

**Approval of the Application
by ASIIN
for Renewal of Inclusion on the Register**

Register Committee

Ref. RC19/A30

Ver. 1.0

Date 2017-06-23

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Application of:	30/10/2015
Agency registered since:	08/04/2009
External review report of:	31/05/2016
Review coordinated by:	German Accreditation Council (GAC)
Review panel members:	Heike Faßbender (chair), Birgit Müller (academic), Mona Sebald (student), Markus Lecke, Antonio Serrano Gonzalez
Decision of:	20 June 2017
Registration until:	31 May 2021
Absented themselves from decision-making:	none
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 26/02/16 2. External Review Report, 31/05/16 3. ASIIN Statement of Opinion on the Report, 30/05/16 4. Additional Representation by ASIIN, 28/03/17 5. Request to GAC, 25/04/17 6. Clarification by GAC, 09/05/17

1. The application of 30/10/2015 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 24/11/2015. Having considered the update and clarification received from ASIIN on 18/12/2015, the Register Committee updated the confirmation of eligibility on 26/2/2016.
3. The Register Committee considered the external review report of 31/05/2016 on the compliance of ASIIN with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered the Statement of Opinion on the Peers' Report, dated 30/05/2016.
5. On the basis of the above-mentioned documentation the Register Committee was unable to conclude that ASIIN substantially complies with the ESG. The Committee therefore invited ASIIN to make additional representation on the grounds for a possible rejection of its application.

6. ASIIN made additional representation on 28/03/2017. The Register Committee subsequently considered the application taking into account the representation.
7. The Register Committee sought and received clarification from the coordinator of the external review of ASIIN, the German Accreditation Council (GAC).

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Analysis:

8. In considering ASIIN's compliance with the ESG, the Register Committee only took into account its various accreditation and certification activities, as well as evaluations for quality assurance and improvement ("type 1").
9. ASIIN's consultancy activities and "type 2" evaluations are not within the scope of the ESG and, thus, not pertinent to the registration on EQAR, except with regard to their clear separation from ASIIN's external quality assurance activities (see below).
10. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

ESG 2.2 – Designing methodologies fit for purpose

The review report noted that ASIIN's certification committee did not currently include a student member. The Register Committee therefore considered that the involvement of stakeholders in the design and decision-making process was not fully ensured as required by the standard.

The review report noted that only criteria that comply with the ESG can be chosen for evaluations (type 1). The report, however, noted that this was not made clear to the public. The Register Committee further noted that it was not explained in detail how this is verified by ASIIN. The Committee therefore considered that the requirement of external quality assurance processes being defined and designed to ensure their fitness for purpose was not complied with as regards evaluations.

The Register Committee was able to verify that a student member was appointed to the certification committee, as noted in ASIIN's additional representation.

The Register Committee further noted that ASIIN had clarified in its public information that the criteria in type-1 evaluations, including those of third parties, must be compatible with the ESG.

Having considered the additional representation, the Register Committee was able to concur with the panel's conclusion.

ESG 2.3 – Implementing processes

The review report noted that on-site visits are not mandatory in evaluations (type 1) and recommends that ASIIN should establish clear

principles to state in which cases on-site visits are not necessary. Given the current absence of such principles, the Register Committee considered that ASIIN did not comply with the requirement to normally include a site visit.

In its additional representation, ASIIN specified that site visits were a mandatory element in all type-1 evaluations. While the Register Committee welcomed the clarification, it underlined that the clear implementation in practice cannot be assessed at this stage; it should thus be subject of the next external review of ASIIN.

The review report further identified cases where ASIIN did not follow the principles established in its own policy regarding the use of evaluation results for programme accreditation. The Register Committee took note of ASIIN's statement on the report, which confirms that fact but does not include an explanation or rationale for departing from the policy. The Register Committee therefore considered that ASIIN did not implement its own processes consistently in all areas.

Despite the fact that ASIIN stated in its additional representation that this was "one case among hundreds of procedures" and announced that it was planning to amend its own policy to the effect that a prior evaluation result could be used, provided it is not older than 2 years, the Register Committee noted that ASIIN's current policies were not always followed in practice, even if this was so in only very few cases.

Also after considering the additional representation, the Register Committee was therefore unable to concur with the panel's conclusion (substantially fulfilled), but considered that ASIIN only partially complies with standard 2.3.

ESG 2.4 – Peer-review experts

The Register Committee took note of the explanation in ASIIN's additional representation of its policy and efforts to recruit "local" students, i.e. coming from the same country as the institutions under review. The Committee noted that the participation of students nationally and internationally was increased "to practically 100%".

Understanding that there was only one case reported where no student could be recruited for the panel, the Register Committee was able to conclude that ASIIN complies with the standard.

The Register Committee, however, underlined that it would not be compatible with the ESG to use the policy in the sense that only a local student can be appointed. That is, if no local student can be recruited for whatever reason, ASIIN is obliged to involve a non-local student, rather than no student at all.

ESG 2.7 – Complaints and appeals

In the additional representation, ASIIN explained that it had clarified that its regular complaints procedures, applicable to accreditation

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procedures so far, is also applied to certification procedures and in type-1 evaluation procedures. The Register Committee was able that this is indeed clarified in public documents.

Having considered the additional representation, the Register Committee was able to conclude that ASIIN complies with the standard.

ESG 3.1 – Activities, policy and processes for quality assurance

When confirming eligibility of the application, the Register Committee requested (see letter of 26/2/2016) that ASIIN demonstrates how it ensures a clear, consistent and transparent separation between activities within the scope of the ESG and others, in particular in its public communication and where similar terms are being used, such as in the case of “type 1” (ESG) and “type 2” (non-ESG) evaluations.

The review panel considered that ASIIN needs to further clarify the distinction between “type 1” and “type 2” evaluations. In particular, the panel recommended that ASIIN should no longer use the term “evaluation” for type 2 evaluations, but rather define those as consultation services internally and externally.

The Register Committee considered ASIIN’s Statement on the review report, noting that third parties tend to use the term “evaluation” for such services.

While this might well be the case, the Register Committee could not see how that would prevent ASIIN itself from avoiding the term “evaluation” in its own communication, e.g. on its website.

The Register Committee further noted the Statement on the review report does not explain how ASIIN would ensure transparency and a clear distinction despite insisting on using the term “evaluation”.

Having considered the additional representation, the Register Committee considered that the distinction between the two types of evaluations is now better presented on the ASIIN website.

The Register Committee noted that ASIIN, however, continued to use the word “evaluation” for type-2 evaluations, against the panel’s recommendation, arguing that “the term is not restricted to uses as falling under the scope of EQAR”. ASIIN was furthermore “convinced that the distinction between the two types and the fact that type 2 evaluations do not fall under the remit of the ESG, and of EQAR, is very transparent on the ASIIN website”.

While the Register Committee recognised that presentation and clarity have been improved, the Committee considered that it remains to be seen whether the presentation is sufficiently clear in practice, in particular in terms of ensuring that all those evaluations that are by their nature within the scope of the ESG are carried out as type-1 evaluations and in compliance with the ESG.

