

ENQA AGENCY REVIEW

ACCREDITATION AGENCY FOR STUDY PROGRAMMES IN HEALTH AND SOCIAL SCIENCES (AHPGS)

OLIVER VETTORI
STEPHANIE HERING
FRANCISCO GONZALEZ
28 APRIL 2020

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EXECUTIVE SUMMARY

This report results from an external partial review assessing the compliance of the *Accreditation Agency in Health and Social Sciences (AHPGS)* with Standard 3.4 in the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. It is based on an external review conducted in February and March 2020.

Following up on a decision of the ENQA Board in June 2019, which was then renewed in November 2019 and found AHPGS non-compliant with Standard 3.4 and thus not in overall substantial compliance with the ESG, AHPGS officially approached ENQA in December 2019 to coordinate the above mentioned partial review and prepare a review report that will be considered for the purpose of ENQA membership renewal.

ENQA nominated a panel of three experts for this partial review, with one member having already served in the panel of the previous review (Stephanie Hering) and two new members (Oliver Vettori and Francisco Joaquín Jiménez González). AHPGS had already sent new documents (in German and English) on 18 January 2020 in order to bolster their claim that they were now compliant with ESG 3.4. The main documents were an extract from the minutes of the meeting of the Board of AHPGS from 16 December 2019, an *Analysis of procedures in the Kingdom of Saudi Arabia* as well as a new concept for the agency's thematic analysis and a plan for the period 2020-2021, dated from 17 January 2020.

A short SAR related to ESG 3.4 was additionally sent to the ENQA Secretariat and the panel on 6 March 2020. An online interview with representatives from the agency took place on 13 March 2020.

The panel found that AHPGS had made some considerable progress since the last visit that was part of the agency review in 2018. The agency has already published a concept on its thematic analysis for the period 2020 – 2021 on its website. The first two first thematic analysis titled *Analysis of procedures in the Kingdom of Saudi Arabia* and *Reflexionen über die ersten Begutachtungsverfahren nach dem Studienakkreditierungsstaatsvertrag in Verbindung mit den Länderverordnungen bzw. der Musterrechtsverordnung* have already been published and can be found on the agency's website. The panel found evidence that there would be enough resources and conceptual fuel to continuously publish thematic analysis reports that could be beneficial for a variety of stakeholders.

The review panel commends AHPGS' decision to engage explicitly in thematic analysis and to have taken the measures to make that resource-wise possible.

The review panel would recommend the agency to include the intended thematic analysis resource-wise already into a working plan beyond 2021.

The review panel suggests for AHPGS to reconsider the target audiences for their thematic analysis reports and make sure that these system level reflections will also be useful for policy makers and QA professionals within this system.

INTRODUCTION

This report analyses the compliance of the Accreditation Agency in Health and Social Sciences (AHPGS) with Standard 3.4 in the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on a partial external review of the agency conducted in February and March 2020.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

The regulations of ENQA require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the *Yerevan Ministerial Conference of the Bologna Process* in 2015. The last review for AHPGS took place in 2018, with a visit of the review panel having been conducted from 4th to 6th of December 2018.

On 25 April 2019, the Board of ENQA considered the final review report of AHPGS for the purpose of the agency's membership renewal in ENQA. During this meeting, the Board stated some lack of clarity concerning the panel's interpretation on the ESG standards 3.4 Thematic analysis and 3.5 Resources. Therefore, before taking a decision on the approval of the report and the reconfirmation of membership, the Board decided to ask the panel to revise the report either by elaborating its analysis and clarifying the current judgement, or by reconsidering the judgement in itself.

Following the panel's response, the Board discussed the revised report, the panel chair's letter, and re-scrutiny of the revised report on 20 June 2019 and decided to put AHPGS under the status of *Member under review* (until 20 June 2021). The Board namely found a *non-compliance* on ESG 3.4 Thematic analysis. To be in line with the requirements of the ESG, the agency should regularly publish reports that describe and analyse the general findings of its own external quality assurance activities.

On 8 August 2019, AHPGS sent a complaint and appeal against the ENQA Board decision from 20 June 2019. The document addressed the following points:

- An appeal against the Board's decision on the ESG 3.4 (judged as non-compliant);
- An appeal against the justification in the Board's decision that no work on thematic analysis has been undertaken since the previous review in 2015;
- An appeal against the Board's decision on the ESG 2.1 (judged as partially compliant);
- A complaint against the lack of transparency in the decision-making process;
- A complaint about the non-consultation of AHPGS in the context of the postponement of decision on membership.

