



AHPGS Akkreditierung gGmbH

Sedanstr. 22
D-79098 Freiburg

Telefon: +49 (0)761 / 208-533-20
Telefax: +49 (0)761 / 208-533-16
E-mail: ahpgs@ahpgs.de
Home: www.ahpgs.de

AHPGS Akkreditierung gGmbH · Sedanstr. 22 · D-79098 Freiburg

To the
President of the European Association
for Quality Assurance in Higher Education (ENQA)
Mr Padraig Walsh
Avenue de Tervuren 36/38, bte 4
1040 Brussels, Belgium

31 May 2016

Subject: AHPGS follow-up report

Dear Mr Padraig Walsh,

As stated in the Board's decision of 2014, please find attached the response to the recommendations.

I would like to assert that the discussions about the recommendations have been very helpful and rewarding for the committee as well as the committee's office.

Best regards

Georg Reschauer
Managing Director



ENQA follow-up report on the recommendations in the panel report

Recommendation 1: The review panel recommends charging an organ to deal with complaints which is independent from both the accreditation commission and the governing body. (Standard 2.3; standard 3.7)

After extensive discussions of the recommendation within the committee, the AHPGS has decided to continue their proven method at present in order to deal with complaints.

The particular organizational form of the AHPGS ensures appropriate handling of complaints.

The guideline „Verfahren der AHPGS zur Regelung von Einsprüchen, Widersprüchen und Beschwerden“ (Resolution of the Accreditation Commission of 25.05.2009) has been approved in 2009 during the accreditation procedure of AHPGS with the German Accreditation Council (GAC) and ENQA. Since then, the guideline has proven to work well for resolving complaints.

Nevertheless, the AHPGS is going to watch the issue closely and will of course act on the matter as and when required.

Recommendation 2: The review panel recommends expanding the time limit for lodging and substantiating a complaint. (Standard 2.3; standard 3.7)

After extensive discussions of the recommendation within the committee and with representatives from several universities, the AHPGS has decided to continue their proven method and management in order to deal with complaints.

The two-week time for complaints has never been an issue before – not even in the annual questionnaire filled out by the universities. Moreover, the universities prefer a final decision that has been carried out speedily. Therefore, they generally consider the two-week time limit to be sufficient.

Recommendation 3: The review panel recommends to constantly enlarge the pool of experts (for instance by increasingly including more medical experts) and to ensure larger diversity and transparency when selecting student experts. (Standard 2.4)

The AHPGS constantly enlarges the pool of experts ensuring the assessment of all areas relevant for the review of a program (e.g. professional aspects, study-related structural and formal aspects, social aspects). The relevant interest groups, particularly representatives of the sciences, students and practitioners from the profession, are part of the expert group.

In 2015, a total of 254 experts have been involved in 71 accreditation procedures (in 110 study programs). 122 have taken part in an accreditation procedure for the first time.

- a) This information is comparable with the data from 2013 and 2014.*
 - 2013: 238 experts, first participation in 122 cases, 66 on-site visits, 128 study programs.*
 - 2014: 199 experts, first participation in 107 cases, 55 on-site visits, 89 study programs.*
- b) In the past few years (2013 and 2014), approximately 50 % of the involved experts used to participate for the first time in an accreditation procedure of the AHPGS.*

The AHPGS nominates student experts in all accreditation procedures using its own data pool as well as the "Studentischen Akkreditierungspool". With regard to the statistics, one can find matching data for instance in 2014 – 2015, 50 % of the involved student experts participated for the first time in an accreditation procedure of the AHPGS. Students are nominated like all other experts by the accreditation commission.

Regarding the point "including more medical experts":

State examination study programs in medicine, dentistry and pharmacy are not bound to accreditation.

In accreditation procedures with health-related study programs, health professionals are included on a regular basis.

In institutional audits regarding faculties of medicine, medical scientists of course outweigh the expert group.