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The EQAR Policy on the Use and Interpretation of the ESG expects that agencies demonstrate under standard 3.1 how they ensure a clear distinction between external quality assurance and its other fields of work.

Having considered the additional representation, the Register Committee concluded that ASIIN only partially demonstrated this for type 2 evaluations. The Register Committee therefore remained unable to concur with the review panel’s conclusion (substantially fulfilled), but considered that ASIIN only partially complies with standard 3.1.

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ESG 3.4 – Thematic analysis

The review panel considered that the ASIIN newsletter and the annual meetings only partially fulfil the requirements of the standard. The panel noted that the newsletters do not include an analysis of finding ascertained by ASIIN in its own work. While the annual meetings might address the type of issues to be covered by thematic analyses, the panel noted that there was no specific documentation with summary analyses resulting from those meetings.

The Register Committee took note of ASIIN's Statement on the review report and the additional representation. While referring to a number of valuable initiatives and publications, the Committee considered that many of those rather represent internal feedback mechanisms or approaches to ensure consistency in decision-making.

While some of ASIIN's newsletters and publications contain elements of thematic analyses, there are currently no regular published analyses which fully respond to the requirements of this standard. The Register Committee therefore concurred with the panel's conclusion of partial compliance.

The Register Committee further underlined that the standard is not entirely new, but succeeded the standard “system-wide analyses” of the ESG 2005, which, despite its name, applied to all registered agencies already in the past.

ESG 3.6 – Internal quality assurance and professional conduct

In its additional representation, ASIIN noted that it had formalised its internal quality management system and fully implemented its new QM manual.

The Register Committee sought and received clarification from the German Accreditation Council (GAC), as the coordinator of the external review of ASIIN. GAC confirmed that it had assessed the implementation of ASIIN's QM structure as part of assessing fulfilment of a condition. In doing so, GAC found that the QM system was appropriately formalised and implemented effectively.

Having considered the clarification by the GAC, the Register Committee was able to conclude that ASIIN complies with the standard.

11. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

Register Committee

Conclusion:

12. Based on the external review report and the considerations above, the Register Committee concluded that ASIIN demonstrated compliance with the ESG (Parts 2 and 3) as follows:

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Standard	Review panel conclusion	Register Committee conclusion
2.1	substantially fulfilled	Compliance
2.2	substantially fulfilled	Compliance
2.3	substantially fulfilled	Partial compliance
2.4	partially fulfilled	Compliance
2.5	substantially fulfilled	Compliance
2.6	substantially fulfilled	Compliance
2.7	partially fulfilled	Compliance
3.1	substantially fulfilled	Partial compliance
3.2	fulfilled	Compliance
3.3	substantially fulfilled	Compliance
3.4	partially fulfilled	Partial compliance
3.5	substantially fulfilled	Compliance
3.6	partially fulfilled	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

13. The Register Committee considered that ASIIN only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that ASIIN complies substantially with the ESG as a whole.
14. The Register Committee therefore approved the application for inclusion on the Register. ASIIN's inclusion shall be valid until 31/05/2021¹.
15. The Register Committee further underlined that ASIIN is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity, as well as to inform EQAR through Substantive Change Reports where required.

¹ Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

ASIIN e.V.
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Robert-Stolz-Str. 5
40470 Düsseldorf
Germany

Brussels, 26 February 2016

Confirmation of Eligibility: Clarified List of Activities

Application no. A30 of 30/10/2015

Dear Iring,

We thank you for your letter of 18/12/2015.

As confirmed in our letter of 24/11/2015, the application by ASIIN for renewal of registration is eligible. Based on the information provided, the external review coordinated by the German Accreditation Council (GAC) fulfils the requirements of the EQAR Procedures for Applications.

We reconfirm that the following activities of ASIIN are within the scope of the ESG:

- Accreditation/Certification of Degree Programmes
Programme Accreditation (for the seals of GAC, ASIIN or external labels)
- Evaluations of Quality Assurance and Enhancement in Teaching and Learning
*Programme Evaluation
Institutional/System Evaluation*
- Accreditation/Certification of Quality Management Systems
Institutional/System Accreditation (for the seals of GAC or ASIIN)
- Certification of Modules and Courses
Certification

Please ensure that ASIIN's self-evaluation report covers all the aforementioned activities.

We reconfirm that the following activities are not external quality assurance activities within the scope of the ESG:

- Consulting Quality Management and Organisation Developments

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- Third Party Funds/EU Projects¹
- ASIIN Dialogue Forums
Workshops and seminars
- Workshops and Trainings in-house
Workshops and seminars
- Quality development: agency development

We also considered the updated overview of ASIIN's activities:

1. We considered the definition and explanation of "evaluations for quality and organisation development / impact analysis" (also called "type 2" in your letter).

Based on the information available we are unable to make a final determination whether or not some of those evaluations might be within the scope of the ESG.

The external review report should thus analyse and comment on that matter, considering the scope of the ESG and the comments thereon in the EQAR Policy on the Use and Interpretation of the ESG.

Furthermore, your self-evaluation report and the review report should address how ASIIN ensures a clear, consistent and transparent separation between activities within the scope of the ESG and others, in particular in its public communication and where similar terms are being used.

2. We further considered the definition and explanation of "Processing of Certification Procedures for Third Parties".

As far as these procedures concern higher education institutions or programmes, they may only be excluded from the scope of the external review if ASIIN acts purely as a subcontractor and has no own responsibility for the procedures and their results whatsoever (i.e. ASIIN is not brought in connection with the results published and the certificates awarded).

ASIIN should clarify this as part of its self-evaluation report and the matter should be addressed in the external review report.

3. Please ensure that ASIIN's self-evaluation report and the external review report cover both ASIIN e.V. and ASIIN Consult, covering all external quality assurance activities within the scope of the ESG (as clarified above) as well as the way in which ASIIN separates between consultancy and quality assurance.

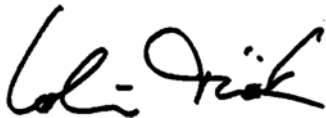
¹ Considering any activities carried out as part of those projects and that are quality assurance activities within the scope of the ESG fall within the activities mentioned above.

We kindly ask you to forward this letter to GAC as the coordinator of the external review and request that GAC inform the review panel, so as to ensure that all activities and matters referred to above are analysed by the panel.

