Register Committee

Ref. RC18/2016

Ver. 1.0
Date 3/12/2016
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# Approval of the Application
# by Central Evaluation and Accreditation Agency (ZEvA)
# for Renewal of Inclusion on the Register

| | |
|---|---|
| **Application of:** | 11/09/2015 |
| **Agency registered since:** | 8/04/2009 |
| **External review report of:** | June 2016 |
| **Review coordinated by:** | GAC |
| **Review panel members:** | Wilfried Müller (chair), Karlheinz Sonntag, (academic), Anett Loescher, Thomas Kreiml, Stanislaw Bondarew (student) |
| **Decision of:** | 3 December 2016 |
| **Registration until:** | 30 June 2021 |
| **Absented themselves from decision-making:** | |
| **Attachments:** | 1. Confirmation of eligibility, 2/10/2015<br>2. External Review Report, June 2016<br>3. Response by ZEvA to the review report, 31/5/2016 |

1. The application of **Central Evaluation and Accreditation Agency (ZEvA)** adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2/10/2015.
3. The Register Committee considered the external review report of June 2016 on the compliance of ZEvA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered ZEvA's response to the German Accreditation Council (GAC) report of 31/5/2016.

## Analysis:

5. In considering ZEvA's compliance with the ESG, the Register Committee took into account the following external quality assurance activities: programme accreditation in Germany; *system accreditation in Germany; institutional, programme, subject and thematic evaluations; certification in tertiary education; international*

*programme and institutional accreditation quality audits in Austria; and programme accreditation in Switzerland*.

6. The Register Committee further noted that the accreditation procedure for Doctoral Programmes is carried out in accordance with the same procedural rules as the accreditation of Bachelor's and Master's study programmes, based on the Guidelines of the Lower Saxon Ministry of Science.

7. *'Validation of modules by non-higher education providers'* are not within the scope of the ESG and, thus, not pertinent to the agency's inclusion on the Register.

8. The Register Committee found that the report provides sufficient evidence and analysis on ZEvA's level of compliance with the ESG.

9. The Register Committee concurred with the review panel's analysis and conclusions regarding the individual European Standards and Guidelines, unless otherwise noted in the following specific comments:

**ESG 2.4: Peer-review experts**

10. In its decision of renewal (of 25/11/2011) the Register Committee flagged the lack of involvement of international experts and representation of the perspectives of students and professional practice in assessments of large clusters including study programmes from different disciplines.

11. In the review report, the panel noted that ZEvA appoints external expert groups in all procedures, and as a general rule at least one student member is included in these groups. The Register Committee however noted that while the agency has involved students in most of its reviews it has not done so for any of its certification procedures and at least one programme accreditation (i.e. PhD in World Maritime University).

12. While the panel formed the view that overall ZEvA's procedures are well structured in its key areas of activity the newly added procedures, i.e. certification procedures lacked clear statements regarding the processes and responsibilities for the selection, nomination and appointment of experts.

13. In ZEvA's response to the panel's report (of 31/5/2016) the agency stated that the responsibility for the appointment of experts lies with the consulting commission and that this has been clarified within the updated Guidelines for Certification and Quality Guidelines. The

Register Committee noted the agency's clarification and action taken to address the panel's concern.

14. The Register Committee underlined the panel's recommendation to increase the participation of experts in the agency's preparatory seminars.

15. **In view of the lack of consistent involvement of students, in particular in the agency's certification procedure the Register Committee was able to concur with the panel's conclusion of partial compliance with ESG 2.4.**

**ESG 2.6: Reporting**

16. The Register Committee noted that at the time of the review the panel was unable to locate the published reports for two of ZEvA's procedures, i.e. the certification procedure and audit. In its letter to the Accreditation Council in response to the panel's report (of 31/5/2016), ZEvA clarified that the audit and certification reports were not published at that time since the procedure had not been finalised. The Register Committee was able to locate the reports on the agency's website and thus came to the conclusion that the reports are published.

