

Substantive Change Report
by Agency for Quality Assurance and Accreditation Austria
(AQ Austria)

Register Committee

Ref. RC24/C46

Ver. 1.0

Date 3/7/2019

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Decision of:	19/06/2019
Report received on:	29/05/2019
Agency registered since:	29/11/2014
Last external review report:	May 2014
Registration until:	31/05/2019
Absented themselves from decision-making:	n/a
Attachments:	1. Substantive Change Report 2. Request of 29/04/2019

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

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

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6. The Register Committee took note of the fact that AQ Austria applies the criteria as set out in the Specimen Decree, which replace the accreditation criteria previously set by GAC.
7. The Committee thanked AQ Austria for enclosing the mapping table elaborated by the GAC, which illustrates how the criteria correspond to Part 1 of the ESG.
8. The Register Committee noted that AQ Austria did not change its practice as regards site visits.
9. The Register Committee understood that AQ Austria did not change its follow-up processes and welcomed that AQ Austria will continue to implement its own, established follow-up processes irrespective of any possible follow-up implemented by GAC.
10. The Register Committee expects that the interaction between GAC and AQ Austria, and their respective roles in the follow-up process, will be analysed in the next external review of AQ Austria.
11. The Register Committee noted that AQ Austria did not change the composition, selection and appointment of review panels, as its established practice is in line with the nomination procedure adopted by the German Rectors' Conference (HRK).
12. The Register Committee noted that AQ Austria did not change the way in which it assures consistency of reports and continues to rely on the existing committees/working structures in that regard.
13. The Committee nevertheless underlined that the next external review of AQ Austria should analyse whether the new arrangements had any impact on the consistency of applying the accreditation criteria.
14. The Register Committee noted that AQ Austria continues to publish the full expert reports on its own website, in addition to the report being published by GAC together with its eventual decision. AQ Austria thus discharges its responsibility to ensure that all its reports are published and the Committee welcomed that commitment to transparency.
15. The Register Committee noted that AQ Austria'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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European Quality Assurance Register (EQAR)
Colion Tück

By Email: colin.tueck@eqar.eu

Vienna, 29 May 2019

Substantive Change Report on New Legal Framework in Germany

Dear Colin

With letter of 29 April 2019 EQAR requested a substantive change report on the legal changes in the German accreditation system. Presumably EQAR is of the opinion that AQ Austria introduced substantive changes and hasn't reported these. This is not the case.

AQ Austria cannot report any substantive changes. The questions EQAR asked in particular shall be answered as follows:

1. EQAR is aware of the fact that quality assurance agencies that are registered as accreditation agencies in Germany are not in the position to define the accreditation criteria. As EQAR is aware of, the Specimen Decree you referred to in your letter came into force 1 January 2018; it replaced the "Common structural guidelines of the Länder for the accreditation of Bachelor's and Master's study courses" and the "Rules for the Accreditation of Study Programmes and for System Accreditation". For further questions regarding the rationale of the legal changes and the reasons for structuring and writing the accreditation criteria as they are I'd like to refer you to "The Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany" that drafted the specimen decree. I'm convinced that the Standing Conference is happy to explain the changes in detail. Concerning the consideration of part 1 of ESG2015 I'd like to refer you to the respective table produced by the German Accreditation Council which I thought EQAR was made aware of during the consultations on the new accreditation system. Since this is not the case I attach it to the letter.
2. AQ Austria didn't introduce any substantive changes in its approach to ensuring consistency.
3. AQ Austria didn't introduce any substantive changes in composing its panels.
4. AQ Austria didn't introduce any substantive changes in conducting site-visits.
5. AQ Austria didn't introduce any substantive changes in its processes because of not taking the final accreditation decision any more.
6. AQ Austria didn't introduce any substantive changes in its organisational structure.

Should EQAR have more questions I shall be at your disposal.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'A. Hopbach', with a horizontal line extending to the right.

Dr Achim Hopbach
Managing Director

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

July 2018

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

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

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

Brussels, 29 April 2019

Substantive Change Report on New Legal Framework in Germany

Dear Achim,

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 AQ Austria 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 AQ Austria 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 AQ Austria 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 AQ Austria change its organisational structure in relation to the new legal framework?

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

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

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

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

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

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

Kind regards,

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

Colin Tück
(Director)