

**Printed Matter AC 34/2017****Review report**

5 **on the application by the Foundation for International Business Administration Accreditation (FIBAA) from 23.05.2016 for accreditation and verification of compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).**

- submitted on 23.01.2017 -<sup>1</sup>

**I. Summary**

10 FIBAA's clients regard the agency as a reliable partner who handles evaluation procedures professionally and efficiently. The committees are high ranking and have impressed the review panel with their professional expertise. The agency has been established for years in the area of accreditation of business study programmes. In the opinion of the review panel, it is also well positioned for implementing system accreditation procedures and other  
15 institutional procedures. However, such procedures have only been carried out to a relatively low extent, especially since FIBAA has been mainly recognised as a specialist agency up until now.<sup>2</sup> As the other new procedures offered by the agency have also been in rather moderate demand up until now, the agency should deepen its strategy debate.

The agency substantially observes the ESG and the national additional criteria of the Accreditation Council with all types of procedures it offers. The agency should, however, increase its efforts to ensure a transparent separation of consultation and assessment procedures as well as provide a more transparent representation of the requirements for the awarding of the premium seal. It should ensure regular implementation of internal and external feedback in all areas of business and increase the evaluation of results from the  
20 procedures it carries out. Finally, there is a need to make improvements with regard to the  
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<sup>1</sup> According to the "Guidelines for ENQA Agency Reviews" (see Section 6.4, p. 18), only the information that was submitted at the time of the site visit or on the basis of subsequent requests by the Accreditation Council's expert group within the scope of the site visit was taken into consideration for the report.

<sup>2</sup> According to FIBAA's statement from 18.01.2017, the agency has been responsible for more than 20 percent (as of 10.01.2017) of the system accreditation procedures implemented throughout Germany. In addition, the agency has also been assigned additional system accreditation procedures. On an international level, the FIBAA has carried out 10 institutional procedures over the last five years; three of which are still in progress.

correct and prompt publication of accredited study programmes in the Accreditation Council's database.

## 5 **II. Procedural framework**

### **II.1. Statutory mandate**

According to § 2 Para. 1 No. 1 of the law establishing a foundation "Foundation for the Accreditation of Study Courses in Germany", the foundation has the task of accrediting accreditation agencies. It grants, for a limited period of time, the right to accredit study programmes or the internal quality assurance systems of higher education institutions by awarding the seal of the foundation.

The Accreditation Council's accreditation decision, as well as the implementation of the procedure for accrediting an accreditation agency, is based on the resolution "*Rules for the Accreditation of Agencies*" from 8 December 2009 in the version adopted on 23/09/2016.<sup>3</sup>

15 In order to promote international recognition for the decisions made by the Accreditation Council and the accreditation agencies, in approving its criteria, the Accreditation Council adopted the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), as they were passed at the Bologna Follow-Up Conference in Yerevan in May 2015 by the ministers responsible for higher education. The Accreditation Council

20 also added criteria that are only relevant for the approval of an agency in Germany.

### **II.2. Compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area**

25 In order to be recognised as a member of the European Association for Quality Assurance in Higher Education (ENQA) or to be included in the European Quality Assurance Register for Higher Education (EQAR), an agency must demonstrate, through an external assessment, that it complies with the ESG. For EQAR, full membership of ENQA is considered prima facie evidence of compliance with the ESG.

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<sup>3</sup> The application of this version of the rules was agreed upon by the agency and the Accreditation Council after initiating the procedure.

Accreditation awarded by the Accreditation Council involves evaluation in accordance with the ESG and thus prevents a double external review. The Accreditation Council follows the *Guidelines for external reviews of quality assurance agencies in the EHEA*.

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### **II.3. Significant results from the previous accreditation/ENQA review/EQAR registration**

FIBAA was reaccredited in 2012 without any conditions but with some recommendations. The entry in the European register (EQAR) was issued with two so-called “flagged issues”, i.e. points were marked that should receive special attention in the subsequent evaluation. All of these aspects are addressed as part of the evaluation of the ESG (Section IV) and the national additional criteria (Section V).

### **II.4 Course of the procedure**

FIBAA submitted the application for accreditation as an accreditation agency to the Accreditation Council in a letter dated 23<sup>rd</sup> of May 2016. On 31<sup>st</sup> of August.2016, the agency submitted a self-evaluation report alongside additional documentation. Further documents were subsequently requested by email on 26<sup>th</sup> of October 2016. These documents were received by post on 09<sup>th</sup> of November 2016.

The following experts were nominated by the Accreditation Council on 22<sup>nd</sup> of June 2016:

**Prof. Dr. Wolfgang Berens**, Chair for Business Administration, especially Controlling, University of Münster (Chairman)

**Dr. Sabine Felder**, Deputy General Secretary and Head of Division Teaching at swissuniversities, expert in the FIBAA’s previous reaccreditation procedure

**Dr. André Rieck**, Head of Department of Higher Education Development at Kiel University of Applied Sciences

**Jacob Wunderwald**, Student at the University of Potsdam (Student Representative)

**Matthias Toepfer**, Head of Department of Higher Education Policy and Political Dialogue, Employers' Association Südwestmetall (Professional Practice)

The review panel was supported by Katrin Mayer-Lantermann on behalf of the head office

of the Foundation for the Accreditation of Study Programmes in Germany. Prof. Dr. Ute von Lojewski from Münster University of Applied Sciences observed the procedure on behalf of the Accreditation Council.

- 5 On 09<sup>th</sup> of September 2016, a preparatory meeting was held for the panel during which the applicable criteria set by the Accreditation Council and the ESG were presented and explained. The preparatory meeting also served to deepen the panel's knowledge about the procedure outlines and understanding of their roles in accreditation procedures. Mr Toepfer, who was unable to attend the preparatory meeting due to conflicting organisational obligations, was prepared individually by the head office.
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### **Self-Evaluation Report**

- The self-evaluation report is informative and limited to essential points. The agency also submitted or subsequently submitted the necessary supporting documents. In a separate chapter of the self-evaluation report, the agency outlines the implementation of the recommendations from the last reaccreditation. The report also includes a statement on the Accreditation Council's progress report.
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### **Site visit**

- A site visit took place at the agency's head office from 24<sup>th</sup> to 25<sup>th</sup> of November 2016, which was preceded by a preliminary discussion between the members of the review panel on 23<sup>rd</sup> of November 2016. The panel held meetings with the management of the agency, the FIBAA Accreditation Committee for Programmes (F-AC PROG), the members of the FIBAA Accreditation Committee for Institutional Procedures (F-AC INST) and the FIBAA Certification Committee for Continuing Education Courses (F-CC CERT), employees of the head office, experts and representatives of higher education institutions for which the agency has previously performed procedures. The agency submitted further documentation as a result of additional claims from the review panel during the site visit. (The schedule is included as an annex.)
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The review panel submitted the enclosed report with a unanimous vote on 23<sup>rd</sup> of January 2017, taking the statement by FIBAA from 18<sup>th</sup> of January 2017 into account.

- 30 This report is based on the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* from May 2015 and the resolution of the Accreditation Council "Rules for the Accreditation of Agencies" from 08<sup>th</sup> of December 2009 in the version adopted on 23<sup>rd</sup> of September 2016.

## II.5. The German Accreditation System

Germany has a decentralised accreditation system which is characterised by the fact that the accreditation agencies are certified for their activities in Germany by the Accreditation Council. Accreditation was introduced in 1998 and has always been based on the involvement of academics, students and professional practice.

The role of accreditation is to ensure the standards of the covered specialised content, which alongside a review of the study programme concept and the academic feasibility of the programme offered, also considers the quality of teaching as well as a review of a programme's professional relevance and the promotion of gender equality. As a rule, accreditation is required for introducing and running Bachelor's and Master's study programmes. In addition to programme accreditation, system accreditation was introduced in 2007. Positive system accreditation entitles a higher education institution to award the quality seal of the Accreditation Council for study programmes in accordance of their own internal quality assurance system.

The work of the Accreditation Council is based on the law establishing a foundation "Foundation for the Accreditation of Study Courses in Germany", which was passed on 15<sup>th</sup> of February 2005. Alongside certifying agencies, for a limited time for operations in Germany, the Accreditation Council determines the basic requirements for accreditation procedures, which must be conducted according to reliable and transparent standards. At the same time, the Accreditation Council ensures that concerns relating to the overall system for which individual states are responsible are given consideration as part of accreditation. The Foundation for the Accreditation of Study Programmes in Germany also functions as a centralised documentation office for accreditation and manages the database of accredited study programmes in Germany.

A European consensus in quality assurance of higher education institutions was reached for the first time by the ministers responsible for higher education with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (hereafter ESG) at the Bologna Follow-Up Conference in Bergen in May 2005. A revised version of the ESG was enacted in May 2015 at the conference of ministers in Yerevan. In order to promote international recognition for the decisions made by the Accreditation Council and accreditation agencies, the Accreditation Council has always taken the ESG into account.

### III. Foundation for International Business Administration Accreditation (FIBAA)

#### III.1. Foundation

5 In 1994 the Foundation for International Business Administration Accreditation (FIBAA) was established as an internationally oriented foundation by the leading organisations of Swiss, Austrian and German industry.

#### III.2. Organisation

10 The main bodies of the foundation are the Executive Committee of FIBAA Foundation Council and Managing Direction. The Management reports to the foundation council and is responsible for operative business. The foundation council appoints the FIBAA Accreditation Committee for Programmes (F-AC PROG), the FIBAA Accreditation Committee for Institutional Procedures (F-AC INST), the FIBAA Certification Committee for Continuing Education Courses (F-CC CERT), and the FIBAA Appeals Committee. The committees make decisions in the accreditation and certification procedures. They decide on the agency's assessment criteria and procedural principles, appoint experts to the pool of experts and nominate the expert groups. The FIBAA Appeals Committee discusses appeals and passes them on to the committees for resolution.

#### III.3. Equipment

20 A new Managing Director was appointed as of 1<sup>st</sup> of December 2016. The head office is divided into the areas Office/IT/Finance, Project Management and FIBAA Consult. There are seven employees in total in the areas Office/IT/Finance (5.45 full-time equivalents - FTE). There are twelve employees in Project Management (9.0 FTE) and one for FIBAA Consult (1.0 FTE). Four external project managers (one also as a special representative of the FIBAA) are employed as freelancers. FIBAA's office spaces are on a long-term lease and are sufficient for the existing personnel. A conference room and a meeting room are integrated. The employed project managers have individual offices. External meeting rooms are rented for meetings, if required. FIBAA uses a computer and network infrastructure. The employees at the head office have modern desktop or laptop computers, depending on their requirements.

#### 30 III.4. Spectrum of activities

The objects of this assessment are only fields of activity in the jurisdictions of the Accreditation Council and ENQA/EQAR, including distinction from areas of activity which do not fall

within its area of responsibility.

FIBAA carries out the following quality assurance procedures in the higher education sector: Programme accreditation, institutional procedures, certification of continuing education courses and "Evaluation Procedures according to individual objectives".<sup>4</sup>

A further distinction can be made in the area of **Programme Accreditation:**

- Programme Accreditation in accordance with the rules of the Accreditation Council (awarding the Accreditation Council's seal);
- Programme Accreditation outside the competence area of the Accreditation Council (to obtain FIBAA's quality seal for programmes).

The second group not only includes the accreditation of Bachelor's and Master's study programmes, but also doctoral/PhD programmes. The agency provides a separate Question and Assessment Guide (QAG) for this (Annex 11).

In the area of Programme Accreditation, FIBAA focuses on study programmes oriented towards legal, social and economic sciences as well as management training. Programme accreditation is the main business area of FIBAA.

Up until now, FIBAA accredited a total of 1,838 programmes in Germany and abroad according to its own figures (as of 30<sup>th</sup> of June 2016). In 2015, 182 courses were accredited; 127 of which in Germany and 55 abroad.

According to the agency, the vast majority of foreign accreditations are attributable to programmes in Kazakhstan (41 study programmes). Some procedures in Albania, Georgia, Lebanon, Northern Cyprus, Luxembourg, Russia, Slovenia and the Czech Republic were added.

According to the information in the subsequent submission, the agency has so far accredited a total of two doctoral/PhD study programmes (in Kazakhstan) (see Annex N 1).

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<sup>4</sup> Please see self-evaluation report p. 13 for the formulation by FIBAA. The term "evaluations" is used for this in the following.

Unless stated otherwise, the information in this section is based on the agency's depictions in the self-evaluation report, p. 10 f.; the EQAR confirmed to the agency in its "Confirmation of Eligibility" dated 4<sup>th</sup> of April 2016 that (only) these areas of activity fall under the area of application of the ESG.

In addition, FIBAA carries out the following **institutional procedures**:

- System accreditation in accordance with the rules of the Accreditation Council (to obtain the Accreditation Council's seal);
- 5 • Institutional Audit Austria (certification) in accordance with the rules of the Austrian Act on Quality Assurance in Higher Education (HS-QSG) (to obtain the FIBAA quality seal 'Institutional Audit Austria');
- Institutional Accreditation in accordance with the FIBAA quality standards (to obtain the FIBAA quality seal 'Institutional Accreditation'),
- 10 • Institutional Accreditation: Strategic Management in accordance with the FIBAA's quality standards (to receive the FIBAA quality seal 'Institutional Accreditation: Strategic Management').

The "Institutional Audit" offered by the agency between 2010 and 2012 is no longer executed.<sup>5</sup>

- 15 As of August 2016, FIBAA has so far issued eleven system accreditations in accordance with the rules of the Accreditation Council. There are also two ongoing procedures. Furthermore, an Institutional Audit Austria and five Institutional Accreditations: Strategic Management procedures were carried out at two Austrian, one Kazakh, one Lebanese and one German higher education institution. Two Institutional Audit Austria procedures are currently
- 20 in progress. The "Institutional Accreditation" procedure was not developed until 2016. In future, it is to become the primary international institutional procedure. Currently, an Institutional Accreditation procedure is being carried out in Kazakhstan.

- In the area of **Certification**, FIBAA certifies further education courses which do not lead to an academic degree but are offered at university level. They lead to the award of the FIBAA
- 25 quality seal for further education courses. FIBAA has so far carried out 48 certification procedures for further education courses primarily in Germany; five were carried out at international institutions (Switzerland, Kazakhstan, Cyprus, Austria) and one in cooperation with institutions in Poland, Romania and the Great Britain.

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<sup>5</sup> According to the self-evaluation report (p. 12), four institutional audits have been carried out (three in Austria, one in Switzerland).

In the area of FIBAA Consult, FIBAA provides the “**Evaluation Procedures According to Individual Objectives**” since 2016. It concludes with recommendations for further development, but without a formal decision and seal. Until now, no such evaluation procedure has been carried out.

In all procedures outside of the sphere of competence of the Accreditation Council, the agency awards the FIBAA premium seal in addition to the FIBAA quality seal for programmes. In order to do so, FIBAA requires the fulfilment of special requirements in five key areas (objectives, admission, contents, structure and didactics, scientific environment and framework conditions, quality assurance and further development) (see manual for Programme Accreditation in Annex 6 and the statements on the ESG Standard 2.5). Information was subsequently submitted that states that the FIBAA premium seal was awarded in five cases in 2015 (see Annex N 1).

Outside the areas of responsibility of the Accreditation Council and ENQA/EQAR, FIBAA Consult offers individual consulting activities, lectures, studies, in-house workshops, conferences and seminars upon request.

Between May 2012 and April 2016, FIBAA also offered the "Certification of Corporate Learning Units" procedure, whereby the quality of in-house training units was reviewed. Due to a lack of further demand, FIBAA decided to no longer offer the procedure. The procedure is no longer be presented on FIBAA's homepage.<sup>6</sup>

#### IV. Evaluation of the European Standards and Guidelines (ESG)

##### 3.1 Use of external quality assurance procedures for higher education

###### STANDARD:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

###### GUIDELINES:

To ensure the meaningfulness of external quality assurance, it is important that institutions and the public trust agencies.

<sup>6</sup> The clarification on the website meets the requirements of EQAR as given to the agency in the "Confirmation of Eligibility" dated 4<sup>th</sup> of April 2016.

Therefore, the goals and objectives of the quality assurance activities are described and published along with the nature of interaction between the agencies and relevant stakeholders in higher education, especially the higher education institutions, and the scope of the agencies' work. The expertise in the agency may be increased by including international members in agency committees.

A variety of external quality assurance activities are carried out by agencies to achieve different objectives. Among them are evaluation, review, audit, assessment, accreditation or other similar activities at programme or institutional level that may be carried out differently. When the agencies also carry out other activities, a clear distinction between external quality assurance and their other fields of work is needed.

### Recommendations/conditions from the previous accreditation

-None-

### Documentation

FIBAA's mission statement is available on the agency's homepage. During the site visit, the agency confirmed that the mission statement had been acknowledged by the foundation council. It describes the agency's objectives, the understanding of quality and working method. According to the statement, FIBAA would like to support higher education institutions to achieve quality objectives they set themselves. It considers itself to be the driving force for further development of quality. It also aims to promote transparency as well as practical experience and vocational competency in academic education. FIBAA follows national and international requirements and standards, in particular by the European Standards and Guidelines (ESG).

The agency regularly puts its objectives and work to the test (self-evaluation report, p. 14). It carried out a SWOT analysis in order to identify potential and develop strategically (Annex 96). In particular, this identifies the short duration of the procedure as well as the transparent and more detailed QAGs as strengths. The further opening of foreign markets for accreditation agencies is seen as an opportunity for FIBAA to position itself in other countries. Even though the agency provides interdisciplinary accreditation and evaluation in these two areas, it is often recognised as a subject-specifically-oriented agency even in the institutional procedures and consulting area, which was identified as a challenge.

