

Review panel's Assessment Report
(including a Recommendation for the Decision)
on the Application for Re-accreditation submitted by the
Foundation for International Business Administration Accreditation
(FIBAA)
on 12 May 2006

1. Basis of the procedure

1.1 Mandate as defined by law

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

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

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

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

1.2 International recognition

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

2. Sequence of events

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

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

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

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

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

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

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

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

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

3.1 History

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

3.2 Organisation

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

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

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

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

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

3.3 Resources

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

3.4 Range of activities

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

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

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

accreditation agencies is particularly worth mentioning. This cooperation covers joint conducting of accreditation procedures.

Since starting work, FIBAA has accredited 374 programmes.

4. Assessment

On 30 and 31 October 2006, the Chairman of the review panel and the Managing Director were in attendance during a FIBAA site visit conducted as part of two *accreditation procedures* at (...). Their overall impression of the procedures was positive. The reviewers were very well prepared; the agency employee assisting the review team provided comprehensive information on the framework conditions of German accreditation procedures to a manner fitting for the situation. The reviewers were assessing two distance learning programmes which shared some common components. It was therefore acceptable that the student member and member from industry were the same in both procedures. The talks with the representatives of the university's management, those involved in the programme and the students were targeted and dealt thoroughly with the particular features of the programmes seeking accreditation. The review teams managed through in-depth questioning and discussion to identify the strengths but, in particular, also the weaknesses of the programmes. The representatives of the Accreditation Council noticed that FIBAA also accepts immediate corrections to programme modalities if a written commitment is given during the actual visit to the HEI that the shortcomings will be remedied and the programme corrections made. This approach could blur the boundaries between consulting and accreditation and should therefore be viewed critically. The review team's internal discussions followed a list of points ("Assessment Guide for Reviewers"), which the agency uses as the basis for all of its accreditation procedures. It particularly focuses on aspects which, if not complied with, would make accreditation impossible. Such a schematic procedure has many advantages but also the disadvantage that it is extremely time-consuming and does not give the reviewers much leeway to make general judgements about the programmes. The observers from the Accreditation Council also had the impression that the representative of the head office steered the review team's discussions too much, even if it was with well-founded and relevant questions. Nonetheless, there is no doubt that the site visit, which, incidentally, following the Accreditation Commission's decision did not result in the programmes being granted accreditation, confirmed the quality of the work of the agency and the head office. The criticisms made here do not detract from this judgment.

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

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

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

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

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

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

As a result of the site visit to the Agency's Accreditation Commission, the Accreditation Council's review panel feels prompted to press for more structured preparation of decisions.

Decisions which the Agency's Accreditation Commission makes with reservations and anticipatory decisions which only come into effect if certain requirements are met should be avoided. All in all, the review panel's impression was that FIBAA's Accreditation Commission shied away from imposing conditions.

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

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

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

Below, the review panel presents its report to the Accreditation Council. It recommends that the Accreditation Council should re-accredit the *Foundation for International Business Administration Accreditation (FIBAA)* until 14 March 2011 whilst also imposing the *conditions* outlined below and making a series of *recommendations* also outlined below.

Review category 1: Understanding of the accreditation task

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

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

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

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

stated, “If a complaint is made with respect to freedom of research and teaching, the lecturer’s opinion must be in line with the objectives and concept of the Bologna Process.”

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

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

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

With regards to its dynamic definition of quality, the agency does not give any detailed information beyond the fact that the overall purpose of accreditation is to raise quality. The agency points out that it informs the institution of obstacles to accreditation *before* the site visit. The agency makes a distinction between initial accreditation (before the programme starts), accreditation and re-accreditation. In the case of initial accreditation, the primary tool used to deal with critical points is a binding (written) commitment. This is used instead of imposing conditions. The agency hopes that such commitments will bring about an increase in quality *before* the programme gets underway. Attendance of a site visit and a meeting of the Agency’s Accreditation Commission reinforced the Accreditation Council’s review panel’s impression that the agency tended (not only in the case of what it refers to as “initial accredi-

tations”) to give preference to recommendations and written commitments to make changes from the HEI over conditions with deadlines.

