

## **Expert Report**

**on the application of the Foundation for International Business Administration Accreditation (FIBAA), dated 28 March 2011, for accreditation and assessment of the compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)**

- issued on 01 February 2012 -

### **1. Procedural basis**

#### **1.1 Statutory mandate**

Pursuant to § 2 para. 1 no. 1 of the German Statute on the Establishment of a *Foundation for the Accreditation of Study Programmes in Germany*, the Foundation is assigned with the task of accrediting accreditation agencies. It grants, for a limited period of time, the right to accredit study programmes or internal quality assurance systems of higher education institutions by awarding the seal of the Foundation.

The decision of the Accreditation Council to award accreditation as well as the conduct of the procedure for accreditation of an accreditation agency are based on the resolution *Rules of the Accreditation Council for the Accreditation of Agencies* adopted on 8 December 2009.

In order to promote the international recognition of the decisions taken by the Accreditation Council and by the accreditation agency, the Accreditation Council adopted the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* in the approval of its accreditation criteria, as approved by the ministers responsible for higher education at the Bologna follow-up conference in Bergen in May 2005. By including the *ESG*, the Accreditation Council emphasised the central role of accreditation in implementing the objectives set for the Bologna Process, making it clear that quality assurance in higher education - and particularly accreditation - can no longer be exclusively orientated toward national standards or particular characteristics. Another important sources for the formulation of the criteria set by the Accreditation Council are the *Guidelines of Good Practice* elaborated by the *International Network for Quality Assurance Agencies in Higher Education* in April 2005.

## 1.2 The German accreditation system

In 1998, an accreditation procedure based upon the "peer review principle" was introduced for study programmes in the tiered graduation system. The group of reviewing peers includes scientists but also students, representatives of professional practice and international experts. The German Law on the Establishment of a *Foundation for the Accreditation of Study Programmes in Germany* adopted on 15 February 2005 provided a new legal foundation for accreditation. The objective of accreditation is to ensure content- and subject-related standards by assessing the conceptual outline of study programmes and the academic feasibility of the courses offered, including the assessment of quality in teaching as well as the scrutiny of the professional relevance and the promotion of gender mainstreaming. Generally, accreditation is a prerequisite for introducing and maintaining Bachelor's and Master's study programmes. In addition to programme accreditation, system accreditation was introduced in 2007. The object of system accreditation is the internal quality assurance system of a higher education institution. A positive system accreditation certifies that the quality assurance system of the higher education institution attains the qualification objectives in teaching and learning and ensures the high quality of the study programmes, and in so doing applies the *Standards and Guidelines for Quality Assurance*, the Guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder*, and the criteria set by the Accreditation Council.

In Germany, decentralised agencies conduct the accreditation of study programmes (programme accreditation) and of quality assurance systems for teaching and learning (system accreditation). In its role as central accreditation body, the Accreditation Council accredits the accreditation agencies periodically and defines the basic requirements for accreditation procedures, which are to be carried out according to reliable and transparent standards. At the same time, the Accreditation Council takes care that the interests of the entire system, which are the responsibility of each *Land*, are taken into consideration during accreditation. The actual accreditation procedures are conducted independently from the state.

The *Foundation for the Accreditation of Study Programmes in Germany* also acts as a central documentation agency for the accreditation system and manages the database of study programmes accredited in Germany.

For private higher education institutions, a procedure of institutional accreditation was introduced by the Science Council, which monitors whether or not a higher education institution complies with the specifications for scientific teaching and research. Private higher

education institutions must be accredited by the Science Council, preferably prior to starting operation, but at the latest prior to final state approval by the appropriate *Land*.

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

In order to be admitted as a member of the European Association for Quality Assurance (ENQA) or included on the European Quality Assurance Register for Higher Education (EQAR), an agency must demonstrate that it complies with the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (ESG) in an external assessment. The full membership of an agency with the ENQA is valid as *prima facie* of compliance with the ESG and is thus also valid for the EQAR.

With regard to accreditation, the Accreditation Council also offers the option of assessing whether the agencies are compliant with Part 2 and 3 of the ESG and presenting this explicitly in its own section of the assessment in order to prevent duplicate external assessments. This assessment is, therefore, executed according to the “Guidelines for external reviews of quality assurance agencies in the EHEA”

## **2. Course of the procedure**

With letter dated 28 March 2011 FIBAA submitted its application for re-accreditation for the procedures of programme and system accreditation applying also for assessment of compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (hereinafter referred to as ESG). On 14 October 2011 FIBAA submitted an explanatory statement for the application together with additional documents.

The following experts were nominated by the Accreditation Council in its resolution of 08 June 2011, while the student representative was nominated by the Board in its resolution of 26 October 2011:

**Prof. Dr. h.c. Dietmar von Hoyningen-Huene** (chairman), Hochschule Mannheim  
University of Applied Science

**Dr. Sabine Felder**, Director of Bologna Coordination, Rectors' Conference of the  
Swiss Universities (CRUS)

**Moritz Maikämper**, Student at the BTU Cottbus (Brandenburg University of Tech-  
nology Cottbus)

**Thierry Malan**, International higher education consultant (former Inspecteur général de l'administration de l'éducation nationale et de la recherche, a.D.)

**Henning Dettleff**, Confederation of German Employers' Associations (Bundesvereinigung der Deutschen Arbeitgeberverbände, BDA)

The expert group was supported by Ms Agnes Leinweber on the part of the office of the Foundation for the Accreditation of Study Programmes in Germany.

On 29 October 2011, the experts participated at a preparatory meeting during which the applicable criteria set by the Accreditation Council and the European Standards and Guidelines (ESG) were presented and explained. This occasion also served to develop the level of knowledge of the experts with regard to the procedural aspects and the understanding of their role.

Between 23 and 24 November 2011 an on-site visit took place at the head office of the Agency in Bonn, prior to which the expert group met for a preliminary meeting on 22 November 2011. The expert group held discussions with the management of the Agency, members of the FIBAA Accreditation Commissions for Programmes and for Institutional Procedures, the FIBAA Certification Commission for Certificate and Further Education Courses, with personnel of the head office, with experts and also with representatives of the higher education institutions that have already been involved in procedures carried out by the Agency (the schedule is provided in the annex).

The expert group presented the following report with unanimous opinion on 01 February 2012.

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

#### **3.1 Founding**

The FIBAA was founded in 1994 as an internationally-oriented foundation by trade associations in Switzerland, Austria and Germany. The prevailing objective was and remains the promotion of transparency, quality and internationality in higher education. The domicile of the foundation is in Zurich, the head office in Bonn.

#### **3.2 Organisation**

Pursuant to Clause III of the foundation statute of FIBAA, the bodies of the foundation are determined: foundation council, executive committee, external auditor. The foundation

council appoints the agency's committees: the FIBAA Accreditation Commission for Programmes (F-AC PROG), FIBAA Accreditation Commission for Institutional Procedures (F-AC INST), the FIBAA Certification Commission for Certificate and Further Education Courses (F-CC CERT) and the Appeals Commission.

### **3.3 Resources**

In 2010, FIBAA stated that it had an annual budget of 1,397,526 EUR. Currently, 12 individuals work full-time in the agency and six individuals work part-time (equivalent of three full-time positions). Five external individuals work for the agency on a fee basis in the area of procedural supervising. For the head office, the agency has rented office space in Bonn with an area of 556 sq m.

### **3.4 Range of activities**

Since 2002, the agency has been certified to award the seal of the Accreditation Council for study programmes and, since 2008, for internal quality assurance systems of higher education institutions in Germany.

The business areas of FIBAA comprise programme- and system accreditation, as well as institutional audits, certifications of further education offers and institutional evaluations. In addition, beginning in the second half of 2011, the agency has been offering regularly held workshops and seminars on general and specific topics related to accreditation and quality assurance. For its various service areas (with the exception of the workshops and seminars), the FIBAA has developed a "modular system" in which these can be combined into a procedure for documentation and assessment of quality assurance.

The emphasis of activity lies in the assessment and accreditation of Bachelor's-, Master's- and PhD study programmes in the areas of economics, law and social sciences at public and private German and foreign higher education institutions; the latter with state recognition or in founding. Since its establishment, the FIBAA has already carried out approx. 1,000 accreditation procedures. The FIBAA plans to complete its first system accreditation procedure at the beginning of 2012.

The FIBAA is a member of the European Association for Quality Assurance in Higher Education (ENQA) and registered in the European Quality Assurance Register for Higher Education (EQAR).

#### 4. Assessment

The analysis of the presented documents and discussions during the on-site visit gave a positive impression of the agency. Of particularly positive note is the high importance of the expertise of the experts in the agency's procedures; this is supported by a structured preparation and continuous further training. The agency was also able to win highly qualified and experienced individuals for work in the committees. In particular, the representation of decision-makers from professional life is important for the recognition of the agency's work in its subject-related context. The staff at the business office is highly professional and committed.

Also of positive note is the international orientation reflected in the composition of the committees, the language skills demonstrated in the business office and the agency's commitment abroad.

The expert group appreciates the activities of FIBAA towards promoting quality development through the certification of further higher education and values this commitment as an example of FIBAA's innovative capability.

Regarding the documents submitted by the FIBAA for the explanatory statement for the application for reaccreditation, it is to be noted that while these fully documented the procedures of the agency, they were, in the sum of annexes, quite extensive and somewhat compartmentalised. Particularly in the explanatory statement for the application, an analytical and critically-reflective view of the strengths and weaknesses of the agency extending beyond description would have been desirable.

The expert group also sees the need for improvement with regard to the formal fixing of the composition of the committees (Criterion 2.2.1), the adaptation of the procedural documents to the guidelines of the Accreditation Council (Criterion 2.2.1), the appointing of the individual expert team (Criterion 2.2.3) and transparency with regard to the awarding of the various seals (Criterion 2.7.).

With regard to the agency's practice in seal awarding, the resolution of the Accreditation Council of 23.09.2011 "Awarding of own seals and third-party seals by the agencies" is relevant. Here, the Accreditation Council establishes that, in future, the awarding of agency-own seals on the basis of an assessment that leads to the quality seal of the Accreditation Council is excluded. Pursuant to the letter of the Chairperson of the Accreditation Council of 11.10.2011, this resolution is to be applied by the agencies for all procedures opened starting 1 January 2012. As the resolution was passed after opening of procedures for the accreditation of the FIBAA on 08.06.2011, the accreditation procedure is

not based on it.

**The expert group recommends that the Accreditation Council accredits the FIBAA both for programme accreditation and system accreditation, and to issue the following conditions and recommendations.**

Condition 1: The FIBAA demonstrates provisions for the specialist disciplinary composition and proportion of the status groups and number of individuals in the FIBAA accreditation commissions (Criterion 2.2.1).

Condition 2: The FIBAA presents revised procedural documents and sample contracts for the procedure with the quality seal of the Accreditation Council in which deviations from the guidelines have been removed (Criterion 2.2.1).

Condition 3: The FIBAA presents a bindingly defined procedure that ensures the participation of all interest groups in appointing the individual expert teams in the programme accreditation procedure (Criterion 2.2.2). The task may not be transferred to individual persons.

Condition 4: The FIBAA more clearly documents the various requirements and meanings of the seals of the Accreditation Council and the FIBAA in the procedural documents and the website.

## 4.1 Assessment based on the Criteria for the Accreditation of Accreditation Agencies

### Criterion 2.1: Self-image and understanding of the accreditation task

**2.1.1 The agency has a publicly documented perception of quality, from which it derives the basis of its accreditation activity. Its activity is geared to the objective of enhancing quality and is based on the Higher Education Institutions' key responsibility for the profile and quality of teaching and learning.**

#### Documentation

The FIBAA bases its work on a guiding vision that is published on their website. It comprises supporting the higher education institution as an autonomous actor, compliance with guidelines, orientation on international standards and social requirements for higher education. The results of FIBAA's work are to provide students, the employment market and also the political world with reliable information pertaining to the performance of the higher education institutions. In its work, the FIBAA orients itself on a multidimensional definition of quality and optimises its processes through ongoing self-reflection. Central principles for quality are the requirements of "compliance with guidelines", "value orientation" and "objectives orientation" (see Criterion 2.5).

The FIBAA sets itself the goal of allowing diversity in study programmes with its accreditation. The agency believes that the evaluation of the integration of research results in teaching and learning is necessary so that higher education institutions will remain oriented on the changing requirements of students, the job market and society when designing their study programmes.

#### Assessment

The FIBAA formulates an understanding of quality that is oriented on the principles of responsibility of the higher education institutions for the quality of the study programmes and the measurement and validation of the objectives of the higher education institutions and which is to be broken down into the individual study programme.

#### Result

Criterion 2.1.1. is fulfilled.

**2.1.2 The agency accredits across types of Higher Education Institutions and also across disciplines in the case of admittance for programme accreditations.**

#### Documentation

With the quality seal of the Accreditation Council, the FIBAA accredits study programmes in the fields of economics, law and social sciences, and quality assurance systems at



state- and private higher education institutions that have their emphasis in this subject spectrum.

### **Assessment**

The agency's programme accreditation focus on study subjects in the fields of economics, law and social sciences is sufficiently broad. The statistics for the accredited study programmes from the years 2009 to the first half year of 2011 (Application 27) show procedures in the subjects mentioned at various higher education institutions.

