



“Accreditation: Paradigm shift in Higher Education?”

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1. Introduction

A new watchword has made its entry into the discussion about Germany's higher education system: Accreditation. This is quite revolutionary a development with regard to a higher education system marked by strong governmental control. For accreditation seems to prepare what can be called a paradigm shift in the traditional ways of steering the HE sector – a development that has far-reaching implications also for the institutional management of universities.

2. Accreditation: Defining Characteristics and Implications

The possible implications of accreditation for Germany's HE system can be measured against the defining characteristics of accreditation in other countries, in particular in the U.S. The American Council for Higher Education Accreditation (CHEA) describes and defines accreditation as follows:

- “Accreditation involves judgement of quality and effectiveness of an institution/program against a set of expectations (standards, criteria).
- Accreditation is a form of non-governmental self regulation as contrasted to compliance to state and/or federal rules, regulations, and codes.
- Accreditation is grounded in the institution's or program's mission, history, and sense of purpose.
- Accreditation acknowledges and respects the autonomy and diversity of institutions and programs.
- Accreditation provides assurance to the public that accredited institutions and programs meet or exceed established public expectations (standards) of quality.
- Accreditation is the responsibility of an external commission.
- Faculty involvement is essential to valid accreditation.
- Accreditation is conducted on a cyclic basis, usually 5-10 years. Shorter cycles are used when serious problems are noted.”

Accreditation, thus, is an instrument of quality assurance as well as a means of legitimizing an institution/unit or a program. As such, it is based on and complements a high level of institutional autonomy.

When applied to the German situation, these characteristics make clear that the move toward accreditation may entail a number of far-reaching reforms. For accreditation requires – or rather constitutes – a system that:

- Emphasizes a high degree of institutional autonomy and responsibility on the side of universities – in contrast to a system that essentially is run by the government by means of detailed rules and regulations.
- Promotes competition among institutions and fosters differentiation within the HE sector – in contrast to a system that is based on the idea of uniformity and that upholds the ideal of every institution offering the same degree of quality.

- Is performance-oriented and honors success on the basis of a combination of ex-ante and ex-post evaluations and quality assurance – in contrast to a system that essentially lives from an ex-ante determination of quality and performance and thus by and large lacks incentives for stimulating competition and enhancing an institution's commitment to quality and change.
- Recognizes quality as the key issue and the *leitmotiv* in higher education and emphasizes the institutional responsibility for ensuring the highest possible degree of quality in teaching and research – in contrast to a system that submits quality to legal rules and regulations and turns it into an issue that eventually can be taken to court.

Accreditation, thus, cannot merely be added to an existing system. Rather, it requires fundamental changes with regard to the traditional modes of steering the system as well as in relation to individual institutions and their institutional management.

3. Accreditation: The German Debate

Bearing this in mind, it is interesting to look at the context in which accreditation in both its dimensions as institutional as well as program accreditation is being discussed and, to some extent, already implemented in Germany's higher education system.

4. Institutional Accreditation

Accreditation first entered the stage in the context of the 1998-reform of the federal framework law on higher education (*Hochschulrahmengesetz*).

The Green party in particular favored institutional accreditation for all universities in Germany.

Accreditation in this proposal – which ultimately fell through – was meant to contribute to the deregulation of the state-run system and to complement the various steps, taken in recent years, toward strengthening the institutional autonomy of universities - the move toward lump-sum budgeting, for instance, or the reforms of governing structures designed to prepare the paths for a professional higher education management.

Accreditation, in this context, was meant to serve as a means of reconciling the demand for institutional autonomy and academic self-regulation on the one hand with the need for coordination and central steering of a, to some extent, deregulated system.

This, indeed, would have contributed to the “paradigm shift” in higher education mentioned earlier.

And yet, not much is left of the initial idea – close to the American practice – of institutional accreditation in the context of a deregulated system. For the focus subsequently shifted to discussing accreditation only with regard to the recent emergence of (semi-)private and even commercially oriented universities or university-like institutions.

This is a completely different context and purpose of implementation. Accreditation subsequently took on a quite different meaning.