17. The panel noted that according to the guidelines for evaluations (institutional, thematic and subject-related) that publication practices may be limited (i.e. excluding individual sections of the report from publication or publication of summary reports, upon request of the higher education institution). Following the on-site discussions the panel was satisfied that the agency ensures that the reports for evaluation procedures are always published in full.

18. The Register Committee noted that ZEvA's guidelines is not fully in line with the requirement of the standard (ESG 2.6) that quality assurance agencies should publish their full reports. **The Committee therefore underlined the panel's recommendation that ZEvA should ensure that the complete expert reports are published in all of the quality assurance procedures the agency offers**.

19. **Having been able to verify the publication of reports for certification and audit procedures the Register Committee was however unable to concur with the panel's conclusion of partial compliance and concluded that ZEvA is in fact compliant with ESG 2.6.**

20. **The Register Committee further underlined that ZEvA is required to make (a) Substantive Change Report(s) once the pilot procedure for certification and auditing has been completed.**

### ESG 2.7: Complaints and appeals

21. The Register Committee noted that higher education institutions whose procedures are decided on by the Commission for International Affairs (KIA) do not seem to have an option to lodge complaints or appeals.

22. The Register Committee further considered the panel's analysis showing that institutions do not have the possibility to launch a complaint to settle conflicts related to ZEvA's procedures. The panel review also noted that the complaints procedure employed by ZEvA is not visibly communicated on the agency's website.

23. In its letter to the review panel (of 31/5/2016) ZEvA stated that it has reviewed its rules of procedure to allow handling of all complaints and appeals' procedures. Additional information on appeals and complaints have been added to the website page of the agency.

24. While the Register Committee took note of ZevA's response to the review report it could not fully satisfy itself that the updated procedure for complaints and appeals address all concerns raised by the panel.

25. **The Register Committee therefore concurred with the panel's conclusion that ZEvA is partially compliant with the standard and underlined the panel's recommendation that the agency should allow for objections to formal decisions as well as complaints about the way procedures are conducted for all external quality assurance activities and ensure they are clearly communicated to higher education institutions.**

### ESG 3.6: Internal quality assurance and professional conduct

26. The Register Committee noted that ZEvA has a formalised and binding system for internal quality management that is addressed by the "Guidelines for Internal Quality Assurance".

27. In its analysis the panel identified a number of gaps in the agency's quality assurance system in particular out-dated aspects within the Guidelines for Internal Quality Assurance as well as insufficient presentation of the (newer) internationally oriented procedures. For instance the agency's new external quality assurance activities (i.e. audit and certification procedures) are not fully integrated into the quality handbook; or the newly developed rules for system accreditation are not represented in the Guidelines for Internal Quality Assurance.

28. In addition to the expert panel's analysis the Register Committee noted that quality assurance processes primarily focus on the programme accreditation activities and that there is little mention of how the

outcomes of the processes are used for improvement of the agency's work and communicated to the users.

29. In its response to the review report analysis the agency (of 30/5/2016) stated that it has provided the panel with a non-revised version of the Guidelines, which in fact have been updated and has incorporated all procedure offered by the agency.

30. **While the Register Committee noted the agency's clarification it was not able to conclude on whether the agency has addressed all concerns raised by the panel and therefore concurred with the panel's view that ZEvA is partially compliant with ESG 3.6.**

## Conclusion:

31. Based on the external review report and the considerations above, the Register Committee concluded that ZEvA demonstrated compliance with the ESG (Parts 2 and 3) as follows:

| Standard | Review panel conclusion | Register Committee conclusion |
|---|---|---|
| 2.1 | Substantially fulfilled | **Compliance** |
| 2.2 | Substantially fulfilled | **Compliance** |
| 2.3 | Substantially fulfilled | **Compliance** |
| 2.4 | Partially fulfilled | **Partial compliance** |
| 2.5 | Substantially fulfilled | **Compliance** |
| 2.6 | Partially fulfilled | **Compliance** |
| 2.7 | Partially fulfilled | **Partial Compliance** |
| 3.1 | Substantially fulfilled | **Compliance** |
| 3.2 | Fulfilled | **Compliance** |
| 3.3 | Fulfilled | **Compliance** |
| 3.4 | Fulfilled | **Compliance** |
| 3.5 | Fulfilled | **Compliance** |
| 3.6 | Partially fulfilled | **Partial Compliance** |
| 3.7 | (not expected) | **Compliance (by virtue of applying)** |

32. **The Register Committee considered that ZEvA only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that ZEvA continues to comply substantially with the ESG as a whole.**

33. **The Register Committee therefore renewed ZEvA's inclusion on the Register. ZEvA's renewed inclusion shall be valid until 30/6/2021**[1].

