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**Taking stock and looking forward**

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**Short bio:** Christine Fahringer is presently the Quality Management Coordinator at the University of Innsbruck. Having held various positions at the university, among them Head of Controlling and Head of Strategic Information Management, she relished the opportunity to coordinate the audit process when it began in 2012. The reason for this is that connecting people and information has always been of particular interest to her, and in Quality Management this is integral to success. Christine holds a doctorate in Social and Economic Science from the University of Innsbruck.

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**Short bio:** Christine Abele is Head of the Office of Quality Assurance of the University of Konstanz since 2008 and is thus responsible for internal processes of quality assurance in teaching and learning, research and the promotion of young scientists as well as administrative matters. Before joining the University of Konstanz, Christine Abele worked as an evaluator on a freelance basis for the German Federal Ministry for Economic Cooperation and Development, the German Federal Foreign Office and various German Foundations and Associations in different thematic fields. Previously, she worked as a researcher in the Institute for Social Science of the Humboldt University, Berlin where she obtained her doctorate degree. Christine studied Politics and Public Administration as well as International and European Studies at the University of Konstanz, the Central European University and the University of Ulster.

**Name:** Susanne Klöpping

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**Short bio:** Susanne Klöpping is head of the Unit for Quality Development at University of Stuttgart. Her team is responsible mainly for the QA-processes in teaching and learning, according to the Stuttgart Evaluation Model ("Stuttgarter Evaluationsmodell"), but also for quality development in research and administration. Before she has been responsible for developing the quality management system at University of Heidelberg and has had positions as Head of the Division of Student Affairs and Teaching at University of Heidelberg and University of Münster. Susanne has obtained her doctoral degree in Comparative Literature at University of Konstanz, studying at the universities of Bielefeld, Konstanz and Yale.

**Name:** Thomas Rothenfluh

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**Short bio:** Thomas Rothenfluh studied Psychology and Computer Science at the University of Zurich. After graduation he worked at the Centre for Interdisciplinary Conflict Research and completed a doctorate in Artificial Intelligence Research and Cognitive Science. As a postdoc he spent several years conducting research in Europe and the USA in the fields of Knowledge Acquisition and Man-Machine Interaction. He was then active in research and teaching at the Methodology and Statistics Section and as the managing director of the



Psychological Institute of the University of Zurich. As an active member and as President of the Association of Non-Professorial Academic Staff, he was involved in local and national higher education politics. Since 2003 he is the managing director of the Evaluation Office of the Zurich University.

**Name:** Anita Klöti

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**Short bio:** Anita Klöti is Quality Management Coordinator at the General Secretary's office of the University of Zurich. In this position she is also responsible for all issues concerning international university rankings. At the moment she is working on a survey on the impact of university rankings on HEIs together with Mike S. Schäfer, Professor of Science Communication at the University of Zurich. She studied sociology, political science and philosophy at the Universities of Zurich and Geneva and worked for some years as a risk management officer and human resource manager in the private sector.

**Name:** Olivier Binet

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**Short bio:** Olivier Binet is Head of Quality Development at the Rectorate of the University of Basel. He is responsible for the implementation of the quality strategy of the university, especially the quality audit, the development of quality indicators and evaluations procedures for strategic planning as well as the evaluation of the study programs. He studied economics at the Universities of Zurich and Basel and worked for several years as a consultant in the private sector.

## **Proposal**

### **Title:**

# **Cross-Border External Quality Assurance: Practical Experiences and Recommendations**

**Abstract:** We present findings on practical experiences with national and cross-border external quality assurance procedures made by six universities in Germany, Austria and Switzerland working with the same Swiss quality assurance agency from 2012-2015. This



paper is based on joint analyses undertaken by the quality managers responsible for internally coordinating the external quality assurance procedure in each involved institution. The aim of the contribution is to discuss the impact of external quality assurance on internal quality assurance and to make recommendations from which both, higher education institutions and agencies may benefit. For the analysis we used the purposes and principles of the revised version of the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

**Text of paper:**

## **Introduction**

### **European Quality Assurance Framework**

Quality assurance (QA) activities are assumed to play an important role in enhancing trust in the European Higher Education Area (EHEA). Developing a first version of European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) in 2005 was an important first step towards a common QA framework. In May 2015 the revised ESG<sup>1</sup> was approved by the Ministerial Conference in Yerevan. The ESG aims to enable the assurance and improvement of quality, to support mutual trust and to provide information on QA in the EHEA (ESG 2015, p. 5). A key goal of the ESG is *"to contribute to the common understanding of quality assurance for learning and teaching across borders and among all stakeholders"* (ESG 2015, p. 4). Therefore, the ESG encompasses three parts, internal QA, external QA, and QA agencies as well as their mutual relation.