### **Result**

Criterion 2.1.2. is fulfilled.

## **Criterion 2.2: Structures and procedures**

**2.2.1 For admittance to programme accreditation and/or for system accreditation, 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 the current version. Responsibilities of the organs and their personnel are functional and legally regulated.**

### **Documentation**

Pursuant to Clause III of the foundation statute of the FIBAA (Application 79), the following bodies of the foundation are established: foundation council, executive committee, review panel. Pursuant to Clause III.2, the foundation council is comprised of six to fifteen members (on the selection, see Criterion 2.2.3). The term of office is, pursuant to Clause III.3, two years, whereby re-election is possible without restriction. The tasks of the foundation council lie in setting the guidelines of the foundation's policies (III.4), the appointment and supervision of the executive committee (III.4), and the appointment of the members of the commissions (III.5) and the review panel (III.5).

Pursuant to the resolution "Tasks and responsibility of the executive committee" (Rules of Procedure, Annex 82), the executive committee principally comprises two individuals who, in addition to the regular business of the agency, also have the task of recommending experts for all work divisions of the agency (§ 6).

The external auditor is a Swiss trust company appointed by the foundation council which audits the work of FIBAA with regard to business/financial aspects (Explanatory statement for the application p. 20).

For the accreditation procedure for study programmes with the quality seal of the Accreditation Council, the FIBAA Accreditation Commission for Programmes (F-AC PROG) is decisive. Its composition, tasks and work approach are regulated in the Rules of Procedure

of the F-AC PROG of 21.07.2011 (Annex 01). Pursuant to § 5 para. 1, it is appointed by the foundation council for the duration of three years. It normally has 20 members.

The tasks of F-AC PROG are: passing the guidelines for evaluation and assessment (in particular, the question- and assessment catalogues) (§ 3 para. 1 of the Rules of Procedure), deciding upon the accreditation of study programmes (§ 3 para. 2), deciding on complaints from higher education institutions or reference to the appeals commission (§ 3 para. 5), setting of the criteria for expert appointment (§ 3 para. 6), nomination and dismissal of experts, as well as their appointment for individual accreditation procedures.

Pursuant to § 5 para. 1, the bodies of F-AC PROG are the board, the commission assembly and the experts.

Since June 2011, public or state-recognised private higher education institutions in Germany can choose between a procedure based on the criteria of the Accreditation Council, the FIBAA or a combined procedure for programme accreditation. The procedure of programme accreditation with the quality seal of the Accreditation Council is based on the following documents:

- Programme accreditation manual (Accreditation Council) of October 2011 (Annex 4)
- Question- and assessment catalogue (Accreditation Council) higher education version (Annex 9a)
- Question- and assessment catalogue (Accreditation Council) expert version (Annex 11a)

The procedures of system accreditation are the task of the FIBAA Accreditation Commission for Institutional Procedures (F-AC INST), the composition, tasks and work approach of which is regulated in their rules of procedure of 01.09.2011 (Annex 29). According to this, normally up to 15 members of the F-AC INST, pursuant to § 4 para. 1, are appointed by the foundation council for the duration of three years. Pursuant to § 5 para. 1, the bodies of the F-AC INST include the board, the commission assembly and the experts.

The tasks of the F-AC INST are: passing the guidelines for evaluation and assessment (in particular, the question- and assessment catalogues) (§ 3 para. 1 of the rules of procedure), deciding the accreditation of systems (§ 3 para. 2), deciding on complaints from higher education institutions or referring to the appeals commission (§ 3 para. 5), setting of the criteria for expert appointment (§ 3 para. 7), nomination and dismissal of experts, as well as their appointment for individual accreditation procedures (§ 3 para. 8).

In the procedures for system accreditation, solely the quality seal of the Accreditation Council is awarded based on the following documents:

- System accreditation manual (Accreditation Council) of September 2011 (Annex 31)
- Question- and assessment catalogue (system accreditation) of April 2008 (Annex 34 a)

With regard to the decision of the Accreditation Council of 31.10.2008 “Standards for Structuring the Relationship between System Accreditation and Consultancy Services”, the system accreditation manual (Accreditation Council) contains a reference on p. 9 in which the Accreditation Council demands a separation between consultancy and the procedure of system accreditation. Here, it is explained to higher education institutions that the FIBAA may not take on system accreditation if it was previously active as a consultant at the institution. In Annex 53, the agency also provides a draft decision for the foundation council containing the separation between consultancy and certification in system accreditation and corresponding guidelines for programme accreditation. This was passed on 15.11.2011 and published on the agency’s website. Pursuant to p. 19 of the explanatory statement for the application, the FIBAA defines consultation service as all activities extending beyond an informational discussion of the procedure, e.g. solutions for structuring study programmes.

In addition to these committees, there is also an appeals commission at FIBAA (see Criterion 2.6), as well as the FIBAA Certification Commission for Training Courses (F-CC CERT), only active outside of the business area of the Accreditation Council (see introduction to chapter 4.2 ESG).

### **Assessment**

The tasks in the process of programme- and system accreditation are comprehensively covered, clearly defined, and comprehensibly assigned to the corresponding committees in the agency based on the purpose.

However, the expert group criticises that, for the FIBAA accreditation commissions, there are no firmly established parameters for the subject-related composition or the number of representatives of the status groups and thereby no voting relationships are documented. During the on-site visit, the management explained that it recommends qualified individuals to the foundation council for appointment based on own judgment. Although the expert group finds the current composition of the committees suitable and comprehensible, there should still be documented, content-oriented criteria for the composition and quantitative distribution of the votes in the status groups, for reasons of transparency and reliability. It should also be reconsidered as to whether a three-year office term for student members in the accreditation commissions and the appeals commission is appropriate considering the shorter standard periods of study.

In the discussions with the agencies, the status of experts as a body of the accreditation commissions at the FIBAA is comprehensively explored. While the management refers here to an analogy that is not further detailed, the experts describe their understanding of the regulation as more an orientation on fundamental principles, such as confidentiality, secrecy, objectivity and impartiality. The expert group thereby gains the impression that the body status is more of a symbolic significance, without playing a role in the daily work of the agency.

The programme accreditation manual (Accreditation Council) of October 2011 (Annex 4) describes the objectives, routine and requirements of programme accreditation in easily comprehensible language and refers to decisions and rules of procedure of the Accreditation Council in a comprehensible manner.

The question- and assessment catalogues "FBK" (Accreditation Council) higher education institution version (Annex 9a) and FBK (Accreditation Council) expert version (Annex 11a), on which the procedure for the accreditation of a study programme with the quality seal of the Accreditation Council is based, contain identical criteria that only differ in the direction: While the FBK for higher education institutions asks these to describe the fulfilment of a criterion, the FBK asks experts to assess this criterion.

The criteria listed in both documents primarily implement the criteria of the Accreditation Council for the accreditation of study programmes in similar language, however without stating the source with each individual criterion. The expert group critically assesses that, in some cases, the FIBAA extends beyond criteria set defined by the Accreditation Council in its level of detail to the extent that the following sentences have no correspondents in the criteria of the Accreditation Council for study programmes:

- *"In the structure of the study programme, the relationship between core subjects / or specialisation subjects (compulsory elective subjects) / or further elective options / or practical elements is provided for in an appropriately weighted manner." (Clause 3.2.1)*
- *"The accompanying teaching seminar materials correspond with the demanded niveau, are current and are available to the students." (Clause 3.4.2)*
- *"The study programme direction coordinates the routines of all those involved in the study programme and ensures problem-free running of the study operation." (Clause 4.2.1)*
- *"A development concept for the library has been presented. Access to literature and magazines, as well as digital media (e.g. electronic media, databases) is suited to study content and is up-to-date. A concept for further development (updating) has*

*been presented.” ( Clause 4.4.2)*

The Criterion 2.9 “Study programmes with a special profile demand”, however, is missing in the presented FBKs (Accreditation Council).

As part of the on-site visit, the expert group also discussed the agency’s practice of awarding the seal in the context of the Accreditation Council’s resolution of 23.09.2011 of “Awarding of own seals and third-party seals by the agencies” (for the FIBAA seal, see Criterion 2.7). On a revision of the procedural documents, the new guideline is to be considered.

The documents on the procedure of system accreditation (manual and FBK system accreditation) thoroughly and comprehensibly treat the corresponding rules of procedure and criteria of the Accreditation Council, however, unfortunately, without clear, corresponding references to the individual criteria. The FBK system accreditation includes the criteria from the study-programme-based FBK (Accreditation Council) with the just established deviations.

The remaining documents of FIBAA also contain sufficient information for the higher education institutions on the routine of the procedure pursuant to Clause 1.1.1 of the resolution “Rules for the accreditation of study programmes and for system accreditation” in the version of 10.12.2010. The comprehensive description of services also mentioned in this clause is provided through the model contracts for programme accreditation (Annex 22 a), system accreditation (Annex 35a) and the general procedural conditions (Annex 22b and 35 bc). However, in the model contract for programme accreditation or the general procedural conditions, implementation of the guidelines in § 6 para. 1 of the agreement between the Accreditation Council and the agency is missing; in this, the agency regulates the consequences of non-fulfilment of conditions in the contracts with the higher education institutions. In § 8 of the special conditions (Annex to the procedural conditions, 22b) FIBAA solely obliges itself to advise the higher education institution of the suspension or intended suspension of an accreditation without delay. In the model contracts, or in the general procedural conditions and special conditions used as a basis, there is also no reference to § 7 para. 1 of the agreement between the Accreditation Council and the agencies which would inform higher education institutions of possible suspension of the accreditation decision in the case of an objection by the Accreditation Council.

In the view of the expert group, the requirements pursuant to the resolution of the Accreditation Council of 31.10.2008 “Standards for Structuring the Relationship between System Accreditation and Consultation Services” are well implemented in the resolution of the foundation council on the separation of consultancy and system accreditation (Annex 53),

also in the procedures for programme accreditation. In the discussions, the expert group gains the impression that the FIBAA is aware of the fine line between service-oriented support of the higher education institution and consultation in the accreditation procedure, and critically reflects on this. To be mentioned in this context is the forwarding of points from preliminary statements of the experts in the procedure for programme accreditation prior to the on-site visit. The agency states (see also expert memorandum Annex 55) that it forwarded only a compilation of subjects to the higher education institution as preparation for the discussions. Differing statements on this during the on-site visit, however, did not lead to a clear picture. If individual statements, possibly also characterising the experts, are forwarded to the higher education institutions, then the expert group sees the danger that changes may be made to study programmes in preliminary obedience, and also that protective interests of the experts may be violated. The expert group recommends describing the procedure in a transparent manner so that all those involved will know what information is forwarded. The expert group also noted that dinner was taken together by experts and representatives of the higher education institution the day before the on-site visit. This may give the opportunity to develop trust and contribute to acceptance in the accreditation procedure. However, the roles of the experts should be clear and possibility for influence or informal negotiation processes should be avoided.

The agency's presented examples of preliminary surveys in the system accreditation are assessed by the expert group as being appropriate and in correspondence with the rules of procedure of the Accreditation Council.

During the on-site visit, the agency explains that the business area of consultancy is in development and that, currently, predominantly seminars for higher education institutions are offered. To what extent the consultancy may also affect the development of study programmes was not clear. For the expert group, it was shown that, with regard to personnel, the consultancy services for higher education institutions are kept strictly separate from the accreditation activities and the foundation council's resolution on the separation of consultancy and accreditation is fulfilled in daily work.

## **Result**

Criterion 2.2.1. is partially fulfilled.

## **Recommendation**

1. The expert group recommends that the Accreditation Council issues a **Condition**, based on which the agency presents definitions for the proportion of the status groups and the number of individuals in the FIBAA accreditation commissions.
2. The expert group recommends that the Accreditation Council issues a **Condition**,

based on which the agency presents revised procedural documents and model contracts for the procedure with the quality seal of the Accreditation Council and in which the deviations from the guidelines have been removed.

**2.2.2 The agency involves representatives of interest groups (sciences, students and practitioners from the profession) relevant for the execution of the task.**

**Documentation**

The composition of the foundation council is not specified in greater detail in Clause III.2 of the foundation's statute. Currently, it comprises five representatives of higher education institutions, two representatives of companies, and six representatives of associations. The term of office is two years, re-election is possible without limitation.

The compositions of the F-AC PROG and F-AC INST are analogously regulated in § 4 para. 1 of the individual rules of procedure (Annex 2 and Annex 29) and comprise members from higher education institutions, practitioners of professions, and students. Currently, the F-AC PROG has 19 members, of these ten from higher education institutions, seven from professions (including one union representative) and two students. The F-AC INST currently has 11 members (five from higher education institutions, five from professions including one union representative, and one student). The appeals commission of the FIBAA currently consists of two higher education institution representatives, one representative of a profession and one student.

Pursuant to the current resolution of the F-AC PROG (Annex 56), FIBAA compliantly includes one representative of a university of applied sciences, one student and one individual from a profession in each expert team for programme accreditations.