[1] Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

34. The Register Committee further underlined that ZEvA is expected to manage the issues mentioned appropriately and resolve them at the earliest opportunity.

EQAR | Oudergemselaan/Av. d'Auderghem 36 | BE-1040 Brussels

Central Evaluation and Accreditation Agency (ZEvA)
Mr Hermann Reuke
Lilienthalstr. 1

**30179 Hannover**
**Germany**

Brussels, 2 October 2015

**Confirmation of Eligibility: Application for Renewal of Registration**
Application no. A27 of 11/09/2015

Dear Hermann,

We hereby confirm that the application by ZEvA for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by the German Accreditation Council (GAC) fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the following activities of ZEvA are within the scope of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015):

- Programme Accreditation in Germany
- System Accreditation in Germany
- Institutional, programme, subject and thematic evaluation
- Certification in tertiary education
- International programme and institutional accreditation
- Quality Audits in Austria
- Programme Accreditation in Switzerland

Please ensure that ZEvA's self-evaluation report covers all the afore-mentioned activities.

We further remind you that the following issues were flagged when ZEvA's registration on EQAR was last renewed, and should be addressed in your self-evaluation report and the external review report:

*ESG 2.4: International experts*

*It should receive attention whether ZEvA has increased the involvement of international experts and included international perspectives in its committees more prominently.*

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*ESG 2.4: Expert groups for clustered programme accreditations*

*It should receive attention whether ZEvA has ensured appropriate representation of the perspectives of students and professional practice in assessments of large clusters including study programmes from different disciplines.*

We confirm that the validation of modules by non-higher education providers is not within the scope of the ESG, provided that these modules are entirely outside the higher education system. While these activities are not relevant to your application, it is ZEvA's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

We kindly ask you to forward this letter to GAC as the coordinator of the external review and request that GAC inform the review panel, so as to ensure that all these activities are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. ZEvA has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,

Colin Tück
(Director)

**Cc**: German Accreditation Council (GAC)

# Response by ZEvA

to the expert report by the Accreditation Council dated 6 May 2016

## 1 Introduction

ZEvA wishes to thank the expert group for the constructive and pleasant atmosphere during the on-site assessment and for the improvement proposals in the report. In particular, ZEvA is pleased about the words of praise for our employees and the overall positive assessment of our traditional business areas programme and system accreditation and evaluation. We are happy to accept the recommendations on the other business areas that so far are not yet as well established and would like to use them to continue to improve our work and to continue working on our strategy for the coming years.

Below we should like to respond to the suggestions and criticisms formulated in the report. As some of these points concern several ESG standards and, in part, also AR criteria, we structure these thematically instead of sorting them according to the standards and criteria.

## 2 Statement on Suggestions and Criticisms

### 2.1 Application Documents

(Chapter 2.4)

The expert group criticises the form of ZEvA's self-report, they took it to be "too short" and, "[w]ithout intensively reading the extensive annexes, [...] not informative enough". With regard to this point we would like to stress that as a general rule, ZEvA recommends exactly the same report structure to higher education institutions applying for programme accreditation. In our view, it is of little benefit to the procedure if the applicant produces long explanatory texts, as the experts must verify any statements contained therein by means of the annexes attached anyway. Hence, we regard Volume 1 of the self-report rather as a reading aid for the annexes. The argument that the application can only be understood following an intensive reading of the annexes therefore has little validity in our view, as an intensive reading of the annexes is essential in any case. This is also stated in the Guidelines of the Accreditation Council: "It should be noted with regard to the explanatory statement for the application that the validity of purely descriptive explanations is naturally very limited. The information given in the explanatory statement for the application is to be verified, however, by the submission of corresponding documents" ("Leitfaden zur Akkreditierung bzw. Reakkreditierung einer Agentur" (Guidelines for the Accreditation or Re-accreditation of an Agency), May 2011, p.9). Nevertheless, we take up the suggestion for future procedures and will en-

deavour to support higher education institutions in designing their self-reports in such a way that they are more comprehensible out of themselves.