An external QA procedure specifically intertwines these three parts of the ESG. In our case, all six universities acknowledge part 1 of the ESG as standards for their internal QA systems by accepting the quality standards of the agency. In each of the three countries, external QA takes on a specific form in line with part 2 of the ESG, described in the Appendix. In line with part 3 of the ESG, the agency is registered in the European Quality Assurance Register for Higher Education (EQAR) and is thus obliged to comply with part 2 of the ESG in their procedures. Considering the mutual relation between the three parts, we discuss the impact of external QA on internal QA systems as well as the role of agencies, peers and institutions in the procedure. From this analysis we conclude with recommendations directed towards higher education institutions (HEIs) and QA agencies.

### **Previous Related Work**

Related publications provide an in depth-view on developments in cross-border QA activities in the EHEA (EQAR 2014) with a comprehensive comparison of "quality audits" in different European countries - including Austria, Germany and Switzerland - by different QA agencies (AQ Austria 2014). In a report by (Massy 1999) the external QA systems of Sweden and Denmark are studied based on interviews and documents after the first full cycle of audits and assessments. The study of (Stensaker 2003) concludes

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<sup>1</sup> In this paper all references are made to the revised version of the ESG.



that the impact of external QA in HEIs was seen as being very much related to structural, organisational and managerial processes. In her study about external QA practices in OECD countries, (Kis 2005) describes effects of QA at HEIs and notes that in effective QA systems internal and external QA intertwine. Empirical results of programme accreditation in the Federal State of Lower Saxony in Germany were studied in (Suchanek et al. 2012) and the implications of a shift to system accreditation in Germany is described by means of a pilot university in (Grendel and Rosenbusch, 2010). An overview on programme and system accreditation activities in Germany and recommendations concerning accreditation as a QA instrument are collected in (Wissenschaftsrat 2012).

(Stensaker et al. 2011) studies the impact of external QA performed by the Norwegian QA agency NOKUT. An interesting finding of this study is that impacts are felt in a similar manner for the - at least formally different - procedures audit, accreditation and evaluation. (Shah 2013) elaborates on the effectiveness of external quality audits performed by the Australian Universities Quality Agency AUQA. The findings indicate that external quality audits are effective to improve QA in HEIs if they are enhancement-led and trigger developments and activities of the internal QA system. A second aim of Shahs' study was to evaluate university satisfaction with the AUQA audit process and the findings are consistent with the experiences described in the present paper.

Our paper adds a new cross-border perspective by focusing on external QA procedures performed by the same Swiss agency (OAQ, now AAQ) but with public universities from different countries (see Table 1).

**Table 1: Participating universities in brief**

<b>University (Country)</b>	<b>Founded in</b>	<b>Students (2014)</b>	<b>Staff (heads)</b>	<b>Budget (2014)</b>	<b>external QA</b>
Univ. of Vienna (AT)	1365	91,898	9,703	€ 572 m	audit
Univ. of Innsbruck (AT)	1669	28,225	4,574	€ 262 m	audit
Univ. of Zurich (CH)	1833	25,643	8,548	€ 1,285 m	audit
Univ. of Basel (CH)	1460	13,273	2,918	€ 673 m	audit
Univ. of Konstanz (DE)	1966	11,704	3,793	€ 183 m	system accred.



Univ. of Stuttgart (DE)	1829	27,211	5,211	€ 455 m	system accred.
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## Impact of External QA on Internal QA

As quality managers of the institutions we analyzed and compared the different experiences and observed similar impacts of the external QA on internal QA systems:

- 1. Rise of awareness for QA:** Quality audit, as well as system accreditation, intensify attention and comprehension for QA inside the HEIs including different stakeholders. As a result, a wide range of staff and students became acquainted with the internal processes of QA – not only in their own fields of experience (e.g., learning conditions) but also on the broad spectrum of QA and improvement processes in the whole institution. This was especially the case when the external quality audit procedures were embedded in a comprehensive, university-wide communication strategy. At all institutions, university task-forces were charged with managing the processes and with approving its decisions and product at various stages. Even in places where communication was restricted due to lack of time, the site visit by the external peers, which involved 50 to 100 university members of all status groups and management levels, raised attention to quality-related issues.
- 2. Increase of QA activities:** During the preparation time for quality audits or system accreditations, specific activities focusing on QA increased. This was especially the case at institutions where a comprehensive internal QA system was installed shortly before, and partially parallel to, the external procedure. At these universities the external guidelines - be it the standards of the German Accreditation Council or the ESG - functioned as orientation and impetus for the internal system. In all institutions the external quality assessment procedure was used to clarify and elaborate existing internal processes. This resulted in an accelerated development and advancement of the internal QA system.
- 3. Improvement of internal communication:** The internal discussion and self-reflection, in preparation of the self-assessment report and the site visit, proved useful to identify strengths and weaknesses of the internal QA system. As an alternative to programme accreditation, the experience with a system accreditation procedure seems to strengthen the willingness to participate and even further develop the internal QA system. In addition, the systemic accreditation provided the opportunity for departments to learn from each other and to exchange know-how and good practices. Through extensive communication and active involvement with all stakeholders, the driving force is no longer perceived as only external – a fact that often triggers defensive reactions – and furthers the realization that the HEI itself is the real owner of QA. This in turn broadens the perspective on the advantages of quality development through systematic processes.



- 4. Increased importance of teaching and learning:** In all cases, despite the fact that quality audits also encompass research and other tasks, the strong focus on the QA processes involved in teaching and learning of the external QA procedure was striking. With the ESG standards as guiding principles, this might be an obvious target. However, at research-intensive universities this constitutes an important shift in perspective that might require some more balancing with respect to QA in other important fields of activity.
- 5. Long-term impact:** The insights from the self-evaluation, the peers' findings, recommendations and - if applicable - regulatory obligations, support the further development of the internal QA system. This is almost guaranteed in cases where the institution is required to fulfill requirements within a certain time frame, deliver an interim report, or where a systematic follow-up process has been initiated – it might be more difficult to keep the “momentum” without such measures.

## Recommendations to Higher Education Institutions

To summarize, external QA enhanced the development of our internal QA systems. However, as with other real-life “recipes”, the proof of the pudding is not in the eating, but in the success of the preparation! We identified the following success factors:

- 1. Systematic selection of the agency:** To further strengthen mutual trust in the EHEA, autonomous HEIs should be granted the right to independently choose a national or international QA agency (e.g., from EQAR) for an external QA exercise. We recommend that HEIs firstly define the criteria for their agency selection process. In addition to desk research, an agency fair, such as in Austria that was jointly organized by several universities in 2010, supports comparative screening of different agencies and an informed preselection of possible candidates. We advocate that each university individually then holds hearings with the short-listed agencies to make its final selection. (Harvey 2002, p. 10) stated that, to increase trust in institutions, there is a need for external QA to constantly reflect and change, thus requiring periodic updates to the purposes and procedures of the agencies themselves. We note that HEIs, which may choose the external agency from a pool of recognized agencies (e.g., listed in EQAR), may drive and influence the desired adaptation processes according to their needs.
- 2. Clarification of rules, roles and responsibilities with the agency:** HEIs should clarify the expectations towards the agency and agree on clear rules, roles and responsibilities. We recommend inviting the agency, at the beginning of the procedure, to present the QA process to a wider audience of university members in leadership positions. As following external procedures and guidelines may be very disruptive and time-consuming for important internal “core processes” in larger organizations, it should be clarified in advance what is to be expected of whom at what time and if, and where, there is room for intervention or change of processes. Internal acceptance of the agency and trust in its procedure is essential and beneficial for the whole process.



