

Approval of the Application
by the Accreditation Agency in Health and Social Science (AHPGS)
for Renewal of Inclusion on the Register

Register Committee

Ref. RC15/A09

Ver. 1.0

Date 2015-06-05

Page 1 / 4

Application of:	18/03/2014
Agency registered since:	07/10/2009
External review report of:	09/02/2014
Review coordinated by:	German Accreditation Council (GAC)
Review panel members:	Eva-Bettina Bröcker (chair), Bernd Baasner, Martin Fischer, Marcel Sauerbier, Kurt Sohm / secretarial support by Katrin Mayer-Lantermann (GAC staff)
Decision of:	4/5 June 2015
Registration until:	28 February 2019
Absented themselves from decision-making:	n/a

1. The application adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee considered the external review report of 9 February 2014 on the compliance of AHPGS with the European Standards and Guidelines (ESG)¹.
3. The Register Committee sought and received clarification from AHPGS as well as the chair of the review panel.
4. On the basis of the above-mentioned documentation the Register Committee was unable to conclude that AHPGS continues to substantially comply with the ESG and, therefore, invited the agency to make additional representation on the reasons for a possible rejection of its application.
5. AHPGS made additional representation on 19/02/2015. The Register Committee considered the application taking into account the representation.

Analysis:

6. The Register Committee noted that institutional audits (carried out internationally) were not addressed in the external review report. The

¹ The application was made before adoption of the 2015 version of the ESG. It has therefore been considered on the basis of the 2005 version of the ESG, and all references refer to that version.

Register Committee received clarification from the review panel that institutional audits were not addressed in the external review report since they were not covered in AHPGS' self-evaluation report and documentation submitted for the review.

Register Committee

Ref. RC15/A09

Ver. 1.0

Date 2015-06-05

Page 2 / 4

7. In its additional representation AHPGS pointed out that the first two audits only started after the self-evaluation report was completed. The Register Committee, however, underlined that these audits might have been part of AHPGS "offer" already before and should thus have been analysed in its self-evaluation report, at least based on the theoretical procedures.

The Register Committee urged AHPGS to ensure that the next external review report contain a thorough analysis of all external quality assurance activities that the agency offers in principle (see par. 17 of the Practices and Interpretations). The issue has therefore been flagged.

8. With regard to the activities analysed and the specific European Standards and Guidelines, the Register Committee considered the following:

ESG 2.3 – Criteria for decisions

9. The review panel concluded that AHPGS' criteria are predefined and publicly available.
10. The Register Committee noted the statement of the panel that "the agency submitted or provided a link to some documents concerning the procedures carried out abroad". Based on this statement, it was not obvious that these documents were public.
11. The Register Committee therefore sought and received clarification from the review panel, which confirmed that it verified that all documents were publicly available.
12. The Register Committee sought and received clarification from AHPGS. AHPGS provided a link to a page on its website with links to third-party web pages (for Lithuania and Switzerland) containing the criteria applicable in these countries.
13. In its additional representation AHPGS explained that these documents were provided by the way of links to ensure their actuality.
14. While the Register Committee acknowledged the rationale for that approach, it underlined that AHPGS should improve the explanation on its website of the basis on which it operates in different countries, especially for those where AHPGS operates regularly. This issue has therefore been flagged.

ESG 2.5 – Reporting

15. The lack of publication of full reports was flagged when AHPGS was admitted to the Register in 2009.

16. The Register Committee welcomed the fact that AHPGS now publishes full reports for programme and system accreditation in Germany. The Register Committee found that, as far as its work in Germany is concerned, AHPGS did address the flag in line with the requirements of the standard. Based on the external review report and additional clarification received from both AHPGS and the review panel, the Register Committee noted that AHPGS did not publish accreditation reports for its accreditations outside of Germany, but only summary reports were available on its website.
17. In its clarification provided to the Register Committee the review panel stated that it was “convinced that reports are published in these countries according to national requirements”. The panel noted that AHPGS did not feel competent to publish reports in cases where AHPGS is not responsible for the accreditation decision; AHPGS held the view that the decision-making authority had “to decide on the publication of the report”, since otherwise “report and accreditation decision could be contradictory”.
18. The Register Committee underlined that it is a normal scenario that a final decision may differ from the recommendation in the expert report. Furthermore, the Committee considers that in such situations there is a particular need for public reports, so that such a difference would be transparent.
19. In its own clarification, AHPGS held that national legislation prevented it from publishing reports for accreditations in Lithuania and Switzerland. AHPGS did not provide reasons for not publishing reports in other cases.
20. For Switzerland, the Register Committee was unable to conclude with certainty whether national legislation effectively forbids AHPGS from publishing accreditation reports. The Register Committee therefore gave AHPGS the benefit of the doubt and accepted the argument.
21. For Lithuania, the Register Committee was unable to confirm that there would be any regulation that could be construed as preventing AHPGS from publishing full reports.
22. For other countries, the external review report stated that procedures are not carried out under a specific national legal framework, but that equivalent procedures as in Germany are followed. However, unlike its practice in Germany AHPGS did not publish full reports in these cases. AHPGS did not provide any specific arguments in defence of its practice not to publish full reports.
23. In its additional representation and further clarification provided to the Register Committee, AHPGS pointed out that – except for accreditation in Switzerland – it published all accreditation/audit

Register Committee

Ref. RC15/A09

Ver. 1.0

Date 2015-06-05

Page 3 / 4

reports since 2009 retrospectively and changed its procedures to the effect that the publication of the full report is now obligatory in all cases.

24. Considering the additional representation and the mitigating circumstances for Switzerland, the Register Committee concluded that AHPGS now complies with standard 2.5. The consistent implementation of AHPGS' changed policy has, however, been flagged.

Register Committee

Ref. RC15/A09

Ver. 1.0

Date 2015-06-05

Page 4 / 4

Conclusion:

25. **Based on the external review report and AHPGS' additional representation, following the considerations above, the Register Committee concluded that AHPGS continues to comply substantially with the ESG and, therefore, renewed its inclusion on the Register. AHPGS' renewed inclusion shall be valid until 27/02/2019².**
26. The following issues have been flagged for particular attention when considering a potential application for renewal of inclusion. AHPGS is expected to address these issues specifically in its next self-evaluation report, setting out whether the issue has been resolved or indicating what progress has been made. AHPGS is further responsible for informing the coordinator of the next external review and the review panel of the need to address these issues in the external review report.

ESG Part 2: ESG compliance in institutional audits

The next review should address in detail how the institutional audits carried out by AHPGS comply with Part 2 of the ESG.

ESG 2.3: Transparency of criteria for work abroad

It should receive attention whether AHPGS published clear and comprehensive information on the criteria for its work.

ESG 2.5: Publication of reports

It should be addressed whether AHPGS' policy of publishing full reports for all reviews has been implemented consistently.

² Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.