In addition, the agency’s reviewers produce a strengths & weaknesses profile, which is intended to increase quality. Both of the tools mentioned here were observed during the site visit and can also be found in the Agency’s Accreditation Commission’s documents. The review panel feels that these tools are the beginning of a scenario in which assessment and consulting are merged. The review panel believes it is not an accreditation agency’s task to see quality improvement as a direct task of the agency; instead, quality should be improved as an indirect result of its activity. Otherwise, in extreme cases, an agency would end up accrediting its own criteria.

The review panel proposes that the Accreditation Council should impose a **condition** on the agency whereby the agency must apply **with immediate effect** all of the types of decision provided for by the Accreditation Council, especially conditions with deadlines, and refrain from obtaining written commitments that the HEI will remedy shortcomings in order to avoid imposing conditions on the institution.

With regard to the European dimension, the agency mentions its international activity but does not give any evidence of an impact on its accreditation work, which, according to the agency itself, is geared to ensuring that “accreditation work in the international context can be compared”. It remains unclear to what extent FIBAA applies international standards. However, the “Assessment Guide for Reviewers” (1.3.1 to 1.6) specifies internationality of the programme design, teaching and the student and teaching communities as a criterion.

The agency carries out accreditation for all types of HEI. The range of subjects it covers encompasses all management-related and economics-related programmes. The Accreditation Council has not made any fundamental decision on when an agency’s disciplinary orientation begins to violate its criterion 1.4. Therefore, based on the way it is currently understood, the criterion must be deemed to be met. The agency has also stated, incidentally, that it wishes to expand its disciplinary orientation but no concrete steps in this direction have yet been taken.

The review panel **recommends** the agency to expand the range of subjects covered in its activities and to take the necessary steps quickly.

The agency operates internationally, provides advice on quality management, reviews content and structure of programmes and, where the requirements are met, awards FIBAA's Seal of Approval. In the opinion of the Accreditation Council's review panel, the agency should make a clear distinction between its activities using the Quality Label of the German Accreditation Council and its activities outside of Germany; this also applies to the budget and staffing plan.

The review panel proposes that the Accreditation Council should impose a **condition** upon the agency whereby the agency must revise its criteria **by 31 December 2007** and, in doing so, make it clear which criteria are necessary for accreditation with the Accreditation Council's Quality Label and which criteria are not absolutely necessary in Germany.

Review category 2: Structural organisation of the agency and its decision-making bodies

The *Foundation Board* appoints the members of the Accreditation Commission. The composition and membership of the *Accreditation Commission* are not specified in the Foundation Statute. The Accreditation Commission's rules of procedure specify that it can be comprised of five to 15 members and that the members must fulfil the criteria for the appointment of reviewers. The *Supervisory Body* is appointed by the Foundation Board.

The Accreditation Council's criterion 2.1 is complied with to the extent that the agency and its bodies are sufficiently legally identifiable. However, neither the *management*, nor its responsibilities are specified in the Statute. According to the agency, these aspects are specified in the 1998 rules of procedure, of which no copy was available.

The review panel proposes that the Accreditation Council should impose a **condition** upon the agency whereby the agency must provide evidence of the specification of the management's responsibilities by **31 December 2007**.

The head office should be boosted by adding more full-time posts, thus increasing its professionalism still further.

The review panel **recommends** that the agency make a clearer distinction between the areas of consulting and accreditation at its head office.

The Accreditation Council's criterion 2.2 can also be deemed to be largely fulfilled since the competencies and responsibilities, apart from those of the management, relating to the agency's internal and external business are clearly assigned. Criterion 2.4, however, is only fulfilled in part because only the appointment but not the composition of the bodies is specified in statutory regulations in a way which secures their ability to function. Although, according to the agency, the Statute enables the bodies to be composed in a manner which meets the criteria (which the review panel feels is actually true), it does not make it mandatory for the composition to be in line with the criteria.

At the moment, the *Foundation Board* comprises four representatives of HEIs, one business representative with a link to a HEI and five association representatives. The *Accreditation Commission* currently consists of seven representatives of HEIs, six representatives from industry (of whom one is a representative of a trade union) and two student representatives. Thus, the membership criteria *are* in line with the specific purpose of the bodies concerned and groups with an interest in the tasks to be performed *are* involved (criteria 2.8 and 2.9 of the Accreditation Council) but there are no actual specifications to this effect. It is essential that relevant specifications be incorporated into the Statute in order to ensure compliance with these criteria.