Recommendation 4: The review panel recommends the intensification and further improvement of the training provided by the agency based on the actual demand. This training may be held during the annual conference in Windenreute. Furthermore, the agency should advertise them and also provide special training seminars for experts in system accreditation. (Standard 2.4)

Since its foundation, the AHPGS has intended to offer training during the annual conference in Windenreute. The lectures are addressed to committee members, invited experts and representatives from universities.

On the occasion of the 14th annual conference in Windenreute in February 2016 the following subjects have been discussed:

- *Internal and external experience with system accreditation,*
- *The German qualification framework in the European context,*
- *Distinguishing between the German Qualification Framework (DQR) and the Framework of Qualification for German Degrees (QRDH),*
- *Recognition of externally achieved credits,*
- *Innovations in the psychotherapists law,*
- *Innovation in the nursing profession law.*

Currently the AHPGS offers different workshops and training seminars, inter alia about system accreditation (www.ahpgs.de/aktuelles/).

Recommendation 5: The expert reports shall be adapted and published in such a way that the experts' decision recommendation provides a clear distinction between recommendations and conditions; furthermore, the rationale of the accreditation commission shall clearly indicate possible derogations from the experts' recommendations. (Standard 2.5)

All expert reports provide a clear distinction between recommendations and conditions. The deviations from the experts' suggestions regarding recommendations and conditions in the accreditation commission's decisions are founded and documented.

The German Accreditation Council (GAC) determined in its resolution to the AHPGS' fulfillment of conditions, dated 2 April 2014 and 18 June 2015, that the required clear distinction between recommendations and conditions is implemented in the experts' resolution suggestions. At the same place the GAC states that the procedure of documenting deviating decisions by the accreditation commission is regulated and ensured.

Recommendation 6: The review panel recommends continuing and possibly expanding the much appreciated publications of the agency on topics such as the academization of health and nursing professions. (Standard 2.8)

AHPGS members, member of the AHPGS bodies and AHPGS staff do publish, besides their work for the agency, on topics of accreditation and academization in the area of health and social sciences.

Information about current publications can be found on the AHPGS website.

Recommendation 7: Since part of the accredited programs are still at in the concept stage and some of the HEIs are still in the course of formation at the time of accreditation, Recommendations of the expert group the experts recommend providing a systematic analysis of the sustainability of the courses offered. (Standard 2.8)

German accreditation agencies are non-profit organisations and for that they do not provide resources for the recommended systematic analysis of the sustainability of study programs that were accredited in the concept state.

Size and differentiation of the German higher education system as well as the federal responsibilities (e.g. for the launching of new study programs and the implementation of accreditation procedures) impede a system wide overview.

Moreover, this task has not been considered as one of the agencies' tasks. Nevertheless, the AHPGS is involved in the scientific discourse of the communities of social work, nursing and health professions and publishes articles regularly (see Recommendation 6).

Recommendation 8: The review panel recommends translating the established common practice into a binding decision according to which members of the accreditation commissions do not participate in deliberations when these concern procedures in which said members have been involved as experts or if they hold any position at the university in question. (Standard 3.6)

The Board of the AHPGS immediately passed an appropriate resolution (committee`s resolution as from 27 January 2014):

Given the case that an AHPGS accreditation commission`s member participated in an on-site visit or that his/her home university or one of his/her home university`s study program is to be accredited, this member has to leave the room for the period of time during the accreditation commission`s session in which the respective study program is discussed and a decision is taken.

Recommendation 9: The review panel recommends systematically and continuously analyzing the communication between the head office and all parties involved in the accreditation procedures in order to determine which procedure-related aspects may be improved. (Standard 3.8)

There is an exchange of information with the experts regarding arrangements and preparations concerning the procedure. Moreover, personal details such as accommodation, meals and travel organization are addressed in advance.

Annual enquiries through questionnaires allow us to determine and evaluate systematically the feedbacks concerning the implementation of an accreditation procedure. The questionnaires are sent to the experts as well as to the HEIs. The AHPGS gives also room to verbal exchange with the experts to identify weak points and to implement improvements.