

2021 European Quality Assurance Forum

Building trust and enhancement: from information to evidence

**Online event
18-19 November 2021**

ISSN: 1375-3797

Author(s)

Name: Alexandre Wipf

Position: Referent / Consultant

Organisation: AQAS - Agency for Quality Assurance through Accreditation of Study Programmes

Country: Germany

E-mail address: wipf@aqas.de

Short bio (150 words max): Alexandre Wipf is a Referent / Consultant at the Agency for Quality Assurance through Accreditation of Study Programmes (AQAS), based in Cologne, Germany. As such he is responsible for the organisation and conduction of programme accreditation procedures and acts as main contact person for both higher education institutions and expert groups. In addition to national programme accreditation procedures, he has been involved in international programme accreditation and certification procedures of further education programmes. Prior to joining AQAS he worked in the central administration of a German university and for a representative association of higher education institutions in Brussels.

Proposal

Title: The mandatory use of performance indicators in programme accreditation – the German example and the experience from an accreditation agency

Abstract (150 words max): This paper presents an overview of the mandatory use of performance indicators in programme accreditation in Germany. The use of performance indicators in Germany is not new, but recent developments have made their use more prominent. The paper discusses how peer reviewers are to use the indicators and how these are intended to contribute to more transparency, not only in the review process but also in the higher education system. The paper also presents the first lessons learned and the potential limitations that have been identified in the use of such indicators.

The session will use the German example to open a discussion with participants on the impact the use of performance indicators has had on accreditation and on the possible ways to use the gathered data in the future.

Text of paper (3000 words max):

1. Context

The German higher education system is characterised by the country's federal structure, regional ministries are responsible for higher education. Several quality assurance/accreditation agencies as well as a central body, the German Accreditation Council are active in Germany. Following regulatory changes in 2018 accreditation agencies carry out the external quality assurance procedures with a group of peer reviewers/experts responsible for the evaluation, whereas the German Accreditation Council takes the final accreditation decision based on the expert report issued by the agency. Approval to operate as an agency in Germany is based on EQAR-registration.

Compulsory external quality assurance can be carried out a) through programme accreditation by an accreditation agency or b) by higher education institutions with self-accrediting powers (following an institutional accreditation). This paper concentrates on the former.

Programme accreditation in Germany does not follow a solely quantitative or solely qualitative approach to evaluation, both are included. In the case of reaccreditation experts are asked to evaluate programmes based on evidence, e.g. performance indicators. The use of performance indicators is not new and precedes changes in the regulatory framework in 2018. One specific change however that took place in 2018 is that higher education institutions are now required to submit a standard set of data on specific indicators and in a pre-defined format. This data must be depicted in the final expert report. A template for the collection of this data was developed by the German Accreditation Council. Previously, higher education institutions could represent data as they wished in their self-evaluation report; tables were not included in the expert reports by AQAS.

2. Requested data & aim

Starting in 2018 higher education institutions were required to provide four key performance indicators for each programme under review: success rate, grade distribution, average duration of studies, students by gender.

Success rate:	
Grade distribution:	
Average duration of studies:	
Students by gender:	

Table 1: Data table, January 2018 [translated by AQAS]

The only template provided was table 1 as depicted above. Higher education institutions had to decide how each indicator was to be calculated and depicted. This led to several questions from higher education institutions to AQAS since they were uncertain as to the calculation basis: Should the success rate be based on the number of enrolments in the first semester? Should it be based on the number of students completing their studies in the foreseen time of X semesters? Should it include students who are enrolled but inactive? Regarding the distribution of grades some institutions provided the distribution of the final grade, others of the grade of the thesis or the average grade of all graduates. Some institutions displayed the data as graphics.

Since the template was developed centrally for all agencies active in Germany institutions had to contact the German Accreditation Council in case of questions; AQAS could provide neither explanations nor support to institutions.

In March 2020, the German Accreditation Council developed a new template for the collection of data. Institutions were asked to detail the completion rate (not "success rate" anymore), the number of students by gender, the grade distribution and the average duration of studies. For each data set a specific table was developed; a data set had to be provided for each student cohort per term for the latest seven years (14 terms). The update of the tables was accompanied by an explanatory note on the background, the use of data and the calculation basis. In April 2021, the tables were slightly updated while retaining their general frame.

