

## **Report**

### **on the decision of the Accreditation Council, dated 16 February 2007: Decision on the Application of the Foundation for International Business Administration Accreditation (FIBAA) for Re-Accreditation Dated 12 May 2006**

issued on 22 January 2009

This report was compiled on request of FIBAA. The purpose of the report is to demonstrate why the Accreditation Council concluded that FIBAA complies with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). For this purpose the following two documents are adapted according to the sequence of the ESG:

- Decision of the Accreditation Council, dated 16 February 2007: Decision on the Application of the Foundation for International Business Administration Accreditation (FIBAA) for Re-Accreditation Dated 12 May 2006 (*Referred to hereafter as “extract from the decision.”*)

and for further information about the reasons for the decision

- Review panel’s Assessment Report (including a Recommendation for the Decision) on the Application for Re-accreditation submitted by the Foundation for International Business Administration Accreditation (FIBAA) on 12 May 2006” (*Referred to hereafter as: Extract from assessment report*)

Please note:

This report invariably contains parts from the above mentioned original documents which were only put in new order. No changes like updating information etc. have been made. This is not to be considered as a new evaluation report.

With its decision from 12 May 2006 the German Accreditation Council granted FIBAA re-accreditation under certain conditions. These conditions have been fulfilled meanwhile, which was certified by the Accreditation Council by decision of 8 October 2007

The report comprises three chapters:

Chapter “A) The accreditation decision” contains the relevant paragraphs of the accreditation decision of the German Accreditation Council on FIBAA, dated from 16 February 2007

Chapter “B) The review process” contains paragraphs from the Review panel’s Assessment Report and describes the course of the accreditation process.

Chapter “C) Findings” contains the relevant paragraphs from “The accreditation decision” and from “the assessment report” which relate to the respective standards of the ESG. This chapter starts with a short description of the agency.

## **A) The accreditation decision**

Extract from the decision:

### **I.**

The Foundation for the Accreditation of Study Programmes in Germany (Stiftung zur Akkreditierung von Studiengängen in Deutschland), hereafter referred to as Accreditation Council, herewith accredits the Foundation for International Business Administration Accreditation (FIBAA) pursuant to § 2 Article 1 No. 1 of the “Law establishing a foundation ‘Foundation for the Accreditation of Study Courses in Germany’” based on the stipulations of the following provisions and herewith grants FIBAA the authority to accredit study programmes by awarding the seal of the Accreditation Council.

### **II.**

The decision pursuant to above Article I shall become effective as of 15 March 2007.

### **III.**

The accreditation and authorisation pursuant to above Article I shall be granted for a term of five years; subject to revocation pursuant to subsequent Article V. Pursuant to § 1 Article 1 Sentence 2 of the decision “Decisions of the Accreditation Council: Types and Effects” dated 15 December 2005 said accreditation shall expire on 14 March 2012. In the event that ENQA should decide by 31 December 2009 that based on general European standards an accreditation with a term of more than five years can be permitted, the accreditation term shall subsequently be extended to the maximum term permitted under general European standards, however, the extension term shall not exceed three additional years.

...

## **VII. Assessment Based on the Membership Criteria of the European Association for Quality Assurance in Higher Education (ENQA)**

To facilitate the international recognition of decisions made by the accreditation council and the accreditation agencies, the accreditation council primarily applied, for the adoption of their accreditation criteria dated 15 December 2005, the *Standards and Guidelines for Quality Assurance in the European Higher Education Area*, such as those criteria for higher education adopted by the competent ministers from the Bologna succession conference in Bergen in May of 2005. The following overview shows where ESG Standards 3.1 to 3.8 find their equivalent in the Criteria for the Accreditation of Accreditation Agencies:

• ESG Standard	• Criteria for the Accreditation of Accreditation Agencies (decision dated 12/15/2005, Criteria); “Law establishing a foundation ‘Foundation for the Accreditation of Study Courses in Germany’” (ASG)
3.1	Criteria Part I, Criteria Part II
3.2	ASG § 2 Article; 1.1; Criteria 2.1, 2.2
3.3	ASG § 2 Article 1.1 und § 9; Criteria 1
3.4	Criteria 5
3.5	Criteria 1
3.6	Criteria 2.12, 2.13, 16.2
3.7	Criteria Part II; Criteria 3, 4, 15, 16, 2.9, 18.1
3.8	Criteria 4, 6, 17.2, 19.1, 1.1; ASG § 1 Article 1

Based on these the accreditation council has arrived at the conclusion that FIBAA does meet the membership criteria of the ENQA, especially since the mandates imposed on the agency do not pertain to the ENQA membership criteria. In particular, the executive summary of the experts’ report on the ENQA membership criteria results in the following assessments:”

## **B) The review process**

Extract from assessment report:

### **“1. Basis of the procedure**

#### **1.1 Mandate as defined by law**

*In accordance with Section 2, Subsection 1, No. 1 of the Act on the Establishment of a “Foundation for the Accreditation of Study Programmes in Germany”, the Foundation’s mandate is to accredit and re-accredit accreditation agencies. It grants authorisation, limited to a certain period, to accredit programmes by awarding the Foundation’s Quality Seal.*

*At its meeting on 15 December 2005, the Accreditation Council adopted “Criteria for the Accreditation of Accreditation Agencies” and thus the basis for its accreditation decisions. In defining these criteria, the Accreditation Council went beyond its direct task of accrediting agencies and also took into account the call for a German accreditation system which fits in with the international scheme of things.*

*At a meeting on 22 June 2006, the Accreditation Council adopted “General Rules of Procedure for the Accreditation and Re-accreditation of Accreditation Agencies” and thus the essential rules of procedure for conducting accreditations.*

*In accordance with Section 2, Subsection 1, Nos. 2 and 3 of the Act on the Establishment of a “Foundation for the Accreditation of Study Programmes in Germany”, the Accreditation Council combined the “Common Structural Guidelines of the Laender” in binding requirements for the accreditation of programmes and stipulated the minimum requirements for application procedures.*

## **1.2 International recognition**

*To promote international recognition of the decisions of the Accreditation Council and the accreditation agencies, the Accreditation Council incorporated, in particular, the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), as adopted by the ministers responsible for higher education at the Bologna follow-up conference in Bergen in May 2005. By doing so, the Accreditation Council underlined the central role of accreditation in the implementation of the objectives of the Bologna Process as well as making it clear that quality assurance and, in particular, accreditation in higher education could no longer be based on purely national standards or features. Other important sources used in the formulation of the criteria were the Code of Good Practice of the European Consortium for Accreditation, dated 3 December 2004, and the Guidelines of Good Practice of the International Network for Quality Assurance Agencies in Higher Education, dated April 2005.*

