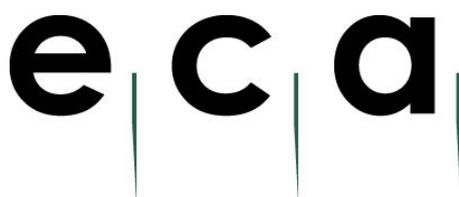


# FIBAA (Germany)

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european consortium for accreditation

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## 1. Introduction

The European Consortium for Accreditation in higher education (ECA) has been founded in 2003 with the aim of mutual recognition of accreditation and quality assurance decisions. A first step towards reaching this goal was the signing of twelve bilateral mutual recognition agreements between ECA members. These agreements are most useful for joint programmes, but twelve bilateral agreements, restricted to a limited number of ECA member countries, only fully covers a limited number of joint programmes. A multilateral mutual recognition agreement (MULTRA) with a focus on joint programmes was conceived to improve this situation. As a result, joint programmes can be assessed in a single procedure rather than through multiple national accreditation procedures.

The MULTRA stands for a high level of trust between accreditation agencies. This trust is based on evidence gained through intense cooperation and observations of procedures amongst the MULTRA agencies. The observation is not meant to repeat the external evaluation of an agency but aims to gain mutual trust through observing accreditation practice. The observation should provide evidence if the accreditation procedures and standards are free of significant differences from those of MULTRA agencies and if the results of accreditation procedures of joint programmes can thus be accepted by MULTRA agencies.

For agencies seeking to sign MULTRA, two MULTRA members will write an observation report and give a recommendation to all MULTRA members.

## 2. General information

<i>Accreditation organisation observed:</i>	FIBAA
<i>Country</i>	Germany
<i>Accreditation procedure regarding:</i>	International Business and Management Studies Avans University
<i>Date(s) of the observation:</i>	17 and 18 September 2012
<i>Name/organisation of the observers</i>	Carme Edo Ros (AQU Catalunya) Jan Willem Meijer (NVAO)

## 3. Observations

The following observations are based on the self evaluation report and the external evaluation report of the agency, the information available on the Agency's Webpage and the evidence gained through the observation visit.

The observation report should provide evidence if the accreditation procedures and standards are free of significant differences from those of MULTRA agencies.

The observation report should also provide evidence if the results of accreditation procedures of joint programmes can be accepted by MULTRA agencies.

### 3.1 Framework of the procedure

In which framework did the procedure take place? This section should address the elements listed below in order to provide an in-depth understanding of the accreditation practice of the observed agency.

1. **Structure of accreditation framework (including relevant documents, e.g. legislation, ...)**
2. **Accreditation standards**
3. **Additional requirements for the assessment of joint programmes**
4. **Focus of the accreditation procedure (e.g. input factors, internal quality assurance, ... )**
5. **Assessment of achievement of learning outcomes**
6. **Enhancement strategies for institutions**
7. **Responsibility for accreditation procedures**
8. **Steps in the accreditation procedure**
9. **Assessment rules and decision scale when accreditation is granted (e.g. excellent, insufficient; conditions, ...)**
10. **Decision-making process of the agency (rules and responsibility)**
11. **Period of accreditation**
12. **Appeal system**
13. **Publication policy**
14. **Average number of procedures per year**

In the German accreditation system, the accreditation of study programmes is carried out by Accreditation Agencies who in turn are accredited by the Accreditation Council of the Foundation for the Accreditation of Study Programmes in Germany.

Agencies must carry out evaluation of study programmes in accordance with the given *Criteria for the Accreditation of Study Programmes* by the Accreditation Council.

The accreditation of study programmes for Bachelor and Master Degrees is prescribed as a directive in the *Common Structural Guidelines of the Conference of German Cultural Ministers* and must, as a precondition for the granting of state approval, be embedded in the various individual laws concerning Higher Education in each Federal German State.

Within this **framework**, FIBAA has dedicated its work to the process launched by the "Bologna Conference" and the follow-up conferences of the responsible national ministries.

FIBAA is a non-profit foundation established specifically to promote quality and transparency in education and science by awarding a Quality Seal to education programmes and providers operating in tertiary and quaternary fields. FIBAA achieves its objectives, in particular, by developing suitable measures and instruments which serve to define quality guidelines for the respective academic goals which educational offerings and institutions pursue. Furthermore, it creates the relevant decision-making bodies to accredit, audit, evaluate and certify educational programmes and their providers in the international field. FIBAA also contributes proactively to the work of international bodies and beyond in order to attain the comparability of quality standards and quality assurance processes in the educational sector.