We would also like to use this opportunity to clarify that the external review report should analyse ASIIN's organisational structure and activities as they are at the time of the external review. Any changes before or after the review should be reported to EQAR by way of a Substantive Change Report.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. ASIIN has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück
(Director)

Cc: German Accreditation Council (GAC)



Statement of Opinion on the Peers' Report forming part of the:

**reaccreditation by the Foundation for
the Accreditation of Study Programmes in Germany
(GAC) for programme and system accreditation**

**renewal of membership of the
European Association for Quality Assurance in
Higher Education (ENQA)**

**renewal of membership of the
European Quality Assurance Register for
Higher Education (EQAR)**

Last revision: 30.05.2016

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A Statement of Opinion on the European Standards and Guidelines (ESG)

Criterion 2.1: Consideration of internal quality assurance

Evaluation of the peers:

„Insofar as criteria catalogues of third party organisations can also be used, it has been assured that the only catalogues that come into consideration are those that comply with the ESG, meaning that they observe Part 1 of the ESG. However, this is not yet sufficiently clear to outsiders.“

ASIIN takes on board the peers' proposal that the conditions under which a list of criteria can be used for evaluations according to type 1 need to be clarified in a more transparent way for third parties.

Criterion 2.2: Designing methodologies fit for purpose

Documentation

„However, the certification committee, which is part of ASIIN Consult, only has representatives of universities, universities of applied sciences and representatives of professional practice.“

Following an activities evaluation performed by the Certification Committee, ASIIN plans to reform this area in the future and the remarks made by the peer team will be taken into account.

Evaluation of the peers

„The criteria for certification of modules and courses are based on the quality control loop (Plan-Do-Check-Act). [...]However, this is not yet assumed without doubt based on the corresponding criteria document. Instead, reading the document (Annex 6, p. 6) may give the impression that the applicants can freely choose which external reference source the review is done by.“

The peers are right in their assumption that the plan-do-check-act (PDCA) control cycle represents a fundamental instrument covering all activity areas of ASIIN, whereby particu-

lar importance should be attributed to C and A of this quality control cycle. In ASIIN's criteria document this is recognisable in the following places: The wording on page 6 of the aforementioned criteria document only refers to the extra option embedded there to perform an allocation to another qualifications framework, such as a national qualifications framework or professional guidelines, in addition to the mandatory examination of certification criteria per se as well as the equally mandatory allocation to a level of qualification within the European Qualifications Framework. It is only in this respect that the applicant has the opportunity to select an external reference source prior to the commencement of proceedings. We are happy to specify the formulations in the criteria document more precisely.

Evaluation of the peers

„Indeed the agency has already taken steps towards a better “mixing” of the committees and expert groups and showed concern for the matter during the on-site visit. The experts However, found that the findings from the last reaccreditation procedure in 2011, that the members of the committees and expert groups showed a great deal of homogeneity with regards to subject disciplines, age and gender, were confirmed once again.“

The concern of the peer team meets fully with the intensive efforts that have been ongoing for years on the part of ASIIN to optimise their pool of peers, the most important resource of any agency, whereby all those party to the system fight for a limited reserve of peers who are prepared to participate in the process.

For years now ASIIN has been taking advantage of **every available opportunity** to broaden and diversify its pool of peers through exchanges with faculty and departmental associations, both domestic and overseas, through talks with the DAAD and the GIZ and other scientific organisations.

The peers' findings in detail:

ASIIN's committees reflect the gender situation in the corresponding departments and faculties of universities and universities of applied sciences and therefore also social reality. Nevertheless, it is encouraging to note that it has been possible in recent years to significantly increase both the number of women in the ASIIN committees and also the number of female peers. These efforts will continue to be pursued in the future. With a view to the disciplines, the ASIIN committees are very well established, insofar as this is deemed appropriate. In the Accreditation Commission for Degree Programmes, all fields covered by ASIIN are represented by several people. ASIIN's Technical Committees orientate themselves naturally towards a corresponding discipline in its selection of members, but cover the entire range of topics within that scientific discipline. In the audit teams a mix of disciplines is only desirable to a lesser extent as higher education institutions in the

mathematics, computer science, natural sciences and technology disciplines do not accept peers outside the subject areas concerned.

With regard to the age structure of the committees, it is to be noted that only a very small proportion of the members is already in retirement. In recent years ASIIN's committees have made successful efforts overall to "rejuvenate" the members. The current situation is that only a few remaining committee members are in retirement and they retired from working life during their current term of office. However, the peer team has correctly assessed that the committees' age structure is reflected in higher education institutions and thus only a few really young people – with the exception of students – are represented in the committees. This is also not offset by industry representatives as, according to ASIIN's requirements profile, they need to demonstrate practical experience with university graduates and can therefore not be right at the beginning of their careers.

All things considered, we share the opinion of the peers that it is a sensitive topic that should be pursued by the whole system; in our opinion, this includes public recognition of the peer review system as well as legal questions on exemption for peer review activities or the tax treatment of compensation of expenses.

Criterion 2.3: Implementing processes

Evaluation of the peers

The outline of the procedures is also transparent for (type 1) evaluations through the representation on the agency's homepage. Follow-up processes are naturally designed in a less formal way here than in accreditation procedures. However, the agency should initiate the implementation of recommendations and/or offer to assist in their implementation. On-site visits should also generally take place and principles should be established which state in which cases on-site visits are not necessary. The experts moreover see a deviation of the agency from their own internal guidelines. As at least in the use of evaluation results for programme accreditation in Slovenia, ASIIN did not employ any predominantly new expert groups, although it provides for this even in its policy paper on the separation of consultation and accreditation for study programme-related and subject-related evaluations.

The correct information from the peers is consistent with ASIIN's current practice: With regard to follow-up processes and the possible waiving of audits, it is common practice that the concept of evaluations according to type 1 works on the basic approach of an audit. Only in the type-2 evaluations can an audit be waived at the request of the higher

education institution and possibly depending on the subject of an evaluation, insofar as this is deemed appropriate.

It is also correct that, in the proposal, ASIIN regularly offers applicants a follow-up in line with the evaluation concept. This offer has so far been gladly accepted by higher education institutions (e.g. feedback/analysis workshops in Slovenia, follow-up evaluations at the University of Kiel, subsequent award of the ASIIN System Seal including requirements and recommendations in Slovenia and Austria).

ASIIN's corresponding policy on the separation of consulting and accreditation determines that the peer team must comprise a majority of people for the accreditation process who were not already peers in the preceding evaluation. The re-deployment of a minority of peers from an evaluation to a subsequent accreditation procedure on the same subject is possible for the purpose of improving the information basis. If a peer was already involved in an evaluation where the results are the fundamentals of a subsequent accreditation procedure, this must be made transparent to all those participating in the procedure.

In the case of the subsequent accreditation procedure reported by peers at the University of Ljubljana, Slovenia, there was a deviation from this principle and the peer team was identical to that of the previous evaluation procedure.

ASIIN continues to follow the approach stated in our policy that, in a degree programme or subject-specific evaluation under the umbrella of ASIIN, an accreditation procedure related to the same degree programme can take place only if the majority is made up of new peers and the underlying evaluation report is not more than two years old. Furthermore, if the submitted evaluation report provides an adequate basis of information in relation to the criteria accreditation according to the responsible committees, the accreditation procedure can be simplified, e.g. an audit can be waived. These principles will continue to remain in place and be followed by ASIIN for subsequent accreditation procedures.