## **2. Sequence of events**

*In a letter dated 12 May 2006, the Foundation for International Business Administration Accreditation (FIBAA) submitted an application to the Accreditation Council for re-accreditation as an accreditation agency.*

*In a letter dated 13 October 2006, FIBAA submitted a rationale for its application, along with other documents. On 18 November 2006 and 13 December 2006, in the course of the procedure and at the request of the review panel, FIBAA submitted additional documents or added details to documents already supplied.*

*The Accreditation Council appointed the following members of the review panel by means of a circular resolution, dated 6 July 2006:*

- *Professor Dr Reinhold R. Grimm, University of Jena, member of the Accreditation Council (Chairman),*

- *Ulf Banscherus, Freie Universität Berlin, member of the Accreditation Council, student member,*
- *Professor Dr Dr h. c. Helmut Konrad, University of Graz, international expert,*
- *Drs Caspar van Rijn, NVAO, international expert and*
- *Monika Donner, Deutsche Bahn AG (stepped down before the beginning of the on-site visit).*

*The review panel was supported by the Managing Director, Dr Achim Hopbach, from the Foundation's head office.*

*On 30 and 31 October 2006, the Chairman of the review panel and the Managing Director were in attendance during a FIBAA review team visit conducted as part of two accreditation procedures being carried out by the agency. On 27 and 28 November 2006, the review panel conducted an on-site inspection of the agency in Bonn. Following a preliminary meeting of the review panel on 26 November 2006, its members held talks on the next day with two of the reviewers involved in FIBAA's accreditation procedures, representatives of higher education institutions at which FIBAA had conducted accreditation procedures and FIBAA's academic director and its two managing directors, as well as attending the meeting of FIBAA's Accreditation Commission. On 28 November 2006, the review panel talked with employees at the agency's head office, toured the premises and attended the second part of the Accreditation Commission's meeting. It then held an internal final meeting to discuss the impressions it had gained. The review panel members had been supplied with the meeting documents before the visit.*

*During its 51<sup>st</sup> meeting on 15 February 2007, the Accreditation Council, which had been supplied with FIBAA's rationale for its application and the assessment report including the recommendation for the decision, heard FIBAA's academic director and managing director.*

*This assessment report is based on FIBAA's application for re-accreditation, the rationale for its application (including annexes and documents submitted later), the FIBAA review team visit attended by the Chairman of the review panel and the Managing Director plus the on-site inspection of the agency.*

## **C) Findings**

Extract from assessment report:

### **“3. The Foundation for Business Administration Accreditation (FIBAA)**

#### **3.1 History**

*The Foundation for International Business Administration Accreditation (FIBAA) was founded in 1994. On 13 April 2000, the Accreditation Council accredited FIBAA as an accreditation agency until 13 April 2002; on 14 March 2002 it was re-accredited until 14 March 2007. Since 1 January 2006, FIBAA has also been certified by the Nederlands-Flaamse Accreditatie Organisatie (NVAO) and is thus authorised to conduct reviews in the Netherlands and Flanders as part of programme accreditation.*

#### **3.2 Organisation**

*The agency is a non-profit Swiss foundation based in Zurich, established by means of a foundation charter in 1994, last amended on 24 July 2000. The agency has its head office in Bonn. Its aim is to “ensure the quality and reputation of (continuing) education provided by economics-related study programmes, primarily by creating the FIBAA Accreditation Commission (abbreviated to “FAK” in German) – a body which draws up quality guidelines for management education and, upon request, examines and accredits the quality of programmes.”*

*The foundation comprises the following bodies: the FIBAA Foundation Board, the FIBAA Accreditation Commission and the Supervisory Body.*

*The Foundation Board is the foundation’s highest body. It specifies foundation policy, appoints the authorised signatories and monitors the management’s actions. It also appoints the members of the Accreditation Commission. It consists of at least five and at most 15 members. The Confederation of German Employers’ Associations, Association of German Chambers of Industry and Commerce, Federation of Austrian Industry, Swiss Federation of Employers, economiesuisse and the Austrian Federal Economic Chamber in Vienna each have a definite seat. At the moment, the Foundation Board comprises four representatives of higher education (HE) institutions, one business representative with a link to an HEI and five association representatives. The Foundation Board is self-constituting and self-electing. Its members hold office for two years, re-election is possible (Statute 2000, III.A).*

*The Accreditation Commission (FAK) defines “guidelines for outcomes of economics-oriented (continuing) education offered by higher education institutions [...],*

*which enable specific educational programmes to be classified. Furthermore, the FAK drafts measures for promoting and improving (continuing) education” (Statute 2000, III.B). The Accreditation Commission decides whether accreditation applications are approved or rejected. The Foundation’s statute does not specify the composition or membership of the Accreditation Commission. The Commission’s rules of procedure specify that it can be comprised of five to 15 members and that the members must fulfil the criteria for the appointment of reviewers. Currently, the Commission consists of seven representatives of HEIs, six representatives from industry (of whom one is a representative of a trade union) and two student representatives. The members of the Accreditation Commission are appointed by the Foundation Board and work on a voluntary basis.*

*The Supervisory Body is appointed by the Foundation Board and monitors FIBAA’s work from an economic and financial point of view. The Supervisory Body is currently a Swiss trust company.*

### **3.3 Resources**

*The human resources in the accreditation department currently number 6.75 full-time equivalents and six freelancers.*

### **3.4 Range of activities**

*FIBAA mainly accredits economics-related Bachelor, Master and PhD programmes at various types of HEI in the areas of business administration, economics, business computing, industrial engineering, business psychology and business law. In 2006, FIBAA’s Foundation Board passed a resolution to expand its field of business to take in subjects in the field of law and social sciences, though the intention is that there should still be a link to economics. The agency tends to concentrate on programmes offered by state-run and state-approved HEIs plus programmes offered by private institutions seeking to gain state approval as a private HEI through accreditation.*

*FIBAA considers its task to be to support HEIs’ continuing development of Bachelor, Master and PhD programmes. Working closely with the partner HEIs, it seeks to improve the quality of and to accredit the programmes. This quality process includes giving advice on quality management, reviewing the content and structure of the programme and – where the requirements are met – awarding the FIBAA Seal of Approval. The aim is for successfully completed FIBAA accreditation procedures to serve as proof of quality for new programmes as well as ensuring academic acceptance, occupational relevance and acceptance in the market.*