FIBAA was founded in 1994 and hence became one of the first agencies to be accredited by the German Accreditation Council. FIBAA has been entitled to award the Seal of the Accreditation Council in Germany for degree programmes since 2002 and for System Accreditation since 2007. Since 2002 FIBAA has been a full member of European Association for Quality Assurance in Higher Education (ENQA).

In 2008, the Federal Department of Economics Affairs (FDEA), Switzerland, recognised FIBAA at national level and confirmed that the federal, legislative requirements and European standards have been met for Accreditation Agencies. This means that FIBAA is entitled, on its behalf, to verify accreditation requests submitted by Swiss Universities of Applied Sciences.

Since April 2009 FIBAA has been listed as an accreditation agency in the European Quality Assurance Register for Higher Education (EQAR).

FIBAA staff members are since June 2011 recognised panel secretaries of NVAO. FIBAA has been now entitled to perform external programme evaluations at Dutch higher education institutions. NVAO recognises the evaluation report produced by FIBAA as a basis for its accreditation decisions.

To assist HEIs in accreditation procedures in accordance with the international oriented FIBAA quality requirements, FIBAA has developed an assessment guide for programme accreditation, which contains the FIBAA quality requirements (in total 60) in the form of questions and definitions of the benchmarks. The guide serves as the basis for the generation of the self-documentation by the HEIs.

The FIBAA assessment guide for accreditation of study programmes in economics, law and social sciences was developed in line with:

- the European Standards & Guidelines (ESG),
- the European quality frame (EQF) and the Dublin Descriptors (DD) contained therein,
- the specialist standard (e.g. EQUAL MBA Guidelines) as well as
- the basic requirements for introduction of credit systems and modularisation of study programmes.

In addition FIBAA has developed an assessment guide specifically for accreditation of distance study programmes.

The freedom from instructions and **independence** of the persons, agencies, accreditation organs and their members is guaranteed by the regulations in the statutes of the commissions and the rules of procedure and in the voluntary work of the FIBAA commissions and the Foundation Council, for which the actors involved must sign a confidentiality agreement and/or impartiality declaration. The Foundation Council has the right to appeal against the decision bodies (accreditation or certification commissions), but does not have the right to give instructions in matters of accreditation/certification. Therefore, third parties cannot exert influence. Furthermore, all FIBAA staff sign confidentiality agreements.

The **FIBAA commission decisions** are solely based on the expert reports, expert assessments and statements of the higher education institutions. Thus, the commissions are free to deviate from the recommendations and resolutions of the experts when this appears necessary in view of conformity with the predefined procedural principles and compliant with other decisions and when justified.

The members of the committees and experts carry out their voluntary task as independent experts and have signed a confidentiality agreement to cover their work. If a committee member opposes a procedure in an impartial manner, for example due to affiliation with a higher education institution, then he does not participate in shaping the opinion and the resolution by the commission for the corresponding procedure.

There are clear regulations in the event of bias and for the autonomy of persons active within FIBAA. These are laid down in the instructions for experts, in the confidentiality agreements and the rules of procedure of the FIBAA commissions.

The experts are obliged to declare their impartiality in writing for every audit that they participate in. The corresponding declarations are archived in FIBAA: The FIBAA staff members (and commission members) are obliged to monitor their own impartiality.

In a procedure, FIBAA supervisors (project managers, external members of staff) inform the higher education institution of the composition of the expert team. If there is suspected bias, the higher education institution has the right to express justified concerns on the composition of the expert team to FIBAA, which in justified cases, FIBAA follows up by exchanging the expert in question. There is no nomination right.

If the other activities of an expert in a current procedure lead to subsequent bias, he/she is obliged to inform FIBAA of this immediately. This shall lead to his/her immediate removal from the respective expert team (normally replaced by another expert, provided that the stage in the procedure allows it).

FIBAA is financed solely by income from its audits.

FIBAA **accreditation standards** are defined in five core areas (Strategy and Objectives, Admission -Admission Process and Procedure-, Implementation, Academic environment and framework conditions, plus Quality Assurance). (Further information available at FIBAA Assessment Guide: <http://www.fibaa.org/en/programme-accreditation/prog-according-to-fibaa-quality-requirements/fibaa0841.html>)

Each core area contains a set of criteria to be assessed. Some criteria are marked with \* (asterisk criteria). These criteria need to be rated at least as “meets quality requirements” in order for accreditation to be recommended.