## 2.2 ZEvA Strategy

(Chapter 1, 2.4, ESG 3.1)

ZEvA welcomes the remarks on the strategic further development of ZEvA and will be happy to put them into practice. An important element of the further strategy is without doubt the development of a new project management software ("ZEvA Connect"), which will replace the current project database and, in addition to project administration is also meant to support the electronic communication with our customers and experts, so that in the medium term the self-reports will be submitted in electronic form only. This is expected to improve process quality even further and to alleviate the submission of applications significantly for higher education institutions.

Furthermore, we should like to point out that we have already undergone a comprehensive strategy identification process, with a detailed marketing study by Prof. Wiedmann, Leibniz University Hanover, and a brand development with the agency DieVision, on completion of which re-structuring measures in ZEvA were also carried out. Naturally, this process has not been completed yet, but ZEvA will consistently continue to further pursue this path.

In addition, we see development potential in three fields:

1. International procedures

The expert group notes that ZEvA has so far "acted with considerable caution " in expanding its activities to the foreign countries. We agree with this conclusion, but have already started to address the topic more pro-actively and urgently. After the first international customers were acquired without any direct initiative on ZEvA's part, clear responsibilities for international affairs have now been established within the agency. ZEvA has designated two employees for the expansion of international contacts. In addition, ZEvA is specifically looking for contacts abroad that could function as multipliers. As a first step, ZEvA has forged a fruiful cooperation with the Russian agency AKKORK, which enabled the realization of several accreditation procedures at Russian universities. This has led to further contacts in Eastern Europe and thus for the building of a first regional focus for the international activities of ZEvA.

A further focus is currently starting to form in the Arab/North-African region, with commissions from universities in Iraq, in Saudi-Arabia and in Egypt. Moreover, ZEvA would like to establish itself throughout all German-speaking countries. In Austria, ZEvA has already invested a great deal of time in order to acquire commissions for the auditing of higher education institutions (HEI) and is meanwhile well established there. In the near future a renewed certification in Switzerland will also be sought where, under the new accreditation system, an opening for foreign agencies has since been agreed upon

again.

In addition, ZEvA would like to follow the recommendation of the experts to develop a more detailed internationalisation strategy and submit it to the Foundation Council in a timely manner. This will also include the proposal to increase the number of staff in order to gain time capacities for the further development and acquisition of international procedures. So far ZEvA has rather avoided such an increase in personnel as, with a view to the outstanding decision of the Federal Constitutional Court (which has meanwhile been taken), the future of accreditation was uncertain, hence an increase in personnel for the development of new business areas appeared to be financially risky.

2. System Accreditation

The expert group is right in concluding that, following the first procedure, system accreditation at ZEvA has had a very slow start. Primarily, the causes of this are to be found in structural problems within ZEvA and have meanwhile been completely remedied so that it was also possible in the meantime to acquire several commissions from higher education institutions. Currently, two employees are assigned to the System Accreditation Department, with simultaneous responsibility for international procedures. In connection with the planned increase in personnel already described under 1., ZEvA also intends to reinforce its acquisition activities in order to expand this business area sustainably.

3. Certifications

The business field of certifications is currently still in the trial stage and a reliable prediction is not yet possible as to whether this will develop into a worthwhile business area for ZEvA. However, the cooperation with Deutsche Gesellschaft für Hochschuldidaktik (dghd) (German Association for Higher Education Institution Didactics) is developing particularly positively and can be regarded as future-oriented and sustainable. If, however, certification should turn into a firm business area and the commission volume increase significantly, ZEvA will also provide more personnel capacity here.