In line with article 24 of the *ENQA Rules of Procedure*, the Secretariat first reviewed the appeal and complaint and determined that eligible grounds and supporting evidence have been presented in the document of AHPGS. The ENQA Secretariat then forwarded the appeal and complaint for the consideration of the Board, who agreed on 19 September 2019 to distribute the appeal and complaint documentation to the *Appeals and Complaints Committee* (hereinafter *the Committee*). The report of the Committee was completed on 25 October 2019 and then submitted to the Board. The report recommended the Board to reject the appeal and complaint and stand by its initial decision on insufficient overall level of compliance of AHPGS with the ESG. More specifically, the Committee concluded that the agency remains non-compliant with the ESG 3.4, whereas the agency was found to be substantially compliant on ESG 2.1. Regarding the complaints that were raised, the Committee found that the ENQA Board followed due process in accordance with its Rules of Procedure in carrying out the review of AHPGS, therefore the main substance of the complaint was not upheld.

Following this, the Board took a decision at its meeting on 28 November 2019, in which it followed the statement of the Committee, i.e. the Board rejected AHPGS' appeal and complaint and stood by its initial

decision not to renew AHPGS membership in ENQA and to designate the agency as *Member under review* for a period of two years from 20 June 2019.

In the Board letter dated 3 December 2019, the agency was explained that it will need to undergo a new partial review process at the end of this period, or sooner, if it wishes. The partial review should focus in particular on ESG 3.4 Thematic analysis. The *ENQA Rules of Procedure* namely state the following regarding the status of *Member under review* (see article 7, paragraph 2):

“A further, partial review shall be carried out by reviewers nominated by the ENQA Board, at the latest at the end of the two-year period and shall focus on the deficiencies mentioned in the review report and/or those highlighted by the Board in its letter.”

Following this, on 19 December 2019 AHPGS officially approached ENQA to coordinate the abovementioned partial review and prepare a review report that will be considered for the purpose of ENQA membership renewal.

REVIEW PROCESS

ENQA nominated the following members for the review panel of the partial review:

Oliver Vettori	Chair (EUA nominee), academic
Stephanie Hering	Panel member (ENQA nominee), quality assurance professional
Francisco Joaquín Jiménez González	Panel member (ESU nominee)

Stephanie Hering had also served in the review panel of the 2018 review and was acting as the main liaison with AHPGS. The panel agreed with the ENQA secretariat that the review should be conducted within a very short time span, also with regard to the agency’s request to do so. The chair defined the main aspects of the process and discussed them with the other panel members.

AHPGS had already sent new documents (in German and English) on 18 January 2020 in order to bolster their claim that they were now compliant with ESG 3.4. The main documents were an Extract from the minutes of the meeting of the Board of AHPGS from 16 December 2019, an *Analysis of procedures in the Kingdom of Saudi Arabia* as well as a new *concept for the agency’s thematic analysis* and a plan for the period 2020-2021, dated from 17 January 2020.

Additionally, when asked to hand in an SAR for the partial review on 25 February 2020, the agency complied with this request on 6 March 2020.

The review panel then scrutinised the SAR and all additional documents and discussed them in online meetings. It had been agreed early in the process that the site visit would be conducted online due to the scope of the review.

The online interview took place on Friday 13 March 2020. The persons interviewed were:

- Georg Reschauer, MA, the managing director of AHPGS, as the head of the agency and person responsible;
- Eva Pietsch, lawyer, program manager and the agency’s legal expert and responsible for one thematic analysis, upon suggestion of AHPGS.

The review panel then discussed the interview and their interpretation of all the information provided in an additional online meeting following the online site visit.

QUALITY ASSURANCE SYSTEM OF THE AGENCY¹

AHPGS is a German accreditation agency with a specific focus in the area of health and social sciences. Founded under German law in 2001, it is located in Freiburg, Germany. AHPGS contributes to the quality assurance of study programs and quality assurance systems of higher education institutions (HEIs) in Germany and abroad.

AHPGS is organized in the legal form of a charitable association. Currently, the association consists of institutional members and individual members. The institutional members include various scientific societies in the area of health and social sciences, the *Assemblies of the Faculties of Social Work and of Therapeutic Pedagogy* and the *Conference for Deans and Directors in Nursing Sciences and Higher Education Institutions*.