*Since its establishment, FIBAA has been working on an international level and involved in the international networks and associations in the field of quality assurance, the European Association for Quality Assurance in Higher Education (ENQA) and the European Consortium for Accreditation (ECA). It provides reviewers for EQUIS (European Quality Improvement System), initiated by the European Foundation for Management Development (efmd), for internationally oriented management schools. At the national level, FIBAA has also entered into cooperation arrangements; the cooperation agreement with the ASIIN and AHPGS accreditation agencies is particularly worth mentioning. This cooperation covers joint conducting of accreditation procedures.*

*Since starting work, FIBAA has accredited 374 programmes.*

#### **4. Assessment**

*On 30 and 31 October 2006, the Chairman of the review panel and the Managing Director were in attendance during a FIBAA site visit conducted as part of two accreditation procedures at (...). Their overall impression of the procedures was positive. The reviewers were very well prepared; the agency employee assisting the review team provided comprehensive information on the framework conditions of German accreditation procedures to a manner fitting for the situation. The reviewers were assessing two distance learning programmes which shared some common components. It was therefore acceptable that the student member and member from industry were the same in both procedures. The talks with the representatives of the university's management, those involved in the programme and the students were targeted and dealt thoroughly with the particular features of the programmes seeking accreditation. The review teams managed through in-depth questioning and discussion to identify the strengths but, in particular, also the weaknesses of the programmes. The representatives of the Accreditation Council noticed that FIBAA also accepts immediate corrections to programme modalities if a written commitment is given during the actual visit to the HEI that the shortcomings will be remedied and the programme corrections made. This approach could blur the boundaries between consulting and accreditation and should therefore be viewed critically. The review team's internal discussions followed a list of points ("Assessment Guide for Reviewers"), which the agency uses as the basis for all of its accreditation procedures. It particularly focuses on aspects which, if not complied with, would make accreditation impossible. Such a schematic procedure has many advantages but also the disadvantage that it is extremely time-consuming and does not give the reviewers much leeway to make general judgements about*

*the programmes. The observers from the Accreditation Council also had the impression that the representative of the head office steered the review team's discussions too much, even if it was with well-founded and relevant questions. Nonetheless, there is no doubt that the site visit, which, incidentally, following the Accreditation Commission's decision did not result in the programmes being granted accreditation, confirmed the quality of the work of the agency and the head office. The criticisms made here do not detract from this judgment.*

*Before presenting the report on the site visit made by the Accreditation Council's review panel to FIBAA's head office in Bonn on 27 and 28 November 2006, including a meeting of the Accreditation Commission, and a summary of our assessment, we should like to offer the following general comments.*

*At the review panel's preliminary meeting on 26 November 2006, a list of points was drawn up to which the panel paid particular attention during the site visit. These included the agency's range of activities, its reviewer training, the composition of its bodies and its internal quality management. The agency's special profile and the distinction it makes between "essential" and "non-essential" criteria were also discussed. In addition, the question was raised as to how the agency differentiates between its international and its national areas of activity, the latter being the only ones which lie within the Accreditation Council's area of responsibility.*

*The results of the inspection of the documents submitted, the attendance of a site visit by the agency and the panel's site visit of the agency are presented below, grouped in accordance with the Accreditation Council's review categories (listed in its "Criteria for the Accreditation of Accreditation Agencies"), and lead to a range of recommendations and conditions which the review panel proposes to the Accreditation Council.*

*Overall, the Accreditation Council's review panel had the impression that the agency had developed positively in many respects in the past two years and that its quality had improved consistently.*

*Nonetheless, a number of critical observations shall be mentioned here. They refer primarily to the agency's domestic and international activities. These areas of activity should be clearly separated and this distinction should also be made in the budget and the staffing plan. For instance, the agency's documents do not always make it clear which accreditation requirements are necessary in Germany and which additional criteria FIBAA applies in its international activities.*

*The review panel considers FIBAA's distinction between initial accreditation (for programmes not yet introduced), accreditation (programmes already introduced) and re-accreditation a step in the right direction for the accreditation system. However, it should not prevent the agency from imposing conditions with deadlines, even for initial accreditations, in order to lend effect to the agency's criticism, which cannot be ensured by means of recommendations or written commitments made during the procedure.*

*As a result of the site visit to the Agency's Accreditation Commission, the Accreditation Council's review panel feels prompted to press for more structured preparation of decisions. Decisions which the Agency's Accreditation Commission makes with reservations and anticipatory decisions which only come into effect if certain requirements are met should be avoided. All in all, the review panel's impression was that FIBAA's Accreditation Commission shied away from imposing conditions.*

*In particular, it was evident that the decisions prepared for discussions concerning MBA programmes (further-education master programmes) were not consistent. Even though criteria can, of course, be evolved, the rules should not be altered during an ongoing procedure. In line with the European debate, the requirements necessary for the qualifications to be awarded upon completion of the programmes should be clearly defined. MBA qualifications should not be awarded for specialist subjects.*

*The Accreditation Council's programme criteria can only be met if the agency and everyone involved in the procedure consistently apply the Bologna terms. There is room for improvement with regard to standardised use of the terms in the areas of modularisation and ECTS (letters to HEIs, review reports, etc.). The review panel occasionally had the impression that modularisation strategies were not always checked for logical sequence or consistency.*

*Nonetheless, the criticisms listed here relate to shortcomings which can be remedied and do not cast doubt on the agency's overall quality. They result in the following recommendations and conditions without questioning the agency's compliance with the re-accreditation requirements in principle."*

**ESG Standard 3.1 (Use of external quality assurance procedures for higher education):**

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

**Guidelines:**

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

Extract from the decision:

“The standards for external quality assurance procedures were implemented in the criteria of the accreditation council for the accreditation of accreditation agencies. As a rule, they are once again addressed in Standards 3.2 through 3.8, with the exception of Standard 2.7 (periodic reviews). The accreditation council, pursuant to its decision of 22 June 2006, requires the agencies to grant accreditations for a limited period of time, so that this decision is not subject to agency discretion. Standard 3.1 has consequently been met.”