Pursuant to the current resolution of the F-AC INST (Annex 56), the expert team for system accreditation is comprised as follows:

- *“three members with experience in the management of higher education institutions and the internal quality assurance of a higher education institution;*
- *one student member with experience in the self-administration of a higher education institution and in accreditation;*
- *one member from a profession (ideally with experience in quality management)*

*If additional professional-practice matters are to be decided, an additional expert will participate provided state rules require this. If the higher education institution offers teacher training programmes or combined study programmes with theological study components, an expert from the Protestant- or Catholic Church will participate in carrying out the fea-*

*ture random sample.*

*Furthermore, the following criteria are to be considered in the composition of the expert team:*

- *One member each of the expert group mentioned above should have experience in the management of a higher education institution, in structuring study programmes and in quality assurance of teaching and learning;*
- *One member of the expert group should come from a foreign country.”*

In the appointment of experts for the procedures for programme- and system accreditation, the FIBAA works with pools of individuals nominated by the individual F-AC (see Criterion 2.2.3). From the individual pool, the head office prepares a recommendation for an expert team and presents this to the chairman of the responsible F-AC for decision in accordance with § 3 para. 8 of its rules of procedure (Annexes 2 and 29).

### **Assessment**

The provisions of FIBAA fundamentally ensure a suitable participation of representatives of higher education institutions, students and professional experience in all committees of the agency and in the reviews. However, the number of people from the status groups and the resulting quantitative voting ratios in the FIBAA accreditation commissions should be bindingly set in writing (see Criterion 2.2.1).

The expert group critically assesses the procedure for the composition of the concrete expert group for programme accreditation. While the individual F-AC in its entirety participates in the nomination of the experts in the pool of the agency, only the board appoints the concrete expert team for a procedure. This currently comprises a representative of academia and professional experience. However, as the typological composition of the board is not regulated in the rules of procedure of the F-AC, no participation of the status groups of academia, professional experience and students (anyway) is ensured on a specified basis.

### **Result**

Criterion 2.2.2. is partially fulfilled.

### **Recommendation**

1. The expert group recommends that the Accreditation Council **issues a Condition** according to which the agency presents a procedure that ensures the participation of all interest groups in the appointment of the individual expert teams in the procedure for programme accreditation. A delegation of the task to individual persons is to be excluded.



**2.2.3 The competence of those involved in the procedures, with regard to all areas relevant for the assessment procedures of programme accreditation or system accreditation, is ensured by appropriate selection procedures and briefing.**

### Documentation

Pursuant to Clause III.1 of the foundation's statute (Annex 79), the following institutions have one definite seat each in FIBAA's foundation council:

- Confederation of German Employers' Association, Berlin,
- Association of German Chambers of Industry and Commerce, Berlin,
- Federation of Austrian Industry (industry association), Vienna,
- Swiss Federation of Employers, Zurich,
- economiesuisse, Swiss Business Federation, Zurich,
- Austrian Federal Economic Chamber, Vienna.

In total, and pursuant to Clause III.1, the foundation council is comprised of six to fifteen members that self-constitute themselves as foundation council, supplement each other or undertake their re-election.

For the experts, the FIBAA generally provides that these are to be appointed by the responsible F-AC after a successful probationary period. For this, a presentation sheet is filled out by the individual, based on which the head office decides whether probationary deployment should be in programme accreditation or an institutional procedure. The information on the probationary appointment by the individual F-AC pursuant to § 2 para. 8 of the individual rules of procedure (Annex 2 and 29) is tied to an invitation to the next expert training. In the case that deployment without previous training should be necessary, the procedural supervisor takes on the briefing prior to and during the procedure. After the probationary deployment, and in mutual agreement, the nomination into the expert pool follows by the responsible F-AC.

Pursuant to the explanatory statement for the application, 397 nominated experts and 102 probationary experts are currently included in the expert pool for programme accreditation. In 2010, a total of 191 experts were fielded for programme accreditations. This year it is 129 so far. In 33 procedures, foreign experts were deployed.

The expert pool for institutional procedures comprises 37 nominated experts and two probationary experts. Of these, 12 appointed experts and one probationary expert come from foreign countries (Bulgaria, The Netherlands, Austria, Romania, Switzerland, Hungary). In

the area of institutional procedures, a total of 16 experts were deployed in 2011.

For the composition of an expert team for the areas programme accreditation and institutional procedures, FIBAA refers to the individual expert pool. The head of the responsible F-AC decides the composition of the expert team for individual procedures (see Criterion 2.2.2) based on a recommendation by the head office, pursuant to § 3 para. 8 of the rules of procedure (Annexes 2 and 29).

Pursuant to the resolution of the F-AC PROG (Annex 56a), an expert team fundamentally comprises the following four persons: two representatives of academia, one of professional experience and a student member. In view of the academic representatives, one person each from a university and a university of applied sciences is deployed. Pursuant to the above-mentioned resolution of the F-AC PROG, the FIBAA takes care in the composition of the expert team that the selected experts present the following expertise and knowledge (Annex 56a):

- *“academic expertise in the core academic areas in question,*
- *practical expertise from businesses, organisations active in business, possibly chambers and comparable institutions,*
- *special academic expertise in the specialised subject area of particular emphasis for the aim of the study programme to be accredited,*
- *knowledge of the developments in the framework of the Bologna Process or of the accreditation systems in question.”*

For the accreditation of programme clusters, the expert team is extended to cover all study programmes with regard to content and assessment expertise. Also for specific profiles, such as distance learning courses, dual study programmes or study programmes in combination with auditing, corresponding experts are included in the expert team. For re-accreditation and resumption of a suspended procedure, FIBAA strives to obtain at least one expert from the previous team for the current assessment (Annex 56a).

In addition, and pursuant to the mentioned resolution of F-AC PROG for the composition of the expert team, FIBAA observes the following criteria:

- *“internationality;*
- *deployment of a maximum of one probationary expert per team;*
- *only one academic representative from the same higher education institution is deployed per team;*
- *no expert comes from the same federal state as the applying higher education institu-*

*tion (for procedures in Germany);*

- *in foreign countries: at least one person must have expertise in the university-political- and accreditation-system aspects of the country in question, as well as, if applicable, language knowledge.”*

For system accreditation procedures, and pursuant to current resolution of the F-AC INST (Annex 56b), FIBAA composes the expert group as follows:

- *“three members with experience in the management of higher education institutions and in the internal quality assurance of a higher education institution;*
- *one student member with experience in the self-administration of higher education institutions and accreditation;*
- *one member from professional experience (ideally with experience in quality management).*

In addition, and pursuant to the mentioned resolution of the F-AC INST, FIBAA observes the following criteria:

- *“one member each of the above-mentioned expert group should have experience in the management of a higher education institution and in quality assurance of teaching and learning;*
- *one member of the expert group should come from a foreign country.”*

For the composition of the appeals commission, reference is made to Criterion 2.6.

As documentation of the general preparation of the experts, the FIBAA presents a sample in Annex 57 and the routine of a current expert seminar in 57 b. In addition to the introductory seminars for new experts, which are to be visited within the first year at the latest, FIBAA also provides for periodic seminars for experienced experts.

The selection, preparation and expertise of the individuals in the head office are discussed in Criterion 2.4.

### **Assessment**

The expert group highly appreciates FIBAA’s proven practice of maintaining a pool of experienced experts for the accreditation procedures. The probationary employment of experts before acceptance in the pool offers the opportunity to personally get to know each other. Also highly positive is the advised “expectation” of the agency in writing regarding participation in an expert seminar, in the first year of activity as an expert at the latest. The regularly held expert seminars for programme accreditation treat the major procedural

rules and criteria for accreditation procedures or – in the advanced version – updates, and thereby presents a good preparation or forum for exchange of experience. Experts are also prepared for the procedures of system accreditation; however, due to the low number of procedures, this is normally only when required. Overall, FIBAA gives the expert group the impression that it places great value on the preparation and further training of its experts as a major element of assessment quality.

Although the criteria for the disciplinary composition of the accreditation commissions and the appeals commission are not fixed (see Criterion 2.2.1), the presented biographical data on the members of the committee show broad expertise in academic subjects, professional experience and quality assurance for higher education institutions.

The existing overlapping of personnel between the commissions of the agency F-AC PROG, F-AC INST and F-CC CERT are comprehensibly rationalised by FIBAA with the motivation of wanting to use experience from programme accreditation for the development of new business areas, such as the institutional procedures and the certification of further education offers in a targeted manner.

## **Result**

Criterion 2.2.3. is fulfilled.

**2.2.4 If the agency engages other organisations for the implementation of parts of the procedures, the correct implementation must be ensured by reliable rules and procedures.**

## **Documentation**

In Annex 87/I, the FIBAA presents a cooperation agreement with the also discipline-focused agencies *Accreditation Agency for Study Programmes in Health and Social Sciences e.V.* (AHPGS) and *Accreditation Agency Specialised in Accrediting Degree Programmes in Engineering, Informatics, the Natural Sciences and Mathematics (ASIIN)* of 10.06.2008, which regulates cooperation in procedures of programme- and system accreditation. Pursuant to this document, a “lead agency” is determined for a joint procedure which works toward the other agencies and also makes the decisions regarding accreditation. Up to now, such procedures have been seldom.

## **Assessment**

The provisions in the cooperation agreement are assessed as being sufficient and suitable for the purpose, and offer a solid requirement for observing the relevant resolutions of the Accreditation Council in the cooperation of the agencies.

**Result**

Criterion 2.2.4. is fulfilled.

**Criterion 2.3: Independence****2.3.1 The agency has a separate legal entity.****Documentation**

The FIBAA goes back to an institution entered in the trade register already in 1987 (Annex 79 b) and was established as a Swiss federal foundation (Annex 79 b) with the name Foundation for International Business Administration (FIBAA) by official deed of 24.07.2000 (Annex 79 c).

Through the acquisition of the “person-cored” foundation in 2004, the FIBAA transferred to its current legal entity in the sense of Art. 80ff. ZGB (Swiss Civil Code) and has been recognised as a Swiss non-profit foundation since that time.

FIBAA was founded by German, Swiss and Austrian business associations in the European perspective of also establishing administrative offices in Vienna, Brussels and Zurich. This approach was not further pursued; the FIBAA has only one head office in Bonn and a domicile in Zurich.

**Assessment**

As the agency is organised in the legal status of a Swiss foundation, it possesses its own legal entity.

**Result**

Criterion 2.3.1 is fulfilled.

**2.3.2 It does not work on a profit-oriented basis and carries out the accreditation procedures on full cost basis.****Documentation**

Effective starting with the tax period 2005, the foundation FIBAA was freed from state taxes, as well as the general local taxes and direct federal taxes in Switzerland (decision of Zurich tax office, 06/10103 of 17.02.2006, Annex 84) due to its pursuance of non-profit purposes and was thereby recognised as a non-profit organisation. According to its explanatory statement for the application, the agency checked whether its status as a recognised non-profit organisation in Switzerland could also be obtained in Germany; however, due to legal circumstances between the two countries Germany and Switzerland,

this could not be further pursued. However, de facto, FIBAA also conducts itself as a non-profit organisation in Germany.

As shown in the business plan, the FIBAA had takings of 1,397,526 EUR in the year 2010; of this, 1,243,948 EUR alone fell to procedures for programme accreditation. Expenses in that year were incurred to the amount of 1,392,188 EUR.

Once per year, the foundation is audited by a Swiss trust company (audit office), which confirms that the takings are used for the intended purpose of the foundation and in accordance with legal tax provisions. This report from 2010 is included in the volume of annexes (Annex 86).

According to Annexes 70 and 71, the fees for the programme- and system accreditation procedures are set in a mixed calculation, taking into account the agency's costs and those of the parties directly involved in the accreditation procedure (experts, supervisors). The calculations include lump sums that cover incurred expenses (expense allowances, travel costs, committee meetings etc.). Currently, the FIBAA does not differentiate between the costs according to awarding of the seal of the Accreditation Council or of FIBAA, as up to June 2011, both seals were commonly awarded together in one procedure.

### **Assessment**

Currently, FIBAA's status as a non-profit organisation is confirmed according to Swiss law. The procedural fees for accreditation procedures are calculated from the costs of the previous year of the agency in the corresponding area and are referred to an estimated number of procedures. To this extent, the calculations of the procedural costs for the expert group are comprehensible and, in connection with the business plan for 2010, demonstrate procedural operations based on absorbed costs.

### **Result**

Criterion 2.3.2 is fulfilled.

#### **2.3.3 The agency ensures the freedom from instructions of the organs in individual cases and the independence and impartiality of the persons working for it.**

### **Documentation**

The descriptions of the tasks of the bodies and committees pursuant to the foundation's statute and the rules of procedures do not contain any reciprocal powers to instruct. There are also no recognisable indications of interventions by third parties in the work of the agency.