## 2.3 Quality Assurance

(ESG 3.6, AR 2.2, 2.5)

At several points in the evaluation report the experts point out that the "Guidelines for Internal Quality Assurance" contained in the annexes of our explanatory statement for the application are not up to date and do not map all business areas. This is correct, and we regret that we had enclosed an out-of-date version here. At the time of forwarding the documents we had already updated the Guidelines but incorrectly provided a non-revised version. We enclose the up-to-date version in this statement, which now

shows an updated mapping of all business areas (See annex 1).

We regret that this has given the impression of an incomplete internal quality assurance system. We can assure you that this is not the case. Our central quality-assurance elements (jour fixe; internal meetings; interviews of customers and experts; dual control principle (four-eyes-principle); staff interviews etc.) are implemented in all our business areas and are also firmly oriented toward the quality development of ZEvA. Our project database should be highlighted here again which so far only maps the programme-related procedures (programme accreditations (national and international), certifications) but is going to be replaced as early as next year with a far more efficient product encompassing all business areas. Also, the effectiveness of quality assurance should be measured by the output, and as the expert group attests ZEvA a very good performance in the traditional business areas, it can be assumed that quality assurance is not as incomplete as it might appear to be on paper.

We do not plan to publish the Guidelines for Quality Assurance, as this is a purely internal manual for employees and as such has the sole purpose of bindingly regulating internal procedural routines.

## 2.4 Selection of Experts

(ESG 2.4)

The assessment report notes critically that rules for the appointment of experts are not clearly stated for all business areas. In particular, audits and certification procedures are highlighted here. However, with regard to the audit procedures this is not quite correct. Audits at Austrian higher education institutions, even if they are shown as a separate field of activity, are classified as “international procedures” and are thus within the responsibility of the KIA, which of course o appoints the experts for these procedures, too, as is clearly specified in the procedural rules. For the sake of transparency we have once again described this explicitly in the Guidelines for Quality Audits and on our homepage (see Annex 4).

In the case of certifications we had indeed not laid down a binding procedure for appointing experts; but this has now been remedied. The responsibility for the appointment of experts lies with the consulting commission, as is now described in the rules of procedure, in the Guidelines for Certification, in the Quality Guidelines and on the homepage (See Annexes 1, 5 and 7).

## 2.5 Publication of Expert Reports

(ESG 2.6)

The experts find that so far no expert reports have been published for auditing in Austria and for the certification procedures. This is correct but easy to explain: these pro-

cedures had not yet been completed at the time of the on-site visit. The first decisions concerning quality audits in Austria will only be taken at the meeting of the KIA in July 2016. Subsequently, the expert reports will be available at the following URL:

http://www.zeva.org/international/informationen-auf-deutsch/qualitaetsaudit-oesterreich/

As for certifications, the first decisions have since been taken on the basis of the Guidelines submitted (publication was not yet mandatory for some of the older procedures), so that the first reports can now also be found on our homepage:

http://www.zeva.org/zertifizierung/

(AR 2.7)

With regard to the reports and internet tables for programme accreditations in Germany, it is noted critically that these are not always published within a period of four weeks following the decision. This is correct but can be justified just as easily: The decisions of the Standing Accreditation Commission (SAK) only become legally binding and final after the minutes of the meeting have been approved and the decisions have been received by the higher education institutions. Only then is it possible to publish the reports and tables. Therefore, the specified aim of “publication within four weeks” may also be counted from the notification of the decision, which we comply with in all cases. Our internal process moves along the following timeline:

- Following the meeting of the SAK (Standing Accreditation Commission): Preparation of the minutes and approval by Academic Director – Duration: usually 1 week
- Forwarding the minutes to the members of the SAK (Standing Accreditation Commission) – Period for objection: 2 weeks
- Dispatching of the decisions – at least 1 additional week
- Only then is it possible to edit the internet tables – duration, depending on the scope of the agenda: 2 weeks

ZEvA continuously strives to publish reports and decisions as quickly as possible. However, a further acceleration of this process is not possible, as the above schedule already assumes ideal conditions. In the event of illness of the responsible project officers or any delays on the part of the higher education institution during the transmission of data for the internet tables, the process may also be slightly prolonged.