Most of the institutions I just mentioned use noble terms like “university” or “academy” to indicate the “business” in which they are involved. And yet, their business models are quite diverse. For instance do we see:

- German institutions – private and public – officially recognized by one of the 16 member states, offering programs and granting degrees on the post-graduate level only (e.g. MBAs).
- German institution without state recognition cooperating with institutions abroad in view of granting international degrees in Germany.
- German institutions without state recognition and without international partner institution granting international degrees.

- Off-shore or branch campuses of international institutions operating in Germany and granting international degrees.
- International institutions with study centers in Germany delivering distance education provided by their home institution and granting international degrees.

Now, the crucial point here is “state recognition” (*staatliche Anerkennung*), i.e. a form of governmental “accreditation” by one of the 16 German state governments on the basis of governmental legal regulations, which grants permission for an institution to use the name “university”. State recognition, thus, is the traditional mode of ex ante quality control on the institutional level.

Along with state recognition comes a series of rights (e.g. the right to grant degrees, to be eligible for governmental support) and tax privileges. Private institutions are “recognized” if they live up to a set of legal regulations geared toward assuring certain standards of quality equivalent to those in state-run universities.

Now, the Science Council (*Wissenschaftsrat*) in particular, turned toward accreditation with regard to the new private, commercial and/or international institutions. Accreditation is supposed to promote their compatibility with the German system, and, by the same token, to regulate access to the predominantly state-run national HE system.

Accreditation, in this sense, is an essentially defensive and reactive gesture. It indicates that the traditional modes of institutional legitimization and ex ante quality assurance no longer seem to work.

To some extent, this is indeed the case. For in a European context, marked by an increasing differentiation of educational service providers on the one hand and the emergence of private, sometimes even commercially oriented institutions on the other state recognition – i.e. *national* standards and procedures – no longer apply.

There are no more barriers, within the European Union, to “commercial mobility” and to the right to do business in any of the Union’s member states. This right also applies to the higher education sector. Private and/or commercially oriented institutions from any of the member states, thus, are allowed to run an institution of higher education – an institution called “university” – without prior permission by a state government.

The quality standards in place on the national level, whatever they are, thus, no longer apply to institutions from abroad providing educational services on the national market. A problem arises in particular, if national standards with regard to granting permission to run a university vary considerably from one country to the other.

This is where institutional accreditation comes in – as a means of national “consumer protection” in view of international players entering the national market *and* as a means of governmental regulation and quality control.

It is in this sense, that the Science Council recommends institutional accreditation of private institutions *only* and in view of securing a set of minimum standards for the activities in which they are involved. The minimum standards are supposed to follow the rules and regulations set down in national and/or state law.

Accreditation, however, in the framework designed by the Science Council, by no means substitutes for state recognition. Quite to the contrary, the rights and privileges that come with state recognition explicitly are excluded from the act of accreditation.

Hence, accreditation is being thought of as a prerequisite for state recognition and, thus, has to precede it; yet it does not grant any rights to an institution, which still needs official state recognition to be considered a university and eventually publicly funded as such. Furthermore, an institution cannot seek accreditation on its own; instead, it needs a state government’s prior permission to do so.

As it turns out, institutional accreditation is (or, rather, will be) a process highly regulated by governmental rules and regulations – and, of course, governmental interests. It de-

generates to a protectionist gesture waved at unwanted intruders from the outside. It is restrictive and lacks a truly competitive orientation.

Hence, not much is left of the idea of strengthening the universities' autonomy and self-responsibility and the academic community's self-regulatory power; and not much can be seen of a governmental withdrawal – by means of turning toward accreditation – from regulating the HE system as a whole.

5. Program Accreditation

Now, the fate of program accreditation is somewhat different. The idea came up in the context of an intense debate on how to ensure the international competitiveness and compatibility of Germany's higher education system.

This issue is crucial since there no longer will be room for the "splendid isolation" of national higher education systems. Rather, national particularities and idiosyncracies increasingly need to be made transparent and, thus, comparable to outsiders; just as quality standards need to be compatible with and competitive on an international "market".