All program assessments are based on these criteria although for the on-line programs additional requirements are required.

**Joint programs** are assessed following the criteria defined above although the procedure includes additional assessments in order to cover all locations where the program is held.

The site visit usually takes place in one unique location although representatives of the stakeholders from all locations are to participate in the procedure and to attend the external visit. (Program directors, teaching staff, students, support staff...)

The **achievement of learning outcomes** is one of the aspects to be assessed during the accreditation procedure. The panel has to decide whether the intended learning outcomes are achieved. As described in the Assessment Guide, the programme meets the quality requirements if:

- The level of performance in examinations and thesis are aligned with the learning outcomes of the module in terms of form and contents.
- The requirements are in the line with the level necessary to attain the qualification in question.
- The performance in examinations is arranged integratively and is characterised by wide variety of forms (insofar as this makes sense from a teaching and methodological point of view)
- The students have provided evidence that they are capable of doing academic work

The **accreditation procedure** is carried out following these **steps**:

An HEI will receive, after filing an application for accreditation in accordance with the FIBAA quality requirements, the corresponding FIBAA Assessment Guide for Programme Accreditation, which contains all relevant FIBAA quality requirements. The HEI then generates its self-documentation on the basis of this guide, and submits it to FIBAA.

FIBAA, after receiving the HEI's self-documentation, convenes an assessor panel, consisting as a rule of at least four experts:

- two members from the field of science,
- one member from professional practice and
- one student member.

This panel and the entire procedure are coordinated by a FIBAA project manager, who is at the same time the main point of contact for the HEI. The assessor panel checks the quality of specific study programmes and generates an evaluation in a two-tiered analysis. The assessor panel checks the documents, records and logic of the study programme in regard to consistency, plausibility and compliance with the FIBAA quality requirements. This is followed by a site visit, which takes, as a rule, up to two days. The report of the assessors generated in this manner forms the basis (together with the comments of the HEI) for the final decision of the FIBAA Accreditation Commission for Programmes.

Upon the previous evidences, the FIBAA Accreditation Commission for Programmes takes the **final accreditation decision**.

Each and every quality criterion in the FIBAA Assessment Guide for Programme Accreditation is reviewed by assessors. The assessment is not only recorded in the assessment report, but also in a quality profile made up of five distinct assessment stages.

The findings on the specific evaluation criteria are described in the assessment stages, taking the relevant national requirements of each case into account.

The assessment stages define the extent to which the FIBAA quality requirements are fulfilled:

- **Does not meet quality requirements** - The programme does not achieve the standards.
- **Meets quality requirements** - The programme achieves the standards.
- **Exceeds quality requirements** - The programme exceeds the standards.
- **Exceptional** - The programme significantly exceeds the standards, making it an outstanding example of best practice with regard to the particular criterion in question.
- **N.R.** – Not relevant

The report of the assessors (together with the comments of the HEI) is considered for the final decision of the FIBAA Accreditation Commission for Programmes.

The FIBAA Accreditation Commission for Programmes takes the following **decisions**:

- **Accreditation without any condition;**

- **Accreditation subject to a maximum of seven conditions** (in case of non-compliance with quality requirements that are essential for the quality of a study programme. The time-limit for compliance with the conditions is, as a rule, nine months, and can be reduced in justified cases or extended once for a period of six months.); or
- **Rejection of the accreditation** (if accreditation is refused, a new request can be filed after a blocking period of one year).

For successfully accredited programmes FIBAA awards its corresponding quality seal; this distinction confirms the high quality of the study programme.

Degree Programmes are accredited for the initial accreditation for 5 years, for a re-accreditation 7 years.

The assessment report send to the institution includes conditions and recommendations which the institution has to get into account. FIBAA will follow up the actions taken by the institution in following accreditation procedures. This procedure should contribute to the **enhancement of institution strategies**.

**Appeals** against the decision of one of the FIBAA Decision Boards can be submitted by the affected Institution within 4 Weeks after notification of this decision. Appeals must be submitted in writing accompanied by a statement of the reason why the appeal has been submitted.

