

Approval of the Application
by Agency for Quality Assurance and Accreditation of
Canonical Programmes of Studies in Germany (AKAST)
for Renewal of Inclusion on the Register

Register Committee
 11-12 December 2023

Ref. RC41/A142
Ver. 1.0
Date 2023-12-18
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Application of:	2023-01-17		
Agency registered since:	2021-08-01		
Type of review:	Full	Site visit:	2023-06-19
External review report of:	2023-10-25	Submitted:	2023-11-14
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)		
Review panel members:	Asnate Kažoka, Bogdan-Marius Negrea, Mark Frederiks, Tomaž Deželan,		
Decision of:	2023-12-12		
Registration until:	2028-10-31		
Absented themselves from decision-making:	n/a		
Attachments:	1. External Review Report, 2023-10-25 2. Applicant's statement on the report, 2023-11-14		

1. The application of 2023-01-17 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2023-02-15.
3. The Register Committee considered the external review report of 2023-10-25 on the compliance of AKAST 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 provided by the agency on the report from 2023-11-14.

Analysis:

5. In considering AKAST's compliance with the ESG, the Register Committee took into account:
 - Programme accreditation in Germany
 - Evaluation procedure – AKAST quality seal

6. The Register Committee found that the report provides sufficient evidence and analysis on AKAST's level of compliance with the ESG.

7. With regard to the specific European Standards, the Register Committee considered the following:

ESG 3.3 – Independence

8. In its last decision, the Register Committee noted the strong role the German Bishops' Conference (DBK) plays in the governance of the agency.

9. Despite the changes made by the agency to further its operational independence, the Register Committee noted that DBK maintains a significant role in the organisational structure of AKAST.

10. The Committee underlined the possible influence that may be exerted by the DBK Episcopal Commissioner in the decision making of the Accreditation Committee. Although the Episcopal Commissioner is present in the Accreditation Committee (AC) of the agency in an advisory capacity, there is still the possibility of undue influence considering the fact that the Episcopal Commissioner still issues a separate consent impacting the programme.

11. Furthermore as noted by the panel, it also seems possible for the episcopal commissioner to express, even unintentionally, a preliminary opinion on particular study programmes, not necessarily based on the findings of the expert panel during the AC meeting.

12. The Committee noted the concentration of power in one place, i.e., the current Chairperson of the Executive Board of AKAST holds the position of Chair of the Accreditation Committee and Chair of the Advisory Board of AKAST. Furthermore, the DBK nominates the Chairperson of the Executive Board.

13. Considering the strong influence of one main stakeholder in the running of the agency, the Register Committee underlined the risk to the agency's operational independence, as well as to its independent decision-making. The Register Committee therefore concurred with the panel's view that AKAST complies only partially with ESG 3.3.

ESG 3.4 – Thematic analysis

14. In its last decision, the Register Committee welcomed AKAST plans for further development of its thematic analysis after an appropriate number of programme accreditation procedures have been carried out.

15. The Register Committee noted that while AKAST has taken some steps in preparing thematic analysis since its last review, i.e., initiating a process for evaluation of the peer review processes carried out by AKAST, since 2022 at the time of the review, no thematic analysis have been made available nor any kind of such analysis have been published.

16. Considering the limited progress made since the inclusion on the Register and the limited development of thematic analysis, the Register

Committee concurred with the panel that AKAST complies only partially with ESG 3.4.

ESG 3.6 – Internal quality assurance and professional conduct

17. The Register Committee, noted in the analysis by the panel the gaps and shortcomings in the implementation of the agency’s Internal Quality Assurance (IQA) Regulations.

18. Furthermore, the Committee underlined that the mechanisms for fostering continuous improvement within the agency are weak and unsustainable on the long-term, i.e., the heavy responsibility of AKAST administrator for all of the IQA processes, the lack of systematic approach in gathering feedback and lack of evidence and example of enhancement based IQA.

19. The Register Committee further noted the lack of commitment in timely addressing the issues previously noted under ESG 3.3 and ESG 3.4 which impacts the overall effectiveness of the agency’s internal quality assurance arrangements.

20. In light of these concerns, the Register Committee could not follow the panel’s judgement of compliance and found that AKAST complies only partially with ESG 3.6.