The agency is comprised of two entities: AHPGS e.V and AHPGS Akkreditierung gGmbH.

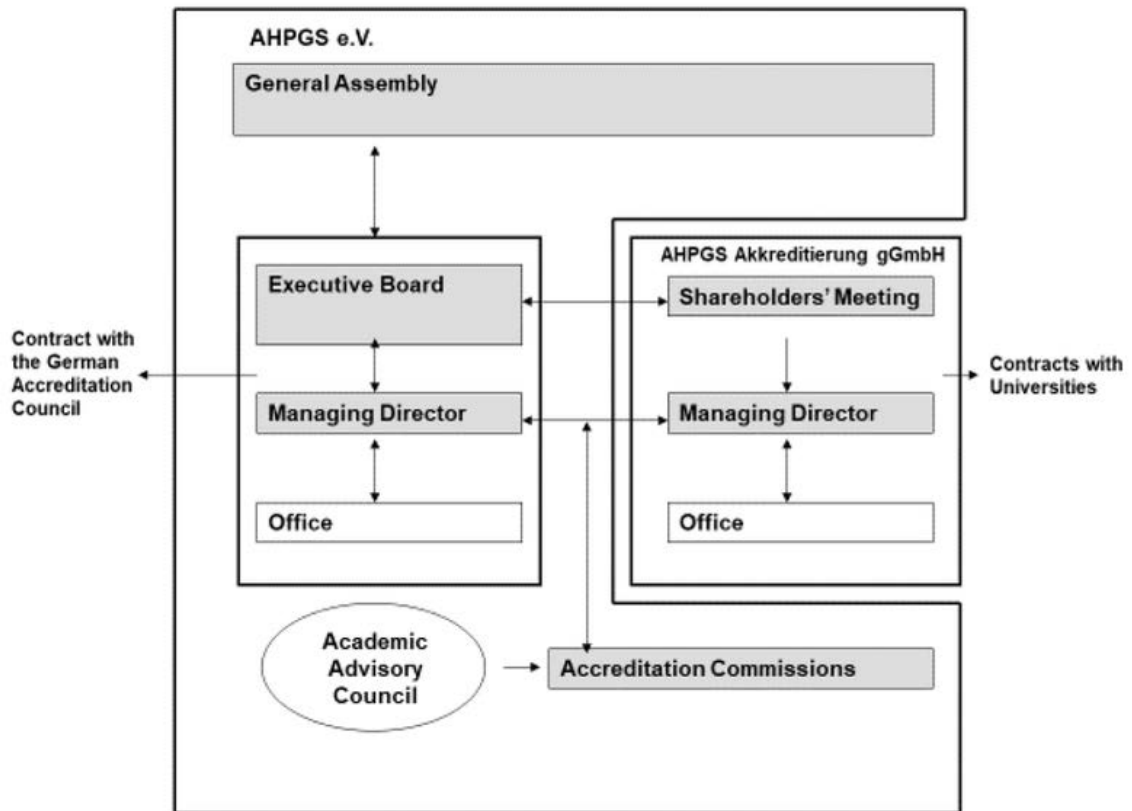
AHPGS e.V. is registered in Germany as a non-profit association. The purpose and objectives are laid down in the by-laws of the association. The members elect an executive board that manages the business and is obliged to report to the members annually. The executive board is registered in the register of associations in Germany. Like all committee members, the board of directors is active on an honorary basis. The members ratify yearly the acts of the executive board. The executive board appoints the members of the accreditation commissions.

For liability reasons, AHPGS Akkreditierung gGmbH was founded by AHPGS e.V. at the beginning of 2008. AHPGS Akkreditierung gGmbH is a non-profit company as well. The purpose and objectives are laid down in the by-laws of the association.

AHPGS e.V is the sole shareholder of AHPGS Akkreditierung gGmbH. In the shareholders' meeting AHPGS e.V is represented through its executive board. A minimum of an annual meeting is mandatory by law.

For orientation, see the organisational chart below.

¹ This section is taken from the ENQA Agency Review report of 2019 - for more detailed information: *ibid*. As this is a partial review and a follow up of the comprehensive review of 2018 this section is kept short in order to fit into the overall structure and length of the report at hand. In the context of this partial review AHPGS did not provide information about other relevant changes in their organisational framework and setup – beyond standard 3.4. Therefore, general developments outside 3.4. could not be specified in this report.