FIBAA is aware of the fact that among other things, the trend towards institutional accreditation domestically and abroad and towards system accreditation in Germany, the implementation of seal separation<sup>7</sup> by the Accreditation Council, as well as the fact that an agency's seal is also attractive to higher education institutions in terms of improving its reputation,

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<sup>7</sup> Several agencies, including FIBAA, have awarded both the Accreditation Council's seal and additional seals in procedures for programme accreditation in Germany. As the Accreditation Council saw this as a threat to the

would change the activity of the agency. It is also important, how the future structure of the German accreditation system will take shape. FIBAA will continue to develop into an international non-profit organisation, even broader than it has been set up until now, with a global perspective. In addition, an expansion in the area of consulting is planned. On the one hand, this is about higher education institutions who are seeking to obtain an institutional or system accreditation and have found an agency to do so, but would like to make use of additional external advice. On the other hand, it is a matter of individual challenges of higher education institutions for which the FIBAA offers customised consultancy services (self-evaluation report, p. 69).

During the site visit, the agency's representatives added that there are plans to strengthen cooperation with the higher education institutions. One option would be joint events. Another consideration is to join up with higher education institutions for organisational purposes by converting into an association.

According to a resolution of the foundation council the headquarters of FIBAA shall be relocated from Switzerland to Germany. This is because there is currently no recognition as a non-profit organisation in Germany, as is largely the case for the other agencies approved by the Accreditation Council, and therefore no exemption from VAT. This means there is an obligation to pay a VAT rate of 19 percent. This, in addition to the requirement of double accounting in Germany and Switzerland, results in considerable costs each year.

The foundation council regulated the separation of assessment (quality assurance procedures) and consultation (FIBAA Consult), which is necessary according to the guidelines and the document "Use and interpretation of the ESG" from the EQAR as an aspect of Standard 3.1, by means of an updated resolution from February 2016. According to this, "assessments and consultancy concerning the subject of the assessment by FIBAA may not be linked" (see Annex 56). The resolution is available on the web pages of all procedures and on the FIBAA Consult page. In the context of the submission, the agency informs that, in principle, FIBAA does not support higher education institutions in the preparation for accreditation, if they applied for such an accreditation at the agency. Reference is made to the aforementioned resolution of the foundation council as proof. The project managers do not have access to the results of the consultation from Consult. This is ensured by separate

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validity of its seal, it places the agencies under the obligation of having to have separate procedures ("seal separation").

drives equipped with 'server lock'.

### **Evaluation**

5 FIBAA regularly performs quality assurance procedures. In its mission statement FIBAA listed objectives for its activities which are reflected in the design of the individual quality assurance procedures offered by the agency and their manuals (see Standard 2.2 for this). However, as part of the site visit, it became evident that so far there is a relatively low demand for the comparatively new fields of activity in certification and institutional procedures, including system accreditation and evaluation procedures. Even against the back-  
10 ground of maintaining a sustainable business model, the review panel recommends further deepening of the agency's internal strategy debate.

For separation of consultancy and accreditation, the agency representatives explained on site that no assessment tasks are to be accepted when consulting has already taken place on the same matter. In the opinion of the review panel, however, this should also be re-  
15 flected in the corresponding resolution of the Executive Committee of FIBAA Foundation Council, which could be formulated more clearly on this matter.

See Standard 2.2 for the involvement of the relevant interest groups in assessment procedures.

### **Recommendations**

20 The review panel issues the following recommendations:

1. The agency should intensify its internal strategy debates as the comparatively new areas
2. of activity of certification, institutional procedures including system accreditation and evaluation procedures have, up until now, experienced relatively low demand.
- 25 3. 3. It should be transparently regulated which measures respectively head-office-internal processes in which line of activity ensure the separation of consultancy and accreditation. Also should be clarified that an application for a quality assurance procedure to be conducted cannot be made at the same time as or shortly after consultancy services.

30 **Result:**

**Standard 3.1 is substantially fulfilled.**

### 3.2 Official status

#### STANDARD:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

#### GUIDELINES:

In particular when external quality assurance is carried out for regulatory purposes, institutions need to have the security that the outcomes of this process are accepted within their higher education system, by the state, the stakeholders and the public.

#### Recommendations/conditions from the previous accreditation

-None-

#### Documentation

5 FIBAA has been authorised by the Accreditation Council to award the seals of programme and system accreditation. It is a non-profit foundation under Swiss federal law (see the Foundation Statute and Excerpt from the Commercial Register in Annex 90).

In addition, FIBAA is entitled to carry out nationally recognised accreditation procedures at Dutch higher education institutions through employees who are certified "Panel Secretaries" at the Accreditation Organisation of the Netherlands and Flanders (NVAO).<sup>8</sup>

15 With decree from June 2014 and on the basis of the recommendation from the Kazakh Republican Accreditation Council, the Ministry of Education and Science of the Republic of Kazakhstan has incorporated FIBAA into the National Register of Accreditation Agencies. This means that FIBAA's resolutions on the accreditation of study programmes at Kazakh higher education institutions are officially recognised (see Annex 97).

Furthermore, the Federal Ministry for Science and Research in Vienna incorporated FIBAA into the "Regulation on quality assurance agencies" in 2013.<sup>9</sup> Therefore FIBAA is entitled to perform audits at public universities and universities of applied science in Austria.

20 Finally, as part of the subsequent supply, FIBAA provided information that the agency had been recognised by the Swiss Accreditation Council on 16 September 2016 and that the Swiss National Institutional Accreditation could be carried out in accordance with the Swiss Federal Act on the Funding and Coordination of the Higher Education Sector (HEdA).<sup>10</sup>

<sup>8</sup> Cf. <https://www.nvao.net/over-nvaosamenwerking/register>

<sup>9</sup> Cf. [http://www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA\\_2015\\_II\\_47/BGBLA\\_2015\\_II\\_47.pdf](http://www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA_2015_II_47/BGBLA_2015_II_47.pdf)

<sup>10</sup> Announcement of the recognition by the Swiss Accreditation Council: <http://akkreditierungsrat.ch/en/>

FIBAA published the certificate of recognition (Annex N 2) as well as a Question and Assessment Catalogue and manuals for the procedure.<sup>11</sup> The documents are also currently  
5 being translated into English.

In addition, FIBAA applied to the National Accreditation Council at the Ministry of Education and Research of the Kyrgyz Republic for registration as an accreditation agency. In the event of a positive decision, FIBAA would be listed in the Kyrgyz Republic's National Register for Accreditation Agencies and therefore receive the right to implement programme-  
10 related as well as institutional accreditation procedures at Kyrgyz higher education institutions.

### Evaluation

As a foundation under Swiss federal law, FIBAA has a secure legal basis and is officially recognised as a quality assurance agency by the relevant authorities.

15 **Result:**

**Standard 3.2 is fulfilled.**

### 3.3 Independence

#### STANDARD:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

#### GUIDELINES:

Autonomous institutions need independent agencies as counterparts.

In considering the independence of an agency the following are important:

- Organisational independence, demonstrated by official documentation (e.g. instruments of government, legislative acts or statutes of the organisation) that stipulates the independence of the agency's work from third parties, such as higher education institutions, governments and other stakeholder organisations;
- Operational independence: the definition and operation of the agency's procedures and methods as well as the nomination and appointment of external experts are undertaken independently from third parties such as higher education institutions, governments and other stakeholders;

<sup>11</sup><http://www.fibaa.org/en/institutional-procedures/institutional-accreditation-switzerland.html>;

<http://www.fibaa.org/en/institutional-procedures/institutional-accreditation-switzerland/documents.html>

• Independence of formal outcomes: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Anyone contributing to external quality assurance activities of an agency (e.g. as expert) is informed that while they may be nominated by a third party, they are acting in a personal capacity and not representing their constituent organisations when working for the agency. Independence is important to ensure that any procedures and decisions are solely based on expertise.

## Recommendations/conditions from the previous accreditation

-None-

### Documentation

5 The committee members are appointed by the foundation council (see the Internal Regulations of the foundation council in Annex 94, the subsequent Rules of Procedure of the F-AC PROG in Annex N 3 as well as the drafts of the Rules of Procedure from other committees in Annexes 21 and 45). The foundation council consists of six to fifteen members. The following unions and associations are entitled to a seat in the foundation council (see Annex  
10 N 4):

- the Confederation of German Employers' Associations, Berlin;
- the Association of German Chambers of Industry and Commerce, Berlin;
- Federation of Austrian Industry (IV), Vienna;
- the economiesuisse, Zürich;
- 15 - the Austrian Federal Economic Chamber, Vienna.

Currently, the foundation council consists of seven members; the aforementioned organizations are fully represented. There are also two representatives of academia, one from Austria and one from Switzerland (see the list of members in Annex 92).

20 In accordance with the rules of procedure of the F-AC PROG, F-AC INST and F-CC CERT, which are available partly in draft versions, the committee members act and make decisions as experts in the field of quality assurance at higher education institutions exclusively according to the quality aspects and are not bound by third-party directives (see Annexes N 3, 21 and 45). The committee members have signed a declaration that states they will immediately report potential partialities in any procedure they take part in or are otherwise involved (see Annex 03).  
25 Should a committee member not be impartial in a procedure, for example because of an affiliation with the higher education institution, they shall not take

part in the formation of opinion and decision-making process when dealing with the corresponding procedure and they must leave the room during discussion and voting. If a committee member has worked as an expert in a FIBAA quality assurance procedure, they shall  
5 also not participate in the decision-making process on the procedure in question (see the rules of procedure in Annexes N 3, 21, 45 and 73 and the statements on Standard 2.4).

For members of the FIBAA Appeals Committee, the corresponding rules of procedure stipulate that they act as experts solely based on quality aspects, whilst taking into consideration the national requirements and the general resolutions of the FIBAA accreditation and  
10 certification committees, and that they do not take part in the voting as an expert in a procedure in cases of impartialities or job affiliation (see Annex 73).

All internal and external FIBAA employees also sign a declaration of impartiality (see Annex 88).

Furthermore, the independence of FIBAA's activities is ensured by the fact that the committees come to their decisions solely on the basis of expert evaluations in the reports and on  
15 the basis of statements made by higher education institutions. The committees can deviate from the recommendations and expert-recommended decisions here, provided that this seems necessary and justified with regard to argumentative plausibility, conformity of the specified procedural principles or consistency with other decisions (self-evaluation report,  
20 p. 19).

For information on impartiality of the experts, see ESG Standard 2.4.

## Evaluation

FIBAA's own legal entity status (see Standard 3.2) provides a guarantee for its independence from third parties.  
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No indication of influence or interventions by third parties was found. There is a responsibility to appoint the foundation council, but this has no impact on the procedures themselves; instead the freedom from instruction of the committee members is explicitly guaranteed in the rules of procedure. However, the submission of binding versions of the rules for  
30 procedure for all committees is required to completely fulfil Standard 3.3.

The inspection of the reports by the committees compensates for possible subjective positions of those involved in the procedures.

The impartiality of the members of the committees and the employees is ensured by detailed and adequate rules in the rules of procedure, which, as stated above, partly exist only as drafts, or by the declaration to be signed by the employees. See Standard 2.4 for personal identity in committees and expert groups.

### Recommendations

The review panel issues the following recommendation:

3. The Agency should adopt the rules of procedures currently available in draft form for the F-AC INST and the Appeals Committee.

10 **Result:**

**Standard 3.3 is substantially fulfilled.**

### 3.4 Thematic analysis

#### STANDARD:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

#### GUIDELINES:

In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts.

A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty.

### Recommendations/conditions from the previous accreditation

15 The following recommendation was issued:

FIBAA should evaluate the findings from its procedures more systematically, if necessary together with other agencies.

#### Documentation

FIBAA makes reference to the agency's own newsletter, the "Expert" newsletter specifically for experts, so-called "workshop articles" as well as publications by employees on thematic analyses.

The FIBAA newsletter is published around five times a year and provides information on

general findings and events that FIBAA made during its activities in external quality assurance. The layout of the newsletter – it briefly outlines current topics and then gives reference to related links – is, according to FIBAA, proven (see an example newsletter in Annex 99, and the self-evaluation report, p. 21). The latest editions of the newsletter are available on the FIBAA's homepage in German and English.<sup>12</sup> They are also sent to the subscribers as an e-mail link (self-evaluation report, p. 21).

The "FIBAA Expert" newsletter is published twice a year and provides information on new developments in German and international accreditation systems as well as of FIBAA, which are particularly important for the work of experts. It also addresses the topics and results from each previous expert seminar (see an example newsletter in Annex 71, and the self-evaluation report, p. 21). The "FIBAA Expert" newsletter is only available in the internal section of the homepage.

In accordance with the information in the self-evaluation report, the workshop articles, as another format, evaluate general findings from FIBAA's accreditation procedure and address common issues in accreditation procedures, which the experts and project managers are faced with during their day-to-day work. They show new developments, offer suggestions for improvement and good practice examples, show possibilities for decision making and give reference to further information on the topic of quality assurance and development within the higher education sector. Workshop articles are released around four times a year and are circulated via the FIBAA newsletter. In addition, all workshop articles are available as a free download from the FIBAA Consult homepage, both in German<sup>13</sup> and English<sup>14</sup> (see Annex 62).

Furthermore, FIBAA gives reference to a number of publications from its employees in specialist journals. The article "Dual study programmes from the perspective of external quality assurance", which appears in the "Handbook of quality in teaching and learning", is also attached as an example (Annex 98). For this article, 36 models of dual study programmes accredited by FIBAA had been empirically evaluated in order to investigate the opportunities and risks involved in the duality of academic quality. According to the overview in the self-evaluation report, other articles address, among other things, the topics of quality assurance

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<sup>12</sup> <http://www.fibaa.org/en/news.html>

<sup>13</sup> <http://www.fibaa.org/de/fibaa-consult/werkstatt.html>

<sup>14</sup> <http://www.fibaa.org/en/fibaa-consult/factory.html>

at higher education institutions, learning outcomes and equal opportunity as an accreditation criterion (self-evaluation report, p. 23).

5 The findings obtained from their work have also been considered in FIBAA's national and international specialist lectures. Furthermore, individual project managers operate in other working groups, such as the German Rectors' Conference working group on the topic of academic franchise (self-evaluation report, p. 23).

10 In implementing the recommendation from the agency's last reaccreditation, the agency also points out that procedural findings were regularly evaluated for several years by means of a continuous analysis of the accreditation decisions under conditions and the evaluation feedback from experts, higher education institutions and project managers (self-evaluation report, p 9). As part of the documentation subsequently submitted, FIBAA provides information that the analysis of the conditions imposed in 2015 led to the conclusion that the majority of the conditions have been imposed for study and examination regulations (20%),  
15 structural layout and modularisation (12%), admission requirements (11%), admission or selection procedures (11%), and personnel selection (9%). The analysis has not been published. As part of the site visit, the agency submitted a supplementary document (see Annex N 5), which explains that conditions that were recognised by the project managers as frequent or difficult, have been discussed during the Jour fixes. Wherever a manual or a  
20 workshop article for the higher education institutions can provide information or proposals for solutions to avoid deficits in the future, FIBAA will compile and publish them. Workshops were designed for more complex issues.

25 Fulfilment of Standard 3.4 was also a "flagged issue". As a result, EQAR stressed in particular the need for thematic analyses to cover all the ESG-relevant areas of the activity of the agency.

### **Evaluation**

30 The agency has several instruments that contribute to the fulfilment of Standard 3.4. In particular, the workshop articles and the publications of the employees in specialist journals are worth mentioning. Both formats are primarily used to circulate "good practice", but they also include or are based on analyses of the procedures carried out by the agency and the defects identified there. To this extent, the review panel identifies an increase in analytically based publications in comparison to the state of the agency's previous accreditation. The review panel encourages the agency to further increase the amount of analytical publications in the future, provided that this is reasonable and possible within the scope of the

agency's operational activities, and also to cover fields of activity beyond programme and system accreditation.

### Recommendations

- 5 The review panel issues the following recommendation:
4. The agency should continue to increase the amount of analytical publications in the future and also cover fields of activity beyond programme and system accreditation.

### Result:

**Standard 3.4 is substantially fulfilled.**

10

### 3.5 Resources

#### STANDARD:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

#### GUIDELINES:

It is in the public interest that agencies are adequately and appropriately funded, given higher education's important impact on the development of societies and individuals. The resources of the agencies enable them to organise and run their external quality assurance activities in an effective and efficient manner. Furthermore, the resources enable the agencies to improve, to reflect on their practice and to inform the public about their activities.

### Recommendations/conditions from the previous accreditation

-None-

### Documentation

- 15 Finances: FIBAA is recognised as a non-profit organisation in Switzerland (see Annex 91). The profit and loss accounts for 2014 show a loss of EUR [...] and a deficit of just below EUR [...] was reported for 2015 (Annex 83). According to the documentation, for the first half of 2016 there was a surplus of just below EUR [...] (Annex 83). The enclosed revenue planning for 2016 and 2017 shows surpluses of just below EUR [...] (for 2016) and EUR [...] (for 2017). The FIBAA explains that it ended 2015 with an increase of EUR [...], which means an increase in revenue of EUR [...]. The deficit for 2015 shown in the profit and loss account results from a changeover in bookings that took place this year and a first-time deferral of revenues in accordance with the services provided by the FIBAA. The accounting deficit will be compensated in 2016 and 2017 as a result of an improved cost structure.
- 20

Personnel: A new Managing Director was appointed as of 1<sup>st</sup> of December 2016. The head office is divided into the areas Office, IT, Finance, Project Management and FIBAA Consult. There are seven employees in total in the areas Office, IT and Finance (5.45 FTE).<sup>15</sup> For  
5 the area of Project Management there are twelve employees (9.0 FTE), one of them is currently on parental leave, and one employee for FIBAA Consult (1.0 FTE). Four external project managers (one also as a special representative of the FIBAA) are employed as freelancers for FIBAA. As of October 2016, eight employees, who work entirely or in part  
10 as project manager, as well as external project manager who can be deployed flexibly, were expected to be available for procedural supervision. This ensures that the processing of about 80 procedures per year could be implemented quickly and in a timely manner (self-evaluation report, p. 25). Workforce overviews were submitted (Annex 85 and Annex N 6, which was subsequently submitted).