Criterion 2.4: Peer-review experts

Documentation

„It was not possible to clarify which preparatory measures the agency arranges for experts of the evaluation procedures.“

We would like to provide further explanations on this here: Since the peers for the evaluation procedures predominantly come from the pool of peers of the programme and system accreditation, an identical training offer by ASIIN is also made available to them.

Another key indication is that part of the fixed components of the evaluation offers is that a briefing module is carried out with the peers (analogous to the preparation for the accreditation system). In addition to a first acquaintance, this briefing module, which takes place either at a meeting or by telephone/video conference, focuses on the clarification of the assignment, criteria security, the role of the peers and a discussion of outstanding issues, amongst other things.

Evaluation of the peers

„Through discussions with foreign contractors during the on-site visit it was also established that students and representatives of professional practice were not included in the evaluation and accreditation procedures in Slovenia in all cases.“

First of all, it should be mentioned that the peer's findings refer to a very specific, singular process, which is virtually a doubly subsequent evaluation. At the University of Ljubljana, an evaluation of the quality management system was first carried out in four faculties. In coordination with the university, all stakeholders were to be represented in these peer teams, since in this first evaluation, fundamental issues regarding the structure (here: the ability to study, involvement of students and the consideration of their interests as well as cooperation with the industry) were already to be clarified for subsequent procedures. The competence of the students and industry representatives was deemed of key importance here. Owing to the scope of the evaluation being limited to only one faculty, the degree programmes on offer could be assessed already at this stage and concrete observations were made to some extent to the following peer teams. ASIIN even managed to adequately replace a student peer who had fallen ill three days before the audit, in order to ensure the participation of students in all procedures. The subsequent certifications directly recognised the results of the systemic evaluation, meaning the perspective of both the students and the industry were sufficiently taken into consideration, in our opinion.

Evaluation of the peers

„For another thing, a suitably large expert group for the number of study programmes to be assessed is needed not just for procedures in the jurisdiction of the Accreditation Council (where it is established through special regulations that the expert groups are sufficiently large for bundle procedures) but also for bundle procedures abroad.“

The peers' comments are valuable and are in line with the philosophy of all ASIIN criteria to deploy sufficiently large peer teams. Even at the risk of substantial competitive disadvantages, as, according to feedback "from the market", ASIIN in general plans much larger teams, we remain true to this philosophy. Our principles are taken into account especially in cluster formation in procedures abroad. The Technical Committees have to give their approval to the groupings and to the intended peers within the scope of the proposal. Here the same discussions take place as during an accreditation procedure in Germany. This means it is agreed with the Technical Committees which degree programmes can sensibly be grouped together and which peer profiles are necessary for this.

Evaluation of the peers

„. However, the pool of experts should be expanded to include more foreign experts. This also applies to procedures for system accreditation, but not only these.“

Many thanks for this remark. Extending the pools of peers with experience in different education systems is one of the most important strategic objectives of ASIIN in connection with the expansion of our international activities. We are currently involved in exchanges on the issue with our partner DAAD, with GIZ, with chambers of commerce, academic institutions, foreign offices and our industrial partners in order to be able to recruit the best foreign peers.

Evaluation of the peers

„However, measures should be taken to improve the professional diversity and other differences in the expert groups“

We would like to thank you for the peer remarks, but at this point, we can only point out that we have actually never seen any evidence from our systematic customer satisfaction surveys that there is criticism of the professional composition of our peer teams; the opposite is the case, to our delight. It is particularly the technical expertise and adequacy of the peer teams which are highly regarded unanimously by our higher education institution customers and which play a key role in our being commissioned.

Evaluation of the peers

„The experts consider participation in structured preparatory briefings of experts by contrast not just in system accreditation, but also in programme accreditation to be desirable due to its central significance for quality of procedures.“

The training of peers in the programme area is not only a permanent subject for discussion within ASIIN. The Accreditation Council has also run an analysis of the training concepts of the different agencies and has several times discussed the possibilities of "compulsory training". In all of these discussions the argument goes that, owing to the structure of the German accreditation system in the programme area (key aspects here are: volunteer activities, duration and cost of the procedures, number of procedures to carry out in total), compulsory training does not appear feasible. Even the need can be questioned, since the active peers mostly know their role very well from other peer activities (internal higher education institution reviews, German Research Foundation peers, etc.). We are convinced that with our concept (regular training offers, check-lists and information in advance; preliminary discussion, composition of the peer teams with experienced and inexperienced peers) we sufficiently fulfil the demand and the objective.

Evaluation of the peers

For (type 1) evaluations [...] However, the process through appointment by the head of office has so far not been formalised or transparent. There are also mandatory stipulations lacking for the preparation of the expert groups.

For the preparation of peers, see the above comments. The process for assigning peers will soon be revised.

Criterion 2.5: Criteria for outcomes

No further comments (cf. criterion 2.1).

Criterion 2.6: Reporting

Evaluation of the peers

„However, during the on-site visit the expert team found it problematic that the agency associated evaluation procedures with accreditation procedures abroad in such a way that to begin with a (type 1) evaluation procedure was carried out based on the ASIIN criteria for the programme seal or for the system seal, However, the awarding of the corresponding seal was only requested subsequent to it because of the positive result of the evaluation procedure. In these cases the reports on the accreditation decisions that re-

sulted from them lacked any clear identification that the accreditations were declared based on a previous evaluation procedure.“

As explained in the audit, ASIIN has learnt from their initial experiences with subsequent certifications. Although the context of the procedure was clear both internally and also for the applicant higher education institution, we had to realise that this is not clearly identifiable for others. Therefore, the concept for the following evaluations and subsequent procedures for the award of the ASIIN System Seal has already been changed and the peer reports follow a new structure. In addition, the evaluation report is published in direct connection with the report on certification. The new representation can be viewed on ASIIN's website: <http://www.asiin-ev.de/pages/de/asiin/akkreditierung-systeme-institutionen/akkreditierte-systeme-institutionen.php>

We expect that this captures the suggestions put forward by the peers.

Criterion 2.7: Complaints and appeals

Documentation

The documentation for application contains no information on how the agency handles complaints.

Here we would like to add that it is the standard process in all evaluations that the applying institution submits the report for a statement of opinion. If the evaluation report contains false information, for example, it is possible to correct this before creating the final version. In substantive assessments by the peers a feedback loop with them is, of course, necessary.

Evaluation of the peers

„In the area of certifying modules and courses, by contrast, the object, procedures and terms of the appeals procedure are not regulated so as to be sufficiently binding. The general reference in the criteria document is just as insufficient as the naming of formal requirements and terms in the letter to the applicant.

[...]

However, the agency should make the public aware of the option to submit complaints.“

The peers' comments will be included in the proposed reform of the certification area.

In terms of the second point raised by the peers, it is the perspective of ASIIN that especially in the area of complaints, the potential party causing the complaint must be suffi-

ciently informed about the available possibilities and the procedure. Information provided to the public appears to play a minor role in this, since they are not directly entitled to complain.