For this reason, German universities have been granted the right to develop a more differentiated structure of study programs by means of adopting – or rather: adapting to the German situation – the anglo-american model of Bachelor's and Master's degrees.

Current national policy demands that the new degrees need accreditation, accreditation, thus, referring to the program level, aiming at assuring the quality of individual study programs in a much more differentiated and internationally oriented system.

This is where the Accreditation Council – an organization set up in 1998 – comes in.

It aims at ensuring quality in higher education, providing reliable orientation and enhancing transparency for students, employers and higher education institutions alike. Its job is to accredit agencies which – on their part – accredit the new *Bachelor* and *Master* degree programs. Such agencies as well as degree programs accredited by them will bear the quality label of the Accreditation Council. So far, four agencies have received accreditation, one further agency has been conditionally accredited.

The Accreditation Council has 14 members, representatives of the member states, higher education institutions, students and professional practice (on behalf of both employer and employee organizations).

Currently, there is a three-year testing period. It aims at setting up an accreditation system that may consist of differently structured and specialized agencies.

Now, the work and quality of the procedures carried out by the agencies must be maintained at comparable standards. This can only be ensured if cross-program quality requirements are met. The Accreditation Council is the authority checking on whether the standards are being adhered to. It coordinates, critically monitors and supports the work of agencies who so far have granted accreditation to approximately 30 study programs on the B.A./M.A.-levels.

At this point, however, it becomes clear that program accreditation in its current form will soon be facing serious problems.

For currently there are over 300 B.A./M.A.-programs, and the number is still increasing. It is more than questionable whether the current system is able to deal with such huge numbers. Furthermore, program accreditation is a somewhat costly undertaking, the average costs for accrediting a program adding up to some 10.000 Euro, to be covered by the institution offering the program.

These quantitative dimensions put considerable pressure on the current system of accreditation. And yet, the system becomes even more questionable when looking at the structural deficiencies inherent in it.

For it should be obvious that program accreditation entails the departure from the long-standing practice of measuring study programs against nation-wide standards with regard to their structure, duration, and the contents they deliver. Originally designed to guarantee unique standards throughout the system, these standards promote the uniformity of a HE system that is based upon the (rather fictive) idea that the quality of education is the same regardless of the specific institution in which it takes place.

And yet, here again accreditation – program accreditation in this case – does not substitute for program approval by the ministry of education. The old system still is in place, accreditation merely adding a structural component to it, making the system altogether more complex and more costly, yet uncertain with regard to the actual progress toward reaching the overall goal: a deregulated higher education system based on institutional autonomy.

6. Conclusion

So, what needs to be done?

In both of its current forms, accreditation in Germany shows serious symptoms of half-hearted reforms. Accreditation, in its current forms, merely is a simulacrum of its actual potential to promote differentiation and competition on the system level.

Hence, in order to make full use of accreditation, we first need to strengthen our universities' institutional autonomy, their actual steering capacity, and their orientation toward strategic goals. For instance, do we need to move toward funding universities according to the principle "money follows students," along with the indirect, that is, market-oriented regulatory effects that come with it.

On the other hand, we need state governments to withdraw from the traditional practice of direct and detailed interventions, governments, that is, which become more modest and devoted to modeling the legal, fiscal and political framework conditions for a system geared toward competition and increasing differentiation.

In such a situation, we then need accreditation to fill in the gap, the (postmodern) space in-between institutional management on the one hand, and political responsibilities on the other.

Accreditation, in this sense, has to focus on the institutions' responsibility for the quality of what they are doing.

Emphasis, thus, needs to be shifted onto the institutional level, towards the integral responsibility of central university management for the quality of the programs offered. Focussing exclusively on program accreditation means to ignore institutional, i.e. *central* managerial responsibilities.

And, finally, why focus on the *national* level only? Accreditation, rather, is a game that we should play like soccer, in different leagues, including a European (Champions) league, which sets standards beyond the narrow national borders.

This, in sum, is the very general direction in which we have to think and further develop not only current practice of accreditation but the orientation of our university system as a whole.