As part of the site visit, the agency explained that the improved cost structure had been  
15 achieved mainly as a result of reduced personnel costs. As a result of changes to personnel, the postponed filling of job vacancies, the strengthening of Project Management and in part the removal of the divisional management, the costs this year were reduced by EUR [...] compared to the previous year.

Based on the result of site meetings, the number of procedures is 15 to 18 per year per  
20 project manager.

As part of the documentation subsequently submitted, FIBAA provides information that the employees from the Consult area should use 20 percent of their working hours to implement accreditation or certifications procedures. On the one hand, this serves the purpose of distributing accreditation projects to more people, and on the other hand, to gain practical ex-  
25 perience from the Consult area with the aim of being able to provide good and experience-based consultation services. The employees working in the Consult area are employees of the Foundation. FIBAA's personnel costs are assigned to the individual areas on a pro rata basis. Time tracking for the individual areas is used for monitoring purposes. If necessary, the records will be adjusted. There is no mutual accounting within the FIBAA. For infor-  
30 mation on the separation of consultation and accreditation, see Standard 3.1.

FIBAA employees regularly receive training opportunities (for example in the last few years,

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<sup>15</sup> The date of this and the following information is 1<sup>st</sup> of October 2016

training courses on conflict discussion management, time management and quality management) and have the opportunity to attend Consult workshops. Individual training measures were also agreed upon, e.g. English courses (self-evaluation report, p. 25).

- 5 The CVs of the employees are attached in full (Annex 86 and Annexes N 7 to N 10). The updated CV of the newly appointed Managing Director was subsequently submitted (Annex N 11).

10 Premises: According to information from FIBAA, the agency's office spaces have a long-term lease and are sufficient for existing personnel. A conference room and a meeting room are integrated into the office space. The employed project managers have individual offices in order to maintain the quality of the project process. External meeting rooms are rented for meetings, if required (self-evaluation report, p. 26).

15 IT architecture: According to its own information, FIBAA uses a computer and network infrastructure. The employees at the head office have modern desktop or laptop computers, depending on requirements. In addition, each employee has access to a landline telephone with an extension number. FIBAA provides intranet or internet access in each room. A change of the infrastructure in 2016 and leasing of additional internet connection allowed for online and image-based expert training courses. Employees who travel regularly receive mobile phones with their operating and administrative expenses fully covered by FIBAA.

20 For all business data, a daily RDX-protected, central memory device is available, which can only be accessed via FIBAA's intranet. There, one will also find the databases required for procedural management: Project management, document workflow, correspondence, publication database and invoicing. In addition, there is extensive wiki-based technical documentation for the system administrator. A colour copier with a high-performance scanner and several network printers supplement the equipment. The FIBAA has a multilingual website (German, English, Russian). In addition, publicly accessible, password-protected tools are available for procedure evaluation (LimeSurvey), committee meetings (password-protected homepages) and the publication of reports. There is also a central groupware solution (project and date manager, calendar and address book) (self-evaluation report, p. 26 f.).

### Evaluation

According to the review panel of the Accreditation Council, the agency's financial situation is finally again acceptable after a significant slump in revenue. The experts were initially sceptical about FIBAA's sustained financial strength due to the agency's unsatisfactory

earnings situation for the years 2014 and 2015. However, a consolidation can be seen in the figures for the first half of 2016, in particular due to the considerable reduction in personnel costs. Another determining factor for the consolidation is the (outstanding) assessment of the offered fields of business with respect to their marketability and the associated focus on more profitable offers (see Standard 3.1). For further consolidation, it also seems reasonable for the management to become increasingly involved again in the process of cost estimation and that this is not the responsibility of employees solely on the basis of a 'break-even guideline'.

According to the review panel, the reduction of the personnel costs has not yet led to a reduction in the procedural quality. Even the significant number of personnel changes, in the opinion of the review panel, has not yet had any discernible negative impact. The employees are satisfied with the working conditions and the workload; in particular, the agency has good integration measures. The customers and the experts assigned by the agency are also very satisfied with the project management provided by the head office. The employees are well qualified as proven by their curricula vitae. For that matter, another positive element worth stressing is that FIBAA has been able to recruit top-ranking and outstandingly qualified special representatives in the higher education sector for many years.

The information given by the agency on the activities of the employees from the Consult area in the accreditation and certification area seem plausible. For information on the separation of consultation and accreditation, see Standard 3.1.

The experts were satisfied by the suitability of the spatial resources and IT equipment on-site. However, the employees would like improved access databases. These are not yet equipped for the expansion of the fields of business of FIBAA.

## 25 Recommendations

-None-

### Result:

**Standard 3.5 is substantially fulfilled.**

### 3.6 Internal quality assurance and professional conduct

#### STANDARD:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

**GUIDELINES:**

Agencies need to be accountable to their stakeholders. Therefore, high professional standards and integrity in the agency's work are indispensable. The review and improvement of their activities are ongoing so as to ensure that their services to institutions and society are optimal.

Agencies apply an internal quality assurance policy which is available on its website. This policy

- ensures that all persons involved in its activities are competent
  - and act professionally and ethically;
    - includes internal and external feedback mechanisms that lead
    - to a continuous improvement within the agency;
    - guards against intolerance of any kind or discrimination;
    - outlines the appropriate communication with the relevant
    - authorities of those jurisdictions where they operate;
    - • ensures that any activities carried out and material produced by
    - subcontractors are in line with the ESG, if some or all of the
    - elements in its quality assurance activities are subcontracted to
    - other parties;
    - • allows the agency to establish the status and recognition of the
    - institutions with which it conducts external quality assurance.

**Recommendations/conditions from the previous accreditation**

In 2012, the review panel established that the agency had developed a comprehensive quality concept only in 2011. Although the process flows were therefore well documented, they were still not yet fully implemented in everyday practice. The results of the quality management were not yet available. In order to improve the concept of quality management and the agency's work, the review panel recommended the introduction of additional sources of external feedback. For example, the results of the inspection and monitoring of the Accreditation Council or complaints from higher education institutions should be systematically evaluated. Also, comparisons with national and international good practice were seen as useful for the future development of the agency's own processes. (review report, p. 30)

**Documentation**

FIBAA states that since the last reaccreditation the internal quality assurance measures have been increasingly integrated into working processes and working areas (management – service areas – support areas). This includes defining and updating all business processes in a quality management handbook (QM handbook), the systematic and regular revision of working documents, evaluation of all FIBAA's services as well as the creation and modification of internal checklists and tutorials. Also, in January 2011 the position of Quality Management Officer (QMO), who is responsible for the internal QM, was created (self-evaluation report, p. 27).

The link to the QM handbook was subsequently submitted. It contains process descriptions

for staff processes, management processes, key processes, support processes and activities of FIBAA Consult. The processes associated with the quality assurance in a narrower sense are included in the "staff processes" area. The definition of these processes serves to inform the employees about the intended execution of the tasks and activities so that each process fulfils the specified quality standards and all relevant requirements are observed. In consultation with the people responsible for each area, the QMO compiles and reviews the QM handbook in electronic format using the software ViFlow. The current progress is password protected and can be viewed online by all employees. Its use is seen as a job-related duty (self-evaluation report, p. 28).

Evaluations: According to its own statements, FIBAA evaluates all areas of activity using the people who are involved. The results of the evaluations are summarised in an annual quality management report by the QMO (self-evaluation report, p. 28 f.). The quality reports from 2014 and 2015 are made available on FIBAA's homepage.<sup>16</sup> These include the evaluation of surveys carried out among experts and higher education institutions concerning programme accreditation procedures, the evaluation of expert seminars and FIBAA consult workshops as well as internal key figures on the pool of experts, the number of procedures and the duration of the procedure. According to the agency, the feedback rate could be increased, among other things, through the use of online questionnaires (self-evaluation report, p. 29). According to the quality report from 2015, only the data from the programme accreditation area was evaluated since there was insufficient evaluation data on the other procedures. The results from the evaluations will be used for future development of the respective formats. They will be discussed annually in the committees and reviewed by the relevant divisional management and quality team (division management, management and QMO). If modifications in the process sequences result, these are amended in the QM handbook. If the amendments concern procedural documents, checklists or tutorials, these are also updated accordingly, submitted to the committees for approval and announced in a suitable manner. Those who were affected by the amendments in the processes are addressed directly and obliged to implement the changes in the future (self-evaluation report, p. 29).

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<sup>16</sup>[http://www.fibaa.org/fileadmin/files/folder/Qualitaetsmanagement/QM-Bericht/QM\\_Bericht\\_2015\\_end\\_extern\\_.pdf](http://www.fibaa.org/fileadmin/files/folder/Qualitaetsmanagement/QM-Bericht/QM_Bericht_2015_end_extern_.pdf)

Checklists and templates: In consultation with the management, the division managers create internal checklists and tutorials for the employees as well as external manuals and templates for FIBAA's clients and experts.<sup>17</sup> These are also amended according to changes in processes, new regulations, results from evaluated monitoring procedures by the Accreditation Council, complaint procedures and adjustments to the procedural documents and are therefore always up to date (self-evaluation report, p. 29 f.).

Jour Fixe: A meeting is held once a month for all employees. A fixed item on the agenda is "suggestions for improving internal quality assurance" (self-evaluation report, p. 30).

Other forms of information and communication as well as a platform for suggestions to improve processes include debriefings of committee meetings, workshops for project managers, emails, the information day, which takes place once a year, as well as event-related discussions (self-evaluation report, p. 30).

For the recommendation of the last reaccreditation, the agency (self-evaluation report, p. 5 f.) explains that over the past few years, FIBAA has repeatedly developed, professionalised and put its quality management system to the test and made it the basis of its day-to-day work. Assessment and complaint procedures are also coordinated and evaluated by each division department responsible for their areas and are seen as an opportunity for improvement. Comparisons with good national practice take place through the implementation of corresponding bulletins and resolutions of the Accreditation Council as well as in regular meetings of the accreditation agencies that are approved in Germany. Comparisons with international good practice are achieved, in particular, through participation in international projects, such as the "CeQuInt" project.<sup>18</sup> The knowledge database with detailed country information has been further expanded over the course of the current accreditation period (see Annex 70).

FIBAA's quality principles as well as the procedures and instruments of internal QM are made available on the agency's homepage.

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<sup>17</sup> Please see <http://www.fibaa.org/de/programmbezogene-verfahren/prog-gemaess-den-anforderungen-des-akkreditierungsrates/handreichungen-und-vorlagen.html>

<sup>18</sup> As part of the EU-funded project "CeQuInt", which aims to promote internationalisation in the higher education sector, thirteen pilot projects have been implemented. On the basis of the experience gained at the level of higher education, at faculty and study level, FIBAA also co-developed a criteria catalogue for evaluating internationality.

According to the information provided by the FIBAA on-site, the agency's QM concept has not yet been discussed and adopted in the committees, but this is planned.

Professionalism:

- 5 The experts used by FIBAA Consult must sign a code of conduct that states they must not discriminate "in particular due to ethnic origin, religion and belief, disability, age, sexual identity or gender" (Annex 59).

Committee members, members of the FIBAA Appeals Committee and experts deployed in the area of accreditations and certifications shall sign a declaration that states that they are  
10 obliged, amongst other things,

- to perform their tasks carefully and conscientiously,

- to make decisions as experts solely in accordance with quality aspects in the area of quality assurance at higher education institutions,

- to act and make decisions in good faith and to the best of their ability in the interests of  
15 FIBAA,

- to not use their tasks to pursue their own interests or the interests of third parties and

- to prevent improper use of information obtained as part of their occupation (Annexes 3, 66 and 73).

The employees of FIBAA are also obliged by the current German Equal Treatment Act  
20 (Allgemeines Gleichbehandlungsgesetz) to prevent or eliminate discrimination on grounds of race or ethnic origin, sex, religion or belief, disability, age or sexual identity (self-evaluation report, p. 32).

Commissioning of third parties: In 2006 (amended in 2008), a cooperation agreement was  
25 concluded with the AHPGS and ASIIN accreditation agencies to establish guidelines for programme and system accreditation procedures carried out in joint operation (Annex 97).

A "Lead agency" will be defined for a joint procedure in accordance with this cooperation agreement. Task distributions and guidelines for cooperation are defined. The cooperation agreement states that the contractual obligations of the individual agencies with the Accreditation Council do not change. Until now, procedures of this kind have only been carried out  
30 occasionally; no such cooperation existed in the past reaccreditation period. The rules of the Accreditation Council were observed here (self-evaluation report, p. 61).

## Evaluation

Thanks to the documents provided by the agency and the on-site discussions, the review panel of the Accreditation Council could see that FIBAA has the essential elements of an internal quality management system. The agency has also made a description of the QM system available on its website.

The evaluations of experts and customers (higher education institutions) are well suited for determining a need for change. The questions arising from the published quality reports, which are addressed to experts and higher education institutions as part of the surveys, concern the key aspects of the procedure and the application or evaluation of the criteria. The increase in the feedback rate is also positive.

Also the rest of the feedback loop, for example the Jour Fixe and the evaluation of complaints and of the monitoring of the Accreditation Council, which the agency now performs regularly according to their own statements and in accordance with the recommendation of the review panel from the previous accreditation, can provide useful suggestions.

Unlike for the evaluations, with which the QM handbook shows that conclusions are regularly drawn from points of criticism, there is still no evidence that conclusions are *regularly* drawn from other internal and external feedback. This is because in the QM handbook only processes for the evaluations and the QM report created on its basis are provided.

This also includes evidence of a closed feedback control system for the smaller business fields beyond programme accreditation. The fact that these fields of business are not included in the evaluations due to the low number of procedures is understandable. However, there is no evidence that internal and external feedback on these procedures are otherwise included in the agency's quality management.

The QM concept should, as announced, finally be discussed and adopted in the committees.

Defining the procedure in the QM handbook responsibilities only by means of functions, but not by specific persons, is sufficient if the assignments of the functions to each responsible person are clear.

For the process of registering accredited study programmes in the Accreditation Council's database, see Standard 2.6.

It should be welcomed that the agency has codes of conduct for expert groups and committee members. However, so far, for FIBAA Consult's experts other texts with key focus

areas other than for those working in the areas of accreditation and certification have been used.

5 The cooperation with AHPGS and ASIIN is in accordance with the rules of the Accreditation Council and the ESG.

### Recommendations

The experts issue the following recommendations:

10 5. The agency should guarantee for all fields of business that conclusions are regularly drawn from other internal and external feedback (alongside evaluations). The QM concept should also be adopted by the agency's responsible committees.

6. The different codes of conduct for committee members and expert groups should be adjusted if necessary.

### Result:

**Standard 3.6 is substantially fulfilled.**

15

### 3.7 Cyclical external review of agencies

#### STANDARD:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

#### GUIDELINES:

A periodic external review will help the agency to reflect on its policies and activities. It provides a means for assuring the agency and its stakeholders that it continues to adhere to the principles enshrined in the ESG.

### Recommendations/conditions from the previous accreditation

-None-

### Documentation

20 The FIBAA was first accredited on 13<sup>th</sup> of April 2000 and last reaccredited on 23<sup>rd</sup> of February 2012. The FIBAA applied for renewed accreditation on 11<sup>th</sup> of May 2016.

### Evaluation

With the current procedure of reaccreditation, FIBAA meets the requirement for a regular external assessment contained in ESG Standard 3.7.

## Recommendations

-None-

### Result:

#### 5 **Standard 3.7 is fulfilled.**

#### **2.1 Consideration of internal quality assurance**

##### **STANDARD:**

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

##### **GUIDELINES:**

Quality assurance in higher education is based on the institutions' responsibility for the quality of their programmes and other provision; therefore it is important that external quality assurance recognises and supports institutional responsibility for quality assurance. To ensure the link between internal and external quality assurance, external quality assurance includes consideration of the standards of Part 1. These may be addressed differently, depending on the type of external quality Assurance.

## Recommendations/conditions from the previous accreditation

-None-

#### 10 **Documentation**

The agency has compiled synopses

- for programme accreditations (AR and FIBAA seal) (Annex 12),
- for certification procedures (Annex 51) and
- for institutional procedures (AR and FIBAA seal) (Annex 33)

15 in order to demonstrate that Part 1 of the ESG was considered part of the respective procedures.

20 For evaluation procedures, the subject and the goals of the evaluation as well as the specific criteria are determined by the client together with FIBAA Consult according to the individual objective of the procedure. A detailed comparison of the specific criteria for the evaluation and the ESG standards is therefore not possible. There is also an exemplary Question and Assessment Guide for this purpose (QAG EVAL, see Annex 58). According to the agency, this is amended by FIBAA Consult project management in consultation with the higher education institution and the experts depending on the procedure. The essential phases of an evaluation and the criteria or standards of the ESG are considered here

in analogous application in accordance with the evaluation object and the respective objective of the evaluation (self-evaluation report, p. 33). As part of the site visit, the agency added that only such assignments are accepted for carrying out evaluations that concern  
5 the area of teaching and learning.

