

**Extraordinary Review of Registration
of the Accreditation Agency in Health and Social Science (AHPGS)
Following a Third-Party Complaint**

Register Committee
28/29 November 2014

Ref. RC13/04.5

Ver. 1.0

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1. The Register Committee considered a complaint received on 30/09/2014 regarding the quality of reports from clustered programme accreditation carried out by AHPGS.

Summary of the complaint:

2. The complaint was made by the Centre for Quality Assessment in Higher Education (SKVC). The complainant is the national quality assurance agency of Lithuania.

3. The complaint relates to the review reports on ten study programmes at a Lithuanian higher education institution that were reviewed by AHPGS in a clustered procedure, i.e. one expert panel of fourteen members was appointed to review all ten programmes, with one site visit.

4. In line with Lithuanian regulations¹, SKVC took accreditation decisions based on the reports produced by AHPGS.

5. The ten reports follow a common template and structure. SKVC alleged that the reports by AHPGS were generic and contained an inappropriate amount of identical text, in particular in the chapter analysing whether the programme fulfils the criteria for accreditation. The complainant noted that identical recommendations were made for all programmes and that the particularities of the different programmes were not properly reflected.

6. SKVC stated that it had raised the issue with AHPGS in the past, after similar cases, but that it had not received a satisfactory response to its questions and did not consider the situation to have improved.

Findings:

7. The Register Committee concluded that the complaint was formally admissible according to the Complaints Policy:

- a. The complaint relates to the quality of review procedures and reports. The ESG are underpinned by the expectation that external quality assurance results need to be valid, reliable and useful. The guidelines to ESG 2.4 specifically underline the importance of “ensuring that the review procedures used are sufficient to provide

¹ Higher education institutions in Lithuania can choose to have their programmes externally reviewed by SKVC or a suitable EQAR-registered agency. In the latter case, the foreign agency produces a report which serves as a basis for the final accreditation decision taken by SKVC.

- adequate evidence to support the findings and conclusions reached". The issues raised thus relate clearly to the ESG.
- b. The complainant provided evidence, i.e. copies of the reports in question.
 - c. The complainant disclosed its relationship with AHPGS and stated how the issue was taken up with AHPGS before making the complaint.
8. The Register Committee considered the issues raised:
- a. The programmes reviewed as one cluster span several domains, including management, law and humanities. The programmes are offered by six different faculties.
 - b. It appears that the panel reviewed every single programme. The descriptive parts of the review reports do not appear unusual in terms of their balance between identical text across all programmes and specific text for each different programme.
 - c. The amount of identical text in the analytical parts of the reports is unusual, especially given the broad range of different programmes reviewed. This raises questions about the depth in which individual programmes were analysed. The fact that all programmes received the same numerical score is surprising.
 - d. The reports in question are not available on AHPGS' website.
9. The Register Committee concluded that the reports delivered raise questions as to the reliability of the findings, since the generic nature of the commentary is not sufficiently specific to the programme under review.
10. The Register Committee's remit is, however, not to adjudicate on a particular case, but to investigate whether the case points to a systemic problem in terms of the agency's compliance with the ESG. The Register Committee therefore considered whether "there are major concerns that the Registered Agency no longer fulfils the criteria for inclusion" (§7.1 of the EQAR Procedures for Applications).
11. The Register Committee sought clarification from AHPGS on its policies and practice in conducting clustered reviews of several programmes.
- a. AHPGS explained that it had no own policies or guidelines, but applied the rules of the German Accreditation Council in all its procedures. Accordingly, the possibility to combine the review of several programmes in one procedures "*requires a high technical affinity of the individual study programs. This is given only if it goes beyond the bare affiliation to a subject area (humanities and cultural studies, social sciences or natural sciences) and there is a disciplinary affinity of the (individual) study programs*".

- b. AHPGS emphasised that it interviewed those responsible for each programme during the site visit, and that it assigned more than one expert for each study programme.
- c. AHPGS stated that between 2012 and 2014 only 8 of its 182 procedures were combining more than 3 study programmes.

12. The Register Committee sought clarification from SKVC as to whether any national regulations would prevent AHPGS from publishing the reports in question. It was clarified that there are no national regulations that would prevent AHPGS from doing so.

Decision:

13. **The Register Committee concluded that:**

- a. **Given the broad range of programmes from different disciplines that were combined into one clustered review it appears that – in the case that lead to the complaint – AHPGS breached its own principles as described in par. 10 a.**
- b. **The complaint gave rise to concerns about the review procedures and reports in clustered reviews of several study programmes. These issues are likely to be a consequence of combining the review of too many different programmes, and the complaint was substantiated in that regard.**
- c. **It could be seen that the panel considered the different programmes in their own right at least to a certain extent, while it remained unclear whether this was with done in appropriate detail.**

14. **While reports may be of reduced quality in certain cases of clustered accreditations there are no grounds to fundamentally question the integrity of AHPGS' reviews and their results. The Register Committee, therefore, decided not to take action such as provided for in §7.4 of the EQAR Procedures for Applications, but to issue a formal warning to AHPGS.**

15. **The Register Committee advises that AHPGS needs to be mindful about the quality of its reports especially when clustering the review of several study programmes at the same time. The issues identified should also be addressed in future external reviews of AHPGS.**

16. The question of publication of review reports is being addressed in the context of AHPGS' current application for renewal of inclusion on the Register; it is, therefore, not addressed in relation to this complaint.

17. AHPGS has the right to appeal this decision of the Register Committee in accordance with the Appeals Procedure (available on the EQAR website at <http://www.eqar.eu/application.html>). Any appeal must reach EQAR within 90 days from receipt of this decision.