Extract from assessment report:

***“Review category 7: Governance of the HEI***

*The agency does not provide any precise details on this point beyond the specific programme seeking accreditation. Asked how it assesses the HEI’s quality orientation in its development of programmes, apart from the programme seeking accreditation, the agency referred to Section 5 of its “Assessment Guide for Reviewers”. However, said section only asks about the quality assurance procedures on the programme and how they are included in the HEI’s overall strategies.*

*The review panel proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must include in its review an assessment of the HEI’s quality orientation in the development of its programmes.*

**Review category 8: Educational goals of the degree programme concept/Review category 9: Conceptual classification of the degree programme within the academic system**

*The information provided by the agency with regard to review category 8 is only partly related to the programme design (“programme concept”). However, information on how the programme design is reviewed is included in the details given on the Accreditation Council’s review category 7. The “Assessment Guide for Reviewers” examines the logic and transparency of the programme objectives (1.1.1), rationale for the qualification title (1.1.2), whether the programme profile (in the case of Master programmes) is application-oriented or research-oriented (1.1.3) and whether the competence goals are aligned with the overall programme design (1.1.4). The positioning of the programme within the HEI’s overall strategy is also examined (1.2.3 and 1.2.4). According to the agency, the reviewers inspect the minutes of the senate meetings and hold talks with the governing body (“Präsidium”) of the HEI. The four learning outcomes are listed in quality criterion 1.1.1. However, no information is given on the assessment of conflicts between outcomes. The Accreditation Council’s criterion 8.1 can be considered to be met but the content-related assessment criteria for the programmes should be more closely linked to one another and the plausibility of the programme design should be assessed more as a whole.*

*The “Assessment Guide for Reviewers” also examines the positioning on the job market (1.2.2) and how the aim of ensuring employability is implemented (3.5). The Accreditation Council’s criterion 8.2. is met.*

*The “Assessment Guide for Reviewers” requires the competence goals to be assessed (1.1.4). However, there is no mention of the need to assess whether they are in line with the level of qualification and competence being striven for. According to the agency, the NQF is included in the “Assessment Guide for Reviewers” (1.1.3 and 1.1.4). However, it became clear during the site visit attended by the Chairman of the review panel and the Managing Director that the European Qualification Framework and the Dublin descriptors do not play an explicit role. The criteria in the “Assessment Guide for Reviewers” deal more with issues related to MBA programmes.*

*As already commented in connection with review category 8, there are no concrete links between the criteria in the “Assessment Guide for Reviewers” and the European Qualification Framework and the “Structural Guidelines” although the review-*

ers are supplied with the EQF and the guidelines. In particular, it remains unclear how the NQF descriptors are used. By contrast, the “Assessment Guide for Reviewers” explicitly requires the modularisation and the application of the ECTS to be assessed (3.1.1 and 3.1.2) as well as outcome orientation (3.2.6).

The review panel therefore proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must explain in writing by **31 December 2007** how it implements the European Quality Framework in its criteria.

**Review category 10: Review and assessment of the degree programme concept**

The question of whether the programme design (“programme concept”) is suitable for achieving the educational goals is assessed in the following sections of the “Assessment Guide for Reviewers”: 3.2.1 (modules), 3.2.2-3.2.4 (content), 3.2.8 (system of assessment and examination) and 3.2.9 (thesis). The Accreditation Council’s criterion 10.1 is met.

The “Assessment Guide for Reviewers” includes criteria for assessing the manageability of the programme for students in 3.1.2 (ECTS), 3.1.6 (study and examination regulations), 4.1.6, 4.2.2 and 4.4.3 (support/coaching for students) and 3.1.5 (integration of practical content). However, the criteria tend to focus on the presence and quality of these aspects, not so much on manageability. The agency described the procedure at the review team’s request and the site visit attended by the Chairman of the review panel and the Managing Director showed that these questions are dealt with. The Accreditation Council’s criterion 10.2 is met.

With regard to programmes with special profiles (Accreditation Council criterion 10.3), the agency refers to a decision by its Accreditation Commission on part-time programmes, which also confirms that programmes are generally manageable if they do not exceed 45 ECTS per year of study. The explanations given by the agency at the review team’s request tended to be related to the academic profile of the programmes. However, the site visit attended by the Chairman of the review panel and the Managing Director did show that special profiles are taken into account.

The review panel therefore proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must revise and supplement its criteria by **31 December 2007** in order to cover programmes with special profiles.

*The HEI's strategy for promoting gender equality is assessed by considering the gender mainstreaming in the programme design. This is not in compliance with Accreditation Council criterion 10.4.*

*The review panel therefore proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must systematically incorporate an assessment of gender equality in its assessment by **31 December 2007** and present a strategy for doing so.*

**Review category 11: Implementation of the programme**

*In accordance with the "Assessment Guide for Reviewers" (Section 4) and according to a statement by the agency, the resources are assessed thoroughly in terms of both quantity and quality. However, collaborative and network structures are not systematically assessed.*

*The review panel therefore proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must systematically assess collaborative and network structures.*

**Review category 12: Examination system**

*In accordance with the "Assessment Guide for Reviewers" (3.1.6 and 3.2.8/9), the examination regulations and the manner in which examinations are conducted are assessed to determine how they fit into the structure of the programme design, how manageable the programme is for the students, examination frequency and organisation (3.1.6), alignment with module content and their suitability for achieving whether the defined learning outcomes and level of qualification (3.2.8). The site visit attended by the Chairman of the review panel and the Managing Director demonstrated that the level of the examination results and the organisation of examinations are dealt with thoroughly by the reviewers.*

**Review category 13: Transparency**

*The "Assessment Guide for Reviewers" (2.3.1.6/7, 4.3.1/2) requires the programme documentation (admission, programme, examinations) to be assessed. The Accreditation Council's criteria 13.1 and 13.2 are met. The advice and guidance provided by the HEI is divided into various categories for assessment purposes, i.e.: student assistants involved in teaching (3.4.7), subject-related support (4.1.6), administrative support (4.2.2) and IT support (4.4.3). The Accreditation Council's criterion 13.3 is met.*

**Review category 14: Internal quality assurance system of the HEI**

*In accordance with Section 5 of the “Assessment Guide for Reviewers”, the reviewers assess the HEI’s internal quality assurance measures with regard to the measures conducted on a regular basis, the presence and quality of procedures for evaluation by students and teaching staff, how the procedures fit into the HEI’s overall strategy and the processes in place for quality enhancement. The agency also reviews the programme’s process organisation in this context. The Accreditation Council’s criteria 14.1 and 14.2 are met.”*

**ESG Standard 3.2 (Official status):**

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

Extract from the decision:

“Pursuant to § 2 Article 1 No. 1 of the “Law establishing a foundation ‘Foundation for the Accreditation of Study Courses in Germany”” it is the responsibility of the Accreditation Council to accredit and re-accredit accreditation agencies. It grants the temporary authorisation to accredit study programmes through the awarding of the Foundation’s seal. Consequently, the Accreditation Council is the public entity responsible for the recognition of the agency pursuant to Sentence 1 of Standard 3.2. By accrediting the agency, it meets Standard 3.2 Sentence 1.

