

**Substantive Change Report**  
**by Foundation for International Business Administration**  
**Accreditation (FIBAA)**

Register Committee

Ref. RC24/C42

Ver. 1.0

Date 3/7/2019

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Decision of:	19/06/2019
Report received on:	27/05/2019
Agency registered since:	08/04/2009
Last external review report:	23/01/2017
Registration until:	31/01/2022
Absented themselves from decision-making:	n/a
Attachments:	1. <a href="#">Substantive Change Report</a> 2. <a href="#">Request of 29/04/2019</a>

1. The Register Committee considered the Substantive Change Report of 27/05/2019 in response to its request of 29/4/2019 and thanked FIBAA for responding to the specific questions raised in its request.
2. The Register Committee took note of the changes brought about by the [Interstate Treaty](#) between the German federal states, which entered into force in 2018, and the related [Specimen Decree](#). The main change lies in the fact that – for accreditation in Germany – FIBAA no longer takes accreditation decisions itself, but prepares an assessment report on the basis of which the German Accreditation Council (GAC) takes a decision; the way in which FIBAA carries out these assessments remains largely similar to the pre-2018 system.
3. The Register Committee underlined that agencies themselves remain responsible for the alignment of their activities with the ESG, even if they work based on third-party processes and criteria. As an EQAR-registered agency it is FIBAA's responsibility to assure itself that the frameworks under which it decides to operate are compatible with the ESG.
4. The Register Committee took note of the fact that FIBAA applies the criteria as set out in the Specimen Decree, which replace the accreditation criteria previously set by GAC.
5. The Committee thanked FIBAA for enclosing the mapping table elaborated by the GAC, which illustrates how the criteria correspond to Part 1 of the ESG.
6. The Register Committee noted that FIBAA did not change its practice as regards site visits.

7. The Register Committee noted that no final details on follow-up processes could be provided to date, but understood that the GAC is likely to have a role in the follow-up processes. The Committee underlined that FIBAA retains responsibility for follow-up to take place, even if GAC makes accreditation decisions. This does not exclude that GAC actually implements the follow-up processes, as long as FIBAA has assured itself that this indeed happens.
8. The Register Committee expects that the interaction between GAC and FIBAA, and their respective roles in the follow-up process, will be analysed in the next external review of FIBAA.
9. The Register Committee noted that FIBAA did not change the composition, selection and appointment of review panels, as its established practice is in line with the nomination procedure adopted by the German Rectors' Conference (HRK).
10. The Register Committee noted that FIBAA did not change the way in which it assures consistency of reports and continues to rely on the existing committees/working structures in that regard.
11. The Committee nevertheless underlined that the next external review of FIBAA should analyse whether the new arrangements had any impact on the consistency of applying the accreditation criteria.
12. The Register Committee noted that FIBAA continues to publish the full expert reports on its own website, in addition to the report being published by GAC together with its eventual decision. FIBAA thus discharges its responsibility to ensure that all its reports are published and the Committee welcomed that commitment to transparency.
13. The Register Committee noted that FIBAA's appeals procedures were not changed. The Committee understood that institutions thus retain the possibility to both complain about procedural errors, etc., or to appeal the report, i.e. specific statements or conclusions in the report.

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## Substantive Change Report on the New Legal Framework in Germany

**1.) Please explain the changes in the accreditation criteria and how ESG 1.1 – 1.10 are reflected in the new criteria (ESG 2.1).**

The basic concept of the accreditation system has remained the same, but the final decision is now made by the German Accreditation Council (GAC). The accreditation criteria are defined in detail in the Specimen decree, which forms together with the Interstate Treaty and the country-specific provisions the relevant legal basis of the new accreditation system, became effective on 1 January 2018.

The Interstate Treaty and the Specimen decree are published on the website of the GAC:

<http://www.akkreditierungsrat.de/index.php?id=44&L=1>.

Please find in Annex 1 the comparison between ESG 2015 and rules and criteria of German Accreditation System by the German Accreditation Council, dated July 2018.