(2018 version)

FINDINGS: COMPLIANCE OF AHPGS WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

Evidence

AHPGS has published a *concept on its thematic analysis* for the period 2020 – 2021 on its website. The concept is based on a working paper by Dr. Karl Kälble. The concept describes AHPGS's understanding of thematic analysis, also in terms of methodology (drawing from an impressive array of literature, mostly from social sciences). The concept also declares the agency's intent to publish at least two analysis every year (one in the first half of the year and one of the second half of the year), focussing on at least one field for comprehensive analysis that is defined for each fiscal year. The concept also contains the intention to publish the thematic analysis on the homepage of AHPGS as well as in relevant scientific journals and edited volumes dealing with quality assurance in a national and international context. The first two thematic analysis are titled *Reflexionen über die ersten Begutachtungsverfahren nach dem Studienakkreditierungsstaatsvertrag in Verbindung mit den Länderverordnungen bzw. der Musterrechtsverordnung* and *Analysis of procedures in the Kingdom of Saudi Arabia* have been published on the agency's website.

The resolutions of the executive board of AHPGS from 16 December 2019 (which were provided to the panel in the form of an extract from the minutes of said Board Meeting) clearly show that the board of AHPGS has endorsed the concept.

Resource-wise, the sustainable generation of future thematic analysis is secured, as the panel learned how, by a resolution of AHPGS' managing directors, already taken on 20 March 2019, which was already confirmed by the executive board of AHPGS on 21 May 2019 and the shareholders' assembly on 23 June 2019.

During the online interview, it was further confirmed to the panel that resources for the analyses are secured, based on the respective resolutions and that an equivalent of 20 FTE working days are to be allotted to the production of the two annual thematic analysis. According to the managing director, the first report on reviews conducted in Saudi Arabia has already generated some interest in the region itself. The interview also confirmed that the agency has come to a new understanding of ESG 3.4 that was more in line with the 2018 review (though it was also mentioned that the understanding of the 2018 review panel apparently differed significantly from the previous panel in 2013). The agency's director also admitted that compliance with the ESG was a key motivation for developing the new concept – but not the only one. According to the answers in the interview, AHPGS sees the institutions for which they are conducting reviews as the primary stakeholders and wants to support them in reflecting their approaches to QA by offering the thematic analysis as a *bird's eye reflection*.

Analysis

The panel found the new concept provided by AHPGS impressive in its consideration of methodological aspects of thematic analysis. There is a clear rationale behind the new analysis and the working plan seems sound. Even though there are only concrete plans yet for 2020 and 2021, the interviews showed that AHPGS has enough ideas and research questions that would conceptually fuel more than half a dozen future reports. It would still be reassuring and help with the planning if the working plan went beyond the 2-year frame.

The exchange during the interview also showed that AHPGS' focus on institutions as the target audience for their thematic analysis reports was underselling their potential value: reflections on the fundamental changes within the German accreditation system and QA operations will be of interest for policy makers and QA professionals in Germany and the entire EHEA. The resource situation seems adequate for a sustainable production of new reports and the staff appears to be more than capable of conducting academically sound and at the same time professionally relevant thematic analysis. Compliance with external requirements (in this case the ESG and the intention of the agency to become fully compliant again) is certainly the main driver of the recent changes, but even though it was the last review that may have propelled the agency to action, the review panel found AHPGS did so in a good way and went far beyond any minimum requirements. The first analysis that was published is a sound report and the fact that it is already met with interest by the target audience speaks well for any future efforts.

Panel commendations

The review panel commends AHPGS' decision to engage explicitly in thematic analysis and to have taken the measures to make that resource-wise possible.

Panel recommendations

The review panel recommends to include the intended thematic analysis resource-wise already into a working plan beyond 2021.

The review panel recommends for AHPGS to reconsider the target audiences for their reports and make sure that the system level reflections will also be useful for policy makers and QA professionals within this system.

Panel conclusion: substantially compliant

CONCLUSION

As explained in the previous chapter, the panel found AHPGS to be substantially compliant with standard 3.4 of the ESG.

SUMMARY OF COMMENDATIONS

The review panel commends AHPGS' decision to engage explicitly in thematic analysis and to have taken the measures to make that resource-wise possible.