For the members of the FIBAA accreditation commissions and the experts, the following

reasons for possible impartiality are mentioned in § 2 para. 2 and 3 of the rules of procedure of F-AC PROG (Annex 2) and analogously also in § 2 para. 2 and 3 of the rules of procedure for the F-AC INST (Annex 29):

*“(2) If matters are consulted that affect the interests of an individual, his spouse, his parents, children, siblings or a person authorised to represent him by law or by power of attorney, this individual may not take part in the discussion and voting. He/She is, however, to be heard before the decision.*

*(3) Bias toward an institution will be irrefutably assumed,*

*a) when an individual has received a complaint through a decision of the institution at the time of the action or during five years before; this particularly includes rejecting, dismissive, revoking, withdrawing or similar administrative acts, as well as the report of a criminal offense,*

*b) when, at the time of the action or during five years before, the individual is or has been employed by the institution, or in a doctoral-, post-doctoral- or appointment procedure at the institution in question,*

*c) when, at the time of the action or during three years before, the individual was enrolled at the institution, is participating or has participated in joint research projects or other intensive cooperation projects, or*

*d) when, at the time of the action or during three years before, the individual or the faculty to which the individual belongs is or has been assessed by employees of the institution.*

*(4) If one of the bias requirements is given with an individual, or if it is assumed that an individual is biased, this is to be immediately advised on own initiative and documented. The biased individual is to be excluded from the discussions and voting.*

*(5) If commission members were active as experts, they do not participate in the voting on the individual accreditation procedure.”*

Annex 3b contains a declaration to be signed by members of the F-AC PROG and F-AC INST for maintaining the code of conduct, confidentiality, consultation- and data secrecy and the advising of any reasons for partiality. The experts also sign such a declaration (Annex 59) and are also informed of the requirements as part of the expert handout regarding the requirements (Annex 55).

### **Assessment**

The impartiality declarations for participants in the accreditation procedures (commission members, experts) are of model character as they not only exclude possible bias but also

inform about the issues of data protection and confidentiality. The expert group has the impression that the FIBAA places great value on impartiality in its work and the protection of personal data.

In sum, there are no indications that the committees and bodies of the agency are subject to reciprocal instructions or external dependencies in their decisions.

## **Result**

Criterion 2.3.3. is fulfilled.

## **Criterion 2.4: Facilities**

**The agency is sustainably and adequately equipped for its function in all required functional areas in respect of personnel and material resources.**

### **Documentation**

Currently, 12 people work full-time in the head office of FIBAA and six people work part-time (three full-time equivalents). The management of the head office is taken on by two managing directors, one of whom works on a fee basis. In addition to the employees in the four service areas, FIBAA has established “executive department positions” that are filled by the assistance of the management in full-time, and by the data protection officer and quality management officer in part-time. For procedural supervision there are six permanently employed project managers in the service areas, a further position was filled on 01.12.2011. In addition, five external officers are available for accreditation procedures on a fee basis. In the area of “internal services”, three people work full-time and five work part-time. With the exception of three assistants and the officers, all employees are permanently employed. The rented office space of FIBAA in Bonn comprises two levels with a total area of 556 sq m. The workplaces are equipped with modern office technology and have access to Internet and Intranet.

Pursuant to p. 28 of the explanatory statement for the application, the employees of FIBAA are selected via a multi-stage procedure involving the department managers (and their deputies), all people relevant for the position and the executive committee. Based on a detailed training plan (Annex 77) that also provides for accompanying several on-site visits, full- and part-time procedural supervisors are to be familiarised with the procedures and processes of FIBAA. Pursuant to the quality concept (Annex 66, p. 13), new procedural supervisors visit an expert seminar, accompany two on-site assessments and participate in “Jour Fixe” and specific internal workshops.

In addition, FIBAA allows participation in conferences and conventions. The employees



are regularly informed of new provisions and their application as part of “Jours Fixes” and workshops (see Annex 26, 90).

According to the explanatory statement for the application, the employees of FIBAA have various options for qualification and also special paid leave. By the end of 2011, agreements between the employees and the management are to be introduced in order to present joint perspectives, individual development options e.g. concrete further education measures and career development options. Until now, regular feedback discussions have been given on the results of the probationary period, then related to events and always at the end of the year. Starting in January 2012, feedback discussions are to take place every half year and, as usual, when called for by an event as well.

In addition to the full-time employees of the head office, FIBAA also employs “officers for accreditation procedures” who support procedures on a fee basis (Explanatory statement for the application p. 33). Biographical data for the employees of the head office and for the freelancers are provided in Annex 76.

### **Assessment**

With regard to personnel, materials and finances, the resources of the agency are appropriate. The expert group positively assesses the strong growth of personnel in the head office as a basis for professional operations and the filling of central positions in the area of internal services for quality management and data protection.

Compared with the findings of the reaccreditation in 2006, the ratio of full-time to part-time employees has significantly improved. For the expert group, it is understandable that FIBAA balances peaks in operations through the use of part-time workers; the management employs full-time workers as a priority. Nevertheless, part-time employees should regularly assist with procedures so that they may stay up-to-date with the current provisions.

The members of the F-AC PROG emphasise that, for them, no qualitative differences between full-time and part-time procedural supervisors is perceived. The quality of the procedures in general, however, has increased over the past years, also due to the higher share of full-time employees. In this context, the expert group appreciates that freelancers experience the same introductory training as new full-time employees and that they are involved in communication through the “Jours Fixes”.

The biographical data on the employees of the head office and the part-time officers for accreditation procedures documents broad expertise in the relevant academic fields, in higher education institution management and international experience.

## Result

Criterion 2.4 is fulfilled.

### Criterion 2.5: Internal quality management

**The agency continuously uses a formalised internal quality management system, which is suitable for assessing the effectiveness of the internal control processes and ensures the safeguarding and continuous improvement of the quality of the activity. It is publicly accessible and covers systematic internal and external feed-back processes.**

#### Documentation

The FIBAA presents a quality concept dated June 2011 (Annex 66) and a process manual (Annex 67). In January 2011, the agency hired a “quality management officer” (QMB); in June 2011, the Quality Team (Q-Team) commissioned by the management board began its work (Explanatory statement for the application p. 35).

The Q-Team is comprised of the following individuals or functions: quality management officer, a member of the executive committee, the management of the division programme accreditation, the management of the division system accreditation, representation of the division internal services and the data protection officer (DSB). It is responsible for controlling the quality management and the implementation of quality measures. It meets at least four times a year.

The aims of the internal quality management lie in “legal compliance”, “goal-orientation” and “value orientation” and are described as follows in the quality concept (Annex 66, p. 6.):

*“Legal compliance means the structuring of criteria, indicators and procedures in compliance with the relevant internal and external provisions.*

*Goal-orientation means the optimal structuring of criteria, indicators and procedures with regard to the commission and the self-understanding of FIBAA.*

*Value orientation means the structuring of the criteria, indicators and procedures with consideration of ethical aspects such as a sense of responsibility, respect and fairness, sense of proportion and comprehensibility, reflection on demands and reality.”*

As a framework of reference for implementation of the quality principles in the daily work, the agency developed a quality matrix (Annex 67, no page given). In this matrix, the quality aims of legal compliance, goal-orientation and value orientation are covered for the three areas of the agency, support, performance and management, and assigned corresponding quality measures. The implementation of the quality measures is to be as-

sessed, among other things, through various evaluations and other measures:

- Evaluation of employees
- Evaluation of experts
- Evaluation of procedures by the higher education institutions
- Evaluation of training sessions
- Individual quality development
- Handling of quality deficits
- Problem management

The results of the evaluations are discussed with the division managers in question (Annex 66, p. 9) and published anonymously in the newsletter. From the analysis of these evaluations, the Q-Team may set measures, responsibilities and schedules (“measure control lists”).

The results of the evaluations are not documented in the annexes. Only the exemplary evaluation of the feedback of a higher education institution to FIBAA is given (Annex 68).

According to the explanatory statement for the application p. 40, the systematic, individual quality development of the employees of FIBAA comprises the elements of individual feedback, collegial feedback, “upward feedback” and the evaluation results that can be combined in the individual case. If required, they can be supplemented by further training measures such as sitting-in on assessments on-site, specific-case internal workshops, “Jours Fixes”, and participation in external events.

### **Assessment**

The expert group establishes that the agency has prepared a comprehensive quality concept in 2011, whereby the approaching reaccreditation could obviously accelerate the reflection. It did not become clear for the expert group as to which measures of quality assurance came into effect in the last accreditation period. During the on-site visit, the management explained that, due to the heavy work load in the last few years, there have been elements of quality development but little systematic quality development. In this context, the expert group welcomes the creation of a position for a quality management officer who can consolidate the processes.

In the quality concept published on the agency’s website, the quality aims, instruments for assessment of implementation, and responsibilities are set, sufficiently described and harmonised with each other. In the preparation thereof, the agency intensively considered

the quality definition on which its work is based and has aligned its quality management to this. The processes are very good and comprehensively documented. However, according to the agency's own statement, they are not yet fully practiced in daily work. The expert group could recognise the first steps of an implementation of the quality concept. During the on-site visit, the agency stated that the internal services, such as accounting and personnel development, are not yet included.

Under these circumstances, it has become understandable that results of the quality management cannot yet be given, although the agency justifies the creation of the position of assistant of the managing directors and of the data protection officer with knowledge gained from the internal quality management.

To improve the quality management concept and the work of the agency, the expert group recommends involving further sources of external feedback. For example, the results of the evaluation and the monitoring of the Accreditation Council or complaints from higher education institutions should be systematically analysed. Comparisons with national and international best practices could also be helpful for the further development of the agency's own processes. In this context, the expert group appreciates the set up of a knowledge database that is, in particular, to gather international experience.

## **Result**

Criterion 2.5 is substantially fulfilled.

## **Criterion 2.6: Internal complaints procedure**

**The agency has a publicly accessible, formalised internal procedure for reviewing accreditation decisions on application of a Higher Education Institution.**

### **Documentation**

For complaints from higher education institutions regarding accreditation decisions, both a binding complaints procedure and an appeals commission have been set up. The accreditation agreements with the higher education institutions refer to the general procedural rules of FIBAA (Annexes 22 bc and 35b c)<sup>1</sup>. In the general procedural rules, § 12 regulates the complaints procedure. In the sense of this provision, a complaint against an FIBAA commission decision can be submitted in writing within a term of one month after the announcement. *“The complaint is to be justified. With consideration of the reasons for the complaint and, if applicable, after the hearing of the appeals commission, the responsible*

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<sup>1</sup> Annex 22 applies for the model contract for programme accreditation and Annex 35 for system accreditation

*commission decides again and conclusively. In the case of a negative decision, the higher education institution is to pay the additional costs of the complaints procedure. The application of any deadlines set by FIBAA will be curtailed by the complaints procedure. Further matters are regulated by the rules of procedure for the FIBAA appeals commission.”* The rules of procedure of the appeals commission are presented as Annex 51.

The members of the FIBAA appeals commission (Annex 50) are appointed by the foundation council for a term of three years. Normally four people are members of the appeals commission. It comprises the groups of the higher education institution representatives, practitioners of professions and students. Current members are:

*Dr. Hans Höller, Siemens AG*

*Prof. Dr. Andreas Knorr, German University of Administrative Sciences Speyer*

*Prof. Dr. Johann Schneider, Lautertal-Engelrod*

*Erik Stohn, Student of law at the University of Potsdam*

The contracts between the higher education institutions and the agency (Annexes 22 and 35) are also based on the obligatory statements according to §§ 2 DL-InfoV1, 4e BDSG, 5 TMG, 55 RStV<sup>2</sup> (Annexes 22d and 35d) which, under the item “Extrajudicial dispute settlement procedure” gives the higher education institution the option to submit a complaint in writing to the Accreditation Council in the case of non-remedy of a complaint by the agency.

The complaints procedure in its entirety with relevant provisions is published on the agency’s website.

### **Assessment**

Terms and procedural steps of the internal complaints procedure are suitably regulated both for programme- and system accreditation in the general procedural rules and on the website of the agency.

### **Result**

Criterion 2.6 is fulfilled.

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<sup>2</sup> Regulation on Service Information Requirements, Federal Data Protection Act, Telemedia Law, The Broadcasting Agreement

## Criterion 2.7: Accountability

**The agency describes its procedures and appraisal criteria adequately in detail and publishes them. It publishes the names of the experts, the expert reports and the decisions of the accreditation procedures carried out by it.**

### Documentation

The procedures for the accreditation of study programmes and for system accreditation are described on the agency's website, along with the quality management, complaints procedure and all service areas of the agency. Various question- and assessment catalogues, manuals and other sample documents are also offered. A database informs of the programmes accredited by FIBAA with a search function that allows a differentiation based on various quality seals.

For procedures for the accreditation of study programmes, the FIBAA publishes the report for the awarding of the seal of the Accreditation Council in the database Higher Education Compass and on the website of FIBAA. The report for the awarding of the FIBAA quality seal is only published on the FIBAA website.

### Assessment

With the publishing on the website of the agency and in the database for accredited study programmes of the Accreditation Council, the criteria, procedures and decisions of the agency are made accessible to the interested public.

However, due to the transition situation resulting from the resolution of the Accreditation Council of 23.09.2011 on awarding agency-own seals, the question- and assessment catalogues submitted in the explanatory statement for the application of 14.10.2011 are not currently shown on the agency's website but still the previous versions. In these procedural documents, the criteria of the FIBAA and the Accreditation Council are integrated and correspondingly labelled. During the on-site visit, the agency explained that, with these procedural documents, the FIBAA seal and the seal of the Accreditation Council will be awarded together for programme accreditations in Germany until summer of this year. During the on-site visit, the expert group had the impression that those present from higher education institutions and experts from FIBAA were more confused by the number of procedural documents, seals and criteria. It was sometimes not clear to the higher education institutions which seal they had received in the accreditation procedure. That the FIBAA prominently places its own seal in the procedural documents for reasons of marketing and also prominently places the seal on the website does not simplify the information for outsiders. The quality seal of the Accreditation Council is even presented on the website only as "awarded according to the criteria of the national minimum requirements".