### Evaluation

With regard to the programme and system accreditation with Accreditation Council's seal, there is no need for a detailed examination of the enclosed synopses. This is because these procedures comply with the "Rules for the Accreditation of Study programmes and for System Accreditation" of the Accreditation Council, which are oriented by the version of the  
10 ESG from 2005. The Accreditation Council is currently revising the rules while taking the version agreed on in 2015 into consideration. Hence a number of points from Part 1 of the ESG from the previous version can also be found in the current version in some form or other, implementation can already be established for a considerable number of standards  
15 of Part 1.<sup>19</sup>

For the accreditation procedures in accordance with FIBAA's quality requirements as well as the Certification of Continuing Education Courses, the way in which Standards 1.1 – 1.10 are implemented in the criteria of the agency understandably develops from the synopses.

With regard to the evaluation procedures, it can be assumed that the standards from Part 1  
20 of the ESG are, at least substantially test subject.

### Recommendations

-None-

### Result:

**Standard 2.1 is fulfilled.**

25

### 2.2 Designing methodologies fit for purpose

#### STANDARD:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

<sup>19</sup> See Mapping ESG-AR criteria in the Annex for this evaluation.

**GUIDELINES:**

In order to ensure effectiveness and objectivity it is vital for external quality assurance to have clear aims agreed by stakeholders.

The aims, objectives and implementation of the processes will

- bear in mind the level of workload and cost that they will place on institutions;
- take into account the need to support institutions to improve quality;
- allow institutions to demonstrate this improvement;
- result in clear information on the outcomes and the follow-up.

The system for external quality assurance might operate in a more flexible way if institutions are able to demonstrate the effectiveness of their own internal quality assurance.

**Recommendations/conditions from the previous accreditation**

-None-

**Documentation**

5 FIBAA has manuals for all procedures (Annexes 5, 6, 24, 25, 26, 27, 48 and 57). These describe the objectives of the various procedures.

10 According to these objectives, the aim of programme accreditation (AR seal) is to ensure compliance with the guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder, country-specific requirements and the rules of the Accreditation Council via all relevant study programmes at German higher education institutions, and therefore to facilitate the recognition of academic achievements and student mobility. In addition, accreditation also serves to ensure transparency in the quality of the study programmes for the interested public (see Annex 5, p. 4).

15 The aim of the programme accreditation procedures and certification procedures according to FIBAA's standards is to provide the higher education institution with incentives and instruments for the development of their study programmes through evaluation in accordance with international quality criteria, as well as the possibility of awarding a premium seal and summary of the results in a quality profile (see Annex 6, p. 4 and Annex 48, p 4). The relevant bases of decision making here are the ESG, the ECTS Users' Guide, the Dublin Descriptors, the MBA Guidelines, the Lisbon Convention, the Qualifications Framework for  
20 European Higher Education Area (for programme accreditation provided there is no relevant national qualification framework), European Qualifications Framework for Lifelong Learning (for certification of training programmes) as well as national regulations, if necessary (self-evaluation report, p. 34f.). The basis for decision making develops from the respective collections of documents (Annexes 8 and 49).

25 The system accreditation procedure (AC seal) examines whether the internal quality assurance system set out by the higher education institution guarantees that the offered study

programmes consistently meet the relevant quality requirements of the German Accreditation Council for the entire duration of the accreditation. In the case of successful system accreditation there is no need for the accreditation of individually offered bachelor and master study programmes to be performed by an external accreditation agency for the entire accreditation period: The study programmes that are set up in accordance with the requirements of the accredited quality assurance system, or that have already undergone the internal quality assurance process, are regarded as accredited (see manual in Annex 24).

The Institutional Audit Austria aims to provide evidence that a higher education institution is successfully taking on the institutional responsibility for quality assurance and development in the areas of learning, research and organisation with the aid of an institution-wide quality management system. The audit is also intended to support higher education institutions with the development of their internal quality management. In addition to the ESG, the requirements of the Austrian HS-QSG are taken into consideration in the Requirements and Assessment Guide (RAG) (see manual in Annex 25 as well as RAG in Annex 30).

The "Institutional Accreditation" procedure aims to provide a comprehensive review of the functional capability of the management and quality management system of a higher education institution and the associated processes of its various service areas, including research and administration (see Annex 27). This procedure may be carried out at any higher education institution, regardless of their place of establishment. However, as a result of thematic overlapping with the German and Austrian national procedures, the procedure is primarily intended for higher education institutions in other countries (self-evaluation report, p. 36).

In the "Institutional Accreditation: Strategic Management" procedure, the strategic planning of the higher education institution is evaluated with regard to all service areas (manual in Annex 26). The higher education institutions receive feedback on their structures and processes beyond the status quo as well as incentives with regard to their specific development possibilities. The procedure can be carried out at higher education institutions that have already successfully completed one of the other institutional procedures. Furthermore, it can be carried out at any higher education institution regardless of their place of establishment (self-evaluation report, p. 36).

In addition to formal requirements, the higher education institutions are also asked in all of FIBAA's quality assurance procedures to describe and evaluate their respective individual objectives at the level of higher education study programmes or courses. All procedures

stated take the principles of "fitness of purpose" and "fitness for purpose" into account (self-evaluation report, p. 37).

5 The purpose of the premium seal, which FIBAA awards in addition to the "normal" quality seal in all accreditation and certification procedures in its competence area, is to provide visualisation of excellent quality.<sup>20</sup>

10 On the one hand, the evaluation procedures are intended to contribute to success control and therefore to reporting, and on the other hand, to set incentives for quality development. Evaluation procedures in accordance with individual objectives are planned together with the customers. They determine what is to be evaluated and what aims are to be pursued with the evaluation procedure. FIBAA Consult's evaluation procedure can concern the quality of teaching and learning in an institution or a sub-unit; it may involve subjects and departments, consider study programmes, courses or individual learning units, or be thematically focussed on specific features (see manual in Annex 57).

15 The evaluation procedure includes relevant requirements, which are defined together depending on the subject of the evaluation and the location of the institution, for example:

- for Germany, the requirements of the Accreditation Council and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder as well as country-specific regulations if necessary;
- 20 • for Bologna signatory states, the European directives and recommendations, if necessary under consideration of national regulations (see manual in Annex 57).

Depending on the objective, the evaluation procedure could also serve as a preparation for an accreditation procedure. The ESG are also used as a basis in the evaluation procedure (self-evaluation report, p. 35).

25 According to the agency, the development and further development of the accreditation and certification procedures as well as the Institutional Audit Austria<sup>21</sup> are carried out in their committees (self-evaluation report p. 37), in which the relevant interest groups (science, professional practice, students) are represented (see appointment regulation in Annex 95;

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<sup>20</sup> <http://www.fibaa.org/en/procedures-at-programme-level/prog-according-to-fibaa-quality-standards/quality-seals.html>

<sup>21</sup> The RAG in the Institutional Audit Austria procedure was last adopted in May 2015 in an updated version by the F-AC INST (self-evaluation report, p. 51).

although only available as a draft until now).

5 In the FIBAA Consult's evaluation procedure, further development of the QAC should take place by project management in consultation and cooperation with the higher education institution and expert team as a result of the individual adjustment and structuring of the procedure in accordance with the pursued objective of the higher education institution for each procedure, in order for all relevant interest groups to be involved in the structuring of the procedure (self-evaluation report, p. 37).

### Evaluation

10 The agency's procedures appear to be well suited to achieve their respective objectives. The national requirements are observed when carrying out programme and system accreditation procedures in the sphere of competence of the Accreditation Council. After the agency's compelling presentation during the site visit, this is also the case for international procedures and does not contradict the observance of the ESG. Due to the fact that the  
15 agency is particularly active in this area, the focus was on the agency's activities in Kazakhstan. It was stated by the agency that Kazakhstan has also accepted the requirements of the ESG and other Bologna instruments. Higher education institutions are very interested in western accreditation. Only higher education institutions that meet the requirements are accredited there. Problems concerning the observance of the Bologna rules arose only in  
20 the case of the accreditation of series of study programmes at the [...] University. In this case, the FIBAA seal is only awarded once all requirements have been fulfilled.

For the accreditation and certification procedures as well as Institutional Audit Austria, the involvement of the relevant stakeholders is ensured by the respective committees. However, the appointment regulation should still be adopted. Due to the participation of the  
25 experts in the structuring of the evaluation procedures, all interested parties are also involved here.

### Recommendations

The review panel issues the following recommendation:

7. FIBAA should adopt the rules of appointment.

30 **Result:**

**Standard 2.2 is substantially fulfilled.**

## 2.3 Implementing processes

### STANDARD:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include

- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow-up.

### GUIDELINES:

External quality assurance carried out professionally, consistently and transparently ensures its acceptance and impact.

Depending on the design of the external quality assurance system, the institution provides the basis for the external quality assurance through a self-assessment or by collecting other material including

supporting evidence. The written documentation is normally complemented by interviews with stakeholders during a site visit. The findings of the assessment are summarised in a report (cf. Standard 2.5) written by a group of external experts (cf. Standard 2.4).

External quality assurance does not end with the report by the experts. The report provides clear guidance for institutional action. Agencies have a consistent follow-up process for considering the action taken by the institution. The nature of the follow-up will depend on the design of the external quality assurance.

### Recommendations/conditions from the previous accreditation

-None-

### Documentation

5 The agency provides information on the outline of all the procedures it offers on its homepage.<sup>22</sup>

10 The agency also provides manuals for higher education institutions (Annexes 5, 6, 24, 25, 26, 27, 48, 57), templates for site visit plans (Annexes 14, 15, 35, 36, 37, 38, 53) and for experts (Annexes 16, 39, 54, 60), collections of documents (Annexes 7, 8, 28, 49) and model contracts (Annexes 17, 18, 40, 41, 55, 61, as well as the subsequently submitted Annex N 12, the model contract for the procedures “Institutional Accreditation: Strategic Management” and “Institutional Accreditation”).

All of FIBAA’s external quality assurance procedures generally consist of

- the self-evaluation report in which the higher education institution or institution describe itself in accordance with the pre-defined and published standards and in accordance with the respective QAG / RAG for the procedure itself,
- 15

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<sup>22</sup> For example, see <http://www.fibaa.org/en/procedures-at-programme-level/prog-according-to-fibaa-quality-standards/procedural-steps.html>

- the subsequent site visit in the peer-review procedure,
- the decision by the responsible FIBAA accreditation or certification committee on the basis of the report and statement from the higher education institution (this is not however the case for FIBAA Consult evaluation procedure, which does not involve a formal decision),
- the subsequent complete publication of the report on FIBAA's homepage, regardless of whether it concerns a positive or negative decision, and in the case where an Accreditation Council's seal is awarded, the publication in the "Higher Education Compass" as well as
- a consistent follow-up in the form of the review of the fulfilment of conditions and continuous monitoring based on the contractually regulated disclosure requirement of the higher education institution in the case of subsequent amendments. In addition, all quality assurance procedures are limited in time and require reaccreditation, recertification and reevaluation after regulated and published time periods. For a first-time system accreditation, an interim evaluation is planned as an additional follow-up in accordance with the rules of the Accreditation Council (self-evaluation report, p. 38).

Evaluation procedures also involve the use of experts (including relevant stakeholders, therefore also students and representatives of professional practice), a site visit and the publication of a report (see manual in Annex 57). This was confirmed on-site by the agency representatives. Depending on the subject and results of the evaluation, a time period is proposed by the experts after which a follow-up, i.e. a reevaluation procedure, is to be carried out. The follow-up is used to evaluate the implementation of the recommendations and establish further development. In addition, a follow-up promotes the future development of the subject of evaluation and provides further external incentives based on the current state of academics, professional practice, didactics, etc. (see manual in Annex 57, p. 8). Also in the model contract for evaluation procedures, higher education institutions are recommended to carry out a new evaluation after the period specified in the final report (Annex 61, § 11).

The self-evaluation report shows that in the case of a programme accreditation procedure to award the FIBAA seal, which is subsequent to a procedure for awarding the Accreditation Council's seal (implementation of the so-called 'seal resolution' of the Accreditation Council dated 23<sup>rd</sup> of September 2011), a site visit is not absolutely necessary, but a conference call may be sufficient (self-evaluation report, p. 68).

With respect to the issue raised in the Accreditation Council's progress report regarding the view of the agency on dual study programmes (see p. 5), the agency explains (in the self-evaluation report, p. 63 f.), despite the whole diversity of models of dual study programmes, which are possible as a result of the criteria for study programmes with a special profile requirement of the Accreditation Council, the core of the dual study programmes is a successful interplay between the two learning locations, that is the higher education institution and the company. In addition to the regular rules, FIBAA takes this into consideration in the accreditation for each procedure (in particular with consideration of the principles of the academic feasibility and the academic level of the higher education institution). For that reason, when assessing dual study programmes, FIBAA always extends the expert team by one expert with corresponding expertise in dual study programme models. In the future, a manual will also be made available to all experts for this study model (Annex 69). FIBAA carried out a training course for experts on this subject matter (see overview of the topics of training courses for experts in Annex 64) and published a professional article (Annex 98) and a workshop report (Annex 62) on the specifics of dual study programmes. The assessment of dual study programmes was also discussed during the course of the site visit. The opinion of the agency is that the question as to whether the quality requirements are fulfilled is more important than the question of wording. However, the name must correspond to the course's content. The key questions are whether the learning locations are integrated and whether transparent contractual regulations exist. FIBAA states that it follows the recommendations of the German Accreditation Council on the topic.

The agency also makes reference to the following measures to react to the potential tension between a thorough assessment and a limited time and resource budget, which was addressed in the progress report:

- limitation of the study programmes in the case of cluster accreditation to four, in general;
- procedural documents and manuals for all types of procedures;
- formal preliminary assessment carried out by the project manager;
- preparation of background information by the FIBAA's head office for special study programme models;
- preparation of unanswered questions by the experts before the site visit;
- communication of project managers amongst each other by means of formats such as Jour Fixes;
- workshops and event-related meetings;

- correction loops by the respective divisional management according to the ‘four eyes principle’;
  - removal of redundancies in the QAG (see ESG Standard 2.5);
- 5
- comprehensive training of employees;
  - as well as clear processes defined by the internal QM (self-evaluation report, p. 65).

### Evaluation

For all types of procedures, FIBAA has predefined procedures which have also been published. A four-step procedure within the context of the ESG is provided for all procedures.

- 10 It is understandable that a site visit is not necessary in the case of a subsequent programme accreditation procedure for awarding the FIBAA seal, which has been carried out in accordance with the requirements of the Accreditation Council’s seal resolution. This is because in this case, a site visit has taken place during the Accreditation Council procedure. The findings gathered here can be used in the subsequent procedure to obtain the FIBAA seal.

- 15 Follow-up processes are carried out in the accreditation and certification procedures as well as with the Institutional Audit Austria as a result of conditions and recommendations. It is understandable that the follow-up in evaluation procedures is of course less formal.

The statements concerning the understanding of the agency and the handling of dual study programmes appears professional and appropriate.

- 20 The agency's statement on how to deal with the conflict between a thorough assessment and a limited time and resource budget is also quite understandable. For the publication of the report in the case of Institutional Audit Austria, see Standard 2.6.

### Recommendations

-None-

- 25 **Result:**

**Standard 2.3 is fulfilled.**

### 2.4 Peer-review experts

#### STANDARD:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

#### GUIDELINES:

At the core of external quality assurance is the wide range of expertise provided by peer experts, who

contribute to the work of the agency through input from various perspectives, including those of institutions, academics, students and employers/professional practitioners.

In order to ensure the value and consistency of the work of the experts, they

- are carefully selected;
- have appropriate skills and are competent to perform their task;
- are supported by appropriate training and/or briefing.

The agency ensures the independence of the experts by implementing a mechanism of no-conflict-of-interest.

The involvement of international experts in external quality assurance, for example as members of peer panels, is desirable as it adds a further dimension to the development and implementation of processes.

### Recommendation/conditions from the previous accreditation

-None-

### Documentation

- 5 *Selection and appointment of experts:* According to the agency (self-evaluation report, p. 39), experts apply either speculatively or in response to a call for tender. According to the information in Annex 1, the agency management also suggests experts. Applications are made using a presentation sheet (Annex 65). Experts are initially appointed by the management to a probationary period. If both parties are satisfied following the expert's initial
- 10 assignments, the experts are appointed by the respective FIBAA accreditation or certification committee (information from the agency's website).<sup>23</sup>

Overall (as of June 2016), 408 experts and 189 experts on probation were registered in the expert pool for programme accreditation, the expert pool for institutional procedures contained 94 experts. Based on previous experience, the agency does not consider a special

15 expert pool for certification procedures necessary. Experts who have previously been appointed to programme accreditation procedures and also have experience in the further education segment are marked accordingly and can be found in the database. In 2015, 47

20 experts left and 35 joined. The division management for experts conducts requirement analyses at regular intervals; in addition, they receive feedback from Project Support, the central office for expert recruitment and team appointment, as to which areas require additional support (self-evaluation report, p. 46). Due to requests from the review panel of the Accreditation Council during the site visit, lists of the people in the expert pool for institutional procedures were subsequently submitted, differentiated between appointed experts and those

<sup>23</sup> <http://www.fibaa.org/en/information-for-fibaa-experts/criteria-for-appointing-fibaa-experts.html>

who have already worked on assignments (Annexes N 13 and N 14), in addition to a list of committee members that are also employed as experts (Annex N 15). The list shows that the majority of committee members are also employed as experts by FIBAA. The agency explained that this is welcomed for it allows the committee members to perform their duties, particularly the development and revision of the question and assessment guide, using experience as a basis.

*Qualification:* According to the criteria published on the agency's homepage<sup>24</sup>, academic representatives in programme accreditation and certification procedures must have sufficient academic expertise in the respective specialist core areas (in economics, social sciences, law) and, as a general rule, must have several years of experience in teaching and research in higher education or continuing education institutions. Academic representatives in institutional procedures must have academic competence and leadership experience in higher education management.

Representatives of professional practice in programme accreditation and certification procedures must have managerial experience. Representatives of professional practice in institutional procedures must have experience with the introduction or the application of quality management systems in professional practice.