Student cohort of term X	New students starting in term X		Graduates, who completed their studies in the foreseen time, or less Start of studies in term X			Graduates, who completed their studies in the foreseen time + 1 semester, or less Start of studies in term X			Graduates, who completed their studies in the foreseen time + 2 semesters, or less Start of studies in term X		
	total	incl. women	total	incl. women	completion rate (%)	total	incl. women	completion rate (%)	total	incl. women	completion rate (%)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Summer term 2021											
Winter term 2020/21											
Summer term 2020											
...											
Total											

Table 2: Completion rate & Students by gender, April 2021 [shortened and translated by AQAS]

Overview of grades for the final grade of the study programme					
Final semester	Very good	Good	Satisfactory	Sufficient	Unsatisfactory /insufficient
	$\leq 1,5$	$> 1,5 \leq 2,5$	$> 2,5 \leq 3,5$	$> 3,5 \leq 4$	> 4
(1)	(2)	(3)	(4)	(5)	(6)
Summer term 2021					
Winter term 2020/21					
Summer term 2020					
...					
Total					

Table 3: Grade distribution, April 2021 [shortened and translated by AQAS]

Final semester	Duration of studies in foreseen time or faster	Duration of studies in foreseen time + 1 semester	Duration of studies in foreseen time + 2 semesters	Duration of studies in more than foreseen time + 2 semesters	Total (= 100%)
(1)	(2)	(3)	(4)	(5)	(6)
Summer term 2021					
Winter term 2020/21					
Summer term 2020					
...					

Table 4: Duration of studies in relation to foreseen time of studies, April 2021 [shortened and translated by AQAS]

The German Accreditation Council considers that the provision of data on the completion rate, the distribution of grades and the average duration of studies are “indispensable” for the expert groups to be able to conduct their evaluation of the study conditions and the study feasibility of each programme. According to the German Accreditation Council “peculiarities” in the data must be looked at by the experts. The overall goal is to support an evidence-based evaluation. On the other hand, data on gender distribution is seen as an “indispensable element” in evaluating whether the gender equality concepts of higher education institutions work. The German Accreditation Council also mentions that the provision of data helps it check the expert reports for plausibility and support it in taking the final accreditation decision. At the same time, it states that data should not stand on its own, that it must be contextualised both in the self-evaluation reports and in the expert reports. Both institutions and experts are expressly requested to comment on the data.

The first lesson learned since the introduction of these tables is undoubtedly that more transparency has been achieved in the system. The depiction of data in a dedicated chapter of the expert report allows for direct comparison between programmes and procedures. The contextualised evaluation of the experts remains available in the corresponding chapter as before. The first problems that were encountered with the original table were also remedied, so that institutions can provide data more easily and experts conduct their evaluation on a clearer basis.

3. Use of the data in programme accreditation procedures

Following an initial reluctance from some higher education institutions when the data tables were first introduced by the German Accreditation Council, AQAS has observed that most institutions now provide the requested data. Reservations regarding the legal basis for the provision of the data seem to have been overcome. Some reluctance can still be seen when discussing specific provision forms (e.g. distance learning), that are not easily comparable with other forms. Surely the specification of the calculation mode led to more acceptance from higher education institutions.

Institutions are free to provide experts with further data and information in their self-evaluation reports.¹ This usually takes the form of more detailed information on the student body (e.g. nationality), in case of a master’s programme e.g. the students’ completed bachelor’s programmes, the number of students completing two programmes at the institution in parallel etc. This depends on the data gathered by the institutions internally, the requirements of their internal quality assurance systems and the data requested by the regional ministries in charge of higher education. Some institutions provide experts

¹ Some institutions consider that further data falls under data protection regulations and cannot be published or shared with experts.

with extensive anonymised evaluation reports, including detailed evaluation surveys and workload evaluations for each course, when others provide only summaries. All the provided data feeds into the experts' evaluation.

The experience of AQAS over the last 20 years has shown that the experts adopt an evidence-based qualitative approach in their evaluation of the programmes and focus their discussions with the institutions on the subject and content of the programmes. Data comes into play when discussing study conditions – but are not the main factor in their evaluation. It should be repeated that the German accreditation system does *not* mandate the attainment of specific completion rates, study time or gender distribution. The criteria *only* require that data be compiled and used for the further development of a programme.