The expert group criticises this presentation as an attempt to open a ranking of the seals and to place FIBAA's own products at the upper end.

The expert group establishes that, so far in the procedures for the accreditation of study programmes, only faults have been found relating to the criteria of the Accreditation Council and not those of the FIBAA. As a result of the practice to date of awarding both seals in one procedure, the evaluation shows that complaints remain without consequences. This could be difficult for higher education institutions to understand, even though the conditions are clearly stipulated with the corresponding criteria of the Accreditation Council.

Surprised, the expert group find out that the criteria according to which the classification "exceeds the quality requirements" is determined and the concrete assessment scheme for awarding the FIBAA premium seal is intentionally not communicated to higher education institutions so as to avoid manipulation (see ESG 2.3).

### **Result**

Criterion 2.7 is partially fulfilled.

### **Recommendation**

1. The expert group recommends that the Accreditation Council issue a condition, according to which the agency should document the various requirements and definitions of the seals of the Accreditation Council and the FIBAA more clearly in the procedural documents and on the website.

## 4.2 Assessment based on the European Standards and Guidelines (ESG)

In the development of its criteria for the accreditation of accreditation agencies, the Accreditation Council comprehensively considered the ESG. However, the assessment regarding compliance with the ESG is given separately in an own section of the report, even though redundancies cannot be avoided.

In the procedures for the accreditation of Bachelor's- and Master's study programmes in the fields of economics, law and social sciences, and pursuant to the resolution of F-AC PROG on 21.07.2011 (see Explanatory statement for the application p. 39), higher education institutions can, in future, choose between the seal of the Accreditation Council and the quality seal of the FIBAA. In addition to this, the agency also offers the accreditation of PhD study programmes with its own seal. These procedures are based on the FBK PhD (higher education institution version Annex 8c, expert version Annex 10c); the decision on accreditation is made by the F-AC PROG pursuant to § 3 para. 2 of its rules of procedure (Annex 2).

Since its founding in 1994, the FIBAA has successfully concluded over 1,000 procedures for programme accreditation. For established study programmes that already present graduates and show the fulfilment of corresponding criteria in the framework of an accreditation procedure (Annex 12 a), the F-AC PROG awards the FIBAA premium seal. For this, special requirements must be presented in all five core areas (targets and strategy, admittance, implementation, academic environment and frame conditions, quality assurance). With expressly internationally oriented study programmes, the special international profile is additionally considered; according to FIBAA, special requirements are also considered for an MBA study programme (EQUAL European MBA guidelines) (see Explanatory statement for the application p. 40).

In addition to the procedures for programme- and system accreditation, the agency offers the following services: certifications of further education offers at higher education institutions, institutional audit, and institutional evaluation.

The subject of the certification procedures are offers of academic further education at higher education institutions that do not lead to an academic degree. The procedures are carried out based on the corresponding question- and assessment catalogue (FBK CERT) (higher education institution version Annex 44a, expert version Annex 44b).

Pursuant to § 3 para. 1 and 2, decisions on the certification, re-certification and possibly the determination of the conditions to be fulfilled are made by the FIBAA Certification Commission for Certificate and Further Education Courses (F-CC CERT). Pursuant to § 4 para. 1 of the rules of procedure, it normally comprises six members made up of the



status groups higher education institution representatives, practitioners of professions and students.

Currently, three of the six commission members of the F-CC CERT are also members of the F-AC PROG, two are also members of the F-AC INST. Since the introduction of the procedure, the FIBAA has certified two further education courses to date; further applications are being processed.

The two institutional procedures of institutional audit and institutional evaluation particularly cater to international higher education institutions, although the procedure description states that they may also be booked by German higher education institutions. **Institutional audit** predominantly caters to higher education institutions, however also allows the consideration of institutions within or tied to the HEIs (faculties, subject areas and business schools etc.), provided these are of self-controlling ability. Institutional audit examines all service areas of a higher education institution measured against the implementation of the higher education institution's own strategy and the question- and assessment catalogue FBK INST (Annex 34 b). The following aspects are considered: "commitment", "teaching and learning", "support processes", "research and development", "resources", "financing", "quality management" and "public relations". The experts evaluate the suitability of the aims (fitness of purpose) and the suitable implementation (fitness for purpose) based on the profile described by the higher education institution and its strategy.

The FIBAA quality seal for the institutional audit is awarded by the F-AC INST (see § 3 para. 2 of the rules of procedure, Annex 29) when the higher education institution can convincingly show that its profile and its strategy are suitable and that the activities within its service areas are suitably oriented on this strategy. To date, one procedure has been successfully concluded; further are in the process of being carried out.

As a consulting service, without the award of a quality seal, the FIBAA also offers **institutional evaluation procedures** based on the criteria of the contractor. Here, the FIBAA guarantees, above all, the transparent organisation of the procedure based on defined standards (impartiality and independence of the experts, comprehensive and consistent reporting etc.) and assessment through external, certifying expertise.

Aside from Germany, the FIBAA is officially certified in other European countries as well: in Switzerland, the FIBAA is certified (in the area of universities of applied science) to carry out accreditation procedures based on the requirements of the Federal Office for Professional Education and Technology (OPET); and in the Netherlands (and Flanders), the FIBAA (or some of its members) is formally certified and authorised to carry out accreditation procedures. In addition, FIBAA has also accredited study programmes at other

European higher education institutions (France, Great Britain, Ireland, Italy, Liechtenstein, the Netherlands, Austria, Russia, Switzerland, Slovenia, Spain and Czech Republic) along with selected non-European higher education institutions (China, India, Jordan, Mexico, Namibia, USA and Vietnam).

Further activities of FIBAA include expert training, seminars and workshops that can be classified in the developing consulting area “CONSULT” and that are to promote the accreditation-specific expertise of the experts. To implement this, the FIBAA differentiates between introductory training sessions for newly appointed experts and periodic further training (seminars) for experienced individuals.

In addition, the FIBAA offers regular seminars and workshops for higher education institutions on general and specific subjects in the areas of accreditation, certification and quality assurance. Examples of previously carried out events are:

- basic principles of programme accreditation;
- development of distance learning study programmes;
- recognition of knowledge and expertise gained outside of the HEI;
- quality standards in programme accreditation.

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

#### **STANDARD:**

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

#### **GUIDELINES:**

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

**As Standard 3.1 comprises the fulfilment of Part II of the ESG, first Standards 2.1 to 2.8 will be discussed here in order to then allow a statement on Standard 3.1.**

## 2.1 Use of internal quality assurance procedures

### STANDARD:

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

### GUIDELINES:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met. If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

## Documentation

The procedures of FIBAA are based on the following documents which transparently describe procedural routines and criteria, and which can be viewed on the website of FIBAA:

- programme accreditation with quality seal AR: FBK Accreditation Council higher education institution version (Annex 9a) FBK Accreditation Council expert version (Annex 11a),
- programme accreditation with the quality seal FIBAA/FIBAA premium: Manual for programme accreditation FIBAA (Annex 06), FBK higher education institution version FIBAA (FBK PROG for economics, law, social sciences) (Annex 8a), FBK Distance learning study programmes higher education institution version (Annex 8b), FBK expert version FIBAA FBK PROG for economics, law, social sciences) (Annex 10a), FBK distance learning study programmes expert version (Annex 10b), FBK PhD higher education institution version (Annex 8c), FBK PhD expert version (Annex 10c),
- certification: Document compilation CERT (Annex 44c), FBK CERT higher education institution (Annex 44a), FBK CERT experts (Annex 44b),
- system accreditation (seal AR): Manual for system accreditation (Annex 31), FBK SYS (Annex 34a),
- institutional audit (seal FIBAA/FIBAA premium): Manual for institutional audit (Annex 32), FBK INST (Annex 34b),
- institutional evaluation: focus and procedures are agreed by contract with the higher education institution at the beginning of the procedure. See sample contract (Annex 36 a), general contract conditions (Annex 36 b), compulsory statements FIBAA (Annex 36 c).

## Assessment

The criteria of FIBAA for institutional procedures, programme accreditation and certification expressly emphasise the significance of functioning internal quality assurance systems of higher education institutions, the requirements for which are concretely stated in all question- and assessment catalogues. Particularly for institutional procedures such as system accreditation and institutional audit, the FBK place the quality management of higher education institutions in the focus of the procedure, while the FIBAA is also active in consulting for quality development in the institutional evaluation.

## Result

Standard 2.1 is fully complied with.

### 2.2 Development of external quality assurance processes

#### STANDARD:

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

#### GUIDELINES:

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used. As external quality assurance makes demands on the institutions involved a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions..

## Documentation

Requirements and routines of the institutional procedures and for programme accreditation and certification of the agency are documented in the question- and assessment catalogues of the agency in a manner that is comprehensible for outsiders and in the manuals for the individual procedures (see documentation on Standard 2.1). These present an assessment approach based on the quality understanding of FIBAA that gives the higher education institution the final responsibility for the quality of teaching and learning. The agency's committees F-AC PROG, F-AC Inst and F-CC CERT, and representatives of higher education institutions, practitioners of professions and students are involved in the development of guidelines.

All documents are published on the agency's website and are thereby accessible for higher education institutions.

## Assessment

The question and assessment catalogues, along with the agency's manuals, suitably inform of the objectives, requirements of higher education institutions, and the routine of the agency's quality assurance procedures. Both in the Accreditation Council as superordinate authority and in the committees of the agency, relevant interest groups such as representatives of higher education institutions, of professional practice, students and also foreign experts were involved in the preparation of the criteria and procedural rules for programme- and system accreditation. The expert group welcomes that the development of the question- and assessment catalogues and the processing of basic questions or problems occurring within the accreditation- and certification commissions of the agency involve all status groups.

## Result

Standard 2.2 is fully complied with.

### 2.3 Criteria for decisions

#### STANDARD:

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

#### GUIDELINES:

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

## Documentation

The agency's requirements and routine of the institutional procedures and of programme accreditation and certification are regulated and published in the individual question- and assessment catalogues and the manuals for the individual procedures (see documentation on Standard 2.1).

The decisions in the procedures concluding with the quality seal of the Accreditation Council are based on the resolution of the Accreditation Council: "Procedures of the Accreditation Council for assessment of the accreditations performed by the agencies" of 08.12.2009 and are evaluated for compliance with the criteria and procedural rules on a random sample basis or as required by circumstances.

## Assessment

Due to the transition situation resulting from the resolution of the Accreditation Council of 23.09.2011 on awarding an agency's own seal, the question- and assessment catalogues submitted in the explanatory statement for the application of 14.10.2011 are not currently shown on the agency's website but still the previous versions. In these procedural documents, the criteria of the FIBAA and the Accreditation Council are integrated and correspondingly labelled. During the on-site visit, the agency explained that, based on these procedural documents, the FIBAA seal and the seal of the Accreditation Council were always awarded together for programme accreditation in Germany. Beginning with the resolution of the F-AC PROG of 21.07.2011, this practice is to change. During the on-site visit, the expert group had the impression that those present from higher education institutions, and experts from FIBAA were more confused by the number of procedural documents, seals and criteria. It was sometimes not clear to the higher education institutions which seal they had received in the accreditation procedure. That the FIBAA prominently places its own seal in the procedural documents for reasons of marketing and also prominently places the seal on the website does not simplify the information for outsiders.

The expert group criticises that the FBK for FIBAA-own seals significantly differ in the version for higher education institutions and experts: The higher education institutions (e.g. Annex 8) only receive the criteria for the assessment "meets the quality requirements", while the FBK "expert version" (e.g. Annex 10) also lists requirements for the categories "exceeds the quality requirements". As the experts evaluate fulfilment of the FIBAA criteria in five assessment levels ("excellent", "exceeds the quality requirements", "meets the quality requirements" "fails to meet the quality requirements" and "n.o., not relevant"), a binding description of at least the category "excellent" is missing. The category "fails to meet the quality requirements" and "not relevant" may be clear or self-explaining from the context. The agency states that it intentionally does not communicate the category "exceeds the quality requirements" or the evaluation scheme for the awarding of the FIBAA premium seal to the HEIs in order to avoid manipulation. The expert group establishes that thereby an important part of the procedural documents for the FIBAA premium seal is not published and the process of decision-making must remain unclear for the higher education institutions.

With regard to the English-language website of the agency, the expert group notes that not all documents and particularly question- and assessment catalogues are available in the English language.

However, as the structured question- and assessment catalogues form the basis of the various procedures of the agency, and the experts are comprehensively prepared for their tasks, a consistent application of the criteria is guaranteed.

## Result

Standard 2.3 is partially complied with.

## Recommendation

1. The FIBAA should create more transparency with regard to the criteria and the provisions for awarding the FIBAA premium seal.

### 2.4 Processes fit for purpose

#### STANDARD:

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

#### GUIDELINES:

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes.

Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance. Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;
- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review; recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality

## Documentation

The FIBAA bases its work on a guiding vision that is published on its website. It comprises supporting the higher education institution as an autonomous actor, compliance with guidelines, orientation on international standards and social requirements for higher education. The results of FIBAA's work are to provide students, the employment market and also the political world with reliable information pertaining to the performance of the higher education institutions. In its work, the FIBAA orients itself on a multidimensional definition

of quality and optimises its processes through ongoing self-reflection. Central principles for quality are the requirements of “compliance with guidelines”, “value orientation” and “objectives orientation” (Application p. 7f)

Both for programme accreditation with the various quality seals of the Accreditation Council and FIBAA, and for the institutional procedures, the agency works based on the procedural steps: self-documentation of the higher education institution, assessment by an expert group and decision by the appropriate committee (see Application p. 16f).