Representatives from the student body in programme accreditation procedures must demonstrate relevant specialist studies (in economics, social sciences or law). In addition, student experts should work in university committees or should have done so in the past. Student representatives in institutional procedures must already have experience in accreditation procedures.

In addition, desired further qualifications are described for all groups, for example experience with accreditation, evaluation or certification procedures for academic representatives and representatives of professional practice.

In evaluation procedures, the criteria for experts in the three status groups correspond to those in programme or institutional procedures (self-evaluation report, p. 42). The criteria are published on the FIBAA Consult web pages.<sup>25</sup>

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<sup>24</sup> <http://www.fibaa.org/en/information-for-fibaa-experts/criteria-for-appointing-fibaa-experts.html>

<sup>25</sup> [http://www.fibaa.org/fileadmin/files/folder/FIBAA\\_Consult/Info-Material/Kriterien\\_Experten\\_FIBAA\\_Consult\\_en.pdf](http://www.fibaa.org/fileadmin/files/folder/FIBAA_Consult/Info-Material/Kriterien_Experten_FIBAA_Consult_en.pdf)

*Composition of the individual expert groups:* The composition of the expert groups is organised by a central responsible employee using a so-called expert team sheet (template in Annex 68). In this way, in addition to considering the qualifications of the experts, FIBAA acts in accordance with the following standards:<sup>26</sup>

- In programme accreditation and certification procedures, one representative from a university, one from a university of applied science, one from professional practice and one from the student body is appointed. In addition, other experts are appointed, for example for dual study programmes or country experts. In the past, student experts have admittedly not regularly participated in certification procedures because it has proven difficult to recruit students taking part in continuing education, since these students frequently work and are often employed full-time. Now, however, student experts are always involved in certification procedures (see self-evaluation report, p. 47). The draft review report submitted subsequently for a certification procedure includes a student representative (in Annex N 16).<sup>27</sup>
- In institutional procedures, three representatives from universities or universities of applied science are selected in addition to one representative from professional practice and one student representative. In system accreditation, a foreign expert is added to this; in Institutional Audit procedures in Austria, two experts from Austria are also involved; and in Institutional Accreditation Procedures and Institutional Accreditation: Strategic Management Procedures at least one expert from the country of the university/higher education institution is also involved.

Furthermore, FIBAA takes the following criteria into account when appointing the expert teams:

- Internationality (e.g. for institutional procedures, inclusion of one foreign expert is necessary)
- Balanced representation of genders
- Use of a maximum of one expert on probation per team
- Avoidance of use of several experts from the same higher education institution

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<sup>26</sup> The following rules are taken from a table contained in the expert information sheet (Annex 63, p. 5) and in the self-evaluation report (p. 43).

<sup>27</sup> In this subsequently filed document, FIBAA states that, recently, only this one certification procedure has been implemented.

- For Germany: no expert should come from the same state as the applying higher education institution
- Abroad: at least one expert must have expertise regarding the national higher education and accreditation system as well as, if necessary, the required language skills
- Profile-specific distinctions (e.g. additional expert knowledge for dual study programmes, distance learning study programmes etc.)

During the site visit it was explained that, for procedures in Kazakhstan, a national expert is always involved. This expert is suggested by one of the two Kazakh agencies.

10 The team sheet is presented to the FIBAA Panel Appointing Committee in all accreditation procedures and in the case of an institutional audit procedure in Austria. The relevant committees have delegated responsibility for appointing the expert groups to these Panel Appointing Committee. They are composed of one representative each from academia, professional practice and the student body (see rules of procedures of the F-AC PROG in the document filed subsequently N 3 as well as the F-AC INST, draft version only, in Annex 15 21).<sup>28</sup> In certification procedures, the F-CC is itself responsible for appointing the expert groups (see rules of procedure in Annex 45, also only as draft).

In evaluation procedures FIBAA Consult, as a general rule, also involves representatives from academia, professional practice and the student body. The concrete composition of the team varies depending on the objectives of the evaluation (self-evaluation report, p. 42).

*Preparation:* FIBAA offers online trainings and presence Expert workshops. The online training courses provide basic knowledge on procedures and assessment criteria. Expert workshops provide information in first part on updates and changes in FIBAA and in accreditation practice. In the second part, a focal topic is addressed (according to information on the agency's homepage<sup>29</sup> as well as the presentation in the self-evaluation report, p. 45). Online trainings have been developed as an asynchronous offer. With this format, however,

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<sup>28</sup> Expert committees were appointed in response to a recommendation for conditions from the previous reaccreditation of the agency in order to guarantee the involvement of all status groups in the selection of expert groups. The recommendation of the condition was therefore no longer necessary, see the resolution by the Accreditation Council on the reaccreditation of the agency. [http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/Agenturen/en/FIBAA\\_Akkreditierung\\_Beschluss\\_en.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/Agenturen/en/FIBAA_Akkreditierung_Beschluss_en.pdf)

<sup>29</sup> <http://www.fibaa.org/en/information-for-fibaa-experts/training-for-fibaa-experts.html>

the fact that there is no option for direct questions is difficult. Therefore, a transition to synchronous online events was planned in 2016 (self-evaluation report p. 45). In the internal area of FIBAA's homepage, online trainings are available on programme accreditation procedures (AC seal), on the criteria of the Accreditation Council for programme accreditation and on dual study programmes. According to the information on the homepage, two presence seminars were held in 2015 (on the topics institutional procedures and dual study programmes) and two such seminars were also offered in 2016. The first seminar in 2016 was concerned with franchise study programmes. In the internal area, it is possible to download the presentations used during the Expert workshops held in recent years. However, one of the two presentations on training for institutional procedures is not available.

In addition, FIBAA publishes the expert newsletter "FIBAA Expert" (see Annex 71 and the explanations regarding Standard 3.4). According to the information provided in the documentation subsequently filed, this is sent to everyone in the expert pool. In addition, experts are provided with manuals where needed (see Annexes 69 and 70 as examples). The experts are prepared for the specific quality assurance procedures in that they are sent the higher education institution's self-documentation, in addition to all relevant documents and information regarding the procedure, at an early stage. In principle, the project managers ask all experts involved for feedback on the draft process schedule for the site visit and on potentially critical points as well as request a preliminary team discussion by email as appropriate preparation. As a general rule, a group dinner is also held with a preliminary discussion on the evening before the site visit for the purpose of preparation. All documentation that is relevant for the experts is also available on FIBAA's homepage (self-evaluation report, p. 46).

The agency subsequently filed the participant list for the presence seminars (Annex N 17). According to information provided by the agency, 170 experts have taken part in the seminars. This corresponds to around 42 percent of the experts appointed. In addition, in August 2014 and October 2016, workshops were conducted for over 80 potential experts in Kazakhstan together with IAAR (Kazakhstan - Agency for Accreditation Rating). These principally served as preparation for potential new procedures. There are no figures available concerning the use of online training courses. Nonetheless, the project managers refer to these as standard in their first mailing with an expert team. Finally, the newsletter "FIBAA Expert" is sent to everyone in the expert pool.

*Evaluation:* A standardised evaluation form for the evaluation of experts completed by the project manager exists (see Annex 79 and the explanations regarding Standard 3.6.) Each

project manager evaluates their expert team after each procedure. The evaluation results are collected and assessed by the division management for the expert management. The purpose of the evaluation is early detection of a need for discussion or training. If an expert is given a mark of 3 or lower in the point “Knowledge of accreditation practice” in two or more procedures, they are requested to take part in an (online) training or a workshop before their next appointment. If an expert is given a mark of 3 or lower in the other assessment points in two or more procedures, the division head for expert management discusses those points with the expert and decides on measures where appropriate, for example, participation in a training or probationary status in their next procedure.

*Impartiality and independence:* The agency possesses declarations of impartiality (Annexes 67 and 59), which the experts must sign in all procedures (self-evaluation report p. 44).

### **Evaluation**

The procedures for selecting and appointing experts are largely transparent. Following the result of the site visit, the management’s right to make suggestions plays no role in practice. The qualification criteria for experts appear suitable for recruiting competent experts. The expert pool for institutional procedures contains individuals who have proven themselves in higher education institution management and leadership.

Appointing the same persons in committees and expert groups is understandable insofar as this allows the committees to benefit from the practical experience of its members in accreditation and certification procedures. The independence of the decision is then guaranteed if the agency’s internal regulations, according to which committee members involved in the procedure as experts have no voting rights (see Standard 3.3 regarding this), are consistently applied. The Accreditation Council’s review panel likewise assumes that any abstentions are marked in the minutes and that it is observed, that no more than one member of the expert group is a member of a committee at the same time.

During the site visit, the fact that the agency does not use the (German) student accreditation pool was discussed. The reason given for this measure, which was comprehensible, was that the agency itself is well-networked and requires student experts that are familiar with the practices of the FIBAA. Nonetheless, the review panel suggests the agency may consider using this pool as other agencies have had positive experiences with it.

The procedure for composing the individual expert teams is conclusive and conforms to ESG 2.4. In the accreditation and evaluation procedures, representatives from academia,

professional practice and the student body are appointed (in relation to the evaluation procedures see Standard 2.3). The fact that the agency now also involves student representatives in certification procedures is welcomed.

- 5 The involvement of national experts in procedures in Kazakhstan is appropriate, in order to observe the national regulations and practices. By training the Kazakh experts, FIBAA is able to ensure that the national experts are familiar with the requirements for procedures in line with the ESG standards.

- 10 The fact that a high proportion of the experts have completed presence workshops is welcomed. The development of online tools for preparing experts can also be conducive to good practice. After inspection of the tools, they appear to be prepared in a very professional way. The other sources of information offered by the agency (in particular the newsletter and manuals) appear to be appropriate.

- 15 The review panel welcomes the fact that the practice of holding a dinner with the expert group and representatives from the high education institution, which was criticised during the previous reaccreditation of the agency (see review report from 2012, p14), has been phased out based on the results of the visit.

The evaluation of experts conducted by the agency can also be helpful to good practice.

- 20 The independence of experts is ensured through the declaration of impartiality used in all procedures and the clear rules contained therein.

Regarding the feedback from experts before the site visit, see para. 3.1 of the additional German criteria.

### Recommendations

-None-

- 25 **Result:**

**Standard 2.4 is fulfilled.**

### 2.5 Criteria for outcomes

#### STANDARD:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

**GUIDELINES:**

External quality assurance and in particular its outcomes have a significant impact on institutions and programmes that are evaluated and judged.

In the interests of equity and reliability, outcomes of external quality assurance are based on pre-defined and published criteria, which are interpreted consistently and are evidence-based. Depending on the external quality assurance system, outcomes may take different forms, for example, recommendations, judgements or formal decisions.

**Recommendations/conditions from the previous accreditation**

The following recommendation was issued:

FIBAA should establish greater transparency with regard to the criteria and regulations for awarding the FIBAA premium seal.

**5 Documentation**

The criteria for the accreditation and certification procedures, as for the institutional audit procedures in Austria, are contained in separate question and assessment guides (QAGs or RAG for the audit) (Annexes 9, 10, 11, 29, 30, 31, 32, 50). They are all published on the agency's homepage<sup>30</sup> and are made available to the expert groups and to the higher education institutions when the procedures are initiated (self-evaluation report, p. 48).

The transparency of the requirements for the premium seal was not only subject of a recommendation in the agency's previous reaccreditation, but was also a "flagged issue" from EQAR. In response, FIBAA published the following information on its homepage:<sup>31</sup>

- To be awarded the premium seal, the higher education institutions must meet special requirements in all review areas relevant to the respective procedure.
- The premium seal can only be awarded to study programmes and institutions that are already established in the market. The premium seal is not awarded if the accreditation or certification is issued with conditions. If the conditions are met and the basic requirements are fulfilled, the premium seal is awarded retrospectively.
- First, each assessment criterion is given points between 1 and 4. The score for the test criteria is guided by the question of which aspects of the study programme are

<sup>30</sup> E.g. the QAG for programme accreditation according to FIBAA standards under: [http://www.fibaa.org/uploads/media/151127\\_AG\\_FIBAA\\_english.pdf](http://www.fibaa.org/uploads/media/151127_AG_FIBAA_english.pdf)

<sup>31</sup> [http://www.fibaa.org/fileadmin/files/folder/PROG/2017\\_Premium\\_PROG\\_en.pdf](http://www.fibaa.org/fileadmin/files/folder/PROG/2017_Premium_PROG_en.pdf); [http://www.fibaa.org/fileadmin/files/folder/Institutionelle\\_Verfahren/Institutional\\_Accreditation/2017\\_Premium\\_INST\\_InstAccr\\_en.pdf](http://www.fibaa.org/fileadmin/files/folder/Institutionelle_Verfahren/Institutional_Accreditation/2017_Premium_INST_InstAccr_en.pdf)

- key to the acquisition of professional skills (programme accreditation) or which aspects are key for a functional and effective system.
- The score is multiplied by a defined factor depending on the expert's assessment. The weighting for the assessment levels is defined as follows: for the assessment "Excellent", the score is multiplied by the factor 3, for "Quality requirements exceeded" the score is multiplied by the factor 2, for "Quality requirements met" the score is multiplied by the factor 1, and for "Quality requirements not met" the score is multiplied by the factor -2.
- Since all core areas are important, the awarding of the premium seal is linked to the fact that the score set as a benchmark by FIBAA is at least achieved in each core area. Based on previous experience, the assessment "Excellent" is achieved only occasionally. Therefore the 100% mark is set at "Quality requirements exceeded".
- The premium seal requires at least 60 percent (programme accreditation) or 80 percent (institutional procedures) in each of the core areas.
- In programme accreditation procedures, FIBAA specifies the additional requirement that 65 percent of the possible total score is achieved.

FIBAA also submits internal calculation tables (see Annexes 13, 34 and 52).

In compliance with recommendations from the previous accreditation, the agency now uses consistent QAGs for expert groups and higher education institutions in which the assessments levels "quality requirements met" and "quality requirements exceeded" are disclosed<sup>32</sup> (see Annexes 10, 11, 30, 31, 32, 50). Since this change in 2014, higher education institutions are better able to emphasize their strengths. As a result the premium seal tends to be awarded more often. This must be monitored in order to avoid a possible devaluation of the premium seal. The agency has deliberately yet not specified any quality standards for the assessment level "Excellent". This is due to the fact that excellence is characterized precisely by the fact that it is largely individual. A specified standard would limit the focus of the experts and higher education institutions too much in their description and assessment and would restrict the higher education institutions in developing innovative ideas. The expert's assessment (regarding all quality levels) is always justified in the review report, with the result that the assessment is always understandable for the higher education institution

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<sup>32</sup> Previously, a distinction was made between QAGs for expert groups and higher education institutions and the assessment level "Quality requirement exceeded" was only shown in the QAG for the expert groups.

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and interested third parties (self-evaluation report, p. 7).

A published<sup>33</sup> QAG is also available for evaluation procedures by FIBAA Consult. FIBAA does, however, state that although the ESGs are applicable to individual and voluntary procedures, they might set too strict of a framework that could limit the intended quality developments in the higher education institutions. This is due to the fact that in an individual procedure transparency can only be established to a limited degree before the start of the procedure. The framework conditions for the review (such as the basic procedure outline and the assessment levels) can be published. However, it is not possible to publish the review areas and criteria in advance, as they are only developed together with the institution and are dependent on the respective subject of the evaluation (self-evaluation report p. 35). Accordingly, the QAG for evaluation procedures indicate that review criteria and indicators are different depending on the focus of the respective evaluation procedures and are discussed individually with the institution (see Annex 58).

According to information provided by FIBAA, consistent application is ensured through comprehensive introductory training, the exclusive use of experienced employees in institutional procedures, accompaniment of the site visit by the project manager and the creation of review reports based on report templates (self-evaluation report, p. 49).

FIBAA also provides information on revisions of the QAGs. In 2014, redundant content was removed from the QAGs for programme accreditation resulting in a streamlining of the procedures. The QAGs for presence study programmes and online study programmes, which were previously separate, have also been merged. According to information by the agency, with this revision, the rule that accreditation is denied if more than seven asterisk criteria<sup>34</sup> or at least one of the criteria 1.1 (Objective of the study programme) and 3.1.1. (Logic and coherence of the curriculum) are not met has also been included in the QAG for programme accreditation in the context of this revision (see Annex 10 and self-evaluation report, p. 49 et seq.). The question and assessment guide for system accreditation (AC seal), Institutional Audit Austria and Institutional Accreditation: Strategic Management have been revised in recent years, particularly editorially, on the basis of the experience of the expert

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<sup>33</sup> [http://www.fibaa.org/fileadmin/files/folder/FIBAA\\_Consult/Info-Material/FBK\\_Evaluation\\_EN.pdf](http://www.fibaa.org/fileadmin/files/folder/FIBAA_Consult/Info-Material/FBK_Evaluation_EN.pdf)

<sup>34</sup> These criteria are considered particularly important and are designated as such. If asterisk criteria are not met this automatically results in a condition, whereas non-compliance with a criterion that is not an asterisk criteria only results in a recommendation. Up until now there has been no upper limit for asterisk criteria.

teams and the project managers. The QAG for the accreditation of doctoral/PhD study programmes will not be revised until further procedures of this kind have been conducted. In the area of certification, streamlining of the QAGs is planned for 2017 /18 as the criteria used to date are strongly orientated towards the QAG for FIBAA programme accreditation and have proven partly irrelevant for certifications (self-evaluation report, p.49 et seq.).

### Evaluation

The criteria for the procedures offered by the agency are defined and published in advance.

The procedure of awarding the premium seal is not yet transparent enough for external parties (in particular the higher education institutions) in spite of the improvements made by the agency, as it is not possible to determine how the criteria are weighted on the scale of 1 to 4 specified by the agency. During the site visit, representatives of higher education institutions confirmed that although they did have some indications as to whether the premium seal would be achievable for them, they had not received any information regarding the precise calculation methods.