- 3. Profound self-assessment:** The explicit commitment of the Rectorate to engage in the self-assessment process and the willingness to implement new measures are mandatory requirements for a successful internal preparation, self-assessment and follow-up. To ensure lasting effects, we advocate to plan sufficient time for the self-assessment that allows involvement of a wide range of stakeholders in the preparation of the self-assessment report. A dedicated internal audit group with an explicit mandate and competencies should meet regularly, and be responsible for, the self-assessment report. This group should include members of already existing internal quality committees to avoid duplication of well attuned structures. If carefully organized, the momentum generated by an external QA exercise can be beneficial for the further development of the internal QA system and such a group could serve as an institutionalized memory and driving force for a learning organization. Furthermore, it may be helpful to make use of external support and advice, for example, by experienced management members of other universities or by specialized accreditation/QA consultants.
- 4. Appropriate strategic communication:** To build up a university wide commitment for the internal QA processes it is imperative to develop a communication strategy in connection with the project planning and the project structure. This is important because it is impossible to be in communication with all university members and bodies at all times. To be successful, informative, continuous, and "spaced" (as opposed to ad-hoc or "massed") communication channels need to be implemented.
- 5. Diligent preparation of site visit and interviews:** We recommend that the interview partners are thoughtfully selected based on their firsthand experience with at least a subset of the core processes and aspects of the internal QA system and issues. It goes without saying that each interviewee should have studied the self-assessment report before the interview. Furthermore, we advise to hold at least one preparatory meeting - a few weeks before the site visit - where all interviewees are informed about the context and procedures of the external QA exercise and where any questions may be clarified.
- 6. Enduring improvement in follow-up:** We recommend that institutions carefully plan the follow-up process to further develop the QA system in those areas where options or required improvements have been detected either in the self-assessment process, during the site visit talks or in the resulting report. In the instance that the external QA procedure ends with a formal certification decision and the institution is required to fulfill obligations within a certain timeframe, the next mandatory development steps should be laid out (but may need some internal substantiation and decision making processes as well). The challenge will be to keep the momentum for continuous improvement in areas where no conditions were imposed.

## Recommendations to Quality Assurance Agencies

As intermediaries between universities and peers, QA agencies hold the balance in the procedure. Therefore, we also discussed recommendations for agencies and agreed on the following points that we have found successful:



- 1. Professional approach in accompanying the University:** HEIs have high expectations towards the agency, its procedures and the way it works with the university. If external QA is to fulfill the twin purposes of accountability and enhancement of the internal QA system, acceptance and trust in the agency and its procedures are prerequisites for a beneficial association with the institution. HEIs expect from the agency that clear rules, roles and responsibilities are agreed upon. As a minimum level of interaction of the agency with the HEI we recommend a kick-off meeting with members of the university at the beginning of the external QA procedure, a visit during the self-assessment to clarify procedural questions, considerate guidance during the site visit, and a final visit to present the results and discuss the outcomes..
- 2. Thoughtful selection of peers:** The peers play a very prominent part in the process. While the QA procedure of the agency defines the framework conditions, the peers analyse and assess the internal QA system and give recommendations or impose conditions. For institutions, it is important that the agency carefully selects international peers based on mutually agreed criteria and that the institution has the right to reject candidates that are not deemed suitable or that are biased in any way.
- 3. Rigorous preparation of agency and peers:** Especially in cross-border external QA procedures, where both, the agency and the peers are from abroad, it is the responsibility of the agency to prepare itself and the peers not only for the procedure, but specifically for the framework conditions of the country and institution<sup>2</sup>. We recommend that the agency involves the institution in this preparation process to ensure a sufficiently deep understanding of the amount of autonomy an institution has in the various aspects of its QA system. Institutions also expect that peers have carefully studied the self-assessment report of the HEI and have experience with, and specific training for, audits/accreditation.
- 4. Systematic site visit and sound peer reporting:** The agency must ensure that the peers make good use of the time available for interviews during the site visit and that their judgement is not solely based on the interviews, but also on the self-assessment report. We recommend that the agency has a transparent mechanism in place to guarantee a high quality of the peer report. Peer judgements must be comprehensible and clearly relate to the relevant criteria and standards. Recommendations should be as substantial and concrete as possible in order to guarantee an optimal learning effect for the institution that is in appropriate relation to the effort invested in the exercise. Reports issued by the peers and/or the agency should highlight strengths as well as weaknesses in a well-balanced manner and should be available for comments by the assessed institutions. HEIs would like to see that their statement in response to the peer report actually has some weight in the overall procedure and that, for example, peers are willing to revise their report if necessary.
- 5. Administrable follow up:** If obligations are imposed on the HEI, the agency should have a lean verification procedure in place. If there are no conditions imposed, continuous improvement should be in the hand of the autonomous institution.

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<sup>2</sup> In (EQAR 2014, p. 29) a main challenge for QA agencies in cross-border QA activities was stated as difficult, namely *"the need to adapt and familiarize themselves with the regulatory framework, context and customs of the "target" country"*.