Pursuant to Criterion 2.1 the agency must be legally identifiable, i.e. it must be a legal entity. The *Foundation for International Business Administration Accreditation* (FIBAA) was founded in 1994 as the Foundation for International Business Administration (FIBA). The agency has been under its current name since 2000. The agency is a not-for-profit Swiss foundation with a seat in Zurich and was established through the foundation charter of 1994, modified lastly on 24 July 2000. The agency pursues the purpose “to secure the quality and reputation of education and continuing education in economic study programs”. Its existence as a legal entity has thus been verified. ESG Standard 3.2 has consequently been met.”

Extract from assessment report:

### **“3. The Foundation for Business Administration Accreditation (FIBAA)**

#### **3.1 History**

*The Foundation for International Business Administration Accreditation (FIBAA) was founded in 1994. On 13 April 2000, the Accreditation Council accredited FIBAA as an accreditation agency until 13 April 2002; on 14 March 2002 it was re-accredited until 14 March 2007. Since 1 January 2006, FIBAA has also been certified by the Nederlands-Flaamse Accreditatie Organisatie (NVAO) and is thus authorised to conduct reviews in the Netherlands and Flanders as part of programme accreditation.*

#### **3.2 Organisation**

*The agency is a non-profit Swiss foundation based in Zurich, established by means of a foundation charter in 1994, last amended on 24 July 2000. The agency has its head office in Bonn. Its aim is to “ensure the quality and reputation of (continuing) education provided by economics-related study programmes, primarily by creating the FIBAA Accreditation Commission (abbreviated to “FAK” in German) – a body which draws up quality guidelines for management education and, upon request, examines and accredits the quality of programmes.”*

*The foundation comprises the following bodies: the FIBAA Foundation Board, the FIBAA Accreditation Commission and the Supervisory Body.*

*The Foundation Board is the foundation’s highest body. It specifies foundation policy, appoints the authorised signatories and monitors the management’s actions. It also appoints the members of the Accreditation Commission. It consists of at least five and at most 15 members. The Confederation of German Employers’ Associations, Association of German Chambers of Industry and Commerce, Federation of Austrian Industry, Swiss Federation of Employers, economiesuisse and the Austrian Federal Economic Chamber in Vienna each have a definite seat. At the moment, the Foundation Board comprises four representatives of higher education (HE) institutions, one business representative with a link to an HEI and five association representatives. The Foundation Board is self-constituting and self-electing. Its members hold office for two years, re-election is possible (Statute 2000, III.A).*

*The Accreditation Commission (FAK) defines “guidelines for outcomes of economics-oriented (continuing) education offered by higher education institutions [...], which enable specific educational programmes to be classified. Furthermore, the*

*FAK drafts measures for promoting and improving (continuing) education” (Statute 2000, III.B). The Accreditation Commission decides whether accreditation applications are approved or rejected. The Foundation’s statute does not specify the composition or membership of the Accreditation Commission. The Commission’s rules of procedure specify that it can be comprised of five to 15 members and that the members must fulfil the criteria for the appointment of reviewers. Currently, the Commission consists of seven representatives of HEIs, six representatives from industry (of whom one is a representative of a trade union) and two student representatives. The members of the Accreditation Commission are appointed by the Foundation Board and work on a voluntary basis.*

*The Supervisory Body is appointed by the Foundation Board and monitors FIBAA’s work from an economic and financial point of view. The Supervisory Body is currently a Swiss trust company.”*

### **ESG Standard 3.3 (Activities):**

#### **Standard:**

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

#### **Guidelines:**

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

Extract from the decision:

“Pursuant to § 2 Article 1 No. 1 of the “Law establishing a foundation ‘Foundation for the Accreditation of Study Courses in Germany”” and subsequently Criteria 1.1 through 1.4 only such applicants will be accredited who perform study programme accreditation processes. FIBAA accredits university types spanning predominantly economics-oriented Bachelor, Master and PhD study programmes in the subject areas of business administration (BWL), economics (VWL), information management, industrial engineering, business psychology and commercial law. In 2006 the foundation committee of FIBAA resolved to expand their business segment to include the subject group “Economics and Social Sciences”, whereby the economic aspect shall remain intact. As a rule, the agency shall concentrate on study programmes of national and nationally accredited universities, as well as study programmes offered by private institutions that seek national recognition as private universities via accreditation.

ESG Standard 3.3 has consequently been met.”

Extract from assessment report:

### **“3.4 Range of activities**

*FIBAA mainly accredits economics-related Bachelor, Master and PhD programmes at various types of HEI in the areas of business administration, economics, business computing, industrial engineering, business psychology and business law. In 2006, FIBAA’s Foundation Board passed a resolution to expand its field of business to take in subjects in the field of law and social sciences, though the intention is that there should still be a link to economics. The agency tends to concentrate on programmes offered by state-run and state-approved HEIs plus programmes offered by private institutions seeking to gain state approval as a private HEI through accreditation.*

*FIBAA considers its task to be to support HEIs’ continuing development of Bachelor, Master and PhD programmes. Working closely with the partner HEIs, it seeks to improve the quality of and to accredit the programmes. This quality process includes giving advice on quality management, reviewing the content and structure of the programme and – where the requirements are met – awarding the FIBAA Seal of Approval. The aim is for successfully completed FIBAA accreditation procedures to serve as proof of quality for new programmes as well as ensuring academic acceptance, occupational relevance and acceptance in the market.*

*Since its establishment, FIBAA has been working on an international level and involved in the international networks and associations in the field of quality assurance, the European Association for Quality Assurance in Higher Education (ENQA) and the European Consortium for Accreditation (ECA). It provides reviewers for EQUIS (European Quality Improvement System), initiated by the European Foundation for Management Development (efmd), for internationally oriented management schools. At the national level, FIBAA has also entered into cooperation arrangements; the cooperation agreement with the ASIIN and AHPGS accreditation agencies is particularly worth mentioning. This cooperation covers joint conducting of accreditation procedures.*

*Since starting work, FIBAA has accredited 374 programmes.”*

### **ESG Standard 3.4 (Resources):**

#### **Standard:**

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

Extract from the decision:

“Pursuant to Criteria 5.1 through 5.4 the agency must verify that it has adequate material and staff resources that are sustainable.

The agency’s business office currently engages 14 employees, of which six (as of 1 November 2006: seven) are full-time. Another full-time position is planned for the beginning of 2007. An existing overview of the employees brings attention to the fact that there is only one permanent employee who is responsible for procedures, while all others are freelancer working on a fee-basis. With regards to qualification, the employees exhibit a broad spectrum of academic training, and moreover have experience in the fields of human resource management, management training, advanced management training and quality assurance. The statements regarding the adequate and realistic sustainable resources are plausible and were verified by the on location inspection performed by the accreditation council’s group of experts.