The argumentation given by the agency for case-by-case adjustment of the assessment criteria in evaluation procedures is conclusive.

The measures presented by the agency for ensuring consistency as well as the regular revision of the criteria can have a positive impact on quality assurance.

### Recommendations

The review panel issues the following recommendation:

8. The agency should publish the weighting of criteria for awarding the premium seal.

### Result:

**Standard 2.5 is substantially fulfilled.**

### 2.6 Reporting

#### STANDARD:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

#### GUIDELINES:

The report by the experts is the basis for the institution's follow-up action of the external evaluation and it provides information to society regarding the activities of an institution. In order for the report to be used as the basis for action to be taken, it needs to be clear and concise in its structure and language and to cover

- context description (to help locate the higher education institution in its specific context);
- description of the individual procedure, including experts involved;

- evidence, analysis and findings;
- conclusions;
- features of good practice, demonstrated by the institution;
- recommendations for follow-up action.

The preparation of a summary report may be useful.

The factual accuracy of a report is improved if the institution is given the opportunity to point out errors of fact before the report is finalised.

### Recommendations/conditions from the previous accreditation

The following recommendation was issued:

In the published “quality profile” for the individual study programmes, reference should be made to the methodology used as a basis.

## 5 Documentation

According to FIBAA, all reports in all procedures types are always published on FIBAA’s homepage following the respective procedure’s completion. This also applies in the case of negative results, provided the contract was completed after 1<sup>st</sup> of January 2016. However, text passages that underlie data protection regulations or confidentiality are excluded (see information provided in the guides to the procedures in Annexes 5, 6, 24, 25, 26, 27, 48, 57 and in the self-evaluation report, p. 52).

With regard to evaluation procedures, the agency notes that the preparation of sensitive decisions, for example the closure of study programmes or the centralisation of quality assurance, is not a topic that an institution can or wants to publish before a decision is reached. Therefore, the publication requirements for reports result in the transfer of certain evaluations to other consultancy service providers, ideally conducted by qualified accreditation agencies (self-evaluation report, p. 36).

In the case of issuing the seal of the Accreditation Council, agencies are required to publish the review reports in the Council’s database immediately.<sup>35</sup> The Accreditation Council’s pro

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<sup>35</sup> Compare Section 11 of the template agreement, resolution of the Accreditation Council from 08.12.2009 in the version from 22.06.2016: [http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR\\_Mustervereinbarung.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Mustervereinbarung.pdf)

gress report states that, according to the results of a random sample assessment, a significant number of entries<sup>36</sup> by FIBAA are missing. In reaction to this, FIBAA explains that a reliable process has been defined in the internal QM. According to this process the higher education institutions receive the complete review report immediately, following an accreditation decision in which the seal of the Accreditation Council was awarded together with the decision of the relevant committee and are requested to check whether any passages of the report should be redacted for reasons of data protection or confidentiality. Likewise, FIBAA for first-time accreditation procedures the higher education institutions enter the study programmes into the HRK Higher Education Compass so that the accreditation decision can be added to the entry. As, according to FIBAA, the agency cannot not influence the processes within the higher education institutions, there may be occasional delays. A FIBAA employee responsible for these entries has the task of ensuring prompt completion or amendment of the data sets (self-evaluation report, p. 65). On-site, the employees responsible for the entries reported that the delays result from late responses from the higher education institutions. Deadlines of 14 days are given; these are, however, not always met.

The agency has review report templates for programme and system accreditation procedures and for certification and evaluation procedures, which are oriented to the respective QAGs (Annexes 16, 39, 54, 60). According to those templates the review report contains general information about the study programme of the higher education institution, information on the outline of the accreditation, certification and evaluation procedures (incl. the legal basis, names of experts, etc.) and a summary of the conditions and recommendations proposed by the expert group, before these are assessed individually. The “quality profile”, a tabular overview of the assessment of the respective criteria, concludes each chapter and can be found at the end of the review report as an overarching quality profile.

For accreditation and certification procedures and for the Institutional Audit Austria, the decision of the responsible committee is put at the beginning of the report and published with it. The first draft of the report is compiled by FIBAA’s relevant project manager and further on completed and authorised by all experts involved in the procedure (self-evaluation report, p. 52 et seq.).

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<sup>36</sup> Just under 20 percent of the study programmes addressed at the 94th meeting of FIBAA’s Accreditation Committee for programme accreditation on 29.01.2015 as well as just under 40 percent of those addressed at the 98th meeting on 26.02.2016 were missing.

In the manual submitted for programme accreditation procedures in the Accreditation Council's area of competence (see Annex 19), notes as well as on aspects requiring particular attention in the assessment of individual criteria and on the outline of the procedure are provided. According to information provided subsequently, the agency does not have manuals for additional types of procedures available. New employees first conduct programme accreditation procedures directed at awarding the seal of the Accreditation Council. Here the available manual serves as a guide and to ensure consistency. Apart from few points that are specific to the AC, the manual is equally suitable for programme accreditation procedures aimed at acquiring the FIBAA seal. In institutional procedures and certification procedures, employees who have already conducted several programme accreditation procedures and are consequently experienced in creating review reports, are appointed. These employees become acquainted with the relevant procedure topics and regulations for the procedures. In combination with the corresponding report templates, this is, according to FIBAA, sufficient to ensure consistent standards and a consistent level of quality of the review reports.

In response to the recommendation from the last reaccreditation of the agency, the review report templates for accreditation procedures, for certification procedures and for Institutional Audit Austria were revised so that the individual assessments of the criteria in the quality profile match the outline, headings and chapter numbers in the QAGs (see Annexes 16, 39, 54, 60). A corresponding legend is now also shown disclosed in the QAGs for accreditation and certification procedures, as well as for Institutional Audit Austria (see Annexes 9, 10, 11, 29, 30, 31, 32, 50).

### **Evaluation**

The review reports from the accreditation of study programmes at the [...] University in Kazakhstan have not yet been published. However, the Accreditation Council's review panel assumes that FIBAA has not yet reached a final decision and that therefore the requirement for publication in accordance with ESG does not yet apply.

In accordance with Standard 2.6, review reports are also published in evaluation procedures. The question of whether there are any fundamental reservations opposing the publication of review reports in evaluation procedures is indeed relevant from the perspective of the Accreditation Council's review panel. However, the group does not consider itself to have any responsibility in this matter.

Contrary to the agency's description, the review panel is of the opinion, that the delays of

database entries are not exclusive the responsibility of the higher education institutions. The QM handbook does specify a process for database entries. Nonetheless, this does not include any measures to counter late entries or releases by the higher education institutions. The practice of sending review reports to the higher education institutions for approval after decisions have been made should also be reconsidered as this is not standard compared to other agencies' practices and is not derived from the rules of the Accreditation Council.

Availability of review report templates, regulated creation of review reports following rules and providing manuals as aids for project manager in programme accreditation (AC seal) can improve consistency. The manual does not pre-empt the expert group's assessment as they only provide information on formal aspects of the assessment. The general information included in the manual can also be of assistance in FIBAA's own procedures. The Accreditation Council welcomes the fact that the review reports now contain clearer quality profiles.

### Recommendations

The review panel issues the following recommendation:

9. The agency should review the process for database entries in such a way that all decisions made in programme and system accreditation procedures, including the publication of the review reports are entered immediately and completely in the database of accredited study programmes.

### Result:

**Standard 2.6 is partially fulfilled.**

## 2.7 Complaints and appeals

### STANDARD:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

### GUIDELINES:

In order to safeguard the rights of the institutions and ensure fair decision-making, external quality assurance is operated in an open and accountable way. Nevertheless, there may be misapprehensions or instances of dissatisfaction about the process or formal outcomes.

Institutions need to have access to processes that allow them to raise issues of concern with the agency; the agencies, need to handle such issues in a professional way by means of a clearly defined process that is consistently applied.

A complaints procedure allows an institution to state its dissatisfaction about the conduct of the process or those carrying it out.

In an appeals procedure, the institution questions the formal outcomes of the process, where it can demonstrate that the outcome is not based on sound evidence, that criteria have not been correctly applied or that the processes have not been consistently implemented.

## **Recommendations/conditions from the previous accreditation**

-None-

### **Documentation**

- 5 Higher education or continuing education providers that are directly affected by the decision of a FIBAA committee (F-AC PROG, F-AC INST or F-CC CERT) appeal against this decision within one month following the written announcement of the decision. An appeal may also be made against the result of an evaluation procedure conducted by FIBAA Consult. Justification for the appeal must be given in writing.
- 10 After the appeal has been received by FIBAA's office, following renewed referral by the experts, it is forwarded to the responsible committee for resolution. If this committee does not remedy the appeal, the procedure is presented to the FIBAA Appeals Committee for review and an opinion. The Appeals Committee clarifies the matter and, accordingly, gives the responsible committee a reasoned recommendation for a final decision in the pending
- 15 procedure. After consideration by the Appeals Committee, FIBAA's responsible committee reaches a reconsidered and final decision.

In the event that the responsible committee reaches a negative decision, the costs for the appeals procedure must be paid by the client (see information on the agency's homepage the relevant menu point "Outline of the procedure"<sup>37</sup>). In addition, reference is made to the

20 options for making an appeal and appeals procedures in the General Terms and Conditions of Business for the various procedures (Annexes 17, 18, 40, 41, 55, 61 and N 12). The Appeals Committee has rules of procedure that are, however, only available in draft form (see Annex 73). The members of the Appeals Committee can also be viewed on the homepage.<sup>38</sup>

- 25 Since 2012, 24 appeals procedures have been conducted. To date, these have only been in the area of programme accreditation. A large proportion of these appeals were referred to the Appeals Committee. In the majority of cases, the Appeals Committee recommended that the appeal be rejected. So far the F-AC PROG agreed with the recommendations of the Appeals Committee in all procedures (self-evaluation report p. 55).

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<sup>37</sup> [http://www.fibaa.org/fileadmin/files/folder/Beschwerdeverfahren/Beschwerdeverfahren\\_EN.pdf](http://www.fibaa.org/fileadmin/files/folder/Beschwerdeverfahren/Beschwerdeverfahren_EN.pdf)

<sup>38</sup> [http://www.fibaa.org/fileadmin/files/folder/Beschwerdeverfahren/Beschwerdeverfahren\\_EN.pdf](http://www.fibaa.org/fileadmin/files/folder/Beschwerdeverfahren/Beschwerdeverfahren_EN.pdf)

In order to increase consistency in the way appeals procedures are conducted, a manual combined with a template was created for the project manager (see Annex 76).

5 The application documents do not contain any information as to how the agency deals with complaints i.e. those not relating to the formal conclusion of a procedure. Site, the agency explained that the higher education institutions can point out faults in the procedure as part of their statement to the review report.

### Evaluation

10 Appeals procedures are clearly defined for all procedure types and are made openly available to the higher education institutions. Nonetheless, the agency could be encouraged to indicate the option of making an appeal more clearly on the homepage by not placing the information in the section “Outline of the procedure” but rather in an additional section that can be accessed directly from the start page. The manual for project managers appears suitable for improving the consistency of procedures.

15 However, up to now there is no reference on the homepage to the option to issue complaints regarding the course of the procedure. Although the option to make a statement on the review report is referred to in the manuals and on the homepage, this only covers a portion of the possible complaint cases as it takes place after the assessment is completed.

### Recommendations

20 The review panel issues the following recommendation:

10. The agency should make explicit reference on its homepage to the option of issuing complaints about the course of the procedure.

### Result:

**Standard 2.7 is substantially fulfilled.**

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## V. Assessment concerning the criteria from the Accreditation Council

Note: In 2016, the Accreditation Council integrated the ESG into its rules for the accreditation of agencies. In doing so, the Accreditation Council issues conditions and recommendations, whereas ENQA and EQAR only work with recommendations. In order to facilitate  
30 the use of the ESG assessment for ENQA and EQAR, the previous section consistently referred to recommendations. The review panel issues some of these recommendations to the Accreditation Council (for its area of responsibility) as conditions. This involves:

Recommendation 3: The Agency should adopt the rules of procedures currently available in draft form for the F-AC INST and the Appeals Committee (ESG Standard 3.3).

5 -> **Condition 1:** The agency shall demonstrate that it has adopted rules of procedure for the F-AC INST and the Appeals Committee.

Recommendation 5: The agency should guarantee for all fields of business that conclusions are regularly drawn from other internal and external feedback (alongside evaluations). The QM concept should also be adopted by the agency's responsible committees (ESG Standard 3.6).

10 -> **Condition 2:** The agency shall demonstrate for all fields of business that conclusions are regularly drawn from other internal and internal feedback (alongside evaluations) and that the QM concept has been adopted by the agency's responsible committees.

Recommendation 7: FIBAA should adopt the rules of appointment (ESG Standard 2.2).

-> **Condition 3:** The agency shall demonstrate it has adopted the rules of appointment.

15 Recommendation 9: The agency should review the process for database entries in such a way that all decisions made in programme and system accreditation procedures, including the publication of the review reports are entered immediately and completely in the database of accredited study programmes (ESG Standard 2.6).

20 -> **Condition 4:** The agency shall demonstrate that it has revised the process for database entry in such a way that of all decisions made in programme and system accreditation procedures, including the publication of the review reports are immediately and completely entered in the database of accredited study programmes.

### Criterion 3.1.

The agency proves binding internal structures and procedures, which ensure the correct and consistent application of the "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" in its current version. The agency concludes an agreement with the Accreditation Council pursuant to § 3 of the ASG.

### 25 Recommendations/conditions from the previous accreditation

-None-

### Documentation

For procedures in the area of competence of the Accreditation Council, FIBAA possesses catalogues of criteria (Annexes 9 and 29), manuals regarding the outline of the procedure

(Annexes 5 and 24), collections of documents (Annexes 7 and 28) and a template contract with general terms and conditions (see Annex 17). The agency also uses the following templates: Template review report (Annexes 16 and 39), a template manual for project manager for creating review reports in programme accreditation (Annex 19) and sample work schedules (Annexes 14 and 35).

FIBAA states that it ensures the correct and consistent application of the rules of the Accreditation Council using binding internal structures and procedures and through its internal quality management system and, regarding this, refers to the explanations regarding ESG Standards 2.2, 2.3, 2.5 and 3.6. Particularly FIBAA states that it actively and continuously informs itself about changes (for example through participation in agency meetings, analysis of the Accreditation Council's newsletter etc. and consideration of the circulars sent to the agencies) and implements these promptly (self-evaluation report, p. 57).

On FIBAA's homepage, the following information appears for each of the higher education institutions the agency has system accredited: "With system accreditation, all of the study programmes currently on offer as well as those added during the term of the accreditation (initially 6 years) are accredited."<sup>39</sup>

The implementation of the rules of the Accreditation Council also includes compliance with the Accreditation Council's resolution "Standards for Structuring the Relationship between System Accreditation and Consultation Services" from 31<sup>st</sup> of October 2008 in the version from 20<sup>th</sup> of February 2013. According to this resolution, the activity of an accreditation agency in a system accreditation procedure is incompatible with a preceding or current activity outside of system accreditation that involves supporting, through consultation or other means, the setup, introduction or further development of the internal quality assurance system to be accredited at the same higher education institution.<sup>40</sup> On this matter, FIBAA has established "Principles for the separation of assessment and consultancy in assessment procedures within the framework of the ESG". Accordingly, "assessments and consultancy concerning the subject of the assessment by the FIBAA may not be linked." (see Annex 56 regarding this and for more details ESG Standard 3.1).

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<sup>39</sup><http://www.fibaa.org/de/institutionelle-verfahren/systemakkreditierung/akkreditierte-hochschulen.html>

<sup>40</sup> [http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR\\_Beratung\\_Systemakkreditierung.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Beratung_Systemakkreditierung.pdf)

Within the framework of Criterion 3.1, the so-called seal resolution from 23<sup>rd</sup> of September 2011 must be observed. It prohibits the agencies licensed by the Accreditation Council from awarding more seals in the programme accreditation and system accreditation procedures, or based on this assessment.

Following the findings recorded in the Accreditation Council's progress report, in the previous accreditation period FIBAA offered the seal of the Accreditation Council and the FIBAA quality seal or the FIBAA premium seal in combined procedures in programme-related procedures, but not in institutional procedures.<sup>41</sup> As part of this, the agency separated the individual procedure steps and documents such as the signing of contracts, criteria catalogues, review reports and the decision of the Accreditation Committee and also concluded separate contracts, created separate review reports and made separate accreditation decisions for awarding the AC seal and the FIBAA seal. Nonetheless, the discussions and assessment of the various criteria catalogues, which ultimately result in the awarding of the agency's own seal along with the seal of the Accreditation Council, were conducted by the same expert group and as part of the same site visit.

The resolution concerning additional seals was not adopted before the previous procedure for accrediting FIBAA was initiated (start 06/2011, conclusion 02/2012) and, therefore, did not yet underlie the procedure. Following the procedure, the Accreditation Council decided, as of 28<sup>th</sup> of June 2012, that programme accreditation procedures by FIBAA contradicted the resolution concerning additional seals, as both the criteria of the Accreditation Council and of FIBAA were discussed and assessed in a single site visit by one and the same expert group. This does not constitute a separate assessment in accordance with the resolution concerning additional seals.

The Accreditation Council did not address FIBAA's practice again until a court dispute with the agency ASIIN, which also awarded several seals in combined procedures, had been concluded. The Accreditation Council made the following decision dated 18<sup>th</sup> of June 2015:

"In accordance with § 5 Para. 2 and 3 of the agreement between FIBAA and the Accreditation Council, the Accreditation Council requires FIBAA to implement the resolution of the Accreditation Council on the awarding of an agency-internal seal from 23<sup>rd</sup> of September 2011 through evidence of the measures listed below:

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<sup>41</sup> See progress report p. 7 et seq.

