2026 European Quality Assurance Forum

Quality Assurance for Skills, Entrepreneurship and Innovation:
Partnering with the World of Work

Hosted by National Polytechnic University of Armenia, Yerevan
18-20 November 2026

ISSN: 1375-3797

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Paper

Designed for Whom? Accreditation Criteria and UAS Doctoral Education in European Binary Systems

Abstract

In several European countries, Universities of Applied Sciences (UASs) are gaining formal rights to award doctoral degrees, while policy discussions on extending these rights are active elsewhere. UASs occupy a distinctive position: their doctoral programmes link applied research, professional practice and industry, making them an important setting for quality assurance (QA) frameworks that connect higher education with the world of work. As national systems design or review their approaches, a practical question arises: are the criteria used to evaluate UASs and their doctoral programmes suited to the institutional forms and research orientations they are expected to assess? This paper examines accreditation criteria in three national systems extending doctoral rights to UASs through different legislative routes: Germany, the Netherlands and Portugal. Drawing on an analysis of QA frameworks, accreditation requirements and sector advisory documents, we find that criteria in Germany and Portugal largely retain the assumptions of the university research tradition. The Netherlands has taken a different route: UASs offer a professional doctorate in a national pilot, validated by a sector committee against criteria written for applied research but outside the statutory accreditation system. The three systems thus fall short in different ways: in Germany and Portugal, statutory criteria for doctoral rights do not reflect the characteristics of applied research, while in the Netherlands, criteria written for applied research lack a statutory footing. Using these cases to examine a wider European issue, we propose diagnostic questions for QA agencies and policymakers on three dimensions of doctoral provision: access conditions, research capacity assessment and supervisory eligibility. These questions are intended to apply across different national starting points and governance contexts. We conclude by identifying what calibrating accreditation criteria to applied research would require.

1. Introduction: doctoral rights as a quality question

When UASs gain the right to award doctorates, attention tends to focus on the legal decision. Less visible but arguably more consequential is how a doctoral programme is judged good enough. That is a matter for quality assurance (QA) expressed in accreditation standards, research assessment thresholds and rules on who may supervise. We use accreditation criteria broadly to mean criteria by which a state or its agents decide whether an institution or programme may award doctorates, whether through programme accreditation (Portugal), sector validation (the Netherlands) or the conferral of doctoral rights by a state ministry after external review (Germany).

This matters because UAS doctoral education is intended to differ from university doctoral education. Its added value lies in research that starts with problems in professional practice, is carried out with

companies and public organisations, and produces results that are used (Kyvik & Lepori, 2010; Coombs & Meijer, 2021). QA is increasingly expected to support these links between research, education and the world of work. If criteria designed for another kind of research are used to judge UAS doctorates1, QA may reward resemblance to university programmes rather than the practice orientation that justified extending doctoral rights to them. Higher education research describes this tendency towards institutional convergence as academic drift (Neave, 1979; Griffioen, 2020), often induced by external templates (Morphew & Huisman, 2002). Accreditation criteria are one such template.

This paper asks whether the criteria used to evaluate doctoral programmes suit the institutions and research orientations they are now expected to assess. It examines Germany, the Netherlands and Portugal, three systems that have extended or are extending doctoral rights to UASs through different legal routes. The empirical basis is 25 policy, accreditation and advisory documents from 2015 to 2025, supplemented by developments up to November 2026. Using qualitative document analysis (Bowen, 2009), we identified the criteria each text sets for doctoral provision and the evidence it accepts. How panels apply these criteria lies outside the corpus. Both authors work at UASs and participate in policy debates on UAS doctoral education: the analysis therefore rests on published documents rather than their own experience.

Whatever the legal route, criteria governing access, research capacity and supervision remain shaped by university research traditions or, as in the Dutch pilot, are outside statutory accreditation. The pilot's sector validation framework is designed for applied research but has no formal place in the statutory system.