Criterion 3.1: Use of external quality assurance procedures for higher education

Evaluation of the peers

Following up this definition, the agency should clearly define how “type 2” evaluations differ from “type 1”. This difference has not been sufficiently clear to the expert team. The second step requires a transparent distinction and outline for third parties (in particular via the homepage). The term “evaluation” should no longer be used for type 2.

We are happy to take up the comments of the peer team to make the distinction between the two types of evaluation even clearer. The complete absence of the word "evaluation" seems difficult for us, at worst infeasible, as many applicants use exactly this term internally and in their calls for tenders without making a claim for an ESG-compliant evaluation. This term is used in many ways, especially in German-speaking countries, not least in teaching evaluations, project evaluations, etc.

Criterion 3.2: Official status

No further comments.

Criterion 3.3: Independence

Evaluation of the peers

However, the subject of the independence of the experts deployed by the agency was raised during the on-site visit. As they were entered into the pool of experts on the suggestion of the member organisations or other institutions relevant to the field (see ESG standard 2.4), there is a potential danger from the perspective of the expert group of influence being exerted by these organisations.

As made clear by the discussion of these issues during the audit, the theoretical reasoning of the peer team ("the potential risk of influence") meets with incomprehension and bafflement of all parties, as we were given no indication in the audit that the theoretical construct of a blanket bias would even begin to be proven.

Against this background, we want to explain again in detail our position at this point, both in terms of the understanding of our committee members and also our principles of peer selection and understanding of the role.

Neither the committee members nor the ASIIN peers (be they faculty associations, departmental associations, technical and scientific associations, trade associations or member organisations) serve as representatives of the institutions eligible to submit proposals. This is clear from the principle that all committee members are elected in their personal capacity and not for their function. This means that if a committee member decides to give up a position in another institution during his/her term of office, his/her term of office within ASIIN remains unaffected. The only exceptions here are the members of the Board, who act as representatives of an organisation, but have no influence on the accreditation/certification processes. It should be noted in this context that unlike most players in the system, ASIIN does not accept any individual memberships of higher education institutions in its membership structure, specifically to exclude any exertion of influence.

As regards the legitimacy of ASIIN peers, the proposals come from a wide range of stakeholders from the academic, scientific and economic fields.

Self-nominations are not possible at ASIIN and all peers undergo a screening process of their suitability to be a peer before being officially appointed.

Merely for the sake of completeness: all peers sign a statement of independence in their activities and we have no reason to believe that they do not feel obliged by it.

Through the composition of the peer teams with representatives from universities, universities of applied sciences and industry it is also theoretically impossible to see how some kind of "organisational influence" could take place. Why a membership of a faculty or departmental association would already justify the assumption that there would be a risk of undue influence is incomprehensible as each peer in the system has a specific organisational involvement or professional background; at the same time, it is completely impractical to use only peers who are not engaged in other institutions.

If there were cases of peer misconduct, the multi-phase ASIIN system of checks and balances in peer selection would anyway be suited to an extraordinary degree to provide corrections, if this were necessary.

All things considered, we have no evidence of a structural problem concerning a possible independence of peers. If there were, it would have to be proven to have a basis for any possible pursuance. On the contrary, we believe that the complex ASIIN peer selection

system with its checks and balances at all levels is one of the great strengths of our organisation and is a national and international role model.

Evaluation of the peers

During the on-site visit, the expert group also raised the problem of committee members who were active as experts in a procedure not being entitled to vote, but taking part in the consultations in the committees. The agency representatives by contrast took the view that the committee members concerned could provide valuable input and report on the procedures "first hand". The expert group is critical of this. This is because being present at the consultations means that the committee member concerned can have an influence on the discussion.

We see our approach as a good working practice to obtain information first-hand if required. In addition, the committee members have practical experience in the accreditation process, which is helpful in the development of criteria and procedures. ASIIN's practices were already addressed during the previous accreditation process of ASIIN by the Accreditation Council and were assessed as being "not problematic"¹.

Furthermore, we would like to point out the following aspects which speak in favour of us maintaining our principle:

- The introduction of the rapporteur principle: owing to the fact that for almost two years the reports have always been assigned to a group of AC members, an intensive examination of the report by several AC members is guaranteed. For this reason, any influence can be virtually ruled out.
- Discussions in several committees: for the most part, the reports are submitted to more than one Technical Committee for discussion, which make quite differing recommendations to the Accreditation Commission. This ensures an analysis comprising different points of view.
- Limiting the committee members in a process: during appointment care is taken to ensure that a maximum of one committee member will be involved in any given process.

Contrary to the fears of the peer team, we expect a positive impact on the process when a direct rapporteur is on site. In this context, there were several situations in

¹ Original text from the previous audit: "The possible combination of committee membership and membership of a peer team mentioned in the application rationale (page 20f.) is not problematic with respect to the AC programmes and the Technical Committees, despite the fundamentally different roles of peer teams and committees, since the independence of these committee members is ensured by the provisions in the Bye-Laws, which state that members of committees who worked in a consultative process as a peer do not participate in the corresponding vote."

which the discussion about the process was interrupted to be able to consult again with the speaker of the peer team.

Criterion 3.4: Thematic analysis

Evaluation of the peers

„The annual meetings held regularly by ASIIN, along with the performance of ASIIN’s work, indeed serve the analysis of current problems and issues of quality assurance, however, as far as can be seen, they do not serve the analysis of findings ascertained by ASIIN in its own work. Also, no elaborate meeting documentation with summary analyses is published, but instead just presentations.“

We agree with the analysis by the peers that continuous analysis of the overall system is of key importance. Thematic analyses were and are therefore the focus of our own strategy development. Only from knowing the interdependencies of the system can one ascertain any approach at all for process optimisation and the adaptation of an agency to the needs of the market; it is thus one of the "survival strategies" to consider this.

Whether this is best done by conference proceedings or by continuous further development of one’s own portfolios or of applicable instruments remains to be seen.

In any case, ASIIN sees itself as a system player and there are three quick examples from the recent past to prove this. First was our "System conference" (impact of QA) organised a few weeks ago in Berlin for exactly this purpose, to promote the missing impact assessments in the overall system and we are delighted to have gained the GAC as a partner in achieving these goals. Our international networks are also of key importance in the treatment of system issues, as only together we can optimally realise this. In the CEENQA network, ASIIN is significantly involved in the organisation of systemically important workshops (a few weeks ago there was one on the topic of "accreditation of joint degrees" and also recently, at the level of EASPA, the third global meeting of professional accreditation agencies took place with its main focus on the effectiveness of academic and professional mobility).

On the "micro level", it is the systematic evaluation (via regular employee meetings, annual conferences, peer and customer satisfaction surveys, etc.) of our accreditation activities/results, which find their way into the selection of main topics for our newsletter, members' information, selection of conference topics or adjustments to our instrumentation.

Criterion 3.5: Resources

Evaluation of the peers

However, as 16 programme accreditations per year, each taking 13 working days, is already enough to exhaust the annual working time contingent, the expert group asked whether cross-departmental tasks that accumulate at the consultant level are taken into account for the calculation of the working days.