With the experts, the FIBAA generally provides that these are to be nominated by the responsible committee such as F-AC or F-CC CERT after a successful probationary period. An introduction questionnaire is to be filled out by the applicant experts based on which the head office decides whether probationary deployment should take place in programme accreditation or in an institutional procedure. The information regarding the probationary nomination by the individual F-AC or F-CC CERT, pursuant to § 2 para. 8 of the individual rules of procedure (Annex 2, 29 and 42), is tied to an invitation to the next expert training. In the case that deployment without previous training should be necessary, the procedural supervisor takes on the information before and during the procedure. After the probationary deployment, and in mutual agreement, appointment takes place by the responsible F-AC in the expert pool.

Pursuant to the explanatory statement for the application, 397 nominated experts and 102 probationary experts are currently included. In 2010, a total of 191 experts were fielded for programme accreditations. This year it is 129 so far. In 33 procedures, foreign experts were deployed.

The expert pool for institutional procedures comprises 37 nominated experts and two probationary experts. Of these, 12 nominated experts and one probationary expert come from foreign countries (Bulgaria, the Netherlands, Austria, Romania, Switzerland, Hungary). In the area of institutional procedures, a total of 16 experts were deployed in 2011.

For the composition of an expert team for the areas programme accreditation and institutional procedures, FIBAA refers to the individual expert pool. The head of the responsible F-AC or the F-CC CERT decides the composition of the expert team for the individual procedure based on a recommendation by the head office, pursuant to § 3 para. 8 of the rules of procedure (Annexes 2, 29 and 42).

Students are involved in all expert groups and committees (see rules of procedures § 4 para. 1 of the F-AC PROG (Annex 2), F-AC INST (Annex 29) and F-CC CERT (Annex 42) and the expert handout in Annex 55.

As documentation of the general preparation of the experts, the



FIBAA presents a sample in Annex 57 and the routine of a current expert seminar in 57 b. In addition to the introductory seminars for new experts, which are to be visited within the first year at the latest, FIBAA also provides for periodic seminars for experienced experts.

### **Assessment**

The FIBAA formulates an understanding of quality that is oriented on the principles of responsibility of the higher education institutions for the quality of the study programmes and the measurement and validation of the objectives of the higher education institutions and which is to be broken down to the individual study programme. In this, it also considers aspects of quality advancement of higher education institutions through internal quality assurance (see Criterion 2.1)

In general, the procedures of FIBAA are suitable for implementing the defined aims with the three-stage structure of self-documentation, on-site visit and report and are also efficiently carried out by the agency. As is common in the German accreditation system and implied in the provisions of the Accreditation Council, the follow-up refers only to evidence of the fulfilment of the conditions in which FIBAA involves the expert group (see ESG 2.6).

The expert group highly appreciates FIBAA's proven practice of maintaining a pool of experienced experts for the accreditation procedures. Here, the probationary employment of experts before acceptance in the pool offers the opportunity to personally get to know each other. Also highly positive is the advised "expectation" of the agency in writing regarding participation in an expert seminar, in the first year of activity as an expert at the latest. The regularly held expert seminars for programme accreditation treat the major procedural rules and criteria for accreditation procedures or – in the advanced version – updates, and thereby present a good preparation or forum for exchange of experience. Experts are also prepared for the procedures of system accreditation; however, due to the low number of procedures, this is normally only when required. Overall, FIBAA gives the expert group the impression that it places great value on the preparation and further training of its experts as a major element of assessment quality.

The expert group has the impression that the institutional audit is still in a trial phase. The expert group establishes that this procedure, which is directed towards the strategic focus of the higher education institution, does subject the individual study programmes to a quality evaluation (see FBK INST Annex 34 b). The qualification objectives (Clause III.2), the curricula (Clause III.5) and the examination system (Clause III.8) are assessed. The F-AC INST rationalises this approach with the argument that the quality of the products of higher education institutions must also be assessed.

The documents to be presented by the higher education institution are also very exten-

sive: study- and examination regulations, module manuals, evaluation-/accreditation reports, further education offers, information on students, number of graduates, dropout rates, examination results or results of ranking, evaluations and accreditations. In view of the aim of the institutional audit to assess performance areas of a higher education institution with regard to the strategy of the higher education institution (explanatory statement for the application p. 38), the expert group finds these requirements more compartmentalised. They recommend critically reconsidering the structure of the inclusion of study programmes in the institutional audit after analysing first experience with the procedure.

The expert group criticises that no set provisions are documented for the disciplinary composition of the FIBAA accreditation commission and appeals commission, or for the number of representatives in the status groups. During the on-site visit, the management explained that it recommends qualified individuals for appointment to the foundation council based on its own judgment. Although the concrete composition of the committees is clear and comprehensible, criteria and the qualitative distribution should be documented for reasons of transparency and reliability.

The strong international orientation of the committees of FIBAA is not sufficiently reflected in the deployment of experts. Here, the agency could use its international networks more strongly for acquisition. The expert pool is also not yet broad enough for the institutional procedures.

It should be reconsidered as to whether a three-year office term for student members in the accreditation commission and the appeals committee is appropriate considering the shorter standard periods of study in the staged study structure.

## **Result**

Standard 2.4 is **fully complied with**.

## 2.5 Reporting

### STANDARD:

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

### GUIDELINES:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone. In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers. Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

## Documentation

Pursuant to Clause 1.1.9 of the resolution of the Accreditation Council "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" of 08.12.2010, publishing of the assessment reports in programme accreditation is provided for only for procedures opened starting in June 2010. In the transition time, abstracts are made available both on the website of FIBAA and in the Higher Education Compass. The FIBAA states that reports for procedures with the FIBAA seal (programme accreditation, certification, institutional audit) can also be found in their entirety on FIBAA's website.

In all reports, FIBAA divides descriptive and analytic/assessment sections in order to facilitate readability (see Explanatory statement for the application p. 29). This is also to help differentiate between conditions and report recommendations and make deviations of the decisions of the individual accreditation commission from the report voting transparent. For the procedures for programme accreditation and certification, the FIBAA presents samples of the reports in the annexes (14, 15a, 47).

## Assessment

With publication of the assessment- or abstract reports, the decisions of the agency are sufficiently transparent. The assessment reports of the procedures with FIBAA seal are clearly structured and make it easier for the interested public to understand information on the current position and the assessments of the experts.

The abstracts on the website of the agency do not always make it clear enough whether they are referring to criteria of the FIBAA or of the Accreditation Council. In addition, the expert group criticises the "quality profile" from the FIBAA criteria as being difficult to com-

prehend as reference is not made to the FBK in the table and therefore the methodology underlying the list on the website is not clearly understandable enough for outsiders.

## Result

Standard 2.5 is fully complied with.

## Recommendation

1. In the published “quality profile” of the individual study programme, the underlying methodology should be mentioned.

### 2.6 Follow-up procedures

#### STANDARD:

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

#### GUIDELINES:

Quality assurance is not principally about individual external scrutiny events: It should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

## Documentation

Pursuant to the procedural rules of the Accreditation Council, accreditations under certain conditions may also be issued for programme- and system accreditation, or the procedure may be suspended.

On successful conclusion of a procedure in the area of programme accreditation according to FIBAA criteria or certification, the higher education institution is accredited or certified for five years with its first-time accreditation/first-time certification, and seven years for re-accreditation/certification. In this case, major quality criteria marked as so-called asterisk criteria (\*) must be achieved with attainment of at least the assessment level “meets the quality requirements”. Non-fulfilment of this criteria leads to accreditation/certification with a corresponding condition. Other quality criteria can be assessed with “fails to meet the quality requirements” without endangering the accreditation. The term for fulfilment of the condition is regularly nine months and, in justified cases, can be shortened or extended (by a maximum of six months). The FIBAA quality seal is awarded when fewer than seven asterisk criteria are not fulfilled. If more than seven asterisk criteria are not fulfilled then accreditation/certification is denied and can be reapplied for after a close-period of usually one year.

Awarding of the FIBAA quality seal for the institutional audit under certain conditions is also possible (Explanatory statement for the application p. 30).

In the case that a condition is issued, the higher education institutions are informed of the deadlines up to which documents providing evidence of fulfilment must be submitted. Experts supported by a responsible FIBAA employee evaluate the fulfilment of the conditions.

In all procedures of accreditation and certification, recommendations are issued that, according to FIBAA, are not binding but may be discussed anew as part of a reaccreditation/certification process (Explanatory statement for the application p. 30).

### **Assessment**

The agency's provisions on conditions in the procedures of programme- and system accreditation with the quality seal of the Accreditation Council comply with the current provisions. Also the provisions for the further procedures of external quality assurance for assessing conditions and recommendations represent sensible follow-up measures in the sense of the ESG.

### **Result**

Standard 2.6 is fully complied with.

#### **2.7 Periodic reviews**

##### **STANDARD:**

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

##### **GUIDELINES:**

Quality assurance is not a static but a dynamic process. It should be continuous and not "once in a lifetime". It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

### **Documentation**

Pursuant to the procedural rules of the Accreditation Council, decisions on programme- and system accreditation are issued with limited accreditation terms, which normally have a new accreditation as a result. For the procedures for programme accreditation with FIBAA seal and certification, the accreditation term is seven years and five years only on first-time accreditation. The FIBAA quality seal in the institutional audit is awarded for six years (Application assessment p. 30).

## Assessment

The accreditation term restricted by the procedural rules of the Accreditation Council for procedures for programme- and system accreditation period has a periodic repetition as a result, pursuant to Standard 2.7. The quality seals of FIBAA are also awarded for a limited time only, resulting in a periodic nature here as well.

## Result

Standard 2.7 is fully complied with.

### 2.8 System-wide analyses

#### STANDARD:

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments etc.

#### GUIDELINES:

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work..

## Documentation

In the self evaluation, FIBAA states that it regularly analyses customer satisfaction surveys of its experts and of higher education institutions and discusses these results in internal committees. Also in “Jour Fixe” and in workshops, results from the procedures for external quality assurance of the agency are discussed (Explanatory statement for the application p. 33). The FIBAA has not yet submitted an analysis of its own work extending beyond the progress report on the last accreditation period.

## Assessment

During the on-site visit, the agency refers to the self-reflective components in the annual report to the foundation council. The expert group also notes that the regular newsletter of the agency is very detailed and treats important subjects from the HEI world. However, it became clear that the assessment of the results of their procedures in the agency is more informal, e.g. takes place in the form of a “Jour Fixe”. Due to the workload of daily business, the expert group can understand this. However, in its own interest, the agency should systematise the analysis and include all procedural types from the various business areas. In this context, the expert group appreciates the set up of a knowledge data-

base in which, among other things, experience from international procedures is processed for the head office.

### **Result**

Standard 2.8 is partially complied with.

### **Recommendation**

1. FIBAA should evaluate findings from its procedures more systematically, possibly together with other agencies.

### **Overall assessment for Standard 3.1:**

**In the overall view of the assessments of Standard 2.1 to Standard 2.8, it can be established that Standard 3.1 is substantially complied with.**

### **3.2 Official status**

#### **STANDARD:**

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

### **Documentation**

Pursuant to § 2 para. 1 no. 1 of the law on the establishment of a *Foundation for the Accreditation of Study Programmes in Germany*, the foundation has the mandate to accredit and re-accredit accreditation agencies. It grants the time-restricted right to accredit study programmes or internal quality assurance systems of HEIs by awarding the seal of the foundation. Since 13.04.2002, FIBAA has been entitled, without interruption, to award the quality seal of Accreditation Council.

In addition to Germany, the FIBAA is also officially certified in other European countries: in Switzerland, the FIBAA is certified (in the area of universities of applied science) to carry out accreditation procedures based on the requirements of the Federal Office for Professional Education and Technology (OPET); and in the Netherlands (and Flanders), the FIBAA (or some of its members) is formally certified and authorised to carry out accreditation procedures (Annex 87c and d).

### **Assessment**

Since its first-time accreditation by the Accreditation Council on 13.04.2002, the FIBAA

has been recognised, without interruption, by the competent public authority in Germany. On a positive decision of the Accreditation Council in the ongoing procedure of accreditation, compliance with the current criteria and procedural rules would be confirmed and the agency certified to carry out procedures for programme- and system accreditation in the upcoming accreditation time period.

## **Result**

Standard 3.2 is fully complied with..

### **3.3 Activities**

#### **STANDARD:**

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

#### **GUIDELINES:**

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

## **Documentation**

The procedures of the agency for external quality assurance are presented as an overview in the introduction of Chapter 4.2 (p.35). According to the agency's statements, it has made 1,000 decisions on the accreditation of study programmes or partial study programmes to date. In addition, it has been certified to carry out procedures of system accreditation since 2008 and, according to a statement during the on-site visit, expects to complete the first procedure at the beginning of 2012.

In addition to Germany, the FIBAA has also accredited study programmes in other European countries such as France, Great Britain, Ireland, Italy, Liechtenstein, the Netherlands, Austria, Russia, Switzerland, Slovenia, Spain and Czech Republic along with some non-European higher education institutions (in China, India, Jordan, Mexico, Namibia, USA and Vietnam).