SUMMARY OF RECOMMENDATIONS

The review panel recommends to include the intended thematic analysis resource-wise already into a working plan beyond 2021.

The review panel recommends for AHPGS to reconsider the target audiences for their reports and make sure that the system level reflections will also be useful for policy makers and QA professionals within this system.

ESG 3.4 - substantially compliant

ANNEXES

ANNEX I: TERMS OF REFERENCE PARTIAL REVIEW

Annex I: Terms of Reference for the external (partial) review of the Accreditation Agency for Study Programmes in Health and Social Sciences (AHPGS)

This document is to agree on the Terms of Reference (ToR) that address the request of AHPGS for an external (partial) review, following the ENQA Board's decision not to renew AHPGS' membership in the Association on 28 November 2019.

Chapter I: Background and the request of AHPGS for a partial review

On 25 April 2019, the Board of ENQA considered the final review report of AHPGS for the purpose of the agency's membership renewal in ENQA. During this meeting, the Board felt there was some lack of clarity concerning the panel's interpretation on the ESG standards 3.4 Thematic analysis and 3.5 Resources. Therefore, before taking a decision on the approval of the report and the reconfirmation of membership, the Board decided to ask the panel to revise the report either by elaborating its analysis and clarifying the current judgement, or by reconsidering the judgement in itself.

Following the panel's response, the Board discussed the revised report, the panel chair's letter, and re-scrutiny of the revised report on 20 June 2019 and decided to put AHPGS under the status of "Member under review" (until 20 June 2021). The Board namely found a 'non-compliance' on ESG 3.4 Thematic analysis. To be in line with the requirements of the ESG, the agency should regularly publish reports that describe and analyse the general findings of its own external quality assurance activities.

On 8 August 2019, AHPGS sent a complaint and appeal against the ENQA Board decision from 20 June 2019. The document addressed the following points:

- An appeal against the Board decision on the ESG 3.4 (judged as non-compliant)
- An appeal against the justification in the Board's decision that no work on thematic analysis has been undertaken since the previous review in 2015
- An appeal against the Board decision on the ESG 2.1 (judged as partially compliant)
- A complaint against the lack of transparency in the decision-making process
- A complaint about the non-consultation of AHPGS in the context of the postponement of decision on membership.

In line with article 24 of the ENQA Rules of Procedure, the Secretariat first reviewed the appeal and complaint and determined that eligible grounds and supporting evidence have been presented in the document of AHPGS. The ENQA Secretariat then forwarded the appeal and complaint for the consideration of the Board, who agreed on 19 September 2019 to distribute the appeal and complaint documentation to the Appeals and Complaints Committee (hereinafter the Committee). The report of the Committee was completed on 25 October 2019 and then submitted to the Board. The report recommended the Board to reject the appeal and complaint and stand by its initial decision on insufficient overall level of compliance of AHPGS with the ESG. More specifically, the Committee concluded that the agency remains non-compliant with the ESG 3.4, whereas the agency was found to be substantially compliant on ESG 2.1. Regarding the complaints that were raised, the Committee found that the ENQA Board followed due process in accordance with its Rules of Procedure in carrying out the review of AHPGS, therefore the main substance of the complaint was not upheld.

Following this, the Board took a decision at its meeting on 28 November 2019, in which it followed the statement of the Committee, i.e. the Board rejected AHPGS' appeal and complaint and stood by its initial decision not to renew AHPGS membership in ENQA and to designate the agency as "Member under review" for a period of two years from 20 June 2019.

In the Board letter dated 3 December 2019, the Agency was explained that it will need to undergo a new partial review process at the end of this period, or sooner, if it wishes. The partial review should focus in particular on ESG 3.4 Thematic analysis. The ENQA Rules of Procedure namely state the following regarding the status of "Member under review" (see article 7, paragraph 2):

"A further, partial review shall be carried out by reviewers nominated by the ENQA Board, at the latest at the end of the two-year period and shall focus on the deficiencies mentioned in the review report and/or those highlighted by the Board in its letter."

Following this, on 19 December 2019 AHPGS officially approached ENQA to coordinate the abovementioned partial review and prepare a review report that will be considered for the purpose of ENQA membership renewal.