1. From 1<sup>st</sup> of January 2016, the procedures for awarding the seal of the Accreditation Council shall be separated from the procedures for awarding FIBAA's own accreditation seal. The respective site visits shall not be scheduled together.
- 5 2. The findings gained from the procedure for awarding the seal of the Accreditation Council may only be used in other procedures after completion of this procedure, including the publication of the report and the entering of accredited study programmes into the database.
3. The costs of the various procedures must be separated completely.
4. FIBAA shall provide a draft of how it plans to implement this separation of procedures by  
10 15<sup>th</sup> of November 2015. The Accreditation Council expects to address this as part of its 85th meeting in December 2015. The drafted principles are integrated in the procedure documents based on this decision, so that the separation applies for procedures that are initiated after 1<sup>st</sup> of January 2016. The procedure practice will be assessed as part of the upcoming reaccreditation procedure in the second half of 2016.
- 15 5. FIBAA shall submit the complete account of all its procedures for 2016 on a full-cost basis. A bilateral subsidisation is not possible.”<sup>42</sup>

FIBAA submitted the requested concept for the separation of the seals in time. In accordance with this concept, site visits will no longer take place at the same time. Assessment and decision-making in accordance with the FIBAA QAG is not planned until after the  
20 assessment for awarding the seal of the Accreditation Council has been published in the database of accredited study programmes. Separate contacts are concluded and separate self-documentation is created for both procedures. Nonetheless, contracts may be concluded simultaneously and the higher education institution in question may develop the respective self-documentation at the same time as well. It is anticipated that the assessment  
25 for FIBAA's procedure will take place two to three months after the AC site visit, depending on the agreement with the higher education institutions, either as a site visit or as a telephone or virtual conference. The agency may draw on the results of the AC procedure, e.g. regarding the basic facilities and staff infrastructure for the study programme. Following this, an individual review report is compiled for FIBAA's procedure. The expert teams may be  
30 identical in their composition based on their availability. According to a calculation by FIBAA,

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<sup>42</sup> After the Accreditation Council had rejected a complaint by the agency against this decision from 10<sup>th</sup> of December 2015, a new deadline of 15<sup>th</sup> May of 2016 was set for submitting the drafts for procedure separation and the requirement for introducing the separation of procedures was pushed back to 1<sup>st</sup> of August 2016.

considerable additional costs are associated with awarding the agency's own seal (see also explanations regarding the new concept of separating the seals in the self-evaluation report, p. 66 et seq.).

- 5 The concept was approved by the Accreditation Council by a resolution dated 22<sup>nd</sup> of June 2016. The agency implemented the requirement set out by the Accreditation Council to implement the concept in committee resolutions, by a resolution of the F-AC PROG dated 15<sup>th</sup> of July 2016. The Accreditation Council also requested the review panel it appointed as part of the reaccreditation of FIBAA to review the implementation of the concept. Particular attention should be given to the information of FIBAA's experts and of the higher education institutions regarding the requirements for separating procedures.<sup>43</sup>

The agency has provided information on its homepage stating that a FIBAA procedure can only be conducted after an AC procedure has been completed.<sup>44</sup> The agency has also stated that the experts would be instructed separately. During the site visit, the agency reported that FIBAA's experts were provided with the information in a workshop on 10<sup>th</sup> of October 2016 and in a newsletter regarding the separation of seals and that it will make use of further opportunities to provide information. In accordance with the rules of the Accreditation Council, the new procedure concept will be applied in all procedures for which contracts are concluded as of 1<sup>st</sup> of August 2016 (self-evaluation report, p. 67 et seq.).

- 20 FIBAA has concluded an agreement with the Accreditation Council which governs their mutual rights and obligations. The current agreement is dated 4<sup>th</sup> of June 2013.

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<sup>43</sup> Furthermore, the Accreditation Council concluded that FIBAA, in order to demonstrate that procedure costs were separated and contrary to Section 5 of the Accreditation Council resolution from 18.06.2015, should submit for review the first five procedures conducted following the requirements of the Accreditation Council for the separation of seals, in which an FIBAA seal was awarded alongside the seal of the Accreditation Council, following completion of the fifth procedure. In the end, the Accreditation Council established that the agency does not link system accreditation procedures with other institutional procedures, but only awards the seal of the Accreditation Council in this area.

<sup>44</sup> <http://www.fibaa.org/de/programmbezogene-verfahren/prog-gemaess-den-anforderungen-des-akkreditierungsrates.html>

## Evaluation

The QAGs for programme and system accreditation in the area of competence of the Accreditation Council comprehensively implement the Accreditation Council's<sup>45</sup> corresponding set of rules. The QAG for programme accreditation is coherent and user-friendly due to the inclusion of all individual decisions by the Accreditation Council and KMK. In its structure, the QAG for system accreditation is based on the higher education institution's internal processes in teaching and learning. The manuals regarding the outline of the procedure in the AC procedures are also very informative and successfully implement the Accreditation Council's procedure rules.

One exception is the statement in the manual for programme accreditation which implies that the Accreditation Council would have to be informed of the suspension of an accreditation procedure (see p. 10 and 20). However, this is not necessary according to the rules of the Accreditation Council. In accordance with the rules, the Accreditation Council only needs to be informed if a higher education institution withdraws an application for accreditation or if the accreditation agency has refused an accreditation.<sup>46</sup> Furthermore, information is missing on p. 21 stating that an accreditation may be withdrawn, not only in the case of insufficient fulfilment of conditions or significant changes, but also in the event of a complaint by the Accreditation Council.<sup>47</sup> Information stating that random sampling of programmes must be conducted for state-regulated study programmes is missing in the manual on system accreditation.<sup>48</sup>

The template contract also does not completely meet the relevant rules of the Accreditation

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<sup>45</sup> The "Rules for the Accreditation of Study Programmes and for System Accreditation", resolution of the Accreditation Council in the version from 20<sup>th</sup> of February 2013;

[http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR\\_Regeln\\_Studiengaenge\\_aktuell.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Regeln_Studiengaenge_aktuell.pdf)

<sup>46</sup> See the template agreement between the Accreditation Council and agencies in the version from 22<sup>nd</sup> of June 2016; § 9, Section 6 and 8;

[http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR\\_Mustervereinbarung.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Mustervereinbarung.pdf)

<sup>47</sup> In relation to this, please see the template agreement between the Accreditation Council and agencies, aaO, § 7

<sup>48</sup> In accordance with Clause 5.9. "Rules for the Accreditation of Study programmes and for System Accreditation"

Council. Accordingly, § 3 Section 1 falsely states that a waiting period of two years applies after a negative decision before the applicant has the opportunity to submit a new application. According to the rules of the Accreditation Council, this only exists in system accreditation.<sup>49</sup> Contrary to what is stipulated in § 3 Section 2, the agency is, also not only entitled, but also required, to check the identity of the procedure.<sup>50</sup> In § 10 Section 2, the option of an extension period of six months (instead of the three months<sup>51</sup> allowed by the rules of the Accreditation Council) is wrongly assumed. In § 10 Section 3, once again a waiting period for a new application in programme accreditation is wrongly assumed, this time of one year.

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The remaining templates and manuals submitted corresponded to the rules of the Accreditation Council. A positive aspect worth noting in particular is the manual for the project manager, as it contains principles for creating the review report that the Accreditation Council views as important.

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The information on the agency's homepage which states that all study programmes are automatically accredited with system accreditation (even if they have not yet passed through the internal system) contradicts the rules of the Accreditation Council, which state that the only accredited study programmes are those established according to the requirements of the accredited system or already made subject to internal quality assurance in accordance with the rules of the accredited system.<sup>52</sup>

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In addition, the resolution of the foundation council on the separation of assessment and consultancy services should be amended. Following the findings of the site visit, there are no indications that unreliable consultancy is taking place. Nonetheless, the agency's internal resolution does not yet correspond to the requirements of the Accreditation Council on this matter.

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<sup>49</sup> There is no waiting period for reapplying in programme accreditation. Regarding the waiting period in system accreditation, see "Rules for the Accreditation of Study programmes and for System Accreditation", Clause 4.2.2.

<sup>50</sup> Refer to the template agreement between the Accreditation Council and agencies, aaO, § 9 Section 1

<sup>51</sup> Compare "Rules for the Accreditation of Study programmes and for System Accreditation", Clause 3.5.4 and 7.4.4.

<sup>52</sup> See Clause 4.1. "Rules for the Accreditation of Study programmes and for System Accreditation"

Based on the file records and the discussions on-site, the agency respects the requirements for separating the seals. The manual on FIBAA procedures assumes a stand-alone procedure by FIBAA, i.e. that only the FIBAA seal is awarded; the corresponding template agreement, in contrast, refers to a procedure conducted following the awarding of the seal of the Accreditation Council. Both the first and second variants are, as permitted, part of the agency's portfolio. However, the Accreditation Council's review panel encourages the agency to reach an understanding internally as to which procedure types FIBAA will offer in which cases and how this can be presented in the procedure documents used by the agency. There have not yet been any practical examples of separating the seals. The public and the experts appointed by the agency have, however, already been informed of the corresponding requirements. In the medium term, FIBAA is considering realigning the FIBAA seal and therefore decoupling it from the criteria of the Accreditation Council in order to improve its competitive situation with agencies such as AACSB and AMBA. In the future, there may, therefore, be fewer points of contact and therefore fewer points of conflict with the criteria of the Accreditation Council.

### **Recommendations**

The review panel suggests the following conditions:

5. The agency shall demonstrate that it has adjusted the "FIBAA manual for the accreditation of study programmes in accordance with the requirements of the Accreditation Council" and the template agreement for procedures in the area of competence of the Accreditation Council according to the resolution of the Accreditation Council.
6. The agency shall formulate the resolution of the foundation council "Principles for the separation of assessment and consultancy in assessment procedures within the framework of the ESG" according to the resolution of the Accreditation Council "Standards for Structuring the Relationship between System Accreditation and Consultation Services" in the version from 20<sup>th</sup> of February 2013.
7. The agency shall demonstrate that it has clarified on its homepage, in accordance with Clause 4.1. of the "Rules for the Accreditation of Study programmes and for System Accreditation" in the version from 20<sup>th</sup> of February 2013, that study programmes at higher education institutions which have undergone system accreditation are only accredited if they were established in accordance with the requirements of the accredited system or were already subject to internal quality assurance in accordance with the requirements of the

accredited system. Furthermore, the agency shall demonstrate that it only enters study programmes at higher education institutions that have undergone system accreditation as accredited in the database of the Accreditation Council if they have been accredited in accordance with the rules of the Accreditation Council.

**Result:**

**Criterion 3.1 is partially fulfilled.**

**Criterion 3.2.**

The agency has a separate legal entity.

10 **Recommendations/conditions from the previous accreditation**

-None-

**Documentation**

FIBAA is a non-profit foundation in accordance with Swiss federal law (see foundation statute and commercial register in Annex 90).

15 **Evaluation**

FIBAA, therefore, has legal entity status.

**Recommendations**

- none-

**Result:**

20 **Criterion 3.2 is fulfilled.**

**Criterion 3.3.**

The agency does not work on a profit-oriented basis and carries out the accreditation procedures on a full-cost basis.

**Recommendations/conditions from the previous accreditation**

-None-

## Documentation

The foundation FIBAA is recognised as non-profit (see Annex 91).

- 5 The agency has submitted a document containing estimates of the calculated total costs for all procedures types, including programme and system accreditation (Annex 81). According to this, a programme accreditation procedure for one study programme costs EUR [...]; a system accreditation procedure costs EUR [...].

The agency also subsequently submitted statements (Annexes N 18 and N 19) showing invoice amounts between EUR [...] and EUR [...] in programme accreditation and between EUR [...] and EUR [...] in system accreditation, plus VAT.

- 10 FIBAA's fees are regularly reviewed with regard to whether they cover the costs incurred by FIBAA. If necessary, they are adjusted. In order to monitor this and to establish the required financial as well as staff resources, the agency drafts annual plans of expected revenues and expenses (see Annex 82 and self-evaluation report, p. 58).

## Evaluation

- 15 FIBAA is recognised as non-profit. This confirms that FIBAA does not work for profit.

- The balanced budget for 2016 confirms, as there is no evidence of cross subsidisation, that the agency conducts the accreditation procedures in a way that covers its costs (see ESG Standard 3.5). Likewise, the overall costs invoiced to the higher education institutions for programme accreditation and for system accreditation are plausible. The agency is merely encouraged to review the calculation for system accreditation, as it seems to assume considerably lower costs than those that have actually been invoiced.
- 20

## Recommendations

-None-

## Result:

- 25 **Criterion 3.3 is fulfilled.**

## Criterion 3.4.

The agency accredits across types of Higher Education Institutions as well as across disciplines in case of certification for programme accreditations.

**Recommendations/conditions from the previous accreditation**

-None-

**Documentation**

- 5 According to the details on FIBAA's homepage, the agency conducts accreditation procedures at universities and universities of applied science, and with regard to programme accreditation, in the fields of economics, law and social sciences.<sup>53</sup>

**Evaluation**

- 10 FIBAA's accreditation activities, therefore, span different types of higher education institutions and different disciplines.

**Recommendations**

-None-

**Result:**

**Criterion 3.4 is fulfilled.**

15

**Criterion 3.5.**

Responsibilities of the bodies and their personnel composition are appropriate and regulated with binding effect. Academics, students and professional practice are properly involved.

**Recommendations/conditions from the previous accreditation**

-None-

**Documentation**

- 20 In accordance with Clause III of FIBAA's foundation statute (Annex 90), the bodies of the foundation are the foundation council, the management and the audit office.

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<sup>53</sup> In relation to system accreditation procedures please see: <http://www.fibaa.org/de/institutionelle-verfahren/systemakkreditierung/akkreditierte-hochschulen.html>; regarding programme accreditation procedures please see: <http://www.fibaa.org/nc/de/programmbezogene-verfahren/prog-gemaess-den-anforderungen-des-akkreditierungsrates/akkreditierte-programme.html>

Regarding the composition of the foundation council, please see the documentation regarding ESG Standard 3.3. The term of office of the members of the foundation council is two years in accordance with Clause III.3; there is no limit to the number of times a member can be re-elected. The tasks of the foundation council involve determining the rules of the foundation policy (III.4), appointing and monitoring the management (III.4) as well as the members of the committees (III.5) and of the Appeals Committee (III.5). The foundation council, which acts on a voluntary basis, forms and expands itself and also organises its own re-elections (self-evaluation report, p. 59).

10 In accordance with the resolution “Duties and responsibilities of management” (rules of procedure, Annex N 20), management reports to the foundation council and is responsible for operational activities. It is also responsible for suggesting committee members for the FIBAA Appeals Committee as well as experts (§ 6 and 7).

15 The respective responsible committees (F-AC PROG and F-AC INST) make decisions regarding programme accreditation and system accreditation procedures in the area of competence of the Accreditation Council (see subsequently filed rules of procedures of the F-AC PROG in Annex N 3 as well as the draft of the rules of procedure of the F-AC INST in Annex 21).

20 The rules of appointment, which are also currently only available in draft form (see Annex 95), stipulate that the F-AC PROG generally consists of 20 members and the F-AC INST generally consists of 15 members. The following distribution of votes should be ensured: at least 50% representatives of higher education institutions, at least 30% from professional practice and at least 10% student representatives. Proportional votes should be rounded up. In F-AC PROG, all relevant disciplinary cultures must also be sufficiently represented (economics, law and social sciences). The current composition of the committees can be found on the agency’s homepage. Thereafter, there are eleven academic representatives, six representatives of professional practice and two student representatives in the F-AC PROG.

25  
30 The F-AC INST is composed of nine academic representatives, five representatives of professional practice and two student representatives.<sup>54</sup>

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<sup>54</sup> <http://www.fibaa.org/de/programmbezogene-verfahren/prog-gemaess-den-anforderungen-des-akkreditierungsrates/entscheidungsgremien.html> and <http://www.fibaa.org/de/institutionelle-verfahren/systemakkreditierung/entscheidungsgremien.html>

The CV's of the committee members can be viewed in Annexes 4, 23 and N 21 to N 23. Each committee member has a term of office of three years (see Annex 95). Alongside the accreditation of study programmes and higher education institutions' quality management systems, the duties of the accreditation committees include adopting the review and assessment tools (in particular the question and assessment guide), making decisions regarding appeals issued by higher education institutions or referring these to the Appeals Committee and establishing the criteria for the appointment experts and appointing and dismissing experts (see rules of procedure of the F-AC PROG in Annex N 3 as well as the draft rules of procedures of the F-AC INST in Annex 21). The committees are also responsible for appointing experts for the individual accreditation procedures, although they have delegated this task to the expert committees, which are each composed of one academic representative, one representative of professional practice and one student representative (see Annexes N 3 and 21). Their terms of office are each three years (see Annexes 95, as well as N 3 and 21).

The Appeals Committee is composed of four members. It contains two academic representatives as well as one representative from professional practice and one from the student body. The term of office of the members of the Appeals Committee is also three years. Their responsibilities are derived from the rules of procedure (see Annex 73, also on a draft version, and the explanations regarding ESG Standard 2.7). The current composition of the committee can be viewed on the homepage. Thereafter, all stakeholders are currently represented as well.<sup>55</sup>

The committee members and the members of the FIBAA Appeals Committee sign a code of conduct in which they confirm, amongst other things, that they shall make judgements as experts in the area of quality assurance in higher education institutions solely according to the quality criteria (see Annexes 3 and 73, for details see ESG Standard 3.3).