The experts use data on the **completion rate** and the **average duration of studies** to assess possible hurdles in the programme. When the data seems “conspicuous” experts always discuss this during the site visit. Institutions can usually provide justifications: students work to finance their studies, they switch programmes or interrupt their studies when receiving a qualified job offer, some students enrol in a specific programme without entry requirements before enrolling in another programme with strict entry requirements or to benefit from the student status.

Yet, the task of the experts becomes more difficult when institutions do not wish to share detailed data or do not conduct specific surveys of students, who decide to drop out or study longer than in the foreseen time. This has led to expert groups suggesting conditions be put on the accreditation or recommendations for further development: e.g. institutions have to develop an action plan regarding evaluations and surveys or are encouraged to continue their efforts in identifying the reasons for a low completion rate. When problems were identified through the institutions' evaluation measures (for example that a semester was especially difficult or that students had false expectations), higher education institutions usually do not wait until the accreditation procedure to change the sequence of the courses or the marketing material. However, when such problems are identified by the expert group within the procedure the experts do suggest changes to positively affect the quality of the programme (and thus the data).

An interesting aspect for AQAS has been the use of data on **grade distribution**. Previously AQAS requested information on the grades of the final thesis but not on the distribution of the overall grade. Grade distribution is often linked to how a specific subject addresses grading. For example, law-related subjects are often known to grade students very strictly and a low grade can be seen in relation to the student body at the higher education institution or nationally as good. In other procedures the depiction of grade distribution has led to more in-depth discussions on grade inflation, again linked to wider debates in the corresponding subjects (e.g. education science). In this sense experts who come from the same subject as the programme being reviewed provide for much needed contextualisation of the data.

Completion rates or grade distributions that can be seen as too good can lead to a discussion within the expert group as to the expectation levels set in the programme. These discussions are however always accompanied by an evaluation of the content of the courses and of the quality of the final theses² – doubts on the expectations and level of an entire study programme are never solely based on grade data. In the end it has led to a limited number of recommendations given by expert groups, for example to raise awareness about the topic of grade inflation within staff at a specific faculty.

The topic of **gender distribution** has also been made a bit more prominent since the introduction of the tables. Data on the percentage of female students must now be provided for each semester, previously only the overall distribution in the student body had to be provided. A more refined data set has allowed for more detailed questions by experts, when e.g. a drop or a steep rise of female (or male) students in a specific semester can be identified. Yet, experts do not solely rely on the provided data for their evaluation, they refer in the large majority to the usual gender distribution in the subject nationally. This is often the case for subjects that are studied predominantly by female students (e.g. educational sciences) or by male students (e.g. informatics). The discussions then concentrate on measures taken by the institution to attain more diversity. AQAS is not aware of a single noteworthy condition put on an accreditation based on provided data on gender distribution. Nevertheless, experts may give the recommendation that the institution should continue or enhance its measures to attract more female or male students, depending on the subject.

² In programme accreditation procedures institutions are asked to provide experts with exemplary final theses covering the entire grade spectrum.

The current version of the tables singles out female students in the student body.³ AQAS has observed that experts address the topic of gender beyond male/female more and more frequently in their discussions with higher education institutions. The topic of which and how genders are depicted may deserve further attention.⁴

Even though some aspects may be considered self-evident for (some) expert groups, such as grade distribution in a specific subject, AQAS must ensure comparability between the procedures by making sure that this view is shared within said expert group and that the data is adequately considered in the final expert report. Complete reports are the basis for the accreditation decision by the German Accreditation Council.

Over the past 12 months⁵ AQAS concluded 108 national programme accreditation procedures. In total, it was suggested that 20 conditions be put on the accreditation and experts gave 431 recommendations for further development.⁶ Of these, only 16 recommendations (3,7 %) were explicitly related to the duration of studies and the completion rate in their phrasing (in comparison more than 130 recommendations were directly related to the content of the programmes/courses, over 40 to exams and about 30 respectively for internationalisation and human resources). This shows indeed that evaluations are predominantly based on the content of the programmes rather than on the requested data.