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

Conclusion:

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

Standard	Previous decision (2021-12-12)	Review panel conclusion	Register Committee conclusion
2.1	Compliance	Compliance	Compliance
2.2	Compliance	Compliance	Compliance
2.3	Compliance	Compliance	Compliance
2.4	Compliance	Compliance	Compliance
2.5	Compliance	Compliance	Compliance
2.6	Compliance	Compliance	Compliance
2.7	Compliance	Compliance	Compliance
3.1	Compliance	Compliance	Compliance
3.2	Compliance	Compliance	Compliance
3.3	Compliance	Partial compliance	Partial Compliance

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3.4	Partial compliance	Partial compliance	Partial Compliance
3.5	Compliance	Compliance	Compliance
3.6	Compliance	Compliance	Partial Compliance
3.7	Compliance	(not expected)	Compliance (by virtue of applying)

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23. The Register Committee considered that AKAST only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that AKAST continues to comply substantially with the ESG as a whole.

24. The Register Committee therefore renewed AKAST's inclusion on the Register. AKAST's renewed inclusion shall be valid until 2028-10-31¹.

25. The Register Committee further underlined that AKAST is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

¹ Inclusion is valid for five years from the date of the external review report, see §3.25 of the EQAR Procedures for Applications.



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Barbara Reitmeier M.A.
Geschäftsführerin

Ingolstadt, 14.11.2023

Dear Blazhe,

on behalf of AKAST, in particular the Chairperson Prof Dr Rieger, I thank you very much for giving us the opportunity to hand in a statement on the review report validated by the ENQA Agency Review Committee and provided by ENQA. In general, we appreciate the report (EER) as very balanced and fair. We are very pleased about the numerous elements of positive feedback and especially about the fact that the Review Panel acknowledge the quality of AKAST's work and concludes that AKAST is overall compliant with the ESG.

AKAST would also like to take this opportunity to expressly reiterate our thanks to the Review Panel and the Review Coordinator for the overall good atmosphere during the entire site visit, despite the technical complexity of the site visit and for the review report. The Review Panel and the Review Coordinator have done a tremendous work studying all the documents and discussing the past, present and prospects of AKAST with multiple stakeholders to compile diligently all information necessary to evaluate our work.

We will take up the generally constructive recommendations and discuss them in our governing bodies. AKAST is convinced that many of the recommendations will support our agency in its development and can contribute to the further enhancement.

In the following, we briefly comment on the areas for development listed in the letter from Mr Alastair Delaney (Annex Areas for development).

Best regards

A handwritten signature in black ink, appearing to read 'B. Reitmeier', written in a cursive style.

Barbara Reitmeier

Administrator

ESG 3.1 Activities, policy and processes for quality assurance

The agency is recommended to diversify the Executive Board by including a student member, as well as include a student representative in the Advisory Board and include the Association of Theology Students to the AKAST General Meeting.

- *AKAST will discuss this suggestion in the governing bodies and in the General Meeting of the Association of the Theology Students. Initial discussions on this topic have already taken place with the Association of the Theology Students Chair. We have agreed to have further discussions during the AGT's biannual meeting on 19 November 2023.*
- *Furthermore, it is not clear to us which ESG requirement covers this recommendation. Students are represented on all Committees related to the procedures at AKAST.*

ESG 3.3 Independence

The agency is recommended to consider a distribution of the formal positions that are currently held by the AKAST Chairperson, by introducing a separation of these positions in the Statutes, as well as consider the appointment of international members as the Chairperson of the Accreditation Committee and Advisory Board, thus further strengthening the independence of the agency, further safeguarding the independence of the universities under review and also bringing in valuable external, international perspectives into the discussions.

- *AKAST will discuss this suggestion in the governing bodies.*

The agency is recommended to strengthen the independence from DBK in the governance of DBK, e.g., by defining the advisory role of the episcopal commissioner of the German Bishops' Conference in the Accreditation Commission more clearly and codifying this through adding the description of the advisory role in § 7 of the AKAST Statutes.

- *AKAST is in the process of drawing up corresponding guidelines.*

ESG 3.4 Thematic analysis

The agency is recommended to develop a plan for producing thematic analysis that would be based solely on the information and resources gathered by AKAST. Decide upon the type of thematic analysis that would be the most useful for AKAST and its stakeholders, taking into account that the thematic analysis has to be focused on the outcomes of external assessment procedures.

- *AKAST will adopt this suggestion.*

The agency is recommended to allocate sufficient human resources for performing the tasks related to thematic analysis. Plan for stable resources (human, financial) allocated to thematic analysis that do not solely rest on members of different bodies further volunteering in a role that is already voluntary.

- *AKAST will adopt this suggestion. In this regard, we already decided this autumn to continue employing our student assistant, who is working on evaluating the procedures and initiating an evaluation of the satisfaction of our committee members.*

The agency is recommended to adapt the methodology of the thematic analysis to the available human resources and context (small number of processes, dialogical culture of feedback) and appropriately take advantage of the opportunities offered by qualitative methodology with in-depth examination of individual cases.