**2.) Did FIBAA change its approach to ensuring consistency (ESG 2.5) in any way beyond the organisational changes described?**

FIBAA did not change its approach to ensuring consistency, but the final decision is now made by the GAC. On the basis of the criteria laid down in the Interstate Treaty and specified in the Specimen Decree, FIBAA makes recommendations for conditions as well as quality development issues. The final responsibility for decisions in accreditation procedures lies within the GAC. The Higher Education Institutions (HEI) still have the possibility to ask for an additional expertise from the FIBAA commissions. Please find in Annex 2 the new process flow.

**3.) Please explain if and how the composition, selection and appointment of review panels (ESG 2.4) changed, in particular with reference to the new nomination procedure for external experts according to Article 3 (3) of the Treaty / §25 (4) of the Specimen Decree.**

Neither the composition, nor the selection or the appointment of review panels have changed. The FIBAA committees continue to appoint FIBAA Panel Appointing Committees. These expert committees check each individual review panel for accreditation procedures and approve them when all requirements and criteria for composition, selection and appointment of review panels have been met. So this process has remained the same. Relevant for the composition of the expert panels are Article 3 (3) of the Treaty / §25 (4) of the Specimen Decree. FIBAA organises the expert panels according to the *Guidelines for the Appointment of Reviewers and the Compilation of Expert Groups for Accreditation Procedures of the German Rectors' Conference* („*Leitlinien zu der Benennung von Gutachterinnen und Gutachtern und der Zusammenstellung von Gutachtergruppen für Akkreditierungsverfahren*“), dated 24 April 2018. The document is published on the website of the German Rectors' Conference: [https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-01-Beschluesse/HRK\\_MV\\_Entschliessung\\_Benennung\\_Gutachter\\_Akkreditierungsverfahren\\_2017\\_2018.pdf](https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-01-Beschluesse/HRK_MV_Entschliessung_Benennung_Gutachter_Akkreditierungsverfahren_2017_2018.pdf).

**4.) Does the new legal framework lead to any changes as regards the use of site visits (ESG 2.3), the publication of reports (ESG 2.6) or follow-up processes (ESG 2.3)?**

The new legal framework does not lead to any changes as regards of the use of site visits in any way. Regarding the publication of reports the GAC introduced the Database and Content Management System “ELIAS” (Further information about “ELIAS” is available online on the website of the GAC: <http://www.akkreditierungsrat.de>). To ensure transparency, FIBAA continues its policy and publishes all results also on its own website (<https://www.fibaa.org/en/welcome-page>). FIBAA also contributes to the project “Database of External Quality Assurance Results – DEQAR” coordinated by the European

Quality Assurance Register for Higher Education (EQAR). The GAC is now responsible for the follow-up processes. This area is no longer the responsibility of accreditation agencies.

***5.) Did FIBAA change its appeals process (ESG 2.7) in light of the fact that the agency does not make final accreditation decisions, but reports forwarded to the German Accreditation Council (GAC)?***

FIBAA did not change its appeals process. There is still the FIBAA Appeals Committee for complaints concerning FIBAA. The GAC is now responsible for complaints against accreditation decisions.

***6.) Did FIBAA change its organisational structure in relation to the new legal framework?***

There were no changes in the organisational structure. Final accreditation decisions, however, are now made by the GAC and no longer by FIBAA committees.

