the Accreditation Council's database.

In programme accreditations under the new statutory framework, accreditation reports are published by the Accreditation Council, which also makes the accreditation decisions (self-evaluation report, page 28). AKAST has not yet completed any accreditations under the new framework.

The external review reports for institutional evaluations are also published in full, as stipulated in the guidelines (Annex 16, page 5). No such report has yet been compiled, however.

Analysis

The external review reports for accreditations under the prior legal framework are easily found on the Agency's website and are well structured. They describe the individual accreditation procedure, divided into status, evaluation and recommendations, and – in accreditations under the prior legal framework – also record the accreditation decision. As there have not yet been any accreditation reports from accreditations under the new legal framework or from institutional evaluations, it was not possible to assess these for readability.

Recommendations

– None –

Panel conclusion:

Fully compliant with Standard 2.6.

2.7 Complaints and appeals

STANDARD:
Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

GUIDELINES:
In order to safeguard the rights of the institutions and ensure fair decision-making, external quality assurance is operated in an open and accountable way. Nevertheless, there may be misapprehensions or instances of dissatisfaction about the process or formal outcomes.
Institutions need to have access to processes that allow them to raise issues of concern with the agency; the agencies, need to handle such issues in a professional way by means of a clearly defined

process that is consistently applied.

A complaints procedure allows an institution to state its dissatisfaction about the conduct of the process or those carrying it out.

> In an appeals procedure, the institution questions the formal outcomes of the process, where it can demonstrate that the outcome is not based on sound evidence, that criteria have not been correctly applied or that the processes have not been consistently implemented.

Previous accreditation recommendations/conditions

– None –

Evidence

AKAST has an appeals procedure (Annex 27) which is published on its website and which sets out possible grounds for appeal and the procedure itself. The availability of the appeals procedure is likewise referred to in the contractual agreement with each higher education institution (Annex 20).

In its self-evaluation report, AKAST explains that higher education institutions or faculties can file a written appeal, stating reasons, within two weeks of being notified of measures, resolutions and decisions of the Accreditation Committee or the review panel. Appeals are examined and decided on a case-by-case basis by the Board or the Accreditation Committee. If an appeal is justified, a remedy is provided. Documentation and archiving are performed by way of minutes of meetings and procedure files (self-evaluation report, page 29).

An appeal against a decision of the Accreditation Committee has been made on one occasion since AKAST was established. After examination and consultation by the Committee, the appeal was granted in part (self-evaluation report, page 29). The appeal procedure does not state whether it also covers institutional evaluations.

In its self-evaluation report, the agency announces that it plans to bring the appeals procedure and the standard accreditation agreement into line with the processes in the new accreditation system (self-evaluation report, page 26).

Analysis

The Agency's appeals procedure is fit for purpose and appropriate. The fact that only one appeal has been filed in ten years testifies to the Agency's sound work.

The review panel suggests that, when bringing the appeal procedure into line with the new statutory framework, a distinction should be made in future between accreditations in which the decision is made by the Accreditation Council and those where the Agency itself decides. The standard contractual agreement should also be updated (see ESG Standard 2.2).

Recommendations

– None –

Panel conclusion:

Fully compliant with Standard 2.7.

V. Compliance with the Accreditation Council criteria

Criterion 3.1.

The agency has binding internal structures and processes that ensure the correct and consistent application of the Accreditation Council's Rules for the Accreditation of Study Programmes and for System Accreditation, as amended. The agency enters into an agreement with the Accreditation Council pursuant to Section 3 of the ASG.

Previous accreditation recommendations/conditions

– None –

Evidence

The responsibilities of the governing bodies in relation to accreditations and their composition are prescribed in the Statutes (Annex 2). Under Section 7 of the Statutes, the Accreditation Committee makes accreditation decisions, adopts resolutions on procedural guidelines and nominates the review panels (see also Section 2.3). In Annex 22, AKAST shows the process sequence for accreditations carried out under the prior framework; Annex 23 describes procedures carried out under the new statutory framework.