In addition to the procedures for programme- and system accreditation, the FIBAA offers certification of HEI further education courses and, in the institutional area, the institutional audit and the institutional evaluation. According to statements by FIBAA, two further education courses have been certified to date (Explanatory statement for the application p. 39) and one procedure for institutional audit has been concluded (Explanatory statement for the application p. 39). Further procedures are currently being carried out.

## **Assessment**

With the programme accreditation as the quantitative main business, the agency regularly



carries out procedures for external quality assurance at the level of study programmes, pursuant to Standard 3.3. In the further business fields, such as certification, institutional audit and institutional evaluation only few procedures have been completed to date.

## **Result**

Standard 3.3 is fully complied with.

### **3.4 Resources**

#### **STANDARD:**

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

#### **Documentation**

Currently, 12 people work full-time in the head office of FIBAA and six people work part-time (three full-time equivalents). The management of the head office is taken on by two managing directors, one of whom works on a fee basis. In addition to the employees in the four service areas, FIBAA has established “executive department positions” that are filled by the assistance to the management in full-time, and by the data protection officer and quality management officer in part-time. For procedural supervision there are six permanently employed project managers in the service areas, a further position was filled on 01.12.2011. In addition, five external officers are available for accreditation procedures on a fee basis. In the area of “internal services”, three people work full-time and five work part-time. With the exception of three assistants and the officers, all employees are permanently employed. The rented office space of FIBAA in Bonn comprises two levels with a total area of 556 sq m. The workplaces are equipped with modern office technology and have access to Internet and Intranet.

Pursuant to p. 28 of the explanatory statement for the application, the employees of FIBAA are selected via a multi-stage procedure involving the department managers (and their deputies), all people relevant for the position and the management board. Based on a detailed training plan (Annex 77) that also provides for accompanying several on-site visits, full- and part-time procedural supervisors are to be familiarised with the procedures and processes of FIBAA. Pursuant to the quality concept (Annex 66, p. 13), new procedural supervisors visit an expert seminar, accompany two on-site assessments and participate in “Jour Fixe” and specific internal workshops.

In addition, FIBAA allows participation in conferences and conventions. The employees are regularly informed of new provisions and their application as part of “Jours Fixes” and

workshops (see Annex 26, 90).

According to the explanatory statement for the application, the employees of FIBAA have various options for training and also special paid leave. By the end of 2011, agreements are to have been introduced between the employees and the management in order to present joint perspectives, individual development options e.g. concrete further education measures and career development options. To date, regular feedback discussions have been given on the results of the probationary period, then related to events and always at the end of the year. Starting in January 2012, feedback discussions are to take place every half year and, as usual, when called for by an event.

Biographical data for the employees of the head office and for the freelancers is provided in Annex 76.

### **Assessment**

With regard to personnel, materials and finances, the resources of the agency are suitable. The expert group positively assesses the strong growth of personnel in the head office as a basis for professional operations and the filling of central positions in the area of internal services for quality management and data protection.

Compared with the findings of the reaccreditation in 2006, the ratio of full-time to part-time employees has significantly improved. For the expert group, it is understandable that FIBAA balances peaks in operations through the use of part-time workers; the management employs full-time workers as a priority. Nevertheless, part-time employees should regularly assist with procedures so that they may stay up-to-date with the current provisions.

The members of the F-AC PROG emphasise that, for them, no qualitative differences between full-time and part-time procedural supervisors is perceived. The quality of the procedures in general, however, has increased over the past years, also due to the higher share of full-time employees. In this context, the expert group appreciates that freelancers experience the same introductory training as new full-time employees and that they are involved in communication through the “Jours Fixes”.

The biographical data on the employees of the head office and the part-time officers for accreditation procedures demonstrates broad expertise in the relevant academic fields, in higher education institution management and international experience.

The procedural documents presented with the explanatory statement for the application were comprehensively revised in 2011 and show that the human resources of the agency guarantee a further development of the procedures.

## Result

Standard 3.4 is fully complied with.

### 3.5 Mission statement

#### STANDARD:

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

#### GUIDELINES:

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

### Documentation

The FIBAA bases its work on a guiding vision that is published on its website. It comprises: the aim of supporting the higher education institution as an autonomous actor, compliance with guidelines, orientation on international standards and social requirements for higher education. The results of FIBAA's work are to provide students, the employment market and also the political world with reliable information pertaining to the performance of the higher education institutions. In its work, the FIBAA orients itself on a high quality definition and optimises its processes through continuous self-reflection. Central principles for quality are the requirements of "compliance with guidelines", "value orientation" and "goal orientation".

With its accreditations, the FIBAA sets itself the goal not of a uniform reference model but of enabling diversity. The evaluation of the integration of research results into teaching and learning represents a requirement for higher education institutions to continuously orient themselves in designing study programmes on the changing needs of students, the job market and society.

### Assessment

The FIBAA formulates and publishes an understanding of quality that is oriented on the principles of responsibility of the higher education institutions for the quality of the study programmes and the measurement and validation of the objectives of the higher education institutions, that states clear goals and that forms the basis for the business areas accreditation/certification/institutional audit.

## Result

Standard 3.5 is fully complied with.

### 3.6 Independence

#### STANDARD:

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

#### GUIDELINES:

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

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

#### Documentation

The FIBAA goes back to an institution entered in the trade register already in 1987 (Annex 79 b) and was established as a Swiss federal foundation (Annex 79 b) with the name Foundation for International Business Administration (FIBAA) by official deed of 24.07.2000 (Annex 79 c).

Through the acquisition of the “person-cored” foundation in 2004, the FIBAA transferred to its current legal status in the sense of Art. 80ff. ZGB (Swiss Civil Code) and has been recognised as a Swiss non-profit foundation since that time.

The descriptions of the tasks of the bodies and committees pursuant to the foundation's statute and rules of procedures do not contain any reciprocal powers to instruct. There are also no recognisable indications of interventions by third parties in the work of the agency.

For the members of the FIBAA accreditation commissions and the experts, the following reasons for possible impartiality are mentioned in § 2 para. 2 and 3 of the rules of procedure of F-AC PROG (Annex 2) and analogously also in § 2 para. 2 and 3 of the rules of procedure for the F-AC INST (Annex 29):

*“(2) If matters are consulted that affect the interests of an individual, his spouse, his parents, children, siblings or a person authorised to represent him by law or by power of attorney, this individual may not take part in the discussion and voting. He/She is, however, to be heard before the decision.*

*(3) Bias toward an institution will be irrefutably assumed,*

*a) when an individual has received a complaint through a decision of the institution at the*

*time of the action or during five years before; this particularly includes rejecting, dismissive, revoking, withdrawing or similar administrative acts, as well as the report of a criminal offense,*

*b) when, at the time of the action or during five years before, the individual is or has been employed by the institution, or in a doctoral-, post-doctoral- or appointment procedure at the institution in question,*

*c) when, at the time of the action or during three years before, the individual was enrolled at the institution, is participating or has participated in joint research projects or other intensive cooperation projects, or*

*d) when, at the time of the action or during three years before, the individual or the faculty to which the individual belongs is or has been assessed by employees of the institution.*

*(4) If one of the bias requirements is given with an individual, or if it is assumed that an individual is biased, this is to be immediately advised on own initiative and documented. The biased individual is to be excluded from the discussions and voting.*

*(5) If commission members were active as experts, they do not participate in the voting on the individual accreditation procedure.”*

Annex 3b contains a declaration to be signed by members of the F-AC PROG and F-AC INST for maintaining the code of conduct, confidentiality, consultation- and data secrecy and the advising of any reasons for bias. The experts also sign such a declaration (Annex 59) and are also informed of the requirements as part of the expert handout regarding the requirements (Annex 55).

## **Assessment**

As the agency is organised in the legal status of a Swiss foundation, it possesses its own legal entity.

There are no indications that the committees and bodies of the agency are subject to reciprocal instructions or external dependencies in their decisions. The impartiality declarations for participants in the accreditation procedures (commission members, experts) are assessed as very good as they not only exclude possible bias but also inform about the issues of data protection and confidentiality. The expert group has the impression that the FIBAA places great value on impartiality in its work and the protection of personal data.

The agency justifies the representation of the employers' associations in the foundation council with feedback on employability, the assessment of which represents an integral element of the procedures of the FIBAA. The foundation council is also not involved in the daily work. With a view to the specialisation in the area of economics, the interest in in-

volving the employers' associations is comprehensible for the expert group. Furthermore, as the ESG promote a participation of stakeholders in the quality assurance, the representation of the business associations in the foundation council do not represent a fault.

## Result

Standard 3.6 is fully complied with.

### 3.7 External quality assurance criteria and processes used by the agencies

#### STANDARD:

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

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

#### GUIDELINES:

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

## Documentation

For procedures for public or state-recognised private higher education institutions in Germany, the higher education institution can, pursuant to the explanatory statement for the application of 14.10.2011, choose between a procedure based on the criteria of the Accreditation Council, the FIBAA or a combined procedure for programme accreditation. To this extent, the accreditations of study programmes with FIBAA are based on the following documents:

- with the quality seal of the Accreditation Council: Manual programme accreditation (Accreditation Council) of October 2011 (Annex 4), question- and assessment catalogue (Accreditation Council), higher education institution version (Annex 9a), question- and assessment catalogue (Accreditation Council) expert version (Annex 11a)
- with the quality seal FIBAA/FIBAA premium: Manual for programme accreditation FIBAA (06), FBK higher education institution version FIBAA (FBK PROG for economics, law, social sciences) (8a), FBK Distance learning study programmes higher education

institution version (8b), FBK expert version FIBAA FBK PROG for economics, law, social sciences) (10a), FBK distance learning study programmes expert version (10b), FBK PhD higher education institution version (8c), FBK PhD expert version (10c).

The procedures for system accreditation are based on the following documents:

- System accreditation manual (Accreditation Council) of September 2011 (Annex 31)
- Question- and assessment catalogue (system accreditation) of April 2008 (Annex 34 a).

In addition to the procedures for programme- and system accreditation, the agency offers the following services: certifications and further education offers to higher education institutions, institutional audit and institutional evaluation.

The subject of the certification procedures are the offers of academic further education at higher education institutions that do not lead to an academic degree. The procedures are carried out based on the corresponding question- and assessment catalogues (FBK CERT) (higher education institution version Annex 44a, expert version Annex 44b).

The institutional audit particularly caters to international higher education institutions. It assesses all service areas of a higher education institution or a partial unit against the implementation of the higher education institution's own strategy and pursuant to the question- and assessment catalogue FBK INST (Annex 34 b). As a consulting service, without the award of a quality seal, the FIBAA also offers **institutional evaluation procedures** based on the criteria of the contracting HEI. Here, aims and the routine are regulated in the agreements with the higher education institutions before the commencement of the procedure (Annex 36a).

The composition of the F-AC PROG, F-AC INST and F-CC CERT are analogously regulated in § 4 para. 1 of the individual rules of procedure (Annex 2, Annex 29 and Annex 42) and comprise members from higher education institutions, practitioners of professions, and students. Currently, the F-AC PROG has 19 members, of these ten from higher education institutions, seven from professions (including one union representative) and two students (Annex 2). The F-AC INST currently has 11 members (five from higher education institutions, five from professions including one union representative, and one student) (Annex 29). The appeals commission of the FIBAA currently consists of two higher education institution representatives, one representative of a profession and one student.

Pursuant to the current resolution of the F-AC PROG (Annex 2), F-AC INST (Annex 56) and F-CC CERT (Annex 56c), the FIBAA compliantly involves people from higher education institutions, students and professional practice in each expert team.

For procedures for the accreditation of study programmes opened after 01.06.2010, the FIBAA publishes the report for the awarding of the seal of the Accreditation Council in the database Higher Education Compass and on the website of FIBAA. The report for the awarding of the FIBAA quality seal is only published on the FIBAA website.

For complaints from higher education institutions regarding accreditation decisions, both a binding complaints procedure and an appeals commission has been set up. The accreditation agreements with the higher education institutions refer to the general procedural rules of FIBAA (Annexes 22 bc and 35b c)<sup>3</sup>. In the general procedural rules, § 12 regulates the complaints procedure. In the sense of this provision, a complaint against an FIBAA commission decision can be submitted in writing within a term of one month after the announcement. *“The complaint is to be justified. With consideration to the reasons for the complaint and, if applicable, after the hearing of the appeals commission, the responsible commission decides again and conclusively. In the case of a negative decision, the higher education institution is to pay the additional costs of the complaint procedure. The application of any deadlines set by FIBAA will be curtailed by the complaints procedure. Further matters are regulated by the rules of procedure for the FIBAA appeals commission.”* The rules of procedure of the appeals commission are presented as Annex 51.

The members of the FIBAA appeals commission (Annex 50) are appointed by the foundation council for a term of three years. Normally four people work in the appeals commission. It comprises the groups of the higher education institution representatives, practitioners of professions and students. Current members are:

*Dr. Hans Höller, Siemens AG*

*Prof. Dr. Andreas Knorr, German University of Administrative Sciences Speyer*

*Prof. Dr. Johann Schneider, Lautertal-Engelrod*

*Erik Stohn, Student of law at the University of Potsdam*

The contracts between the higher education institutions and the agency (Annexes 22 and 35) are also based on the obligatory statements according to §§ 2 DL-InfoV1, 4e BDSG, 5 TMG, 55 RStV<sup>4</sup> (Annexes 22d and 35d) which, under the item “Extrajudicial dispute settlement procedure” give the higher education institution the option to submit a complaint in writing to the Accreditation Council in the case of non-remedy of a complaint by the agency.