## Annex 1: Comparison between ESG 2015 and rules and criteria of German Accreditation System by the German Accreditation Council

### Comparison between ESG 2015 and rules and criteria of German Accreditation System

July 2018

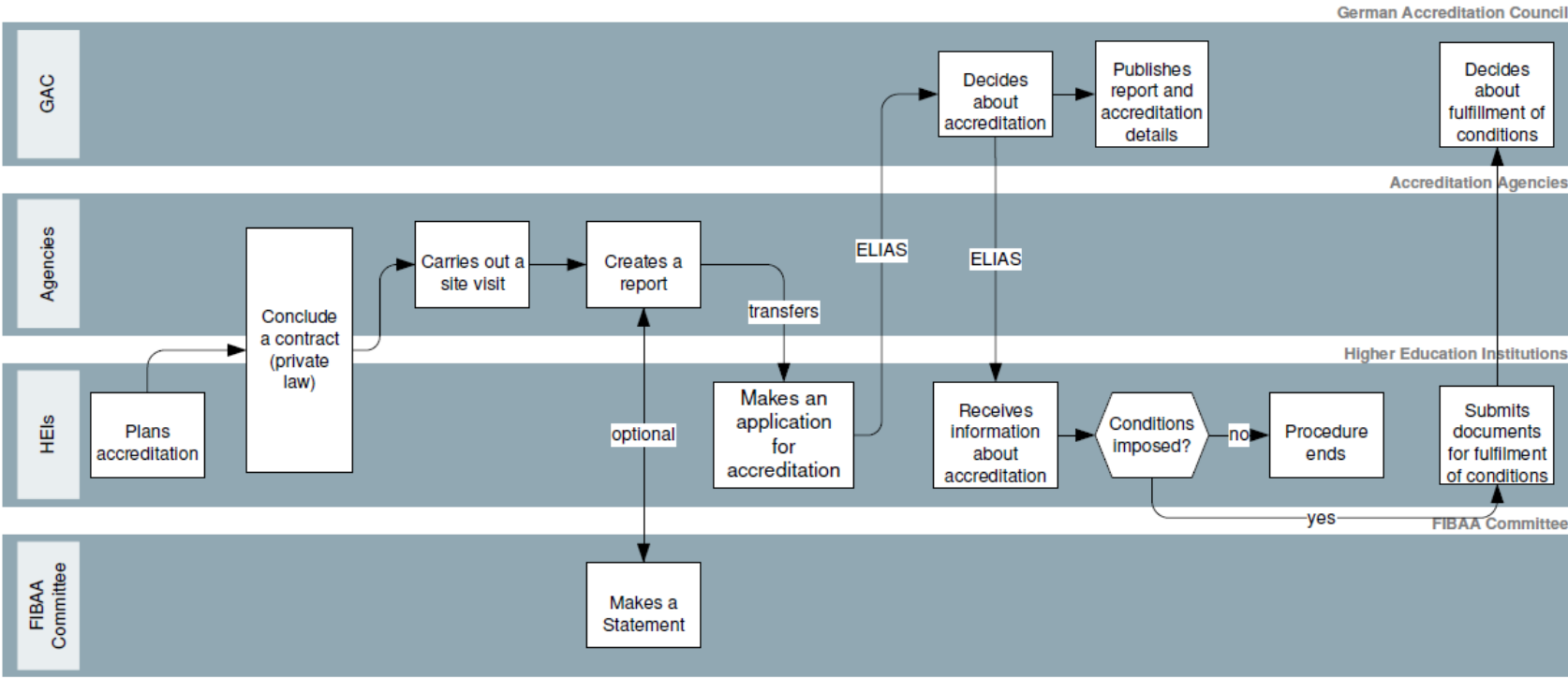
Comparison between part 1 of ESG 2015 and the German accreditation rules and criteria, mainly determined in parts 2 and 3 of the specimen decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treaty

ESG 2015	Programme accreditation	System accreditation
1.1 Policy for quality assurance	§ 14 Academic success	§ 17 Concept of the quality management system (goals, processes, instruments)
1.2 Design and approval of programmes	§ 11 Qualification goals and qualification level; § 12 Coherent study programme concept and adequate implementation; § 13 Subject-content organisation of the study programmes	§ 17 Concept of the quality management system (goals, processes, instruments)
1.3 Student-centered learning, teaching and assessment	§ 12 Coherent study programme concept and adequate implementation (paragraph 1); § 15 Gender equality and compensation of disadvantages	§ 17 Concept of the quality management system (goals, processes, instruments)
1.4 Student admission, progression, recognition and certification	§ 5 Admission requirements and transitions between different courses; § 6 Qualifications and qualification designations; § 12 Coherent study programme concept and adequate implementation (paragraph 1); § 14 Academic success	§ 17 Concept of the quality management system (goals, processes, instruments)