In addition, AKAST publishes the following documents as the basis of its procedures: *Leitfaden für die Programmakkreditierung* (Guidelines on Programme Accreditation – under the prior legal framework), a sample accreditation agreement with a higher education institution (Annex 20), and *Verfahren und Kriterien zur der Gutachterbenennung bei AKAST* (Procedures and Criteria for the Nomination of Reviewers at AKAST) (Annex 21).

Following its initial accreditation, AKAST most recently signed the agreement with the Accreditation Council in 2013 at the beginning of the current accreditation period.

AKAST is able to assign the administrative oversight of accreditations to ACQUIN under a cooperation agreement (see ESG Standard 3.6).

Regarding the contractual agreements with higher education institutions, see ESG Standard 2.2.

Regarding the nomination of reviewers, see ESG Standard 2.4.

Regarding the revision of procedural documents, see ESG Standard 2.2.

Analysis

The procedural documents submitted by AKAST fully implement the Accreditation Council's rules under the prior accreditation system. Important groundwork has been laid for implementation under the new accreditation system in the form of the process sequence. Regarding the revision of procedural documents, see ESG Standard 2.2.

Recommendations

– None –

Panel conclusion:

Fully compliant with Criterion 3.1.

5

Criterion 3.2.

> The agency has its own legal personality.

Previous accreditation recommendations/conditions

– None –

10 **Evidence**

AKAST was established in 2008 as *Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland e. V.* (Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany) and has been registered in the register of associations at Bonn Local Court *(Amtsgericht Bonn)* under registration number VR 8946 since
15 29 October 2008 (Annex 3). AKAST is formally recognised as a non-profit association (Annex 4). AKAST was established by the German Bishops' Conference as an incorporated public association under canon law in accordance with the Code of Canon Law (CIC), cc. 116, 301 § 3 and 312. The Statutes (Annex 2) are publicly documented (www.akast.info).

Analysis

20 AKAST has a legal personality formally recognised by the state and the Church.

Recommendations

– None –

Panel conclusion:

Fully compliant with Criterion 3.2.

25

Criterion 3.3.

The agency does not work on a for-profit basis and carries out accreditation procedures on a full-cost basis.

Previous accreditation recommendations/conditions

Recommendation 5: In the Agency's budget, receipts and payments, including the costs of the services provided by the Catholic University of Eichstätt-Ingolstadt, should be presented more transparently in order to obtain a comprehensive overview of income and expenditure (see Criterion 2.3.2).

Recommendation 6: In the future, AKAST should bill accreditations under its own responsibility, take receipt of the entire revenues from accreditations and reimburse ACQUIN solely for the actual services rendered (see Criterion 2.3.2).

Evidence

According to its budget (Annex 10), AKAST has at its disposal revenue of €253,207.50 for 2018. Of this, €60,000 is intended to be generated from accreditation income and approximately €120,000 from the German Bishops' Conference through the Association of German Dioceses (VDD), while the remainder comprises reserves held on two bank accounts. Budgeted expenditure for 2018 is likewise €253,207.50. In 2017, revenue of €257,247.29 was offset by expenditure of €176,034.38, with the remainder having been taken to reserves.

Under the law as it applies to associations, the annual accounts are audited by an independent auditor each year and presented to the General Meeting (self-evaluation report, page 31). AKAST has also submitted a notice of non-profit status from the competent tax office (Annex 4). In accordance with the fixed fee schedule presented by AKAST, a fee of €12,000 is levied for a programme accreditation under the prior legal framework, comprising a €4,000 basic fee and an €8,000 procedure fee (Annex 17). The fee calculation is based on that of ACQUIN. It assumes seven working days in the Head Office for one accreditation, although expenditure for reviewers, committees and material costs is not listed separately.

AKAST reports on page 31 of the self-evaluation report that the Agency will remain unable to be self-funding in the future because of the limitation of its area of activities by the Accreditation Council.