First, we would like to point out that not all process supervisors execute 16 programme accreditation procedures per year. In 2015 about 116 procedures were executed, meaning that on average each process supervisor completed 13.5 procedures. Second, a further 16 working days would also be available for cross-sectional tasks in the supervision of 16 procedures. The 16 procedures per year are merely for calculation and as a warning that a process supervisor may be over-burdened and that the workload needs to be balanced. It is also key to note that each process supervisor has the option to pass a process to colleagues on a central list to prevent an overload (this is often the case during peak times in May/June and October/November).

Criterion 3.6: Internal quality assurance and professional conduct

Evaluation of the peers

The designation of those responsible for processes is also only in planning. A new QM structure should show the core processes and contain a clear assignment of responsibilities.

We can already at this point document the further development of the new system. Enclosed is the assignment of responsibilities.

Evaluation of the peers

It should also, in accordance with the recommendation of the last reaccreditation of the agency, discuss the results of these analyses with committee members, employees and experts.

The discussion of the results of the customer and peer survey is one of the recurring discussion points in the regular meetings and committee meetings. After inspection by the peer team the current report was completed and will now be discussed in the upcoming committee sessions in June this year. We enclose the report as an annex.

Criterion 3.7: Cyclical external review of agencies

No further comments.

B Statement of opinion with regard to the observation of supplementary criteria of the Accreditation Council

On criterion 2.1.1

No further comments.

On criterion 2.1.2

No further comments.

On criterion 2.2.1

Documentation

According to this, the cost for such a procedure is 1740.00 EUR. However, during the on-site visit prices twice as high were stated.

The numbers contained in the report are correct. We are not aware that other numbers were mentioned during the procedure. Possibly this is the result of a misunderstanding.

On criterion 2.2.2

Evaluation of the peers

According to the rules of procedure it is not guaranteed that students will also contribute to the appointment of experts in the Programme AC and the System AC. The appointment of experts however is pursuant to Cl. 1.1.3 of the “Rules for the Accreditation of Study Programmes and for System Accreditation²” one of the elementary tasks of the agency.

First we would like to make the distinction between the nomination and the appointment of peer teams for the programme area. Our procedure is dichotomous. The peers' proposals for representatives from higher education institutions and industry

² Resolution of the Accreditation Council in the version adopted on 20 February 2013

regularly come from the Technical Committees; the proposals for the student representatives are (almost exclusively) received from the student accreditation pool whose suggestions are always taken into account. The inclusion of students in nominating peers has thus already been ensured. In addition, the Appointing Commission of the Accreditation Commission for degree programmes was supplemented already some time ago by a de facto student representative. The decision in principle to expand the Appointing Commission will continue to apply.

In the system area the nomination of peers for a process is done as a separate agenda item at a meeting in connection with the permission of a higher education institution for system accreditation. At that moment, the Accreditation Commission knows the profile of the higher education institution and, based on this knowledge, can determine the necessary peer profile. This way, all members of the Accreditation Commission are involved in the nomination of peers. During the proposal process at least one replacement candidate is proposed and the required profile is outlined as accurately as possible. For the nomination of student representative, the Accreditation Commission for quality management systems has always relied on the proposals of the student accreditation pool.

On criterion 2.2.3

No further comments.

On criterion 2.2.4

No further comments.

On criterion 2.2.3

No further comments.

On criterion 2.3.2

No further comments.

On criterion 2.3.3

No further comments.

On criterion 2.4

No further comments.

On criterion 2.5

No further comments.

On criterion 2.6

No further comments.

On criterion 2.7

No further comments.

Düsseldorf, 30 May 2016

Dr. Iring Wasser
(Managing Director)

(Annexes in German language removed - EQAR)

Von: **Iring Wasser** GF@asiin.de 
Betreff: ASIIN membership in the EQAR
Datum: 28. März 2017 17:17
An: Colin Tüeck colin.tueeck@eqar.eu
Kopie: info@eqar.eu

IW

Dear Mr. Froment,
Dear members of the EQAR Register Committee,

Enclosed you will find the requested additional information ASIIN submits to demonstrate at least substantial if not full compliance with the points mentioned in your letter to us. We have also included a letter by the German Accreditation Council which has attested full compliance with a number of requirements which play a role in both procedures. While fully accepting the fact that the EQAR register will come to its independent decision, it might still be helpful to know that after a thorough review of the GAC of the changes implemented, full compliance was attested in the attached English letter by the GAC (the corresponding criteria are identified in ASIIN additional representation).

As of today we also have published a thorough analysis “on the future of the German accreditation system”, the first comprehensive review in this country of the upcoming changes in the German legal system and what it means for universities and agencies alike. It’s for a German audience/stakeholders, therefore in German, but for those within the EQAR bodies who are familiar with the language, it might be of interest.

We remain at your disposition for any issue that might arise.

Best regards
Iring Wasser

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Ihr Zeichen, Ihre Nachricht vom

Unser Zeichen

Durchwahl, Name

Datum

jm/GF

-10, Dr. Iring Wasser

20.03.2017

Inclusion of ASIIN on EQAR – additional representation

Dear Mr. Froment,

dear members of the EQAR Register Committee,

With regard to your letter concerning ASIIN's renewal of registration in EQAR, dating 03 December 2016, ASIIN hereby submits additional clarification and information. With this we expect to demonstrate at least substantial if not full compliance with the points mentioned in your letter, in particular those where the Register Committee came to a different conclusion, with a lower level of compliance, than the review panel.

ESG 2.2: Designing methodologies fit for purpose

No student member in the certification committee

The committee itself was established not long ago to deal with quality assuring education offerings outside of programme and institutional accreditation, and indeed no student representative was a part of in the founding phase. The shortcoming of a lack of student representation has meanwhile also been healed with the appointment of Jorge Moreno, Student at the University of Mainz.

(please check on our English speaking website: <https://www.asiin.de/en/about-us/expert-panels/certification-committee.html>). The German Accreditation Council has acknowledged fulfillment of this fact.

Clarification to public that only criteria compliant with ESG can be chosen for evaluations

The website explaining the difference between the two types of evaluation offered, clearly states that type 1 evaluations are subject to the ESG. Furthermore, the relevant sets of criteria are listed as can be seen here: <https://www.asiin.de/en/quality-management/evaluation/principles-standards/criteria-type-1-esg.html>

Furthermore, we have added a sentence that also criteria of third parties to be used must comply with the ESG (this only happens under exceptional circumstances, when like in some Baltic countries ASIIN is requested to use the existing national criteria, which on a regular basis are ESG compliant, but we double check.

How is this verified by ASIIN

On the website mentioned above, it is clarified that ASIIN will carry out a synopsis of any non-ASIIN criteria (with the presumption that the mentioned ASIIN criteria are ESG-compliant).