Due to the change of the data collection template the use and handling of data within the procedures has been improved. Experts now know on which basis they should comment the data (compared to the original provision of a single number without background information).

4. Further use of data within & outside of programme accreditation procedures

When introducing the requirement for the provision of specific data, it was argued that institutions already gather this data for their own internal quality assurance purposes or for their regional ministries. The rationale being, that this should make the data-gathering process more easy, more cost-efficient and more resource-saving. This may be true internally for institutions.

One of the initial reasons for the reluctance of higher education institutions to provide the requested data was however that crude comparisons between programmes or institutions could be made without contextualisation. Even though a common basis for the data has been defined through the new versions of the data tables this remains a risk; misinterpretation is also possible when only considering the depicted data tables and not the evaluation of the experts.

Since higher education remains a state issue in Germany, there is no systematic collection of detailed data at national level. This means that a wider use of data within programme accreditation procedures (e.g. for comparisons between institutions/programmes or the attainment of specific targets) seems very hypothetical. Current use suggests that German programme accreditation procedures will remain qualitative in essence and supported by the use data.

On the other end, the data gathered for programme accreditation procedures seems to remain unused outside of these. The data on each single programme is published in the expert reports, which are available in the database of the German Accreditation Council. The data itself is however not made centrally available, e.g. in a specific section of the database or for download. One would have to download all expert reports and extract the data (which may be included as a picture in the report) before it can be used. Additional functionalities may also be required to allow for filtering e.g. according to the date of the accreditation decision.

Since the data is already being gathered electronically, the question remains whether it should not be made more accessible, e.g. for evidence-based policy making or research purposes. In the context of sustainability policies as well as national transparency and open data strategies this is a pressing question.

³ In the winter term 2019/20 50,67% of students in Germany were male, 49,33% female (German Federal Statistical Office).

⁴ A decision by the German Federal Constitutional Court opened the possibility for oneself to register as "diverse" as a "third gender". The aforementioned data on the student population in Germany by the German Federal Statistical Office only differentiates between male/female.

⁵ June 2020 until May 2021. These procedures covered 366 study programmes, of which 326 (89 %) were to be submitted for reaccreditation.

⁶ Some of these conditions and recommendations may have been given for several programmes within a cluster accreditation.

Another limitation may be due to the lack of comparison with programmes accredited by higher education institutions internally. Expert groups in these procedures are also expected to address gathered data, the final expert reports must also be published, yet the structure of the reports and of the data tables may be different, thus hindering comparability throughout the entire higher education system.

References:

Information on the application process, German Accreditation Council, accessed in June 2021:

<https://www.akkreditierungsrat.de/de/antragstellung/antragstellung>

Letter on the new version of the template (March 2020), German Accreditation Council, accessed in June 2021:

https://www.akkreditierungsrat.de/sites/default/files/downloads/2020/20200318%20Grimm_Raster_an_Agenturen.pdf

Information note “Data sheet: explanation on calculation models” (May 2021), German Accreditation Council, accessed in June 2021:

https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Erlaeuterung_Datenblatt_02.3_20210504.pdf

Decision of the German Accreditation Council “Instructions for Quality reports from system-accredited higher education institutions” (September 2020), German Accreditation Council, accessed in June 2021:

https://www.akkreditierungsrat.de/sites/default/files/downloads/2020/AR_Beschluss_Hinweise%20f%C3%BCr%20Qualit%C3%A4tsberichte%20systemakkreditierter%20Hochschulen_2020-09-29_Drs.%20AR%2091-2020.pdf

Central database of accredited study programmes and system-accredited higher education institutions, German Accreditation Council, accessed in June 2021:

<https://antrag.akkreditierungsrat.de>

Data set 21311-0001: Students, Germany, term, nationality, gender, German Federal Statistical Office, accessed in June 2021: [https://www-](https://www-genesis.destatis.de/genesis/online?operation=table&code=21311-0001&bypass=true&levelindex=0&levelid=1625144433914#abreadcrumb)

[genesis.destatis.de/genesis/online?operation=table&code=21311-0001&bypass=true&levelindex=0&levelid=1625144433914#abreadcrumb](https://www-genesis.destatis.de/genesis/online?operation=table&code=21311-0001&bypass=true&levelindex=0&levelid=1625144433914#abreadcrumb)