Chapter 2: Content of the partial review

As explained in chapter 1 of this document, ENQA Board decided at its meeting on 28 November 2019 to reject AHPGS membership renewal, judging that the agency achieved non-compliance with the ESG 3.4 Thematic analysis and thus failed to prove sufficient overall level of compliance with the ESG.

The partial review will address the abovementioned ESG standard 3.4 through the following list of activities of AHPGS:

1. Programme accreditation in Germany
2. System accreditation in Germany
3. Institutional audit in Austria
4. Programme accreditation in Austria
5. Institutional evaluation in Romania
6. Programme evaluation in Romania
7. Institutional audit in Slovenia
8. Institutional accreditation in Switzerland (not yet been carried out in practice)
9. Other programme accreditations carried out abroad.

The agency is expected to produce a self-assessment report on the points raised in relation to the ESG 3.4, indicating in particular the changes that have taken place since the last full review. In addition, the agency will indicate any eventual changes and developments in the agency beyond those listed under the criteria under scrutiny.

The partial review does not foresee a site visit to the agency. As the ENQA's policy for partial reviews² (see the chapter on site visits) states:

"The duration and the programme of the site visit will depend on the number of type of elements to be looked at by the review panel. In practice this is likely to mean a visit of 1-2 days. Other arrangements such as a visit by the panel chair only, or no visit at all (only study of the SAR and additional documentation) may also be considered if appropriate." Therefore, in the case of this partial review, the panel is expected

² See here: https://enqa.eu/wp-content/uploads/2016/09/ENQA-Agency-Reviews_Partial-Reviews.pdf

to analyse all evidence as provided in the SAR by the agency. Additionally, the panel is welcome to request for additional documentation to be provided by the agency in written.

The report by the reviewers will concentrate on the same criteria and assess how the compliance has evolved since the last full review. It will also assess any eventual changes that have been brought to the attention of the panel in the self-assessment report.

Chapter 3: Panel composition

The Board will nominate three external reviewers to complete the task.

The composition of the panel for the AHPGS full review in 2018 was as follows:

Andy Gibbs	Chair (EUA nominee), academic
Nuria Comet	Secretary (ENQA nominee), quality assurance professional
Stephanie Hering	Panel member (ENQA nominee), quality assurance professional
Samin Sedghi Zadeh	Panel member (ESU nominee)

The proposal is to use **one member of the panel which carried out the last full review** in order to ensure consistency, sufficient background knowledge on the agency, and the external trust in the outcomes (independent of the Board). The two other panel members should be selected so to complement the panel with altogether three viewpoints, that of a student, an academic and a quality assurance professional.

The proposal is to employ:

Oliver Vettori	Chair (EUA nominee), academic
Stephanie Hering	Panel member (ENQA nominee), quality assurance professional
Francisco Joaquín Jiménez González	Panel member (ESU nominee)

One of the two members (the quality assurance professional or the student) will be appointed as a secretary by the Chair.

The panel members will be asked whether they are willing and able to carry out the work within such timelines (see below).

Chapter 4: Timeline

Terms of Reference and agreement with AHPGS	By 17 January 2020
Completion of partial review SAR by AHPGS	By 20 January 2020
Appointment of partial review panel members and agreement on reviewer contracts, setting date for the completion of the partial review report	By 31 January 2020
Delivery of draft report to ENQA Secretariat	20 March 2020
Draft report to AHPGS for factual check	27 March 2020
Completion of report and submission to ENQA	3 April 2020
Consideration of the report by ENQA Board and decision	29 April 2020

Chapter 5: Costs

ITEM	COST
Expert fee - Chair	€ 2 000
Expert fee - panel member	€ 1 500
Expert fee - panel member	€ 1 500
Coordination fee ENQA	€ 2 500
TOTAL	€ 7 500

ANNEX 2: DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY AHPGS

Concept Thematic Analysis AHPGS (available on the agency's website)

Board Decision March 19, ESG 3.4

Accreditation Procedures in the Kingdom of Saudi Arabia – Analysis of the general recommendations (available on the agency's website)

OTHER SOURCES USED BY THE REVIEW PANEL

Website of AHPGS

ENQA AGENCY REVIEW 2020

THIS REPORT presents findings of the ENQA Agency Review of the Accreditation Agency for Study Programmes in Health and Social Sciences (AHPGS), undertaken in 2020.

enqa.

European Association for
Quality Assurance in Higher Education