After the appeal has been received by the FIBAA Office, the appeal will be forwarded to the relevant FIBAA Decision Board for a new decision. If the FIBAA Decision Board fails to redress the appeal, the process will be presented to the FIBAA Appeals Committee for examination and decision. If the Appeals Committee determines that the appeal is inadmissible, it will reject it. Conversely, if the Appeals Committee finds the appeal to be fully or partly justified, it will revoke the decision of the FIBAA Decision Board and will refer the process to it together with a written statement. If a new decision has to be made, the reasons that led to revocation of the decision will have to be considered by the FIBAA Decision Board. If the FIBAA Appeals Committee considers the appeal to be unsubstantiated, it will confirm the decision of the Decision Board. The statement by the FIBAA Appeals Committee must be considered in the final decision to be taken by the FIBAA Decision Board.

**Report assessments are published in full** on the FIBAA website. This serves to ensure transparency, comparability and orientation, also in regard to international standards, of the various study programmes offered. Potential students, employers and sponsors, but also the responsible ministries and the HEIs themselves obtain clear indications of the quality of the educational services offered.

Since its founding, FIBAA has performed more than **1,100 successful accreditation procedures**.

## 3.2 Site visit

### 3.2.1. The expert panel

This section of the observation report is based on the ECA Principles for the Selection of Experts. Here the observations concerning the selection of the expert panel are presented.

Number of panel members: 7, but one member fell ill and another missed the train.

Gender balance Because the above mentioned expert fell ill, the panel at the site visit included only male experts.

Expertise included in the panel of the observed procedure

Expertise	Included
experience in quality assurance in higher education	Yes
appropriate academic qualifications and scientific or professional reputation in the relevant area(s)	Yes
relevant international experience that provides a basis for making international comparisons	Yes
knowledge on teaching and learning methods	Yes
expertise in development, design, provision and evaluation of higher education programmes	Yes
knowledge of the country-specific system of higher education, institutions and applicable legislation	Yes
student representatives in the respective area(s)	Yes

representatives from the labour market	Yes
a significant proportion of panel members from outside the country	Yes

The site visit was complicated, because also a NVAO assessment had to be worked out, so the chairman of the NVAO-panel also acted as chairman of the FIBAA assessment. The chairman, who was much younger than the other panel members, grew in his chairmanship very well. The panel member from Hungary was present by skype, and he participated actively.

This report concerns only the FIBAA-assessment.

### 3.2.2. The procedure

This section of the observation report is mainly based on the ECA Code of Good Practice. Here the observations concerning the ECA standards relating to the accreditation procedure and standards are presented.

The procedure was in line with the ECA Code of Good Practice and included a site visit lasting two full days. The procedure was at a high level, and based on interviews, submitted documents and theses.

Beforehand the experts had formulated questions relating to the programme and to the Self Report, and these were communicated by the project manager/secretary from FIBAA.

The members attended two lessons (Economy and English language). From the observers point of view all necessary facets (e.g. professional experience as well as academic qualification and knowledge of quality assurance) were well presented in the panel.

The discussion on the programme – supported by the FIBAA project manager/secretary and the chairman, was focused on the topics, according to the checklist and guidelines of FIBAA.

The panel kept track and was efficient. The atmosphere was marked by a polite but straightforward and open minded approach.

### 3.2.3. Learning Outcomes

How and by what means is the assessment of achieved learning outcomes taken into account during the procedure?

The process and the panel paid adequate attention to the Learning Outcomes, relevant for this bachelor programme. Six theses were studied during the site visit and the panel had an interview with some industry representatives. Also on the agenda there was an interview with the double degree partners.

According to the panel the learning outcomes enable graduates of the programme to achieve attitude and skills that are necessary to become successful in their professional career in the respective field.

### 3.2.4. ECA Code of Good Practice: standard 14

Standard	<b>The accreditation procedures must include self-documentation/-evaluation by the higher education institution and external review (as a rule on site)</b>
Question	How is the accreditation procedure structured?
Reference points	<p>Self-documentation/-evaluation and external review are part of the accreditation procedure</p> <p>External reviews encompass on site visits at the higher education institutions</p> <p>The external review team is instructed clearly about its tasks</p> <p>The accreditation organisation provides specific regulations in case of ex ante-accreditations</p>

The procedure included all these stages, with the exception of the ex ante accreditation, because this assessment deals with a reaccreditation. The content of the self-assessment report is clearly prescribed and consists of a documentation regarding the programme and contains information related to the standards of the accreditation framework. The self-assessment report also includes a description of the double degree programme. The external review process is well structured, as is the preparation of the panel's decision.

