

## Substantive Change Report

by Accreditation Agency for Study Programmes of Engineering,  
Information Science, Natural Sciences and Mathematics (ASIIN)

Register Committee

Ref. RC24/C43

Ver. 1.0

Date 3/7/2019

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Decision of:	19/06/2019
Report received on:	27/05/2019
Agency registered since:	08/04/2009
Last external review report:	31/05/2016
Registration until:	31/05/2021
Absented themselves from decision-making:	n/a
Attachments:	<ol style="list-style-type: none"> <li>1. <a href="#">Substantive Change Report</a></li> <li>2. <a href="#">Request of 29/04/2019</a></li> </ol>

1. The Register Committee considered the Substantive Change Report of 27/05/2019 in response to its request of 29/4/2019 and thanked ASIIN for responding to the specific questions raised in its request.
2. The Register Committee took note of the changes brought about by the [Interstate Treaty](#) between the German federal states, which entered into force in 2018, and the related [Specimen Decree](#). The main change lies in the fact that – for accreditation in Germany – ASIIN no longer takes accreditation decisions itself, but prepares an assessment report on the basis of which the German Accreditation Council (GAC) takes a decision; the way in which ASIIN carries out these assessments remains largely similar to the pre-2018 system.
3. The Register Committee underlined that agencies themselves remain responsible for the alignment of their activities with the ESG, even if they work based on third-party processes and criteria. As an EQAR-registered agency it is ASIIN's responsibility to assure itself that the frameworks under which it decides to operate are compatible with the ESG.
4. The Register Committee took note of the fact that ASIIN applies the criteria as set out in the Specimen Decree, which replace the accreditation criteria previously set by GAC.
5. The Committee thanked ASIIN for enclosing the mapping table elaborated by the GAC, which illustrates how the criteria correspond to Part 1 of the ESG.
6. The Register Committee noted that ASIIN did not change its practice as regards site visits.

7. The Register Committee noted that no final details on follow-up processes could be provided to date, but understood that the GAC is likely to have a role in the follow-up processes. The Committee underlined that ASIIN retains responsibility for follow-up to take place, even if GAC makes accreditation decisions. This does not exclude that GAC actually implements the follow-up processes, as long as ASIIN has assured itself that this indeed happens.
8. The Register Committee expects that the interaction between GAC and ASIIN, and their respective roles in the follow-up process, will be analysed in the next external review of ASIIN.
9. The Register Committee noted that ASIIN did not change the composition, selection and appointment of review panels, as its established practice is in line with the nomination procedure adopted by the German Rectors' Conference (HRK).
10. The Register Committee noted that ASIIN did not change the way in which it assures consistency of reports and continues to rely on the existing committees/working structures in that regard.
11. The Committee nevertheless underlined that the next external review of ASIIN should analyse whether the new arrangements had any impact on the consistency of applying the accreditation criteria.
12. The Register Committee noted that the reports are published by GAC together with GAC's eventual decision.
13. The Register Committee underlined that ASIIN remains responsible for assuring that all its reports are published, irrespective of whether that is on its own website or elsewhere, and regardless of the fact that GAC takes the final accreditation decisions. In particular, ASIIN should find appropriate ways to ensure that its final reports are also published if the institution does not forward the report to GAC.
14. The Register Committee noted that ASIIN's appeals procedures were not changed. The Committee understood that institutions thus retain the possibility to both complain about procedural errors, etc., or to appeal the report, i.e. specific statements or conclusions in the report.

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our sign  
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Name  
Dr. Iring Wasser

Date  
14.05.2019

Dear Mr. Tück,

Dear Colin,

thank you very much for your request concerning substantive changes of the accreditation procedures of ASIIN related to the development of a new accreditation system in Germany. We are glad to answer your questions as follows.

#### 1) Accreditation criteria

As in the former German national system, the accreditation agencies do not have any influence on the definition of the accreditation criteria. While in the former system, the Accreditation Council defined the criteria to be applied by the agencies, in the new system the criteria have been defined by governmental institutions.

Regarding the content of the criteria, there are generally no changes compared to the national criteria in the former German system. The German Accreditation Council has compiled a synopsis of the new German accreditation criteria and the ESG (see enclosed Appendix).

#### 2) Ensuring consistency with criteria

As there are no substantial changes of the criteria in the new accreditation system in Germany, no change of our approach is thus necessary.

### 3) Review panels

The composition, selection and appointment of the review panels does not change either. The German Rectors Conference (HRK) indeed is responsible to define the regulations for the panels, but only defines requirements regarding the qualification of individual peers and the composition of the panel. These regulations are essentially identical with the criteria defined by ASIIN. The HRK did not establish rules for the process of selection and appointment of the review panels.

In our accreditation procedures, our Technical Committees continue to nominate the auditors, who are confirmed by the accreditation commission. Within the panels, representatives of the labour market, students and professors are included as stakeholders.

### 4) Use of site visits, publication of reports, follow up process

The new accreditation system in Germany allows a paper based accreditation procedure under certain conditions. This regulation to dispense a site visit already existed in the former German accreditation system. For the new accreditation system, the Accreditation Commission of ASIIN however confirmed its former decision that a site visit is a regular part of all ASIIN accreditation procedures.

In the new German system, the German Accreditation Council will publish the accreditation reports of all agencies. To which degree the German agencies continue to publish the reports on their own website after the decision of the Accreditation Council remains under consideration and discussion.

In the new German accreditation system, the accreditation agencies are no longer involved in the follow-up of the accreditation decision. The German Accreditation Council is responsible for all steps following the accreditation decision. Nevertheless, the universities have the opportunity to eliminate deficits identified by the experts before they send their application for accreditation to the Accreditation Council.

### 5) Appeal Process

There are no changes in the appeal process. By contract, the universities have a right of appeal against the monitoring procedure or specified measures or assessments therein.

### 6) Organisational Structure

The organisational structure of ASIIN remains unchanged. Besides the panels, our Technical Committees and our Accreditation Commission are still involved in all national accreditation procedures.

We hope that our statement answers your questions satisfactorily and, in particular, explains why we are not considering the new German accreditation system as requiring major changes in our external quality assurance procedures.

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'.

Dr. Iring Wasser

**Appendix**

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

July 2018

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

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

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

Brussels, 29 April 2019

## Substantive Change Report on New Legal Framework in Germany

Dear Iring,

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

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

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

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

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

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

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

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

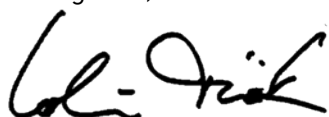
If there are **other changes** to your organisational structure or external quality assurance activities, i.e. not related to the new legal framework in Germany, please kindly include them in the same report. For those activities please follow the usual questions and instructions.

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

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

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

Kind regards,

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

Colin Tück  
(Director)