Regarding Recommendation 5, AKAST states that it has taken the recommendation into account (page 6). The annual accounts together with the use of funds statement for 2017 have been submitted.

In relation to Recommendation 6, AKAST reports that the standard accreditation agreement and the cooperation agreement with ACQUIN have been revised such that AKAST is the sole contracting party to higher education institutions and also invoices the fees itself. For each accreditation that ACQUIN oversees for AKAST, a service agreement is signed covering rights/duties and remuneration between the two. Under this arrangement, ACQUIN is remunerated for its work input (usually two person-days) and incurred travel and accommodation costs.

Analysis

AKAST does not operate on a for-profit basis but also does not cover its costs. At the time of the last reaccreditation, it was found that the Agency expected to perform an average of two programme accreditations itself. In the accreditations overseen by ACQUIN under the cooperation agreement, all revenues went to ACQUIN, which was not conducive to AKAST being financially self-supporting. This situation has since changed in that AKAST performs more accreditations itself and, for example, budgets for revenue of €60,000 from accreditations in 2018. This corresponds to six accreditations for study programmes under the prior legal framework. The documentation did not show the cost of a program accreditation under the new legal framework.

As the costing shows only the number of working days needed and not the cost of reviewers or committees, it only serves as a rough guide. Further information would be needed in order to verify that individual accreditations are performed on a full-cost basis. Under the Interstate Treaty, however, new agencies will be exclusively authorised from 1 January 2018 on the basis of the ESG, and the national criterion requiring accreditation to be performed on a full-cost basis will cease to apply. The Accreditation Council also ceases to have the role of guardian of competition in the new system. The review panel therefore accepts the information as it currently stands.

The cooperation agreement with ACQUIN now submitted assigns AKAST significantly greater responsibility than it had under the agreement in force at the time of the last reaccreditation. In accordance with Section 5 (4), the agency responsible for an accreditation also handles billing with the higher education institution and provides for the remuneration of any partner provider in a service agreement.

In relation to Recommendation 5, it is noted that the submitted budget for 2019 and the use of funds statement for the 2017 financial year do not differ in structure to the documents presented for the last reaccreditation. The review panel can accept this, however, as the revenues and expenditures are fully broken down and the accounts are regularly audited.

Recommendations

– None –

Panel conclusion:

In the opinion of the review panel, Criterion 3.3 is not complied with. This does not stand in the way of reaccreditation, however. The national criterion requiring accreditations to be performed on a full-cost basis will cease to apply in future agency accreditations and the Accreditation Council could already decide to refrain from imposing a condition in this regard.

Criterion 3.4.

> The agency accredits across all types of higher education institutions and, in certification for programme accreditation, additionally across disciplines.

Previous accreditation recommendations/conditions

– None –

Evidence

In its self-evaluation report, AKAST explains that the Agency carries out programme accreditation at various types of higher education institutions. These include faculties of Catholic theology under the auspices of the state (universities), faculties of Catholic theology under the auspices of the Church, schools of philosophy and theology, and colleges of sacred music. AKAST also deals with study programmes having canonical value. Alongside single-subject theology programmes, these include Bachelor's and Master's study programmes in philosophy and sacred music and canonical study programmes leading to a licentiate examination. The study programmes accredited by AKAST are listed on the Agency's website (see self-evaluation report, page 32).

Analysis

The accreditation decisions documented on the Agency's website show that AKAST – within the assigned area of activities – operates across all types of higher education institution and across disciplines.

Recommendations

– None –

Panel conclusion:

Fully compliant with Criterion 3.4.

Criterion 3.5.

The responsibilities of the governing bodies and their composition are appropriate and are prescribed with binding effect. Academics, students and professional practice are appropriately involved.

Previous accreditation recommendations/conditions

– None –

Evidence

The responsibilities of the Agency's governing bodies are prescribed in the Statutes. Its governing bodies are the Board and the General Meeting. Further organisational units comprise the Accreditation Committee, the Advisory Board and the Head Office, whose tasks are likewise set down in the Statutes. For their composition and responsibilities, see also section 2.3 Organisation.