### 3.2.1. ECA Code of Good Practice: standard 15

Standard	<b>The accreditation procedures must guarantee the independence and competence of the external panels or teams</b>
Question	<p>How is the independence of external panels guaranteed?</p> <p>Are selection criteria for expert panels set up?</p>

Reference points	<p>Selection criteria for external panels/expert committees are set up and published by the accreditation organisation.</p> <p>Selection criteria assure competence and independence of external experts</p> <p>Independence of the experts is assured by a written statement</p> <p>The decision about the composition of the expert team is made by the accreditation organisation in a transparent way</p>
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The panel members' independence and confidentiality is assured by FIBAA regulations on this issue. See also paragraph 3.1 of this report.

### 3.2.2. ECA Code of Good Practice: standard 16

Standard	<b>The accreditation procedures must be geared at enhancement of quality</b>
Question	Which elements and mechanisms within the accreditation process are used to enhance quality at the higher education institution?
Reference points	<p>The accreditation process contains elements that promote quality development and improvement of the higher education institution</p> <p>The accreditation process should respect autonomy, identity and integrity of the higher education institutions</p>

The aim of this assessment procedure is to guarantee and certify that the prescribed standards are being met. The procedure includes clear aspects geared towards quality improvement, especially where the evaluators have questions or doubts about the programme. The Avans self-assessment report gives the implementation of the recommendations of the 2006-accreditation. Also teaching staff are involved in giving feedback on the programme from a quality assurance point of view. One paragraph concerns an overview of student-evaluations. Here the panel was critical because, according to them, the follow-up and measures to improve were not clear. The Avans School of International Studies (ASIS) is also involved in several international benchmark procedures, like the Network of International Business Schools (NIBS) and MINT (Mapping Internationalisation, established by the Nuffic, a Dutch organisation dealing with higher education at international level). The double degree programme was also assessed and the

observers were impressed by the adequacy and the accuracy of the questions discussed by the panel.

In the last meeting with the programme management and staff representatives, the panel pointed out the stronger and weaker points of the programme.

The accreditation process respected autonomy, identity and integrity of the higher education institution.

### 3.2.3. ECA Code of Good Practice: standard 17

Standard	<b>The accreditation standards must be made public and comply with European practices taking into account the development of agreed sets of quality standards</b>
Questions	Which are the quality standards and criteria used for accreditation procedures?  Do they meet international standards?
Reference points	The quality standards and criteria used in the accreditation procedures correspond to European good practices  The quality standards and criteria are made public  The process of formulation of the quality standards and criteria is transparent and involves all important stakeholders

The standards and criteria applied by the agency are well known to higher education institutions that provide study programs. These standards and criteria are available at the FIBAA website. The set of standards and criteria applied by the agency is, according to the observers, fully in line with the international standards and hence with ECA's Code of Good Practice. The panel went through all the criteria of the accreditation framework.

The observers are grateful to FIBAA for the invitation to participate (in silence) in this procedure, which provided with them the possibility of gaining insight into the FIBAA accreditation process and therefore learning more about our own procedures.

## 4. Recommendation to the MULTRA members

The observers fully agree that FIBAA consistently and rigorously applies a set of criteria that are fully in line with ECA's requirements. These criteria were applied to the accreditation of the above mentioned study programme as well as for the double degree programme. The panel requested the appropriate information and dealt with it. And in the meantime the observers were able to check that they, the panel, also knew how to deal with double degree programmes. The procedure being observed was only geared to the "verification" of the fulfillment of the requirements from a relatively small, but nevertheless international viewpoint. The agency is not (yet) a member of MULTRA, but in Germany, the Netherlands and Switzerland FIBAA has been already recognised as an accrediting or quality assessment agency . FIBAA is accrediting programmes on the international level in growing numbers: 2010 - Austria, Slovenia, Czech Republic, USA, 2011 - France, Great Britain, Austria, Ukraine, 2012 Albania, Kazakhstan, Namibia, Austria, Turkey, Cyprus. This list of countries where FIBAA is active is even longer if the accreditation of joint programmes carried out with German HEIs is included.

The observers have no doubt that FIBAA is in a position to provide accreditation also in even more countries than those mentioned above.

The observers therefore recommend that the MULTRA members accept FIBAA as a member of the group, without any restriction.



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