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und qualitätssicherung

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Recommendations in Accreditation Procedures

Thematic Analysis | 26.07.2021 | Michelle Brunner



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1. Introduction/Preface

1.1. Legal framework, difference between conditions and recommendations

Recommendations given in accreditation procedures have no legal effect. Unlike conditions, which must be fulfilled within a set period of time and duly evidenced, the primary purpose of recommendations is quality development. Compliance or non-compliance with recommendations does not therefore have any formal consequences.

Conditions may be proposed by the expert group and the Agency, but the Accreditation Council takes ultimate responsibility for them. The fulfilment of conditions is verified by means of a further procedure, "condition monitoring". Conditions must refer to one or more standards. Several conditions may be stipulated for one standard. It must also be possible to fulfil them within a specific period of time (usually two years). If the Accreditation Council comes to the conclusion during the monitoring process that the conditions have not been fulfilled (or not all of them), it may send a reminder about the conditions, set new conditions or withdraw accreditation (see HEdA Accreditation Ordinance (Akkreditierungsverordnung HFKG¹)).

Recommendations are only formulated by the expert group. The Agency and the Accreditation Council do not make recommendations. The recommendations are made by the experts in their role as peers and should serve the further development of the HE institution. They are not subject to formal requirements or rules. This also means that they are not linked to the quality standards, and may even exceed them.

In summary, it could perhaps be said that the conditions serve quality assurance whilst the recommendations serve quality development. Although they can be seen as an integral part of accreditation procedures, there are virtually no guidelines for formulating recommendations or points of reference for implementing the latter. Expert groups may therefore make three recommendations for one standard, for example, or decide to combine three points in one recommendation. In principle, HE institutions are completely free to decide what to do with the recommendations and whether and how to use them for their further development.

1.2. Purpose of this analysis

This analysis seeks to illustrate the meaning and purpose of recommendations in expert reports. It is also to provide an overview of the recommendations made to date. This is not the place for a critical appraisal, since the recommendations are not limited by any requirements, nor do they follow any guidelines.

Although this analysis deals with the recommendations, it takes account of the conditions at the same time, first and foremost for comparison purposes as conditions and recommendations cannot be completely separated from one another in practice.

¹ Akkreditierungsverordnung HFKG, SR 414.205.3, Art. 15 and 15a
(<https://www.fedlex.admin.ch/eli/cc/2015/362/de>)

2. International framework

On an international level, it is interesting to note that the recommendations are not perceived uniformly in the EHEA. Perceptions differ in terms of language: by way of example, English-language procedures speak of commendations and recommendations. A study of quality assurance terminology found that some interviewees saw recommendations as something that underlines the dominant position and monitoring role of the Agency. The term "points for consideration" would be preferable.²

The German Accreditation Council conducted an analysis of the cross-sectional sample "Auflagen" ("Conditions") in 2017. The original intention was to study the recommendations at the same time. However, the analysis of the conditions and the volume of work associated with it proved to be so time-consuming that the recommendations were not studied.³ Furthermore, although the Accreditation Council regards both conditions and recommendations as "vital control instruments in (programme) accreditation"⁴, no (further) analyses have been published to date.

The Specimen Decree (Musterrechtsverordnung) passed by the Standing Conference of the Ministers of Education and Cultural Affairs has applied to accreditation procedures in Germany since 2018. The principle that recommendations may exceed the framework for quality standards is thus enshrined in law due to the fact that these specific aspects are not the basis for a condition. In this context, recommendations are seen as a means of "quality improvement".⁵

3. External perception: feedback

As every HE institution can give feedback in the form of a questionnaire in order for the procedure to be conducted at its own institution, most feedback also refers directly to its own procedure. The AAQ is always looking for appropriate ways to gather feedback⁶, so that it can also obtain feedback on the work and perception of the AAQ outside the procedure. Feedback interviews⁷ and the biannual AAQ Institutional Accreditation Day⁸ are examples of such formats.

² ENQA Occasional Papers 12, Terminology of quality assurance: towards shared European values? Fiona Crozier, Bruno Curvale, Rachel Dearlove, Emmi Helle, Fabrice Hénard, Helsinki 2006, 11.