In accordance with Section 7 of the Statutes, the Accreditation Committee includes two individuals from professional practice (one of whom is the head of a seminary) and one student representative. The review panels likewise include, as a rule, two individuals from professional practice (one of whom is the head of a seminary) and one student member (Annex 21).

Analysis

The provisions in AKAST's Statutes on the composition and responsibilities of its governing bodies and organisational units are fit for purpose and appropriate. Representatives of professional practice and students are involved at all procedural levels.

Regarding the working practices of the Advisory Board, see ESG Standard 3.6.

Recommendations

– None –

Panel conclusion:

Fully compliant with Criterion 3.5.

Criterion 3.6.

The review panels appointed by the Agency include representatives from the academic community, the student body and professional practice. Reviewers are carefully selected and are prepared for each specific accreditation. The Agency takes suitable measures to ensure reviewer impartiality.

Previous accreditation recommendations/conditions

– None –

Evidence

See ESG Standard 2.4

Analysis

See ESG Standard 2.4

Recommendations

– None –

5 **Panel conclusion:**

Fully compliant with Criterion 3.6.

Criterion 3.7.

In the governing bodies and review panels, academic representatives have the majority of the votes.

Previous accreditation recommendations/conditions

10 – None –

Evidence

AKAST explains on page 34 of the self-evaluation report that the three members of the Board are usually individuals from academia. Section 5 (1) of the Statutes solely stipulates for the Chairperson that he or she must be a professor or retired professor of a faculty of Catholic
15 theology. However, the Board currently consists entirely of academics (Annex 8).

Under Section 7 of the Statutes, the Accreditation Committee consists of ten members, who are either elected or ex-officio members, of whom – besides the Chairperson – an additional four are professors. In accordance with the Statutes, there are two substitute members for this group. The Accreditation Committee's members also include an expert in quality assurance
20 and accreditation matters. On the Agency's website, the current composition of the Accreditation Committee is shown as including seven members from academia, two of whom are stated to have guest status (Annex 2).

The General Meeting includes institutions of Catholic theology, which have the status of legal entities and send delegates, and individuals. According to the list of members in Annex 9, the
25 individuals comprise representatives of the Association of Faculties of Catholic Theology (KThF) and two members for the German Bishops' Conference.

AKAST states on page 34 of the self-evaluation report that review panels at AKAST consist as a rule of seven individuals, four of whom are representatives of the academic community (see also ESG Standard 2.4).

Analysis

The groups of relevance to the application of Criterion 3.7 are review panels and governing bodies of the Agency that have a role in the accreditation process. For AKAST, this applies to the Accreditation Committee and, in a broader sense, to the General Meeting, which adopts the procedural documents.

In the Accreditation Committee, five of the ten members are from the academic community as a rule, meaning that this group cannot be outvoted. When asked, the Agency explained that consent from the German Bishops' Conference is still pending for a number of members of the Accreditation Committee, which is why those members are indicated as 'guest' on the website.

Due to the membership structure of the AKAST registered association, the General Meeting is almost entirely composed of individuals from the academic community.

Recommendations

– None –

Panel conclusion:

Fully compliant with Criterion 3.7.

Criterion 3.8.

> The agency publishes its procedures for internal quality assurance and for handling complaints and appeals.

Previous accreditation recommendations/conditions

– None –

Evidence

See ESG Standards 3.6 and 2.7.

Analysis

See ESG Standards 3.6 and 2.7.

Recommendations

See ESG Standard 2.7.

Panel conclusion:

Fully compliant with Criterion 3.8.

Criterion 3.9.

> If the agency engages other organisations for the implementation of parts of the procedures, correct implementation must be ensured by binding and documented agreements.

Previous accreditation recommendations/conditions

– None –

Evidence

See ESG Standard 3.6.

Analysis

See ESG Standard 3.6.