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<sup>3</sup> Annex 22 applies for the model contract for programme accreditation and Annex 35 for system accreditation

<sup>4</sup> Regulation on Service Information Requirements, Federal Data Protection Act, Telemedia Law, The Broadcasting Agreement



The complaints procedure in its entirety with relevant provisions is published on the agency's website.

For FIBAA's regulation of the issuing and assessment of conditions (see ESG 2.6).

### **Assessment**

The procedures and criteria of the agency are defined and comprehensibly described in the individual question- and assessment catalogues, and provided on the website of the agency. With the exception of the criteria for the assessment level "exceeds the quality requirements" and the concrete assessment scheme for the premium seal, all criteria and procedural rules are published (see ESG 2.3).

In general, all procedures of the agency are based on the principle of the three-stage peer review with self-documentation, the on-site visit and assessment report of an expert group. Students are regularly involved in all business areas in committee and expert groups. Deadlines and procedural routines of the internal complaints procedure of the agency are suitably regulated and comprehensibly documented in the general rules of procedure and on the website of the agency. The agency's provisions for issuing and assessing conditions in the procedures for programme- and system accreditation and the further procedures for external quality assurance represent sensible follow-up measures in the sense of ESG (see ESG 2.6).

The agency quickly fulfils the obligation pursuant to § 11 of the agreement to enter the accredited study programmes in the Higher Education Compass and to forward the assessment reports and accreditation decisions. The assessment reports from the procedure concluding with the quality seal of the FIBAA are published on the agency's website in suitable form.

### **Result**

Standard 3.7 is fully complied with.

### 3.8 Accountability procedures

#### STANDARD:

Agencies should have in place procedures for their own accountability.

#### GUIDELINES:

These procedures are expected to include the following:

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

A mandatory cyclical external review of the agency's activities at least once every five years.

#### Documentation

The FIBAA presents a quality concept dated June 2011 (Annex 66) and a process manual (Annex 67). In January 2011, the agency hired a "quality management officer" (QMB); in June 2011, the Quality Team (Q-Team) commissioned by the management board began its work (Explanatory statement for the application p. 35).

The Q-Team is comprised of the following individuals or functions: quality management officer, a member of the management, the management of the division programme accreditation, the management of the division system accreditation, representation of the division internal services and the data protection officer (DSB). It is responsible for controlling the quality management and the implementation of quality measures. It meets at least four times a year. If required, additional meetings are called by the QMB.

The aims of the internal quality management lie in "legal compliance", "goal-orientation" and "value orientation" and are described as follows in the quality concept (Annex 66, p. 6.):

*"Legal compliance means the structuring of criteria, indicators and procedures in compliance with the relevant internal and external provisions.*

*Goal-orientation means the optimal structuring of criteria, indicators and procedures with regard to the commission and the self-understanding of FIBAA.*

*Value orientation means the structuring of the criteria, indicators and procedures with consideration of ethical aspects such as a sense of responsibility, respect and fairness, sense of proportion and comprehensibility, reflection on demands and reality.”*

As a framework of reference for implementation of the quality principles in daily work, the agency developed a quality matrix (Annex 67, no page given). In this matrix, the quality aims of legal compliance, goal-orientation and value orientation are covered for the three areas of the agency, support, performance and management, and assigned corresponding quality measures. The implementation of the quality measures is to be assessed, among other things, through various evaluations and other measures:

- Evaluation of employees
- Evaluation of experts
- Evaluation of procedures by the higher education institutions
- Evaluation of training sessions
- Individual quality development
- Handling of quality deficits
- Problem management

The results of the evaluations are discussed with the division managers in question (Annex 66, p. 9) and published anonymously in the newsletter. From the analysis of these evaluations, the Q-Team may set measures, responsibilities and schedules (“measure control lists”).

The results of the evaluations are not documented in the annexes. Only a model evaluation of feedback from a higher education institution on FIBAA has been provided (Annex 68).

According to the explanatory statement for the application p. 40, the systematic, individual quality development of the employees of FIBAA comprises the elements of individual feedback, collegial feedback, “upward feedback” and the evaluation results that can be combined in the individual case. If required, they can be supplemented by further training measures such as sitting-in on assessments on-site, specific-case internal workshops, “Jours Fixes”, and participation in external events.

The descriptions of the tasks of the bodies and committees pursuant to the foundation’s statute and rules of procedures do not contain any reciprocal powers to instruct. There are also no recognisable indications of interventions by third parties in the work of the agency.

For the members of the FIBAA accreditation commissions and the experts, reasons for possible bias are mentioned in § 2 para. 2 and 3 of the rules of procedure of F-AC PROG (Annex 2) and analogously also in § 2 para. 2 and 3 of the rules of procedure for the F-AC INST (Annex 29) and analogously in § 2 para. 2 of the rules of procedure of F-CC CERT (Annex 42).

Annex 3b contains a declaration to be signed by members of the F-AC PROG and F-AC INST for maintaining the code of conduct, confidentiality, consultation- and data secrecy and the advising of any reasons for bias. The experts also sign such a declaration (Annex 59) and are also informed of the requirements as part of the expert handout regarding the requirements (Annex 55).

In Annex 87/I, the FIBAA presents a cooperation agreement with the also discipline-focused agencies *Accreditation Agency for Study Programmes in Health and Social Sciences e.V. (AHPGS)* and *Accreditation Agency Specialised in Accrediting Degree Programmes in Engineering, Informatics, the Natural Sciences and Mathematics (ASIIN)* of 10.06.2008, which regulates cooperation in procedures of programme- and system accreditation. Pursuant to this document, a “lead agency” is determined for a joint procedure which assists the other agencies and also makes the decisions regarding accreditation. Up to now, such procedures have been seldom.

### **Assessment**

The expert group establishes that the agency has prepared a comprehensive quality concept in 2011, whereby the approaching re-accreditation could obviously accelerate the reflection. It did not become clear for the expert group as to which measures of quality assurance came into effect in the last accreditation period. During the on-site visit, the management explained that, due to the heavy work load in the last few years, there have been elements of quality development but little systematic quality development. In this context, the expert group welcomes the creation of a position for a quality management officer who can consolidate the processes.

In the quality concept published on the agency’s website, the quality aims, instruments for assessment of implementation, and responsibilities are set, sufficiently described and harmonised with each other. In the preparation thereof, the agency intensively considered the quality definition on which its work is based and has aligned its quality management to this. The processes are very good and comprehensively documented. However, according to the agency’s own statement, they are not yet fully practiced in daily work. The expert group could recognise the first steps of an implementation of the quality concept. During the on-site visit, the agency stated that the internal services, such as accounting and

personnel development are not yet included.

Under these circumstances, it has become understandable that results of the quality management cannot yet be given, although the agency justifies the creation of the position of assistant to the management and of the data protection officer with knowledge gained from the internal quality management.

To improve the quality management concept and the work of the agency, the expert group recommends involving further sources of external feedback. For example, the results of the evaluation and the monitoring of the Accreditation Council or complaints from higher education institutions should be systematically analysed. Comparisons with national and international best practices could also be helpful for the further development of the agency's own processes.

The impartiality declarations for participants in the accreditation procedures (commission members, experts) are of model character as they not only exclude possible bias but also inform about the issues of data protection and confidentiality. The expert group has the impression that the FIBAA places great value on impartiality in its work and the protection of personal data.

With regard to the freelance procedural supervisors, the expert group establishes a solid training and good involvement in the business processes of the agency.

The provisions in the cooperation agreements with AHPGS and ASIIN are assessed as being sufficient and suitable for the purpose, and offer a solid requirement for observing the relevant resolutions of the Accreditation Council in the cooperation of the agencies.

## **Result**

Standard 3.8 is fully complied with.  
ary 2012

Bonn, 01 February

**Annex 1****List of abbreviations**

ESG	European Standards and Guidelines
F-AC PROG	FIBAA-Accreditation Commission for Programme Accreditation
F-AC INST	FIBAA-Accreditation Commission for Institutional Procedures
FBK	Question and assessment catalogue
FBK PROG	Question and assessment catalogue for programme accreditation
FBK SYS	Question and assessment catalogue for system accreditation
FBK INST	Question and assessment catalogue Institutional Audit
F-CC CERT	FIBAA Certification Commission for Certificate and Further Education Courses

**Annex 2**
**Accreditation of the Foundation for International Business Administration Accreditation (FIBAA) in the year 2011/2012**

Procedure plan for the on-site visit

Status: 21.11.2011

Accommodations / Meeting venue (22 and 24 November 2011):

**Collegium Leoninum**

**Nova Vita Residenz Bonn GmbH**

**Noeggerathstrasse 34**

**53111 Bonn**

**0049 (0)228 62980**

Meeting venue (23 November 2011):

**FIBAA**

**Berliner Freiheit 20-24**

**53111 Bonn**

**0049 (0)228 280356 - 0**

<b>22.11.2011 in Hotel Leoninum</b>		
18:00	Internal preparation in the hotel	(Loggia).
20:00	Internal dinner discussion in the hotel	

<b>23.11.2011 in the FIBAA head office</b>		
09:00 – 10:30	Discussion with the management of the agency	<ul style="list-style-type: none"> <li>- The management of FIBAA: Hans-Jürgen <b>Brackmann</b> and Daisuke <b>Motoki</b>.</li> <li>- Possible PPP by Constanze <b>Gonzales</b> (QM project officer) and Andreas <b>Linder</b> (Data protection officer / internal audit) for the internal QM system and databases.</li> </ul>

10:30 – 10:45	Break	
10:45 – 11:45	Group discussion with all employees of the head office	<ul style="list-style-type: none"> <li>- Possibly PPP by Constanze <b>Gonzales</b> (QM officer) and Andreas <b>Linder</b> (Data protection officer / Internal audit) for the internal QM system and databases</li> <li>- <b>All permanent employees of the head office.</b></li> <li>- Present freelancers: Dr. Alexander <b>Merck</b>, Dr. Heinz-Ulrich Schmidt</li> </ul>
11:45 - 12:45	Lunch break, internal discussion	
12:45 – 13:45	Group discussion with experts from the procedures of the agency	<ul style="list-style-type: none"> <li>- Prof. Dr. Volker <b>Ahrens</b>, Nordakademie;</li> <li>- Prof. Dr. Andreas <b>Knorr</b>, DHV Speyer;</li> <li>- Helga <b>Krausser-Raether</b>, Career consultation, F.a.M.;</li> <li>- Thomas <b>Sachs</b>, Uni Bayreuth.</li> </ul>
13:45 - 14:00	Break	
14:00 – 15:00	Discussion with representatives of study programmes accredited by FIBAA	<ul style="list-style-type: none"> <li>- Prof. Dr. Peter <b>Kiel</b>, HS Wismar;</li> <li>- Prof. Dr. Andreas <b>Musil</b>, University of Potsdam;</li> <li>- Prof. Dr. Sabine <b>Scheckenbach</b>, FH Ludwigshafen;</li> <li>- Prof. Dr. Jürgen <b>Weigand</b>, WHU.</li> </ul>
15:00 – 15:15	Break	
15:15 – 16:45	Discussion with the members of the FIBAA Accreditation Commission for Institutional Procedures (F-AC INST)	<ul style="list-style-type: none"> <li>- Dr. Karl-Heinrich <b>Steinheimer</b>;</li> <li>- Urs <b>Hofmann</b>, Executive Advisor Learning and Development, Deputy Chairman;</li> <li>- Christina <b>Rozsnyai</b>, Hungarian Accreditation Committee, Budapest, Hungary</li> </ul>



		Prof. Dr. Johann Schneider, FH Frankfurt
16:45 – 19:00	Internal final discussion of the first day	
approx. 19:30	Internal dinner discussion: Altes Treppchen, Hotel Restaurant, Endericher Straße 308	:

<b>24.11.2011 in the Leoninum</b>		
09:00 – 10:30	Participation in the meeting of the FIBAA Accreditation Commission for Programmes (F-AC PROG) and discussion with the members	Room: "Kapitelsaal", (approx. 30 minutes; possible previous wish to which Tos), afterwards, in the meeting room: <b>Discussion ONLY with the FAC</b> ).
10:30 – 10:45	Break	
10:45 – 12: 00	Discussion with the members of the FIBAA Certification Commission for Certificate and Further Education Courses for Certificate and Further Education Courses (F-CC CERT)	Room: "Loggia",: - Prof. Dr. Ulrich <b>Grimm</b> , EBS Executive Education, Oestrich-Winkel (participation by telephone), Chairman; - Urs <b>Hofmann</b> , Executive Advisor Learning and Development.
12:00 – 12: 45	Small lunch	
12:45 – 13:15	Possible discussion with the direction of the agency	Hans-Jürgen <b>Brackmann</b> and Daisuke <b>Motoki</b>
13:15 –14:30	Internal final discussion of the expert group with preparation of the report	
starting 14:30	Brief final discussion with the direction of the agency	Hans-Jürgen <b>Brackmann</b> and Daisuke <b>Motoki</b>