## 2.6 Complaints Procedure

(ESG 2.7, AR 2.6)

With regard to the complaints procedure the expert group criticises that the Review Commission seems to be responsible for programme and system accreditations only, that is, decisions by the SAK (Standing Accreditation Commission). Indeed, the rules of

procedure for the Review Commission so far only apply to decisions taken by the SAK (Standing Accreditation Commission), although we were implicitly assuming that the Review Commission would take care of any other objections or complaints arising, too. This had also been mentioned in the Guidelines for Certification.

In the meantime, we have adapted our homepage, the rules of procedure for the Review Commission and the Guidelines for Programme Accreditation (with regard to doctoral study programmes), Certification, International Procedures and Quality Audits in Austria as well as the Guidelines for Internal Quality Assurance, in order to draw out clearly that the Review Commission is responsible for all these procedures (see Annexes 1, 2, 3, 4, 5 and 6). Also, a further member with experience in the area of certification will be designated. There is already sufficient experience with international procedures in the Review Commission.

The modified rules of procedure for the Review Commission will be submitted to the SAK (Standing Accreditation Commission) for decision on 12 July. The members continue to be designated by the SAK (Standing Accreditation Commission), the KIA and the Certification Commission will subsequently be requested to commission the Review Commission officially for the procedures in their respective areas of responsibility.

Furthermore, the report criticises that there is hardly any information to be found on our internet pages about the complaints procedure and the Review Commission. We have meanwhile remedied this: the information is shown under the following URL, which is also linked to the individual procedures:

http://www.zeva.org/ueber-die-zeva/revisionskommision/

## 2.7 Accreditation of Doctoral Study Programmes

(Chapter 1, 3.4; ESG 2.2, 2.3, 2.5)

At several points in the review report, it is criticised that the criteria and procedures for the accreditation of doctoral study programmes are not sufficiently described in our guidelines and on our homepage. Here, we should like to point out again that this is not a separate area of business, which is also confirmed by the experts on page 18.

So far, we have carried out accreditation procedures for doctoral study programmes almost exclusively in Lower Saxony because it is only there that the accreditation is legally required. The procedure is carried out in accordance with the same procedural rules as the accreditation of Bachelor's and Master's study programmes, but is based on the Guidelines of the Lower Saxon Ministry of Science, with no AR seal being granted. The doctoral study programmes were always accredited in a cluster procedure together with Bachelor's and Master's study programmes, some of them being fast track programmes in connection with an associated Master's study programme.

Our homepage currently lists 14 Lower Saxon study programmes accredited by ZEvA, some of them already for a second time. The number 15 mentioned in the report is incorrect in so far as one doctoral programme from an international procedure was in-

cluded in the count, but this doctoral programme was accredited in accordance with our international rules and therefore must be attributed to the international business area. In total, we have so far taken 22 decisions regarding doctoral programmes offered in Lower Saxony. In total, this shows that, when viewed against an overall volume of 3,752 accredited programmes at the end of 2015, these decisions represent less than one per cent and are unlikely to become more quantitatively significant in the future.

For this reason it appears remarkable that the expert report attaches such a large importance to this topic. Due to the very low number of such procedures we do not consider it appropriate either to prepare distinct guidelines for these study programmes. However, for these procedures we have inserted separate sub-chapters in the Guidelines for Programme Accreditation and in the Guidelines for Internal Quality Assurance (see Annexes 1 and 2) and, on our internet pages, we have also set up a new sub-item under Programme Accreditation. Here, the Guidelines of the Lower Saxony Ministry of Science are now also referenced:

http://www.zeva.org/programmakkreditierung/promotionsstudiengaenge/

## 2.8 Certification Procedure

(ESG 2.1, 2.4, 2.5, 3.5)

At several points, the expert report criticises that the the certification procedures carried out by ZEvA remain unclear. This concerns the following points:

1. Publication of the reports
2. Process description in the Quality Guidelines
3. Responsibility of the Review Commission
4. Responsibility for the appointment of experts
5. Participation of students and professionals
6. Consideration of Part 1 of the ESG

Points 1-4 have already been discussed in previous sections of this statement (Point 1 at 2.5, Point 2 at 2.3, Point 3 at 2.6, Point 4 at 2.4). The other two points are to be dealt with in the following.