2. Three routes to UAS doctoral rights

The three systems were chosen because together they cover the main legal options open to a binary system: the same degree under conditions, a separate degree, or the same degree on formally equal terms. Changes of institutional status, such as Ireland's technological universities or Portugal's polytechnic universities (Lei n.º 32/2026), are left aside here. Table 1 summarises the legal route, governance, main quality gate and relation to universities in each system; the last two rows anticipate the tensions in Section 3.

Table 1. Three routes to UAS doctoral rights

	Germany	Netherlands	Portugal
Legal route	Same doctorate, granted under conditions set by each state	Separate degree: Professional Doctorate (PD) at EQF level 8	Same doctorate, formally equal with universities
Governance	Fifteen of sixteen states have enacted or (Lower Saxony) tabled provisions; Saxony has not	National pilot 2023–2029; draft bill (2026) for a legal PD degree	National legislation
Main quality gate	Research strength, tested through individual professors' funding and publications	Programme validation by a sector committee including employers (VaCo-PD); no institutional entry conditions or research-volume threshold	Every principal supervisor in a scientific research entity rated at least Very Good (from 2027; before: 75 per cent of doctoral teaching staff)
Relation to universities	Varies by state, from required cooperation to independent rights	"Equivalent, but different" from the PhD	Same accreditation agency (A3ES) and same criteria

Sources: Müller (2026); Vereniging Hogescholen (2023); Ministerie van OCW (2026); Lei n.º 16/2023; Decreto-Lei n.º 74/2006 and n.º 214/2026.

[1] "UAS doctorate" denotes any doctorate awarded by a UAS, whether formally identical to the university doctorate or a distinct qualification. It names the awarding institution.

In **Germany**, Hochschule Fulda obtained the first independent doctoral right for a UAS in 2016. By October 2026 every state except Saxony has legislated for UAS doctoral rights or, in Lower Saxony, tabled a bill (Müller, 2026). Ten states opted for rights tied to research-strong units of individual UASs, a model pioneered by Hesse (HMWK, 2022), five chose a state-wide college instead. North Rhine-Westphalia conferred the right on a college then backed by 21 UASs in 2022, after the Wissenschaftsrat had found that it could support doctorates "at university level" (Wissenschaftsrat, 2022; MKW NRW, 2022). Numbers remain small: 1,667 doctoral candidates were registered at UASs in 2025, 0.8 per cent of the national total, alongside 1,929 in cooperative doctorates awarded by universities (Müller, 2026).

In **the Netherlands**, the university and UAS associations agreed in 2019 that a UAS doctorate should be "equivalent, but different"; at the minister's request, the UAS association then designed a separate degree (Vereniging Hogescholen, 2021). The Professional Doctorate (PD), at the same EQF level as the PhD, trains "inquisitive professionals" rather than academic researchers. Since 2023, it has operated as a pilot validated by a sector committee instead of NVAO (Vereniging Hogescholen, 2023). A 2026 draft bill would create the degree Professional Doctor from 2027/28 (Ministerie van OCW, 2026).

In **Portugal**, polytechnic institutes have been entitled to award the same doctorate with the same accreditation procedures as universities since 2023 (Lei n.º 16/2023). Until the 2026 reform, at least 75 per cent of a doctoral programme's teaching staff had to belong to research units rated at least Very Good by the Foundation for Science and Technology (FCT), now part of AI² (Decreto-Lei n.º 74/2006, Art. 29).

3. Where existing criteria create tensions

3.1 Access conditions: borrowed thresholds and displaced risks

The conditions for gaining doctoral rights are usually presented as neutral quality safeguards, but they often take the university as their reference point. North Rhine-Westphalia requires "scientific equivalence" of the doctorate measured against "the standard of state-funded universities" (§ 67b (2) HG NRW). Hesse's thresholds were, in its evaluators' words, "borrowed from university research" (HMWK, 2022, p. 8). Universities hold doctoral rights by status and across all faculties, UASs unit by unit, on demonstrated performance and subject to review. The same holds for individuals: UAS professors, appointed on a doctorate and at least five years of professional practice, must pass a second, output-based test before they may supervise, which university professors do by status. The borrowed yardstick has served UASs too: in the CHE's assessment, strict thresholds silenced the warnings of university associations and won acceptance for UAS doctorates. Yet the same assessment concludes that the right should not hinge on whether UAS research "meets university standards" and calls for criteria that reflect transfer and innovation (Müller, 2026, pp. 39-41). The quality safeguard thus doubles as a status boundary, through which QA reproduces institutional differences.