ESG 2.3 Implementing Processes

Procedures, evaluation type 1, do normally include a site visit

As the rules for evaluations type 1 as published on the website above clearly link to the ASIIN criteria for programme or institutional accreditation or certification, all of which stipulate in their respective procedural rules a site visit, the standard is fulfilled. Even in those extremely rare cases, as proposed above, where other than the ASIIN criteria should be used for an evaluation, it is clearly stated that these must comply with the ESG which automatically includes that a site visit is mandatory.

Case where ASIIN did not follow the principles established in its own policy regarding the use of evaluation results for programme accreditation and explanation for that case

As documented in the statement of ASIIN to the panel report, there was one singular case among hundreds of procedures implemented by ASIIN where a different approach was taken. However, the explanation for this particular singular deviation was also given, namely that in case the evaluation report provided sufficient evidence and was implemented in accordance with the principles, so that this audit was waived. We will however amend our policy paper accordingly in the upcoming meetings of the ASIIN bodies, as there is also a stipulation by the German Accreditation Council, that the results of a prior evaluation visit can be used in an ensuing accreditation decision, provided that the results are not older than 2 years old.

ESG 3.1: Activities, policy and processes for quality assurance

Further clarify the distinction between type 1 and type 2 evaluations

Since the time of the review, when the panel found the distinction between the two types of evaluation to be not sufficiently clear, ASIIN has updated its website regarding evaluations:

<https://www.asiin.de/en/quality-management/evaluation.html> and subsites.

Recommendation to not use the term evaluation for type 2 evaluations

ASIIN has taken note of the recommendation of the review panel to avoid the term “evaluation” for type 2 evaluations. The Register Committee has commented on the ASIIN statement that our argument that customers do use this term does not prevent ASIIN from also using it. However, the term is not restricted to uses as falling under the scope of EQAR. Furthermore, as explained above, ASIIN is convinced that the distinction between the two types and the fact that type 2 evaluations do not fall under the remit of the ESG, and of EQAR, is very transparent on the ASIIN website.

ESG 3.4: Thematic analysis

No publication fully responding to the criterion

With regard to this newly established ESG criterion, ASIIN has been entertaining a broad range of measures:

On the quality assurance level of our accreditation procedures, all experts and universities are contacted on a very systematic level and according to a fixed protocol after the review visits to find out about the adequacy of our procedures and criteria as well as the performance of our peers. A summative evaluation of these findings (we are happy to have a good response rate via our peer as well as client survey) are made and presented to our stakeholders, members and bodies and appropriate conclusions drawn (see attached last quality assurance report dating of last year, albeit in German).

Equally important, ASIIN for many years has entertained a thorough list of its standard requirements and recommendations (for more than 4000 national and international accreditation procedures, see as attachment the English version) in a written form which are regularly reviewed as part of our internal quality assurance regiment as they are the collective memories of our decision practice with regard to typical topics and themes which need to be dealt with in a coherent manner. This is thus a reflection of the qualitative changes/priorities in our decision making processes. In a few weeks, ASIIN together with the German Accreditation Council is at this very moment conducting a joint review to identify the most important topics on the national level, ASIIN providing one of the few existing comprehensive data basis to this regard.

ASIIN also has published a considerable numbers of newsletters frequently selecting topics of national concern and is sending it out to all national stakeholders (presidents of all universities, deans conferences, members from industry, technical associations etc.). Topics on which we reflected in the past relate to issues such as outcome orientation (Number 11), internationalization (Number 12), or Joint Degrees (Number 13). The current version of this week's newsletter ("The future of the German accreditation system") is the first comprehensive analysis of what the constitutional rulings and subsequent decisions by the Standing Conference of Ministers of Education mean for universities and agencies alike.

As a final reflection: "Impact studies" on external QA are extremely rare as a thorough internet analysis by us in the course of last year revealed. This was the reason, why ASIIN in May of 2016 in its annual international Berlin conference convened stakeholders from more than 40 countries to discuss the manifold facets of this topic which is implicitly linked to this new ESG criterion, thereby stimulating manifold new discussions on the national and international level.

In general, the topics of all of our annual conferences as stakeholder events are reflections of our analysis of the external quality assurance procedures, as well as our involvement in a number of international networks, and the findings and issues of these procedures.

Furthermore, we would like to comment on the following standards where the original finding had been of partial compliance but where enhancements have been made since the submission of the report, as evidenced also by the fact that the German Accreditation Council (see attached letter by the GAC) has confirmed the fulfillment of our requirements in March of 2017. These standards are fully complied with.

ESG 2.4 Peer-review experts

Student representatives have been and are involved in all quality assurance procedures in ASIIN since its very beginning. Students from the founding of ASIIN in 1999 always have been members in ASIIN's two Accreditation Commissions for Program as well as Institutional Accreditation and have been members in every single of its 13 Technical Committees. All this is laid down in our statutes; on our website the names of the students are mentioned. ASIIN had excellent experiences with our usually very active student representatives over the past 15 years. This by itself has been one of the best guarantees that this ENQA requirement is fully honored.

To further underline this point it is important to note that ASIIN is one of the only agencies in ENQA and within Germany, which for a long time has been funding on a completely voluntary basis our national student accreditation organization, the so called German student accreditation pool. This is done with a base fund of 2500 EUR each year in addition to funding training courses in the framework of which the pool is carrying out training sessions. It is important to note that ASIIN benefits from these measures as the pool sends qualified student experts to all our national accreditation procedures.

With regard to our international procedures, ASIIN follows a different philosophy. We are, as a core priority, investing a lot of effort to recruit students (as well as industry representatives by the way) from the very country we have been asked to perform accreditations as only they have an intimate knowledge of the specific student experience, thereby establishing an international data base of students experts in the process. In spite of the fact that in many countries no formal student bodies are in place and international student bodies in the STEM disciplines (such as BEST or SPEED) to our great regret are lacking the necessary organizational rigor, we have nevertheless succeeded in almost all cases to secure student participation in our expert teams using multiple techniques of recruitment.

The involvement of student representatives in all panel groups thus is surely not a structural issue and students are involved as panel members nationally and internationally as described above. With the development of accreditation, and new certification and evaluation type 1 procedures, ASIIN has been able to increase the participation of students nationally and internationally to practically 100%.

Furthermore, with regard to another point mentioned in the report: as opposed to what is written in the external report, students in the past also have been a part of the ASIIN selection committee for peers which, in a very sophisticated procedure, selects the most suitable experts for our accreditation procedures. Currently, there are two students who have been members of the ASIIN Accreditation Commission since 2014. In the period between December 2014 and December 2016 one of them was elected (in addition to already being a regular member as student representative!) to the Presidium of the Accreditation Commission, thereby automatically becoming a member of the overarching peer selection committee (see footnote). Until 2019 this function will now be taken on by the alternate student member of the Commission. In spite of the fact that students thus on a factual basis had been involved in the selection of our peer groups (including the obligatory student peer) it is true to state that this was not explicitly anchored in the statutes of the commission ASIIN. To also satisfy this from a formal point of view, the ASIIN Accreditation Commission has changed this last year by rephrasing its statutes (§ 4 in combination with §5); translation in English is provided below, in the attachment also the German version. ¹The German Accreditation Council has acknowledged this change during its meeting last week.