ESG Standard 3.4 has consequently been met. However, the accreditation council recommends that the number of permanent employees be increased in proportion to the number of freelance employees.”

Extract from assessment report:

***“Review category 5: Equipment and sustainability***

*The agency’s head office currently has 14 staff, of whom six (seven as of 1 November 2006) are full-time; a further full-time post is planned from the beginning of 2007. The Accreditation Council’s review panel has been supplied with a staff overview, in which it is noticeable that only one panel secretary is a permanent member of staff and all others are freelancers. The staff have a wide range of academic education and experience in HR management, management training, continuous training for managers and quality assurance. The information given as evidence of the adequacy and sustainability of the material resources is plausible and was checked by the Accreditation Council’s review panel during its site visit.”*

**ESG Standard 3.5 (Mission Statement):**

**Standard:**

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

**Guidelines:**

These statements should describe the goals and objectives of agencies quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

Extract from the decision:

“Pursuant to Criteria 1.1 through 1.4 the agency is required to evidence its understanding of the accreditation responsibility.

The agency describes its task as such: it examines national and international standards and in this way ensures the quality of the study programs they have verified. It assesses study group concepts from this standpoint and in doing so integrates the strategies and objectives of the study groups, admission procedures, resources, services and quality assurance into their examination. The agency also takes into consideration the educational objectives and study feasibility of the programmes to be accredited, makes the differentiated study offers of the university transparent and verifies the legal quality standards. This performance requirement can be extrapolated from the agency outline: “FIBAA examines and promotes public and private educational institutions and creates transparency in the education market. FIBAA sees itself as an international quality and accreditation agency which is primarily active in Europe, and which supports universities in the development of economics-oriented study programmes and quality assurance systems.

Their ethical self-image is implicitly declared in the foundation’s statute and in the rules of operation of the foundation commission and the accreditation commission, even when it is only task breakdowns that are found there. The agency has explained to the accreditation council that it is “committed to the principles of objectivity, establishment of truth and economic integrity”, however, these objectives are not stipulated in its charter.

ESG Standard 3.5 has consequently been met.”

Extract from assessment report:

***“Review category 1: Understanding of the accreditation task***

*The agency describes its task as being to assess national and international standards and thus to secure the quality of the programmes it reviews. It states that it is on this basis that it assesses programme designs, including strategy and programme objectives, admission procedures, resources and services and quality assurance.*

*In addition, the agency takes into account the educational objectives and manageability on programmes seeking accreditation, makes the profiles of the HEI's different programmes transparent and assesses compliance with the applicable quality standards. These tasks stem from the agency's mission statement: "FIBAA assesses and promotes private and public education institutions and creates transparency on the education market. FIBAA sees itself as an international quality and accreditation agency, primarily active in Europe, which supports HEIs in their development of economics-oriented programmes and quality assurance systems".*

*The agency's definition of quality is based on the specific subject area; it is from this that it derives its assessment approach, which, according to the agency, is documented primarily using the frequently revised and supplemented "Assessment Guide for Reviewers". Its concept of ethical practice is implicit in its statute and the rules of procedure of the Foundation Board and the Accreditation Commission even if they only contain descriptions of tasks. The agency informed the Accreditation Council that it was "committed to the principles of objectivity, pursuit of truth and academic integrity" even though this commitment is not set out in writing in the statutes.*

*With regard to the Accreditation Council's criterion 1.2, the Agency refers to its "Assessment Guide for Reviewers" (1.1.1), which cites the four educational objectives specified in the criteria but does not mention the special requirement relating to Article 5.3 of Germany's Basic Law. There could be a conflict in this respect with the Accreditation Commission's mandate as specified in the statute, i.e. "to draw up guidelines for the outcomes of economics-oriented study programmes which enable specific educational programmes to be classified" (Foundation Statute B. 1). However, in a document supplied at a later stage, the agency stated, "If a complaint is made with respect to freedom of research and teaching, the lecturer's opinion must be in line with the objectives and concept of the Bologna Process."*

*The agency bases its assessments on an outcome-oriented approach (1.1.1 and 1.1.4 of the Assessment Guide for Reviewers) and also takes generic learning targets into consideration (3.2.6; 3.3). It requires the learning targets to be aligned with the programme's educational goals (1.3.b), which are reviewed both with regard to the situation on the job market (1.1.1; 1.2.1; 1.2.2; 3.5) and their positioning within the overall strategy of the HEI (1.2.3; 1.2.4).*

*The agency stresses emphatically that it is not its task "to enforce standardised study programmes". It is true, in the opinion of the review panel, that its "Assess-*

*ment Guide for Reviewers” does not contain any aspects geared to an unsuitable standardisation of content. However, there could be a conflict with the task set out in the Foundation Statute (B. 1), i.e. the task of drawing up “guidelines for the outcomes of economics-oriented study programmes which enable specific educational programmes to be classified”. However, when asked, FIBAA explained that these guidelines were only intended to facilitate differentiated assessment and were not standards for programmes. Based on the information on file and its experience during the site visit, the Accreditation Council’s review panel has the impression that this statement is true even though it did identify a certain risk of “over-steering” of the reviewers due to the detail in the “Assessment Guide for Reviewers”.*

*The review panel **recommends** the agency to revise its criteria in the “Assessment Guide for Reviewers” in such a way that HEIs’ discretion in decision-making is not restricted by implicit standardisation.*

*With regards to its dynamic definition of quality, the agency does not give any detailed information beyond the fact that the overall purpose of accreditation is to raise quality.”*

### **ESG Standard 3.6 (Independence):**

#### **Standard:**

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

#### **Guidelines:**

An agency will need to demonstrate its independence through measures, such as:

- Its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts).
- The definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence.
- While relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Extract from the decision:

“Pursuant to Criterion 2.12 in combination with 2.13 and 16.2 the agency must prove the independence of its organs and their decision-making processes, in particular that of its experts.

The instruction autonomy of the organs can be derived from the provisions on the status of the precise task assignments. Regarding the independence of the concerned parties, the agency obtains non-bias and confidentiality statements from all members of the accreditation commission and the experts. Furthermore, there is a code of practice in the event of bias. Criteria 2.12 and 2.13 of the accreditation council are thus fulfilled. The agency requires that its experts provide a non-bias declaration. Moreover, it expressly requires experts to report reasons for a bias that occur during the process. An appeal option for the university to use against experts is stipulated in the contract. However, no reasons are specified. Bias is pointed out as the sole reason here. Criterion 16.2 of the accreditation council is largely met. Consequently, ESG Standard 3.6 has been met.”