### **Evaluation**

The competences and responsibilities of the agency's bodies are governed transparently and appropriately. All status groups are represented in the bodies involved in accreditation procedures i.e. the Committee, the FIBAA Appeals Committee and the expert committees. Through regular involvement of students as at least 10% of the committees, the student perspective can be adequately involved.

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<sup>55</sup> [http://www.fibaa.org/fileadmin/files/folder/Beschwerdeverfahren/Beschwerdeverfahren\\_EN.pdf](http://www.fibaa.org/fileadmin/files/folder/Beschwerdeverfahren/Beschwerdeverfahren_EN.pdf)

The procedure for selecting and appointing the members of the committee is also appropriate. The F-AC PROG regularly includes representatives in the agency's specialist area of focus. The code of conduct to be signed emphasises the requirement of the committee members, as experts, to make judgments. The biographical details submitted also provide evidence of their competence.

Nonetheless, it was noted that, during the meeting of the AC Programme, in which the review panel of the Accreditation Council participated, more than a third of the members were absent but excused. If this is not an isolated case, the agency should make efforts to increase the attendance rate, since otherwise the specialist competence of the Committee could be compromised.

To fulfil Criterion 3.5, the adopted version of the rules of procedure for the F-AC INST and the Appeals Committee still has to be handed in as well as the rules of appointment.

For information on members of the committees also serving in expert groups, please see ESG Standard 2.4.

### Recommendations

See conditions 1 and 3 above.

### Result:

**Criterion 3.5 is partially fulfilled.**

### Criterion 3.6.

In the expert groups appointed by the agency, academics, students and professional practice are represented. The experts are carefully selected and prepared for the specific accreditation procedure. The agency ensures the impartiality of experts using suitable measures.

### Recommendations/conditions from the previous accreditation

-None-

### Documentation

See ESG standard 2.4

### Evaluation

See ESG standard 2.4

### Recommendations

-None-

**Result:**

**Criterion 3.6 is fulfilled.**

5 **Criterion 3.7.**

In the bodies and expert groups, academic representatives have the majority of the votes.

**Recommendations/conditions from the previous accreditation**

-None-

**Documentation**

10 The rules of appointment (Annex 95, draft version), stipulate that academic representatives possess the majority of votes in the accreditation committees. In the same way, the rules of procedure of the Appeals Committee stipulate: "In case a consensual decision is not reached or a vote does not achieve a consensus, the academic representatives have the majority of the votes." (Annex 73, also only available as a draft). The expert information sheet also stipulates that the academic representatives have the majority of the votes in  
15 expert groups in case a consensual decision is not reached (see Annex 63).

FIBAA also explained that, in the composition of each committee, it intends, in principle, to involve more academic representatives than representatives of professional practice and student representatives. Accordingly, academic representatives have the majority of votes.

20 In addition, each committee member has a vote transferable to another member of the same status group so that the majority of votes for academic representatives is ensured in each meeting (self-evaluation report, p. 60). Regarding the composition of the committees and the complaints committee, see ESG Standard 3.5.

**Evaluation**

25 Contrary to FIBAA's description, the agency's internal regulations do not guarantee that academic members form the majority in the committees, since only *minimum* numbers of members for the individual status groups are specified. However, in regulating the required voting majority, the agency does take Criterion 3.7 into account. Academic representatives are also guaranteed the majority of votes in the Appeals Committee and in the expert groups. Nonetheless, adopted versions of the rules of appointment and the rules of procedure for the Appeals Committee are still lacking.  
30

**Recommendations**

See conditions 1 and 3 above.

**Result:**

5 **Criterion 3.7 is partially fulfilled.**

**Criterion 3.8.**

The agency publishes its procedures for internal quality assurance and for handling complaints and appeals.

**Recommendations/conditions from the previous accreditation**

10 -None-

**Documentation**

See ESG Standards 3.6 and 2.7 above.

**Evaluation**

See ESG Standards 3.6 and 2.7 above.

15 **Recommendations**

See ESG standard 2.7

**Result:**

**Criterion 3.8 is substantially fulfilled.**

**Criterion 3.9.**

If the agency engages other organisations for the implementation of parts of the procedures, the correct implementation must be ensured by binding and documented agreements.

20 **Recommendations/conditions from the previous accreditation**

-None-

**Documentation**

See ESG standard 3.6

**Evaluation**

See ESG standard 3.6

**Recommendations**

5 -None-

**Result:**

**Criterion 3.9 is fulfilled.**

**Criterion 3.10.**

In the area of business of the Accreditation Council, the agency generally uses the German language.

**10 Recommendations/conditions from the previous accreditation**

-None-

**Documentation**

15 The business language of FIBAA, as an international agency with its head office in Germany, is exclusively German in the area of business of the Accreditation Council (self-evaluation report, p. 62). All information on FIBAA's homepage relating to the awarding of the seal of the Accreditation Council is written in German,<sup>56</sup> as are the corresponding contracts, agreements and explanations regarding the procedures in which the seal of the Accreditation Council is awarded (Annexes 05, 07, 09, 16, 17, 24, 28, 29 and 40). All review reports for the seal of the Accreditation Council and all decisions are, as a general rule, also drafted and published in German.<sup>57</sup> FIBAA makes exceptions where discussions, for example with English speaking teaching staff and international partners, require small parts of the review to be written in English. Here it is ensured that all those involved can follow the discussions, and where necessary they are translated (self-evaluation report, p. 62).

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<sup>56</sup> <http://www.fibaa.org/en/welcome-page.html>

<sup>57</sup> <http://www.fibaa.org/nc/de/programmbezogene-verfahren/prog-gemaess-den-anforderungen-des-akkreditierungsrates/akkreditierte-programme.html> and <http://www.fibaa.org/de/institutionelle-verfahren/systemakkreditierung/akkreditierte-hochschulen.html>

**Evaluation**

In the area of business of the Accreditation Council, the agency, as a general rule, uses the German language.

**5 Recommendations**

-None-

**Result:**

**Criterion 3.10 is fulfilled.**

**10 Criterion 3.11.**

The agency's quality assurance includes internal and external feedback.

**Recommendations/conditions from the previous accreditation**

See ESG standard 3.6

**Documentation**

See ESG standard 3.6

**15 Evaluation**

See ESG standard 3.6

**Recommendations**

-None-

**20 Result:**

**Criterion 3.11 is fulfilled.**

**VI. Recommendations from the review panel****VI.1. Regarding compliance with the ESG**

**25** The review panel recommends that the Accreditation Council finds FIBAA to have substantially fulfilled the "Standards and Guidelines for Quality Assurance in the European Higher Education Area" (ESG).

According to the assessment by the review panel, the following five standards are fulfilled:

3.2; 3.7; 2.1; 2.3; 2.4

According to the assessment by the review panel, the following eight standards are substantially fulfilled: 3.1; 3.3; 3.4; 3.5; 3.6; 2.2; 2.5; 2.7

- 5 According to the assessment by the review panel, the following standards are partially fulfilled: 2.6

The review panel issues the following recommendations:

**Recommendation 1:** The agency should intensify its internal strategy debates as the comparatively new areas of activity of certification, institutional procedures including system accreditation and evaluation procedures have, up until now, experienced relatively low demand (ESG Standard 3.1.).

10

**Recommendation 2:** It should be transparently regulated which measures respectively head-office-internal processes in which line of activity ensure the separation of consultancy and accreditation. Also should be clarified that an application for a quality assurance procedure to be conducted cannot be made at the same time as or shortly after consultancy services. (ESG Standard 3.1).

15

**Recommendation 3:** The Agency should adopt the rules of procedures currently available in draft form for the F-AC INST and the Appeals Committee (ESG Standard 3.3).

**Recommendation 4:** The agency should continue to increase the amount of analytical publications in the future and also cover fields of activity beyond programme and system accreditation (ESG Standard 3.4).

20

**Recommendation 5:** The agency should guarantee for all fields of business that conclusions are regularly drawn from other internal and external feedback (alongside evaluations). The QM concept should also be adopted by the agency's responsible committees (ESG Standard 3.6).

25

**Recommendation 6:** The different codes of conduct for committee members and expert groups should be adjusted if necessary (ESG Standard 3.6).

**Recommendation 7:** FIBAA should adopt the rules of appointment (ESG Standard 2.2).

**Recommendation 8:** The agency should publish the weighting of criteria for awarding the premium seal (ESG Standard 2.5).

30

**Recommendation 9:** The agency should review the process for database entries in such a way that all decisions made in programme and system accreditation procedures, including

the publication of the review reports are entered immediately and completely in the database of accredited study programmes (ESG Standard 2.6).

**Recommendation 10:** The agency should make explicit reference on its homepage to the option of issuing complaints about the course of the procedure (ESG Standard 2.7).

## VI.2 Regarding compliance with the Accreditation Council's criteria

The review panel recommends that the Accreditation Council accredits FIBAA for both programme accreditations and system accreditations and in doing so issues the following conditions:

**Condition 1:** The agency shall demonstrate that it has adopted rules of procedure for the F-AC INST and the Appeals Committee (ESG Standard 3.3, compare Recommendation 3).

**Condition 2:** The agency shall demonstrate for all fields of business that conclusions are regularly drawn from other internal and external feedback (alongside evaluations) and that the QM concept has been adopted by the agency's responsible committees (ESG Standard 3.6, compare Recommendation 5).

**Condition 3:** The agency shall demonstrate that it has adopted the rules of appointment (ESG Standard 2.2, compare Recommendation 7).

**Condition 4:** The agency shall demonstrate that it has revised the process for database entry in such a way that all decisions made in programme and system accreditation procedures, including the publication of the review reports are entered immediately and completely in the database of accredited study programmes (ESG Standard 2.6, compare Recommendation 9).

**Condition 5:** The agency shall demonstrate that it has adjusted the "FIBAA manual for the accreditation of study programmes in accordance with the requirements of the Accreditation Council" and the template agreement for procedures in the area of competence of the Accreditation Council according to the resolution of the Accreditation Council (AC Criterion 3.1).

**Condition 6:** The agency shall formulate the resolution of the foundation council "Principles for the separation of assessment and consultancy in assessment procedures within the framework of the ESG" according to the resolution of the Accreditation Council "Standards for Structuring the Relationship between System Accreditation and Consultation Services" in the version from 20<sup>th</sup> of February 2013 (AC Criterion 3.1).

**Condition 7:** The agency shall demonstrate that it has clarified on its homepage, in accordance with Clause 4.1, the "Rules for the Accreditation of Study Programmes and for System

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Accreditation” in the version from 20<sup>th</sup> of February 2013, that study programmes at higher education institutions that have undergone system accreditation are only accredited if they were established in accordance with the requirements of the accredited system or were  
5 already subject to internal quality assurance in accordance with the requirements of the accredited system. Furthermore, the agency shall demonstrate that it only enters study programmes at higher education institutions that have undergone system accreditation as accredited in the database of the Accreditation Council if they have been accredited in accordance with the rules of the Accreditation Council. (AC Criterion 3.1).

10

**Annex 1: Schedule for the site visit**

**Accommodation:**

Hotel Collegium Leoninum, Noeggerathstraße 34, 53111 Bonn

**5 Meeting venue:**

24.11.2016: Head office of FIBAA, Berliner Freiheit 20-24, 53111 Bonn

25.11.2016: Hotel Collegium Leoninum, Noeggerathstraße 34, 53111 Bonn

<b>23.11.2016 – Leoninum</b>		
6:00 p.m.	Internal preparatory meeting at the hotel	
8:00 p.m.	Internal dinner discussion at the hotel	

<b>24.11.2016 – FIBAA head office</b>		
09:00 - 10:30 a.m.	Meeting with the management of the agency	Dr. Birger Hendriks, Prof. Dr. Kerstin Fink
10:30 - 10:45 a.m.	Break	
10:45 a.m. – 11:45 p.m.	Group meeting with all employees of the head office	All internal employees, as well as Dr. Heinz-Ulrich Schmidt, as representative of the special representatives and external project managers
11:45 a.m. - 12:45 p.m.	Lunch break, internal meeting	
12:45 - 13:15 p.m.	Discussion concerning international activities with representatives of national authorities in cases of national certification (possibly via Skype)	Zarina Nikolayevna Chikibayeva, Head of analysis and methodology division in the Bologna centre of the Kazakh ministry  Dr. Ewa Popowska, head office manager of the Swiss Accreditation Council
13:15 - 13:30 p.m.	Break	

13:30 a.m. – 14:30 p.m.	Individual discussions with client representatives (all internal procedures types, via Skype, also procedures with conditions or suspension)	Prof. Dr. Andreas Altmann, MCI Innsbruck  Renata Faizova, KAZGUU University, Kazakhstan  Mustafa Ilkan, Eastern Mediterranean University, Cyprus  Igor Kochev, TSU Tomsk, Russia
14:30 - 14:45 p.m.	Break	
14:45 - 15:45 p.m.	Group discussion with experts from the agency's procedures (from all types of procedure, national and international; in addition representatives from professional practice and the student body)	Karl-Peter Abt, Stanton Chase Düsseldorf  Prof. Dr. Andreas Altmann, MCI Innsbruck  Prof. Dr. Peter Thuy, International University of Applied Sciences Bad Honnef  Prof. Dr. Vera de Hesselle, City University of Applied Sciences Bremen  Stefanie Fecher, doctoral candidate at the University of Erlangen-Nuremberg  Prof. Dr. Reinhard Hünnerberg, University of Kassel  Dr. Markus Tomaschitz, AVL Graz
15:45 - 16:00 p.m.	Break	
16:00 a.m. – 17:00 p.m.	Discussion with client representatives (all national procedure types, via Skype, also procedures with conditions or suspension)	Prof. Dr. Peter Thuy, International University of Applied Sciences Bad Honnef  Philipp Hecht, Technical University Ingolstadt  Dr. Carl-Martin Preuß, University of Augsburg  Gerrit Frerich, University Hospital Cologne

17:00 - 19:00 p.m.	Internal concluding meeting for the first day	
Approx. 19:30 p.m.	Internal discussion dinner: Roses	

<b>25.11.2016 – Leoninum</b>		
09:00 - 10:30 a.m.	Participation in the meeting of the F-AC Prog and discussion with the members.	All committee members present
10:30 - 10:45 a.m.	Break	
10:45 a.m. – 11:30 p.m.	Discussion with the representatives of the F-AC Inst	Prof. Dr. Thomas Heimer, RheinMain University of Applied Sciences Prof. Dr. Ernst Trossmann, University of Hohenheim Prof. Dr. Johann Schneider, formerly of Frankfurt University
11:30 - 11:45 a.m.	Break	
11:45 a.m. - 12:30 p.m.	Discussion with representatives of the F-CC Cert	Prof. Dr. Ulrich Grimm, formerly of EBS University Prof. Dr. Johann Schneider, formerly of Frankfurt University
12:30 - 16:00 p.m.	Lunchtime snack and internal concluding discussion within the review panel with preparation of the review report; if necessary, brief questions to the agency management.	
16:00 - 16:15 p.m.	Short concluding meeting with management of the agency and departure	Dr. Birger Hendriks Prof. Dr. Kerstin Fink

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**Annex 2: Abbreviations**

AC	Accreditation Council
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
F-AC PROG	FIBAA Accreditation Committee for Programmes [ <i>FIBAA-Akkreditierungskommission für Programmakkreditierung</i> ]
F-AC INST	FIBAA Accreditation Committee for Institutional Procedures [ <i>FIBAA-Akkreditierungskommission für institutionelle Verfahren</i> ]
F-CC CERT	FIBAA Certification Committee for Continuing Education Courses [ <i>FIBAA-Zertifizierungskommission für Zertifikats- und Weiterbildungslehrgänge</i> ]
KMK	Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany [ <i>Ständige Konferenz der Kultusminister der Länder in der Bundesrepublik Deutschland</i> ]
KMK Structural Guidelines	Common structural guidelines of the Länder for the accreditation of Bachelor's and Master's study courses. Resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany of 10 October 2003 as amended on 4 February 2010 [ <i>Ländergemeinsame Strukturvorgaben für die Akkreditierung von Bachelor- und Masterstudiengängen</i> ]
QAG	Question and Assessment Guide (on the website of FIBAA defined as "Assessment Guide")
RAG	Requirements and Assessment Guide for the Institutional Audit Austria

Rules	Rules for the Accreditation of Study Programmes and for System Accreditation from 8 December 2009 in the version adopted on 20 February 2013 [ <i>Regeln für die Akkreditierung von Studiengängen und für die Systemakkreditierung</i> ]
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### Annex 3: Equivalence between Part 1 of the ESG 2015 and the criteria for programme and system accreditation (as of September 2015)

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ESG 2015	Programme accreditation	System accreditation
1.1 Policy for quality assurance	Implicit in 2.9 Quality assurance and further development	6.3 Internal quality assurance systems of higher education institutions
1.2 Design and approval of programmes	Implicit in 2.3 Study programme concept	Implicit in 6.2 Internal management of higher education institutions
1.3 Student-centred learning, teaching and assessment	Active learning – examinations: 2.5	Active learning – organisation of examinations: 6.2
1.4 Student admission, progression and certification	Certification: 2.3 Curriculum design: 2.4 Recognition: 2.3 Certificates: 2.2	Implicit in 6.2
1.5 Teaching staff	2.7 Resources	Teaching staff: 6.2
1.6 Learning resources and student support	2.7 Resources	Resources: 6.2
1.7 Information management	2.9 Quality assurance	6.3 Internal quality assurance systems of

		higher education institutions
1.8 Public information	2.8 Transparency and documentation	6.4 Report system and data collection
1.9 On-going monitoring and periodic review of programme	2.9 Quality assurance	6.3 Internal quality assurance systems of higher education institutions
1.10 Cyclical external quality assurance	3.2.1 Time limitation	7.2.1 Time limitation