Portugal shows the same effect under formal equality. The rating condition dates from 2018 and was conceived as a neutral gate: the minister at the time spoke of raising requirements for all institutions (Diário de Notícias, 2018). Neutral in form, it rests on ratings built for academic research. FCT rates a unit Very Good when its work is nationally leading with international potential, and its evaluation rules, amended seven months after the 2023 law, make no provision for polytechnics (FCT, 2023, Arts. 7–8). The 2026 degrees regime tightens the gate rather than adapting it, extending it to every principal supervisor (Decreto-Lei n.º 214/2026, Art. 26 (3)(d), see 3.3).

The Netherlands sets no entry criteria for UASs. Participating institutions need not demonstrate research strength to join the PD pilot, and quality is assured at programme level by a sector-run validation committee (Vereniging Hogescholen, 2023). In this respect Dutch UASs are treated more like universities, whose rights rest on status. The tension takes the form of time and legal status instead. Because the PD is a pilot, candidates are told before they start that legal recognition of their degree cannot be guaranteed, and they confirm this in writing (Vereniging Hogescholen, 2023). The uncertainty

of the policy experiment is thereby shifted from institutions onto individual candidates. University PhD candidates carry no such risk. The risk is not hypothetical. In April 2026 two motions, one to drop a separate UAS doctorate altogether and one to await the pilot's end in 2029, gained support from several parties but no majority (Tweede Kamer, 2026a, 2026b). The validation committee had urged quick clarity on statutory embedding (ValidatieCommissie PD, 2024, p. 8).

3.2 Research capacity assessment: what counts as output

Germany assesses individual professors and, through minimum numbers varying among the states from 6 to 14, the unit they form. Portugal assesses that of the research unit behind each programme, the Netherlands assesses programmes. The question is what counts as evidence. In the documents analysed, capacity is measured mainly through peer-reviewed publications, competitive research funding and research ratings designed around academic output. German rules typically count only competitively won funding (PK NRW, 2021, § 3; PZAI, 2024, § 4). Contract research for companies and public bodies, a usual source of funding for applied research, is thereby sidelined. Outputs typical of applied research, such as prototypes, design solutions, implemented interventions, professional guidelines, patents or co-developed services, are rarely named as evidence of quality. Patents may replace at most a quarter of the publications required for membership of the NRW doctoral college, the only applied output its rules mention (PK NRW, 2021, § 3); Saxony-Anhalt, by contrast, scores a patent like a peer-reviewed article (HAWPromVO LSA, 2021, § 3).

Capacity is also measured in volume, and here the systems differ sharply. In Germany, doctoral rights depend on a critical mass of research-active professors in each doctoral centre, and the required mass varies: Hesse asks for at least twelve research-strong professors per field (Forschung & Lehre, 2016), Saxony-Anhalt for six (HAWPromVO LSA, 2021). The Dutch framework sets no numerical threshold and asks instead for a sustainable vision on staffing for supervision (Vereniging Hogescholen, 2023). This spread, even within Germany, suggests that capacity thresholds are policy choices rather than fixed quality standards: how high the bar for research volume is set largely determines how many UASs can take part.

Alternatives were available. In 2020, the Wissenschaftsrat treated basic and applied research as a continuum, criticised the use of bibliometric indicators as a default for all institutions and proposed criteria suited to applied research (Wissenschaftsrat, 2020). In 2022, Hesse's evaluation commission judged the doctoral centres a success but found that quantitative indicators dominated and recommended discipline-specific criteria (HMWK, 2022, pp. 13-14, 24). Two centres' revised statutes of 2024 now mention "the specifics of application-oriented research", while the operative thresholds remain competitively won, peer-reviewed funding and publications in quality-assured journals (PZNW, 2024, § 3a; PZAI, 2024, § 4).