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

The agency is not profit-oriented. It is recognised as a non-profit organisation by an order issued by Zurich tax office on 17 February 2006. The agency presented budgets and balance sheets for 2003, 2004 and (where already available) 2005 by way of evidence of the sustainability of its finances; the documents do not indicate a lack of sustainability. The Accreditation Council's criterion 2.3 is thus met.

Both the Foundation Council and the Accreditation Commission have specified deputation arrangements in their regulations. The Accreditation Council's criterion 2.5 is thus met.

With regard to the assignment of accreditation-related tasks, the Statute specifies that the Accreditation Commission is responsible for defining criteria, assessing quality and deciding for or against accreditation (Statute III.B.1. and 3.). The Accreditation Commission's regulations stipulate that the Commission appoints reviewers on the managing directors' recommendation (Regulation no. 3). The agency has documented the accreditation-related tasks in process descriptions, which describe the responsibilities in detail and are complete in all other respects as well. The Accreditation Council's criterion 2.6. is met but a transparent process description for HEIs and the public would be desirable.

The tasks of defining criteria and procedural rules as well as making decisions with regard to applications for accreditation are entrusted to the Accreditation Commission, as is the task of appointing reviewers. Reviewers conduct the review and write the assessment report. This assignment of tasks is appropriate and adequate; the Accreditation Council's criterion 2.7 is thus met.

The methods for selecting the members of the decision-making bodies are not described – apart from the fact that the bodies are responsible for appointing the members. However, the agency does have lists of criteria for the appointment of reviewers (representatives of HEIs and industry plus students), which also apply to the members of the Accreditation Commission. The Accreditation Council's criterion 2.10 is largely met but the procedures for recruiting reviewers should be described more clearly. The competence of those involved in the procedures is ensured by means of the selection criteria and through training. The Accreditation Council's review panel had the impression that (in the first few months of 2005, for example) a number of persons appeared both as review-ers *and* review-ees of the agency within a short period of time.

The review panel therefore proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must provide a summary by **31 October 2007** of the methods used to select the members of the Accreditation Commission and the review teams. The agency is also **recommended** to use the student accreditation pool.

The criteria lists do not give any detailed information regarding the relevant areas listed in the Accreditation Council's criterion 2.11 (e.g. subject-related aspects, structural and formal aspects of the study programme, manageability, social dimension) apart from the necessary experience in accreditation or evaluation procedures. It is also evident that such competence is listed among the target criteria, not the essential criteria. Nonetheless, all in all, the criteria

lists demonstrate that reviewers are selected in a careful manner. The agency conducts reviewer training courses every year, which are also evaluated, and has future reviewers participate in an accreditation procedure on a trial basis the first time around. A record is kept both of the training and the trial procedure. Criterion 2.11 is therefore met.

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

Review category 3: Procedural organisation of the agency

The agency provides reviewers with the "Assessment Guide for Reviewers" – the main document for programme reviews. The guide is divided into the following areas: "Strategy and objectives", "Admission (admission process and procedure)", "Programme design", "Resources and services" and "Quality assurance". It lists 27 aspects to be assessed; the introductory section, "Rules for site visits", also draws reviewers' attention to essential criteria which, if not complied with, prevent the programme from being accredited. Quality ratings are also introduced, ranging from "Does not meet quality requirements" to "Meets quality requirements" to "Exceeds quality requirements" right through to "Exceptional". According to the agency, the "Assessment Guide for Reviewers" ensures that its decisions are consistent (Accreditation Council criterion 3.1) and that normative requirements are enforced (Accreditation Council criterion 3.2).

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

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

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

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

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

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

Review category 4: Accountability

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

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

Review category 5: Equipment and sustainability

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

The review panel **recommends** the agency to increase the number of staff at its head office and add more full-time posts in order to promote its professionalism.

Review category 6: Internal quality management

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

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

Review category 7: Governance of the HEI

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

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

Review category 8: Educational goals of the degree programme concept

Review category 9: Conceptional classification of the degree programme within the academic system

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

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

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

As already commented in connection with review category 8, there are no concrete links between the criteria in the “Assessment Guide for Reviewers” and the European Qualification Framework and the “Structural Guidelines” although the reviewers are supplied with the EQF and the guidelines. In particular, it remains unclear how the NQF descriptors are used. By contrast, the “Assessment Guide for Reviewers” explicitly requires the modularisation and the application of the ECTS to be assessed (3.1.1 and 3.1.2) as well as outcome orientation (3.2.6).