¹ („2. The Accreditation Commission has a standing committee for the appointment of peers. It is composed of the presidium of the accreditation commission as well as the so called “caretakers” for each of the technical committees. This standing working group is responsible for the selection of the peers/composition of each review team and decides the appointment of each peer..

This essentially leaves the case of the ASIIN Certification Committee, where the final gap has been closed as described above. To check the fact that student participation is guaranteed on all levels, simply check again the relevant website: <https://www.asiin.de/en/about-us/expert-panels>. ASIIN is thus in full compliance with this ESG requirement.

ESG 2.7 Complaints and appeals

Following up on the peer's recommendations that the appeals procedure was not fully clear for all types of procedures, we have clarified on our website (<https://www.asiin.de/en/service/complaints.html>) the means to formally launch a complaint for program and institutional accreditations, certification procedures and evaluation type 1-procedures. More specifically, the procedures and steps for complaints in certification procedures but also in evaluation type-1 procedures are now completely aligned to those of accreditation procedures. The same complaints channels are open for customers from all these review types and the Complaints Committee (which does have a student member) is the relevant body for all of them. This information is thus publicly available, in addition to the information provided in the letters to the reviewed institutions. With the changes implemented, we are in full compliance with this ESG criterion.

ESG 3.6

With its decision of 07.02.2017, the German Accreditation Council confirmed that the requirement regarding the formalization of ASIIN's internal quality management system has been fulfilled.² Therefore, the standard is now completely fulfilled.

§ 5 Chair and Presidium: the members of the accreditation commission elect two chairs as well as five deputy chairs out of their midst. This Presidium is composed of representatives of universities, universities of applied sciences, industry as well as a student representative..")

² The formal decision is available (in German only) at:

http://akkreditierungsrat.de/fileadmin/Seiteninhalte/Agenturen/ASIIN_Drs_AR_29_2017_Beschluss_Auflagenerfuellung.pdf

We would appreciate if the EQAR register committee considered this additional information and recognized the evidence provided.

Best regards

A handwritten signature in black ink, appearing to read "Iring Wasser". The signature is written in a cursive style with a large initial "I" and a long, sweeping underline.

Dr. Iring Wasser
Managing Director



Accreditation Council | Adenauerallee 73 | D-53113 Bonn

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AZ: 081/17 – KML – 5.7.2

- via electronic mail -

Bonn, 27.03.2017

Re-accreditation of ASIIN; fulfillment of conditions

Dear Dr. Wasser,

Thank you for sending all necessary documents to deal with the last remaining condition concerning your re-accreditation by the German Accreditation Council (GAC).

GAC's board has analysed your changes to ASIIN's rules of procedure. I am happy to inform you that the board will recommend to GAC's main body to declare the condition as fulfilled because ASIIN now includes students regularly in all cases expert groups are appointed.

GAC's final decision is supposed to be taken at June 7th.

Yours sincerely


Dr. Olaf Bartz

Brussels, 25 April 2017

Application by ASIIN for renewal of registration on EQAR

Dear Olaf,

ASIIN has made an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as coordinator of the external review on which ASIIN's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, one matter in order to contribute to the consideration of ASIIN's application:

In its report of May 2016, the external review panel had concluded that ESG standard 3.6 was only partially fulfilled, due to a lack of formalisation of ASIIN's quality management (QM) system. In relation thereto, the panel had also proposed that GAC impose the condition that the agency demonstrates the formalisation of its internal QM system.

In its additional representation of 20/3/2017, ASIIN informed EQAR that GAC had considered this condition fulfilled on 7/2/2017.

As the formal decision was made available in German onlyⁱ, could you please elaborate what evidence GAC reviewed in concluding that the condition was fulfilled, as well as any possible further considerations by GAC that may be of relevance in terms of ASIIN's level of compliance with ESG 3.6?

European Quality Assurance
Register for Higher Education
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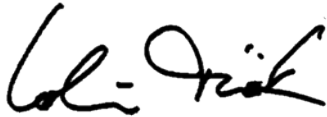
VAT BE 0897.690.557

We would be grateful if it was possible for you to **respond by 9 May 2017**, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on ASIIN's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück
(Director)

Cc: ASIIN

ⁱ http://akkreditierungsrat.de/fileadmin/Seiteninhalte/Agenturen/ASIIN_Drs_AR_29_2017_Beschluss_Auflagenerfuellung.pdf



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- via electronic mail -

Bonn, 09.05.2017

Application by ASIIN for renewal of registration on EQAR

Dear Colin,

Thank you for your clarification request.

1. Evidence the German Accreditation Council (GAC) reviewed concerning the fulfillment of the condition 3 (formalisation of the agencies' internal QM system; standard 3.6 ESG):

ASIIN handed in a link to its updated, publicly available, quality management manual (see http://www.asiin-ev.de/media/QM-Handbuch_ASIIN_eV_2011-10-27_Aenderung_2016-04-27.pdf, German only) and an internally available process map.

The quality management manual explains the quality objectives of the agency as well as the expectations, as far as quality is concerned, placed on the different processes. Besides, in the manual the measures are explained which the agency applies to enhance quality. Those measures comprise QM measures in a broad sense, such as the preparation of experts, as well as in a narrow sense, such as the surveying of experts and customers. For all measures, it is explained for which products they apply and what consequences follow if deficiencies are uncovered.

The process map lists up all processes and the staff members responsible for each process (only for evaluations according to ESG, that is "type 1" evaluations, responsibilities are not yet assigned).

For most processes, there are internal process sheets which contain general information on the respective process and flow charts. ASIIN delivered the process sheets for programme accreditation as an example. The process sheets contain a section "feedback loop" which is

used by the agency to note problems that occurred and respective solutions agreed on by the agency. The agency also handed in its templates for programme accreditation as an example.

ASIIN explained that all QM documents are stored on the agency server and thus are easily available for the staff.

According to ASIIN, the main feedback loops of the agency are the internal „QM jour fixe“ and the surveying of experts and customers. The agency has process sheets and flow charts for both instruments, which also contain follow-up measures.

ASIIN's annual strategic conference will in the future be used to update the process sheets and flow charts when necessary.

2. GAC's assessment:

GAC came to the conclusion that the agency has proved the necessary formalisation of its QM structure and therefore declared its condition 3 as fulfilled. The agency now has a plausible QM system which keeps the balance between formalisation and flexibility. It applies to all services the agency offers. The surveying of experts and costumers is carried out only in the area of accreditation; nevertheless, the QM principles also govern the evaluation and certification procedures. The completion of process descriptions and assignment of responsibilities is welcome. GAC suggests that the responsible staff members for evaluations "type 1" could be added. The feedback loops guarantee that consequences follow regularly from the internal and external feedback mechanisms.

Please feel free to contact us if you have further questions.

Best regards

A handwritten signature in blue ink, appearing to read 'Olaf Bartz', is written over a light blue circular stamp.

Dr. Olaf Bartz