When the Wissenschaftsrat returned to UAS doctorates in 2023, it did not apply its earlier proposals (Wissenschaftsrat, 2023a; 2023b). In Portugal, the 2026 degrees regime allows doctoral programmes to have a professional orientation and to include practising experts among their teaching staff, yet retains the research rating as a prerequisite for doctoral provision (Decreto-Lei n.º 214/2026, Arts. 25 (1), 26 (3)(b) and (d)). In both cases, proposals for assessing applied research did not find their way into the accreditation criteria.

3.3 Supervisory eligibility: whose track record qualifies

In North Rhine-Westphalia, only professorial members of the doctoral college may supervise its candidates. Membership requires a doctorate and, on average, one peer-reviewed publication a year plus competitively acquired funding, and it is reviewed every five years (PK NRW, 2021, § 3). The professional practice for which UAS professors were appointed counts for nothing here. Hessian centres also expect supervisory experience where possible (PZ PH, 2024, § 3a (2)), which UAS professors have mainly gained in cooperative doctorates under university rules. In Portugal, every

principal supervisor must belong to a scientific research entity rated at least Very Good, whatever the institution or the programme's orientation (Decreto-Lei n.º 214/2026, Art. 26 (3)(d)), for new programmes from October 2027 and existing ones from 2028 (Art. 76). A practitioner with a doctorate can become principal supervisor only by joining such an entity.

The Dutch framework takes a different approach. Supervisory committees are chaired by a UAS professor (lector) holding a PhD or PD. At least two such professors sit on the committee, alongside two professionals from the relevant field, who must hold a master's degree or equivalent (Vereniging Hogescholen, 2023). Candidates are examined by a separate committee whose members, three of four nominated by the supervisory committee, reflect its stakeholders (Vereniging Hogescholen, 2023). This is a candidate-level counterpart to the mixed panels proposed in Section 4.

If supervisory eligibility rests on academic publication alone, UASs will tend to select supervisors who resemble university researchers. Candidates may then be pushed toward academic outputs, and the links to the world of work that justify UAS doctorates in the first place weaken. Research on collaborative doctorates shows that their quality hinges on how academic and practice-based supervisors share roles (Salminen-Karlsson & Wallgren, 2008; Kitagawa, 2014), an interplay that rules centred on individual publication records cannot capture.

3.4 One pattern, three mechanisms

The approaches differ: conditional rights in Germany, a separate degree in the Netherlands and formal equality in Portugal. Germany and Portugal carried criteria written for university research over to UASs, which must demonstrate their strength on university terms. In Germany this amounts to a double test: professors appointed for their professional practice must then show university-type output before they may supervise. The Netherlands requires no institutional proof at entry and places assessment at programme level, where a sector committee applies criteria designed for applied research but without statutory standing, leaving candidates to bear the legal risk. The legal route determines where the tension appears, not whether it does.

4. What calibration could mean in practice

Calibrating accreditation criteria to applied research requires a clear account of what good applied doctoral research looks like and evidence suited to it. The core questions remain familiar: is the research rigorous, original and ethically sound; is supervision adequate and is the research environment sufficient? What changes is the evidence used to answer them. For rigour, the Frascati criteria (novel, creative, uncertain, systematic, transferable or reproducible) provide a yardstick that does not depend on output type (OECD, 2015). Differentiated criteria can, however, create a hierarchy of qualifications, as debates on professional doctorates show (Neumann, 2005; Kot & Hendel, 2012). Parity of esteem must therefore be built into the design from the outset. These proposals build on principles already recognised in QA: the European Standards and Guidelines (ENQA et al., 2015) state that QA "responds to the diversity of higher education systems, institutions, programmes and students" and call for fit-for-purpose methodologies (Standard 2.2; Harvey & Green, 1993). Salzburg II calls for doctoral quality assessment based on peer review "sensitive to disciplinary differences" (EUA, 2010). The Agreement on Reforming Research Assessment (CoARA, 2022), signed by more than 800 organisations by 2025 commits signatories to recognise a wider range of research outputs and rely more on qualitative judgement than on journal-based metrics. Dutch UAS research is already assessed for practical relevance, methodological soundness and ethical responsibility, by panels that include practitioners (Vereniging Hogescholen, 2022).