Re Point 5: Here, it is criticised that the Guidelines use an unclear formulation (“Kann-Formulierung”) and thus leave it open whether students or representatives of professional practice will be involved. In particular, the experts’ critical view is due to the following sentence: "The group of experts consists of a group of persons who can represent the scientific perspective on the side of the provider, the perspective of participants and of the demand side (employment sector)". We assume that there has been a misunderstanding as the “can” is not to be understood as describing an option. Instead, it is meant to express that in all cases the group of experts in its entirety must be able to represent these three perspectives. The fact that we do not use the terms "Students" and "Representatives of Professional Practice" here is due to the diversity of the field of certification, as these terms cannot be used without any problems in all cases. In the

case of the certification of higher education institution didactic programmes, it is a question of, for example, not having programmes of study per se, but having instead the training opportunities for higher education teachers. Thus, for these programmes, the Subject Representatives, the "Students" and the "Representatives of Professional Practice" of the relevant professional field would all be higher education teachers, thus making these three groups very difficult to separate. On the other hand, in certifications relating to study programmes, students and representatives of professional practice from outside academia will, of course, be involved.

Re Point 6: The report criticises that our Guidelines do not state clearly how our assessment procedures take into account Part 1 of the ESG. The diversity of certification procedures means that the aims of the procedures may be very different from one to another. Thus, it depends on these aims, whether Part 1 of the ESG is drawn on during the assessment. For all ESG-relevant parts of the assessment, the relevant standards from Part 1 of the ESG will of course be applied.

See Annex 5

## 2.9 "Cross-subsidization" of Programme Accreditation

(AR 2.3.2)

The expert report expresses the suspicion that there might be a (low) cross-subsidization of the accreditation procedures by revenues from evaluation procedures. It is argued here that with regard to the earnings in the accreditation in relation to costs, a loss of € 47,547 resulted, whilst in the realm of evaluations outside the MWK (Lower Saxony Ministry of Higher Education) area of responsibility a surplus of € 50,100 is established.

ZEvA must decisively reject this conclusion. On the one hand we should like to emphasise once again that the evaluation procedures referred to are not funded by the State of Lower Saxony but are also paid for by the higher education institutions on the same full cost basis as accreditation procedures. Therefore, they are not to be included in the Evaluation Department but fall under the Accreditation Department. In fact, only the quality audits in Austria fall into this category.

Also, the allegation of cross-subsidization indicated by the group of experts can be completely rebutted and invalidated as the business plan (Annex 34 of the application) does completely without any subdivision of the salaries, fees and travel costs. However, these cost items occur for the activities in the evaluation (column 2) in the same ratio as for the activities in the accreditation.

For ZEvA, the focus was on the detailed presentation of the turnover to enable a quantitative evaluation of the business field of evaluation (column 2).

The turnover of activities from evaluation (column 2) does not subsidise the other activities, but is a component of the total cost planning of the accreditation and provides for a balanced planning result.

The execution of all accreditation and evaluation procedures (column 2) is carried out on a full cost basis in accordance with the example calculations submitted (Annex 42 and 43 of the application).

### 2.10 Proportion of Women in the SAK (Standing Accreditation Commission)

(AR 2.2.1)

We welcome the experts' conclusion that the agency is on a good way as regards increasing the proportion of women in the SAK (Standing Accreditation Commission), and their encouragement to proceed along this path. In the meantime we have already filled another position with a woman and thus increased the proportion even further.

## 3 List of Annexes

Annex 1 Guidelines for Internal Quality Assurance

Annex 2 Guidelines for Programme Accreditation

Annex 3 Manual for the External Assessment of Study Programmes

Annex 4 Guidelines for Audits at Universities of Applied Sciences in Austria

Annex 5 Guidelines for Certification

Annex 6 The Review Commission's Rules of Procedure

Annex 7 Rules of Procedure of the Consulting Commission for Certification

Hanover, dated 31/05/2016