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

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

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

The “Assessment Guide for Reviewers” includes criteria for assessing the manageability of the programme for students in 3.1.2 (ECTS), 3.1.6 (study and examination regulations), 4.1.6, 4.2.2 and 4.4.3 (support/coaching for students) and 3.1.5 (integration of practical content). However, the criteria tend to focus on the presence and quality of these aspects, not so much on manageability. The agency described the procedure at the review team’s re-

quest and the site visit attended by the Chairman of the review panel and the Managing Director showed that these questions are dealt with. The Accreditation Council's criterion 10.2 is met.

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

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

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

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

Review category 11: Implementation of the programme

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

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

Review category 12: Examination system

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

Review category 13: Transparency

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

Review category 14: Internal quality assurance system of the HEI

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

Review category 15: Acquisition (of accreditation contracts)

The agency holds a detailed information meeting with interested HEIs, during which it explains all of the key points involved in an accreditation procedure. The HEIs receive all of the necessary documents (accreditation application form, sample contract, “Self-Assessment Guide for Higher Education Institutions” and the document pack). The documents are published on the agency’s website (apart from the sample contract). Any questions the HEIs may have can be put to the employee responsible for providing preliminary information, the

person in charge of accreditation procedures or the managing directors. The sample contract contains a precise, thorough description of the agency's services and a list of charges. The charges are based on a mixed calculation, taking into account the agency's costs and those of the parties directly involved in the accreditation procedure (reviewers, panel secretaries). The Accreditation Council's criteria 15.1 to 15.3 are met.

With regard to fairness during the acquisition phase (Accreditation Council criterion 15.4), the agency merely refers to the Unfair Competition Act and does not provide any further details.

The review panel therefore proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must explain to the Accreditation Council by 31 December 2007 how it complies with criterion 15.4.

Review category 16: Organisation of the process

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

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

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

Review category 17: Decision and reasons for the decision

Following the Accreditation Commission's decision (accreditation, conditional accreditation, suspension, no accreditation), the HEI are supplied with the accreditation report and informed of the Accreditation Commission's decision. The accreditation report contains an assessment of the programme in summary form plus ratings for each of the specific sections covered in the "Assessment Guide for Reviewers". The Accreditation Commission's assessment is also explained. The deadline by which the HEI has to prove that it has complied with imposed conditions or, following a suspension, apply for resumption of the procedure is also clearly specified. The reviewers are informed of the process steps by the responsible employee from the agency. If the suggestion that the procedure be suspended comes from the Accreditation Commission, the suspension decision is submitted to the HEI so that it can make a statement in response. The Accreditation Council's criterion 17.1 is met.

With regard to integrity in the use of the Accreditation Council's Quality Label (Accreditation Council criterion 17.2), the agency does not provide any information beyond its assurance that it only awards the Label in the cases for which it is intended. Since the agency's area of activity extends beyond the Accreditation Council's remit, the Accreditation Council's review panel feels that the agency must ensure that the Accreditation Council's Quality Label is not used without authorisation and that misunderstandings are avoided. Similar requirements apply to the criteria with which the agency works (see above, "Review category 2").

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

Review category 18: Compliance with conditions

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

Review category 19: Internal appeals process

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

Review category 20: Clustered programme accreditations

FIBAA composes clusters for accreditation procedures, based on affinity between subjects and resources and taking into account the fact that its range of accreditation activities comprises economics-oriented programmes. One cluster usually consists of three to four programmes. The review team is structured in such a way that the range of subjects in the cluster is properly covered (e.g. business psychology, business law, etc.).

Where an accreditation procedure involves two clusters, two review teams are formed. In this case, the two teams assess the generic criteria set out in the "Assessment Guide for Reviewers" during one and the same site visit but the programme-*specific* criteria are then only assessed by the relevant team. The process is defined in II.A.2.1 though criteria for cluster-building are not explicitly mentioned. A cluster accreditation site visit attended by the Chairman of the Accreditation Council's review panel and the Managing Director of the foundation confirmed this.

The review panel therefore proposes that the Accreditation Council should impose a **condition** upon the agency whereby the latter must prove by **31 December 2007** that soundly defined programme-clustering criteria are used, which enable each programme in the cluster to be assessed adequately to verify the substance and validity of the HEI's statements, with the "Criteria for the Accreditation of Accreditation Agencies" (dated 15 December 2005) applied in their entirety.