Extract from assessment report:

**“Criteria 2.12 and 2.13** *“The decision-making bodies’ autonomy can be deduced from the Statute’s provisions on the precise assignment of tasks. With regard to the independence of the persons involved, the agency has all members of the Accreditation Commission and the reviewers submit declarations of impartiality and sign non-disclosure agreements. Procedural rules are also in place to deal with cases of partiality. The Accreditation Council’s criteria 2.12 and 2.13 are thus met.”*<sup>1</sup>

**Criterion 16.2:** *“The agency requires the reviewers to sign a declaration of impartiality. It also explicitly obliges reviewers to report any reasons for partiality which occur during the procedure. The contract specifies that the HEI may object to a reviewer. However, it does not specify any reasons for doing so. Partiality should be cited in the contract as the only reason for such objection. The Accreditation Council’s criterion 16.2 is largely met.”*<sup>2</sup>

### **ESG Standard 3.7 (External quality assurance criteria and processes):**

#### **Standard:**

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;

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<sup>1</sup> Extract from Review panel’s Assessment Report, p 15.

<sup>2</sup> Extract from Review panel’s Assessment Report, p 22.

- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

**Guidelines:**

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people. Agencies that make formal quality assurance decisions, or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

Extract from the decision:

“The study programme accreditation criteria to be applied by the agency are defined in Criteria 7 through 14. Pursuant to Criteria 15.1 in combination with 15.2 and 16.1 the agency is required to provide universities with comprehensive information on its process regulations and criteria. Pursuant to Criterion 16.4 the agency is required to involve all relevant stakeholders in the proceedings, whose results have to be published pursuant to Criterion 4.1. Pursuant to Criterion 18.1 the agency must verify the fulfilment of assignments.

The agency does conduct a comprehensive informative meeting with the interested universities, during which the universities are provided with all pertinent information on the execution of an accreditation proceeding. Universities receive all required documents (application form for accreditation, sample contract, “questionnaire and assessment catalogues”, and a set of documents). All documents (disregarding the sample contract) are published on the website of the agency. The sample contract contains a precise and complete description of the service and a fee overview. Criteria 15.1 through 15.3 and 16.1 of the accreditation council have been met.

The agency publishes its decisions on its website and provides the information along with the names of the experts to the accreditation council and the university compass. By publishing its annual report, the agency also meets its reporting obligations to the accreditation council and the Swiss foundation supervision authority. Consequently, Criterion 4.1 of the accreditation council has been fulfilled.

As result, ESG Standard 3.7 has been complied with.”

Extract from assessment report:

***“Review category 3: Procedural organisation of the agency***

*The agency provides reviewers with the “Assessment Guide for Reviewers” – the main document for programme reviews. The guide is divided into the following areas: “Strategy and objectives”, “Admission (admission process and procedure)”*

*“Programme design”, “Resources and services” and “Quality assurance”. It lists 27 aspects to be assessed; the introductory section, “Rules for site visits”, also draws reviewers’ attention to essential criteria which, if not complied with, prevent the programme from being accredited. Quality ratings are also introduced, ranging from “Does not meet quality requirements” to “Meets quality requirements” to “Exceeds quality requirements” right through to “Exceptional”. According to the agency, the “Assessment Guide for Reviewers” ensures that its decisions are consistent (Accreditation Council criterion 3.1) and that normative requirements are enforced (Accreditation Council criterion 3.2).*

*The agency does not provide any details on the interaction between the head of office, reviewers and the Accreditation Commission. The review panel’s site visit revealed that additions or changes are made to assessment reports during ongoing accreditation procedures and after discussion by the Accreditation Commission.*

*The review panel therefore proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must, **with immediate effect**, keep review reports, HEIs’ statements and subsequent amendments by the Accreditation Commission strictly separate and identify them as separate documents. A further **condition** to be met by the agency is that it must **immediately** cease the practice of making changes to assessment reports during ongoing procedures.*

*With regard to the requirement for reasons to be given for decisions (criterion 3.3.), the agency cites its quality manual (2.41). Section 3 of the manual also contains a sample letter relating to the suspension of procedures.*

*All of the steps and phases in the accreditation procedures are defined in the form of schematic process descriptions. The descriptions make the links between the individual steps clear, which themselves are appropriate and are clearly linked to the persons responsible for them. These descriptions are evidence of an efficient procedure. The Accreditation Council’s criterion 3.4 can be deemed to be met.*

*The agency works with a template for assessment reports. The criteria in the “Assessment Guide for Reviewers” are implemented by means of a schematic assessment using the quality profile. It is the opinion of the Accreditation Council’s review panel that pre-worded sentences and blocks of text result in texts which do not differ much and occasionally prevent specific cases from being described in an adequate manner. The Accreditation Council’s review panel identified shortcomings in the Accreditation Commission’s debates concerning joint degrees and dual*

programmes. It would appear that the employees' and reviewers' training is lacking in this respect.

The review panel **recommends** the agency to reduce its use of text blocks and pre-worded passages.<sup>3</sup>

...

### **Review category 16: Organisation of the process**

The agency supplies the HEIs with the "Self-Assessment Guide for Higher Education Institutions". The guide contains all of the quality requirements used as the basis for the accreditation procedure. Criteria which are essential for accreditation to be granted are marked as such. In addition, the HEIs receive a constantly updated document pack, which also contains the Accreditation Council's stipulations. "Essential criteria" ("asterisk criteria") refer to shortcomings which the Accreditation Council has declared cannot be remedied by imposing conditions. The Accreditation Council's criterion 16.1 is met.

The agency requires the reviewers to sign a declaration of impartiality. It also explicitly obliges reviewers to report any reasons for partiality which occur during the procedure. The contract specifies that the HEI may object to a reviewer. However, it does not specify any reasons for doing so. Partiality should be cited in the contract as the only reason for such objection. The Accreditation Council's criterion 16.2 is largely met. The statement in response to the review report is defined as a process step; the fact that the HEI does not receive the review team's recommendation for the accreditation decision is also specified. The arrangements for the participation of the listed stakeholders are specified in the manual (1.8). The Accreditation Council's criteria 16.3 and 16.4 are met.

The review panel **recommends** the agency to advise the HEIs that the only possible reason for objecting to reviewers is partiality.<sup>4</sup>

**Criteria 2.8 and 2.9:** "At the moment, the Foundation Board comprises four representatives of HEIs, one business representative with a link to a HEI and five association representatives. The Accreditation Commission currently consists of seven representatives of HEIs, six representatives from industry (of whom one is a representative of a trade union) and two student representatives. Thus, the membership

<sup>3</sup> Extract from Review panel's Assessment Report, pp 15-16.

<sup>4</sup> Extract from Review panel's Assessment Report, pp 21-22.