- *The Office has already made a specification of the IQM and presented it to the Executive Board. All procedures will continue to be evaluated. The results will continue to be published as before.*

ESG 3.5 Resources

The agency is recommended to perform robust and forward-looking planning of human resources and financial resources in order to accommodate the foreseen transitions in the office as well as additional intellectual capacity needed to perform important internal quality assurance and developmental processes and processes/products stipulated by the relevant quality standards (ESG).

- *AKAST will adopt this suggestion.*

The agency is recommended to diversify the funding to prevent excessive financial dependency on one stream of funding.

- *As a non-profit association, AKAST does not aim to make a profit and is not permitted to do so due to its legal status as a non-profit organisation. Nevertheless, we are constantly reviewing our financial situation and our requirements and are adapting our funding through procedural costs and grants.*

ESG 3.6 Internal quality assurance and professional conduct

The agency is recommended to align the internal quality manual not only with the procedures of feedback collection already in place, but also in line with the qualitative methodological conventions (e.g., transcripts, minutes, interview notes, etc.).

- *We are taking this recommendation very seriously and have already started to implement it. The IQ-manual has been revised and the actual form of evaluation by means of minuted feedback discussions is reflected in this draft.*

The agency is recommended to analyse its operations in an aggregate rather than individual manner (annual, bi-annual) and present them in a single document/ report.

- *AKAST evaluates every procedure. We can't publish the results less frequently (once a year or biannually), as otherwise (due to the small number of procedures; e.g. one procedure in a semester) we cannot rule out the possibility of drawing conclusions about individual feedback. We publish our results as soon as we have reached a quantitative size that guarantees the anonymity of the respondents as well as the higher education institutions. Within the scope of the current evaluation, about 30 experts and 11 higher education institutions have already been interviewed about the procedures in the period from 2018 to 2023, i.e. since the introduction of the new accreditation law. AKAST plans to finalise the evaluation and publish the results in the first quarter of 2024.*

The agency is recommended to introduce tools and processes that would encompass operations beyond regular accreditation processes (e.g., satisfaction with the performance of different bodies, etc.).

- *We adopt this recommendation and have already drafted a feedback survey for our committee members and added a corresponding passage to the IQ-manual.*

The agency is recommended to codify the role of a rapporteur and the level (if at all) of his/her active intervention during the visit/ procedure.

- *AKAST is in the process of drawing up corresponding guidelines.*

ESG 2.2 Designing methodologies fit for purpose

The role of the accompanying member/observer to the already large accreditation panel should be reconsidered due to the observers' presence throughout the accreditation process (site-visit, preparatory meetings) as well as their possibility to actively intervene.

- *AKAST would like to clarify once again that the rapporteur and the observer are one and the same person.*
- *Reference is also made to the response to the previous suggestion.*

ESG 2.4 Peer-review experts

The agency is recommended to ensure that all potential review panel members receive consistent training before engaging in a review procedure.

- *AKAST would like to point out once again that the voluntary experts cannot be forced to participate in specific trainings within the German system. AKAST offers regular training (most recently four times per semester, online; as stated in the SAR). In particular, those experts who will be involved in future procedures for the first time are invited to these seminars.*
- *In addition to this, biannual trainings are offered for students, these are also mentioned in the SAR (page 46).*

The agency is recommended to publish an open call for experts on the AKAST website.

- *AKAST will discuss this suggestion in the governing bodies.*
- *Currently, the pool of reviewers for the majority of reviewers is supplied by the democratically legitimised bodies of the respective group.*

ESG 2.7 Complaints and appeals

The agency is recommended to clarify what happens if the complaint involves the work of the AKAST's office.

- *AKAST will discuss this suggestion in the governing bodies.*
- *The Office has already prepared a clarification for the IQ-manual in this regard. This clarification includes the exclusion of biased persons; this also applies to employees of the Office. Moreover, it is a matter of course that complaints about employees are addressed to the supervisor.*

The agency is recommended to publish both the latest version of the Complaints and Appeals Regulations and the Rules of Procedure of the Complaints and Appeals Committee on the website so that the right to lodge a complaint or appeal and the explanation for the procedure are as clear as possible.

- *We thank for this recommendation and point out once again that the latest version Rules of Procedure are published since beginning of September on our website. In addition, the latest version of the Complaints and Appeals Regulations was and is always available on our website.*