Concretely, this points to five actions:

- When doctoral rights are extended, agencies and ministries should check whether existing thresholds remain appropriate for the newly eligible institutions. Portugal shows what happens when a pre-reform threshold remains in place and is later tightened. Embedding a review

requirement in the reform would institutionalise this reassessment. Hesse, by contrast, made the rights of its four oldest centres permanent after evaluation and reviews all centres every seven years (Hessischer Landtag, 2024).

- Criteria should specify which applied outputs count as evidence of research quality and how their rigour and contribution are assessed.
- Panels assessing UAS doctoral programmes should include reviewers with applied-research experience and, where relevant, professionals from the fields concerned. This gives employers and professional partners a role in doctoral QA. ESG Standard 2.4 already requires a student member. For doctoral programmes, this could be a doctoral candidate with professional experience.
- Eligibility rules can assess academic rigour at supervisory team level rather than requiring every supervisor to have the same publication profile. The Dutch framework already takes this approach.
- Pilot schemes should include transition guarantees, so that candidates are not asked to accept that their degree may never be legally recognised.

Institutions have their own part in this. UASs preparing for accreditation can document their applied-research outputs systematically, define their own doctoral profile and avoid building internal criteria that copy university norms before an external body requires it. Supervision agreements, briefings for all supervisors, including those from practice, and research information systems with categories for applied outputs are modest internal steps in this direction (Gille et al., 2024).

5. What transfers to other systems

Portuguese research ratings, German state legislation and the Dutch pilot are rooted in their national settings and are not directly transferable as instruments. What can be transferred is the lesson that the choice of legal route settles less than it may appear. Conditional rights, a separate degree and formal equality all leave the criteria to be developed. Countries now debating UAS doctoral rights have an opportunity to shape those criteria before institutions organise themselves around existing thresholds which become difficult to revise. QA agencies should therefore be involved when reforms are designed, not only when their effects are evaluated. A Dutch draft bill would create two degrees, Professional Doctor at UASs and Engineering Doctor at universities (Ministerie van OCW, 2026), while Portugal's 2026 degrees regime distinguishes doctoral programmes by academic or professional orientation (Decreto-Lei n.º 214/2026, Art. 25 (1)). In both countries the latest instruments distinguish doctorates by orientation rather than sector, making orientation-specific quality criteria harder to defer.

Diagnostic questions for QA agencies, ministries and institutions

Access conditions

- Against which reference point is eligibility for doctoral rights tested, and is the same test applied to all institutions?
- Were existing thresholds reviewed when the group of eligible institutions changed?
- Who carries the risk if a pilot or transitional scheme is not continued?
- How is parity of esteem between differently oriented doctorates secured, for example towards employers and recognition bodies?

Research capacity assessment

- Which outputs count as evidence of research quality, and are applied-research outputs named?
- Are indicators designed for academic output used as defaults for all institutions?
- Do review panels include reviewers with applied-research and professional experience?

Supervisory eligibility

- Is eligibility judged on the individual supervisor or on the supervisory team?

- Can an applied-research record qualify a supervisor, and how are co-supervisors from industry or public organisations recognised?

6. Conclusion

Extending doctoral rights to UASs is usually discussed as a question of law and institutional status. The three cases suggest that the criteria governing those rights matter just as much. In Germany and Portugal, they retain assumptions from the university research tradition. In the Netherlands, criteria designed for applied research exist but lack statutory standing, leaving candidates to bear the consequences. If UAS doctorates are to fulfil their stated purpose, QA must recognise applied research on its own terms and specify the evidence by which its quality is judged. The diagnostic questions above offer one way to begin. What documents cannot show is whether revised criteria change panel practice. Answering that requires watching panels at work.

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