*criteria are in line with the specific purpose of the bodies concerned and groups with an interest in the tasks to be performed are involved (criteria 2.8 and 2.9 of the Accreditation Council) but there are no actual specifications to this effect. It is essential that relevant specifications be incorporated into the Statute in order to ensure compliance with these criteria.*

*The review panel therefore proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must provide evidence by **31 October 2007** of a specification to ensure that the composition of its bodies complies with the criteria.”<sup>5</sup>*

### **Review category 18: Compliance with conditions**

*The agency’s head office ensures that the case is re-submitted. It is the task of the responsible employee from FIBAA and the reviewers to assess whether conditions have been complied with. The decision as to whether conditions have been complied with is made by the Accreditation Commission. The Accreditation Council’s criterion 18 is met.”<sup>6</sup>*

### **ESG Standard 3.8 (Accountability procedures):**

#### **Standard:**

Agencies should have in place procedures for their own accountability.

#### **Guidelines:**

These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website;
2. Documentation which demonstrates that:
  - the agency’s processes and results reflect its mission and goals of quality assurance;
  - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;
  - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties;
  - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
3. A mandatory cyclical external review of the agency’s activities at least once every five years.

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<sup>5</sup> Extract from Review panel’s Assessment Report, p 13.

Extract from the decision:

“Pursuant to Criterion 4 the agency is required to make its processes transparent for the universities. Pursuant to Criterion 6 it is also required to verify that an internal quality assurance system is in place and that same is being documented. Criterion 19.1 commits the agency to set up a formal appeals process. The regular external assessment is binding upon the agency pursuant to § 2 Article 1 No. 1 of the “Law establishing a foundation ‘Foundation for the Accreditation of Study Courses in Germany’” and must be performed every 5 years.

Upon completion of the accreditation process, the applicant university receives a detailed, decision-justifying report along with the decision, for which a template letter is available in the quality manual. If the accreditation commission’s decision is negative, the university can request that two other experts perform an on location inspection. In this case, the accreditation commission shall make another decision after the second opinion is submitted. This decision regarding the requested accreditation process is final. Along with the information concerning the finalised decision of the accreditation commission, FIBAA is required to communicate the fundamental reasons for the granting or withholding of the accreditation to the university. By publishing their annual report, the agency also meets its reporting obligations to the accreditation council and the Swiss foundation supervision authority. Consequently, Criterion 4.1 of the accreditation council has been fulfilled. The agency conducts regular analyses of their processes. For instance, in 2003 a poll of experts concerning the instruments and processes of FIBAA was carried out, and in 2004 the agency conducted round tables with student and university representatives regarding the further development of instruments. In 2005 the agency implemented a process management system and compiled for this purpose a census and analysis of business processes and supporting management processes. Evaluation certificates for experts and universities were implemented in 2006.

FIBAA also offers expert training programmes (four in 2006). The agency has compiled a quality manual which describes the core processes and moreover makes samples available for all key documents (experts’ reports, regular correspondence etc.). Criteria 19.1 to 19.3 of the accreditation council have been fulfilled.

As result, ESG Standard 3.8 has been complied with.”

Extract from assessment report:

***“Review category 4: Accountability***

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<sup>6</sup> Extract from Review panel’s Assessment Report, p 23.

The agency mainly explains its procedures in schematic process descriptions and its “Assessment Guide for Reviewers”. At the end of the accreditation procedures, the HEI seeking accreditation receives a detailed, substantiated report, for which a template is provided in the quality manual (document II.A. 2.4) along with the decision. The agency publishes the decisions on its website and supplies the information, plus the names of the reviewers, to the Accreditation Council and the “Hochschulkompass” (“Higher Education Compass”). The agency fulfils its duty to report to the Accreditation Council and the Swiss Supervisory Authority for Foundations by publishing annual reports. The Accreditation Council’s criterion 4.1 is met.

The agency ensures the procedures are handled confidentially by requiring all persons involved, reviewers, commission members and employees to sign non-disclosure agreements. Sample agreements have been provided (II.A.2.3 for reviewers; Annex 6 for members of the Accreditation Commission).<sup>7</sup>

#### **“Review category 6: Internal quality management**

The agency regularly conducts analyses of its own processes. In 2003, for instance, a survey was carried out among the reviewers on the topic of FIBAA’s tools and processes; in 2004, discussions were held with students and representatives of HEIs with the aim of evolving the tools. In 2005, the agency introduced a process management procedure, for which it analysed the business processes and the supporting management processes. Evaluation sheets for reviewers and HEIs were introduced in 2006.

The agency provides internal training for employees on the latest documents and amendments to the “Structural Guidelines”. It also gives them the opportunity to attend congresses and conferences. Individual training is provided for the reviewers during accreditation procedures. In addition, FIBAA offers reviewer training courses (four in 2006). The agency has drawn up a quality manual, which describes the core processes and provides templates for all key documents (review reports, letters required on a regular basis, etc.).<sup>8</sup>

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**Criterion 17.2:** With regard to integrity in the use of the Accreditation Council’s Quality Label (Accreditation Council criterion 17.2), the agency does not provide any information beyond its assurance that it only awards the Label in the cases for

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<sup>7</sup> Extract from Review panel’s Assessment Report, pp 16-17.

<sup>8</sup> Extract from Review panel’s Assessment Report, pp 17-18.

which it is intended. Since the agency's area of activity extends beyond the Accreditation Council's remit, the Accreditation Council's review panel feels that the agency must ensure that the Accreditation Council's Quality Label is not used without authorisation and that misunderstandings are avoided. Similar requirements apply to the criteria with which the agency works (see above, "Review category 2").

The review panel therefore proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must explain in writing by **31 December 2007** how it ensures in its documents that unauthorised use of the Accreditation Council's Quality Label is prevented.<sup>9</sup>

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#### **Review category 19: Internal appeals process**

The accreditation process is defined in the contract: the Accreditation Commission decides, on the basis of all of the assessment material presented, whether accreditation is to be granted. Conditional accreditation is possible. If the Accreditation Commission's decision is negative, the HEI can request that two additional reviewers conduct another site visit. In such cases, the Accreditation Commission makes a new decision once the second assessment report has been presented. This decision is final for the requested accreditation procedure. When it informs the HEI of the Accreditation Commission's final decision, FIBAA also advises it of the main reasons why accreditation has been granted or denied. The Accreditation Council's criteria 19.1 to 19.3 are met.<sup>10</sup>

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<sup>9</sup> Extract from Review panel's Assessment Report, p 23.

<sup>10</sup> Extract from Review panel's Assessment Report, p 24.