Recommendations

– None –

Panel conclusion:

Fully compliant with Criterion 3.9.

Criterion 3.10.

> Within the ambit of the Accreditation Council, the agency generally uses the German language.

Previous accreditation recommendations/conditions

– None –

Evidence

AKAST explains that all information on the website about programme accreditations performed by AKAST, communication with review panels, higher education institutions and other documents (guidelines, contractual agreements, external review reports, accreditation certificates, resolutions, etc.) are in German (self-evaluation report, page 35).

Analysis

Within the ambit of the Accreditation Council, the agency generally uses the German language.

Recommendations

– None –

Panel conclusion:

Fully compliant with Criterion 3.10.

5 ## Criterion 3.11.

The agency's quality assurance includes internal and external feedback.

Previous accreditation recommendations/conditions

See ESG Standard 3.6.

Evidence

See ESG Standard 3.6.

10 **Analysis**

See ESG Standard 3.6.

Recommendations

– None –

Panel conclusion:

15 **Fully compliant with Criterion 3.11.**

VI. Recommendations of the review panel

VI.1 Compliance with the ESG

The review panel recommends that the Accreditation Council should find that AKAST substantially complies with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

According to the review panel's analysis, the following ten standards are fully complied with: 3.1, 3.2, 3.5, 3.7, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7.

According to the reviewers' analysis, the following three standards are substantially complied with: 3.3, 3.4, 3.6.

The review panel makes the following recommendations:

Recommendation 1: AKAST should publish more findings from analyses of its own work in future. At the same time, the neutral observer viewpoint should be preserved in tried and tested manner in order to avoid pre-empting university policy bodies such as the Association of Faculties of Catholic Theology (ESG 3.4).

Recommendation 2: In the forthcoming revision of the Agency's basic documents, either the Statutes should be brought into line with the Advisory Board's working practices or the Advisory Board should also hold meetings as a separate body (ESG 3.6).

Recommendation 3: AKAST should commence the process of revising the relevant documents in line with the new statutory and canon law framework as soon as possible and should combine this with the revision of the website (ESG 2.2).

Recommendation 4: When nominating the second representative from professional practice, AKAST should include theologists from a greater variety of non-ecclesiastical professions (ESG 2.4).

VI.2 Compliance with the Accreditation Council's national criteria

The review panel recommends that the Accreditation Council should accredit AKAST without conditions, although AKAST currently does not comply with Criterion 3.3 – "full-cost basis" – due to its special status and structure under canon law. On the transition to the new accreditation system, however, the national criteria will cease to apply and for this reason it would no longer be appropriate to specify a condition.

Appendix 1: Site visit schedule

Meeting venue: Catholic University of Eichstätt-Ingolstadt, Ingolstadt Faculty of Economics, Auf der Schanz 49, 85049 Ingolstadt, Room 107 *(Neubau)* and Room 207 *(Neubau).*

5

19 September 2018		
6:00 pm	Internal preliminary meeting, breakfast room, Altstadthotel	AR review panel
8:00 pm	Internal working dinner Restaurant Hugl, Schutterstraße 6, 85049 Ingolstadt, phone/fax 0841 99377929	AR review panel

20 September 2018		
8:30 – 10:00 a.m.	Interview with Agency management	Prof. Dr. Michael **Gabel** (Chairperson of AKAST) Prof. Dr. Stephan **Haering** OSB (First Vice Chairperson) Prof. Dr. Gerhard **Krieger** (Second Vice Chairperson) Barbara **Reitmeier** M.A. (Administrator)
10.00 – 10:15 a.m.	Break	
10:15 – 11:15 a.m.	Interview with a representative of the German Bishops' Conference	Auxiliary Bishop Christoph **Hegge** (representative of the German Bishops' Conference) Dr. Michael **Karger** (Secretariat of the German Bishops' Conference)
11:15 – 11:30 a.m.	Break	
11:30 a.m. – 1:00 p.m.	Participation in meeting and interview with members of the Accreditation Committee and Advisory Board	All members and substitute members of the Accreditation Committee and the Advisory Board.