- 6. Elaboration of, and access to, agency synthesis reports:** With standard 3.4. “Thematic analysis”, the ESG expect that the agencies will regularly publish general findings that synthesize knowledge gained in various external QA procedures. In extension to that standard and to support further cross-border QA activities we recommend that ENQA collects these reports and provides a single point of access to HEIs and other stakeholders.

## Conclusions

Although Germany, Austria and Switzerland have chosen different paths on how and when they legally implement external QA procedures, the practical experiences we have shared, the challenges we have had to face in the process and the conclusions we have come up with are very similar. Having worked with the same agency, we could eliminate in our analyses some (but probably not all) biases that may have been due to variance in agency behavior and procedures. We propagate cross-border audits/system accreditations and the free choice of agencies to further nurture trust in the EHEA. However, according to (EQAR 2014) governments in many European countries still need to adapt legislation to allow HEIs to choose non-national, officially recognized agencies that comply with a common set of principles for QA in Europe’s HEIs.

The ESG interweave internal and external QA in the area of learning and teaching. By doing so, they support autonomous universities in developing and maintaining their internal QA systems. This propagates the institutional implementation of European standards for QA as formulated in the ESG. On the one hand, QA agencies seem to be necessary to speed up the implementation of the ESG at the institutional level. On the other hand, the overall effort put into external QA must yield sufficient return on investment for a HEI. However, external QA remains a susceptible process, especially dependent on the commitment of the institution, the professionalism of the peers performing the assessment and the delicate hand of the agency to ensure with its procedures an added value for the institution.

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## Appendix: National Legal Frameworks

**Legal QA framework in Austria.** In Austria, the Universities Act 2002 (UG 2002) requires universities to establish a comprehensive internal QA system covering research, teaching, management and further tasks. With the implementation of the Austrian Act on Quality Assurance in Higher Education (HS-QSG) in 2012, external audits of the institutional QA system became mandatory. By mid-2015, two thirds of the 21 Austrian public universities have either passed an audit or are in an advanced preparation/planning state according to the schedule stated in the performance agreement of each university with the responsible ministry. The Austrian law allows



universities to choose the audit agency from the EQAR. So far, nine universities decided to perform the audit with a non-national agency.

**Legal QA framework in Germany.** In Germany the Accreditation Foundation Law (ASG) 2005 is forming the current legal framework for the German accreditation system. It defines the German "Accreditation Council of the Foundation for the Accreditation of Study Programmes in Germany" as the main actor in the accreditation system who defines the basic requirements for accreditation of study programmes and internal QA systems of HEIs and agencies. Thereby the German Accreditation System is organised in a decentralised manner. Accreditation processes are carried out by national and non-national Accreditation Agencies, who in turn are accredited by the Accreditation Council. Since 2008, HEIs can choose to accredit their internal QA systems (system accreditation) instead of single study programmes. As a result the HEI is allowed to be responsible for conducting QA of its study programmes. In contrast to Austria and Switzerland, the external QA system in Germany focuses exclusively on teaching and learning.

**Legal QA framework in Switzerland.** The "Federal Law on Financial Aid and Cooperation in Higher Education" (UFG) from 1999 requires a periodical review of all public universities in Switzerland to assure high quality standards and to make the universities eligible for federal subsidies. The Swiss University Conference, the federal coordination body, has issued "Quality Assurance Guidelines" that refer to and are compatible with the ESG. A summary process, the so-called "Quality Audit", has been organized and conducted for all Swiss universities in the years 2003/04, 2007/08, and 2013/14 by the federally mandated "Swiss Center of Accreditation and Quality Assurance in Higher Education" (OAQ). The main goal of the quality audits was to assure the compliance of the universities with the (ESG-based) standards.

As of 2015, a new legal framework ("Higher Education and Funding Act") that encompasses the full Swiss Higher Education Sector, now including all universities, universities of applied sciences and universities of teacher education has been put into force. This new framework strives to unify the previously different QA approaches. Although not all structures and procedures have been established, two important changes with respect to external QA have been made: (a) an independent "Swiss Accreditation Council" and (b) a "Swiss Agency of Accreditation and Quality Assurance in Higher Education" (AAQ, rebuilt from the former OAQ), under the authority of the Swiss Accreditation Council, have been implemented. A major change for the institutions undergoing the periodic mandatory external QA process is that it is newly possible to choose either the AAQ or another accreditation agency that has been recognized by the Swiss Accreditation Council.