Continued on next page

1.5 Teaching staff	§ 12 Coherent study programme concept and adequate implementation (paragraph 2)	§ 17 Concept of the quality management system (goals, processes, instruments)
1.6 Learning resources and student support	§ 12 Coherent study programme concept and adequate implementation (paragraph 3)	§ 17 Concept of the quality management system (goals, processes, instruments)
1.7 Information management	§ 14 Academic success	§ 18 Measures to implement the quality management concept, see paragraph 3
1.8 Public information	Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states	§ 18 (paragraph 4); Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states
1.9 On-going monitoring and periodic review of programme	§ 14 Academic success	§ 18 Measures to implement the quality management concept
1.10 Cyclical external quality assurance	§ 26 Period of validity for the accreditation; extension	§ 26 Period of validity for the accreditation; extension

Annex 2: New Process Flow in the German Accreditation System



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Brussels, 29 April 2019

## Substantive Change Report on New Legal Framework in Germany

Dear Kerstin,

On 1 January 2018, a new legal framework for accreditation entered into force in Germany, i.e. the [Interstate Treaty](#) between the German federal states accompanied by the related [Specimen Decree](#). As FIBAA operates as part of the official accreditation system in Germany we understand that your agency is directly affected by those changes.

As a registered agency you are required to notify EQAR about substantial changes to your process or methodology (see §6.1 of the [EQAR Procedures for Applications](#)).

According to the EQAR Guide for Applicants, “changes should be reported as soon as the changes are sufficiently clearly defined to allow providing comprehensive information on their nature and impact” and we are confident that this is the case by now.

We therefore kindly request that you **make a Substantive Change Report, using the official [reporting form](#).**

In order to streamline your report and ensure comparability with other agencies' reports, we kindly ask you to address the following questions (instead of the aspects i. to viii. as listed on the form):

1. Please explain the changes in the accreditation criteria and how ESG 1.1 – 1.10 are reflected in the new criteria (ESG 2.1).
2. Did FIBAA change its approach to ensuring consistency (ESG 2.5)?
3. Please explain if and how the composition, selection and appointment of review panels (ESG 2.4) changed, in particular with reference to the new nomination procedure for external experts according to Article 3 (3) of the Treaty / §25 (4) of the Specimen Decree.

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4. Does the new legal framework lead to any changes as regards the use of site visits (ESG 2.3), the publication of reports (ESG 2.6) or follow-up processes (ESG 2.3)?
5. Did FIBAA change its appeals process (ESG 2.7) in light of the fact that the agency does not make final accreditation decisions, but reports forwarded to the German Accreditation Council (GAC)?
6. Did FIBAA change its organisational structure in relation to the new legal framework?

I wish to draw to your attention that we have addressed identical questions to all EQAR-registered agencies operating within the official accreditation system in Germany, i.e. AAQ, ACQUIN, AHPGS, ASIIN, AQAS, AQ Austria, evalag, FIBAA and ZEvA. It is at your discretion whether to coordinate your response with some or all other agencies.

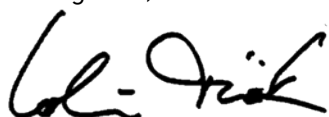
If there are **other changes** to your organisational structure or external quality assurance activities, i.e. not related to the new legal framework in Germany, please kindly include them in the same report. For those activities please follow the usual questions and instructions.

We kindly ask you to make your report **by 29 May 2019**.

Please also note that this request will be published together with the final decision on your Report.

I shall be at your disposal if you have any further questions or inquiries.

Kind regards,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück  
(Director)