1:00 – 2:30 p.m.	Lunch break, internal meeting, Mensa Konviktstraße 1, ground floor	AR review panel
2:30 – 3:30 p.m.	Interview with reviewers from Agency accreditation procedures	Prof. Dr. Ansgar **Wucherpfennig SJ** (Rector, Chair of NT Exegisis, Sankt Georgen Graduate School of Philosophy and Theology) Prof. Dr. Heike **Grieser** (Faculty of Catholic Theology, Seminar for Church History, Dept. of Ancient Church History and Patrology, Johannes Gutenberg University Mainz) Dipl.-Theol. Sabine-Maria **Kuchta** (Caritasverband für das Bistum Erfurt e.V.) Prof. Dr. Harald **Schwillus** (Institute of Catholic Theology and Didactics, Martin Luther University Halle-Wittenberg, Advisory Board of the Association of Faculties of Catholic Theology) Msgr. Martin **Fahrner** (Wilhelmsstift Episcopal Theological College of the Diocese of Rottenburg-Stuttgart, Tübingen) Johanna **Tannen** (Philosophical-Theological Faculty S.V.D. St. Augustine, Master's student in Catholic theology)
3:30 – 5:30 p.m.	End of first day internal meeting	AR review panel
7:00 p.m. approx.	Internal working dinner Ristorante Castello, Harderstr. 3, 85049 Ingolstadt, phone: 0841/93 11 786	AR review panel

21 September 2018		
9:00 – 10:00 a.m.	Interview with Head Office staff	Barbara **Reitmeier** M.A. Susanne **Barbati**
10.00 – 10:15 a.m.	Break	
10:15 – 11:30 a.m.	Discussion with representatives of study programmes accredited by AKAST	Prof. Dr. Dr. Johannes **Wallacher** (Professor of Social Sciences and Business Ethics, President of Munich School of Philosophy) Prof. Dr. Manfred **Gerwing** (Chair of Dogmatics and Dogma History, Dean of the Faculty of Theology, Catholic University of Eichstätt-Ingolstadt) Prof. Dr. Wolfgang **Weiß** (Professorship in Franconian Church History and Recent Church History, Dean of Studies, Institute of Historical Theology, University of Würzburg) Prof. Dr. Joachim **Schmiedl** (Chair of Medieval and Modern Church History, College of Philosophy and Theology, Vallendar; President of the Association of Faculties of Catholic Theology)
11:30 a.m. – 3:00 p.m.	Final internal meeting of the review panel for preparation of the external review report with lunch; if necessary, interview with Agency management in the event of outstanding questions	Prof. Dr. Michael **Gabel** (Chairperson of AKAST) Barbara **Reitmeier** M.A. (Administrator)
From 3:00 p.m.	Departure	

Appendix 2: Abbreviations

ACQUIN	*Accrediterungs-, Certifizierungs- und Qualitätssicherungs-Institut* (Accreditation, Certification and Quality Assurance Institute)
AGT	*Arbeitsgemeinschaft der Theologiestudierenden* (Association of Theology Students)
AKAST	*Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland e.V.* (Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany)
AR	*Akkreditierungsrat* (Accreditation Council)
ASG	*Akkreditierungs-Stiftungs-Gesetz* (Act Establishing a Foundation for the Accreditation of Study Programmes in Germany)
AVEPRO	*Agenzia della Santa Sede per la Valutazione e la Promozione della Qualità delle Università e Facoltà Ecclesiastiche* (Agency for the Evaluation and Promotion of Quality in Ecclesiastical Universities and Faculties)
CIC	*Codex Iuris Canonici* (Code of Canon Law)
DBK	*Deutscher Bischofskonferenz* (German Bishops' Conference)
Eckpunkte resolution	Resolution of Standing Conference of the Ministers of Education and Cultural Affairs of the Länder, "*Eckpunkte für die Studienstruktur in Studiengängen mit Katholischer oder Evangelischer Theologie/Religion"* ("Key Points for the Structure of Studies in Study Courses Involving Catholic and Protestant Theology/Religion", ('Key Points')), of 13 December 2007
EHEA	European Higher Education Area
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education

ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
e. V.	*eingetragener Verein* (German registered association)
HRK	*Hochschulrektorenkonferenz* (German [Higher Education] Rectors' Conference)
KThF	*Katholisch-Theologischer Fakultätentag e. V.* (Association of Faculties of Catholic Theology)
KMK	*Kultusministerkonferenz*, Standing Conference of the Ministers of Education and Cultural Affairs of the Länder
KMK structural guidelines	Structural guidelines for the accreditation of Bachelor's and Master's study programmes that are common for all *Länder*. KMK resolution of 10 October 2003, as amended 4 February 2010
KUE	*Katholische Universität Eichstätt-Ingolstadt* (Catholic University of Eichstätt-Ingolstadt)
MRVO	*Musterrechtsverordnung* (Specimen Decree pursuant to Article 4 (1) to (4) of the Interstate Treaty on the organisation of a joint accreditation system to ensure the quality of teaching and learning at German higher education institutions). KMK resolution of 7 December 2007
Rules	Rules for the Accreditation of Study Programmes and for System Accreditation dated 8 December 2009, as amended 20 February 2013
VDD	*Verband der Diözesen Deutschlands* (Association of German Dioceses), the legal entity for the German Bishops' Conference

Appendix 3:

Canonical study programmes at German higher education institutions, winter semester 2018/2019 (as of June 2018)[12]											
	Theology			Canon law		Philosophy				Sacred music	
Land / University	Single-subject	Licentiate	Doctorate	Licentiate	Doctorate	BA	MA	Licentiate	Doctorate	BA	MA
Baden-Wurttemberg											
Freiburg, University	**X** (2010)	**X**	**X**								
Rottenburg, College of Church Music										**X**	**X**
Tübingen, University	**X** (2016)	**X**	**X**								
Bavaria											
Augsburg, University	**X** (2013)	**X**	**X**								
Eichstätt, Fac. of Cath. Theol.	**X** (2013)	**X**	**X**								
Munich, School of Philosophy						**X** (2014)	**X** (2014)		**X**		
Munich, University	**X** (2014)	**X**	**X**	**X**	**X**						
Regensburg, College of Church Music										**X**	**X**
Regensburg, University	**X** (2011)	**X**	**X**								
Würzburg, University	**X** (2013)	**X**	**X**								

[12] The table shows the relevant study programmes in Germany; years in brackets indicate the year of first accreditation by AKAST. Source: Secretariat of the German Bishops' Conference, Accreditation Council database and AKAST website

	Theology			Canon law		Philosophy				Sacred music	
Land / University	Single-subject	Licentiate	Doctorate	Licentiate	Doctorate	BA	MA	Licentiate	Doctorate	BA	MA
Hesse											
Frankfurt, Grad. School of Philosophy and Theology	**X** (2010)	**X**	**X**			**X** (2011)					
Fulda, Faculty of Theology	**X** (2010)	**X**	**X**								
North Rhine-Westphalia											
Bochum, University	**X** (2013)	**X**	**X**								
Bonn, University	**X** (2011)		**X**								
Münster, Grad. School of Philosophy and Theology	**X** (2014)	**X**	**X**								
Münster, University	**X** (2017)	**X**	**X**	**X**							
Paderborn, Fac. of Theol.	**X** (2010)	**X**	**X**								
Philosophical-Theological Faculty St. Augustine	**X** (2010)	**X**	**X**								
Rhineland-Palatinate											
Mainz, University	**X** (2011)	**X**	**X**								
Trier, Faculty of Theology	**X** (2011)	**X**	**X**								
Vallendar, College of Philosophy and Theology	**X** (2010)	**X**	**X**								
Thuringia											
Erfurt, University	**X** (2009)	**X**	**X**								