³ German Accreditation Council, Auswertung der Querschnittstichprobe „Auflagen“ (analysis of the cross-sectional sample "Auflagen" ("Conditions")), conducted in 2017, 01.08.2018, 3 and 35.

⁴ Ibid, 3.

⁵ Specimen Decree (Musterrechtsverordnung) passed by the Standing Conference of the Ministers of Education and Cultural Affairs, 2017, §24, 35.

⁶ See also: von Steiger, Berchtold, Interne Qualitätssicherung und -entwicklung von Akkreditierungsagenturen: Welche Methoden zum Erheben und Verwenden von Rückmeldungen sind wirksam?, AAQ 2020 (<https://aaq.ch/download/hematische-analyse-interne-qualitaetssicherung-und-entwicklung-von-akkreditierungsagenturen-welche-methoden-zum-erheben-und-verwenden-von-rueckmeldungen-sind-wirksam-aaq-2020/>)

⁷ Zusammenfassung und Massnahmen nach den Feedbackgesprächen zur institutionellen Akkreditierung, AAQ 2020 (<https://aaq.ch/zusammenfassung-und-massnahmen-nach-den-feedbackgespraechen-zur-institutionellen-akkreditierung/>)

⁸ Programme, presentations and participants can be found among the entries for the respective year: <https://aaq.ch/category/veranstaltungen/>

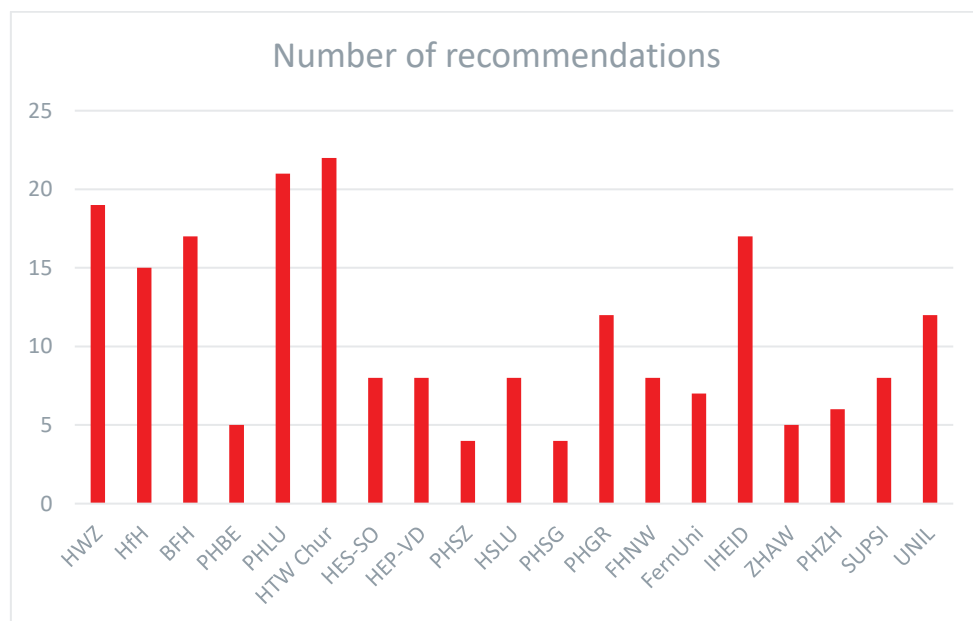
4. External perception: Kammer PH report

A critical external eye is cast on AAQ procedures for the first time in the 2019 report by the Chamber of Universities of Teacher Education (Kammer PH) of swissuniversities, which is only available internally. The procedure of institutional accreditation, which several universities of teacher education have already undergone, is scrutinised more closely in the process. One area of emphasis is conditions and recommendations. The report gives the AAQ valuable insights into the perception of its work among stakeholders. It comments, for example, on the assumption that recommendations and their implementation also have implications for the monitoring of conditions and any further accreditation procedures. See section 6 for further details.

5. Overview of recommendations made to date

At the present time⁹ expert groups have made 206 recommendations in 19 procedures for institutional accreditation. This equates to an average of 10.8 recommendations per procedure.

The following chart provides an overview of the number of recommendations per procedure (including details of the HE institution). The chart shows the procedures in chronological order from left to right.



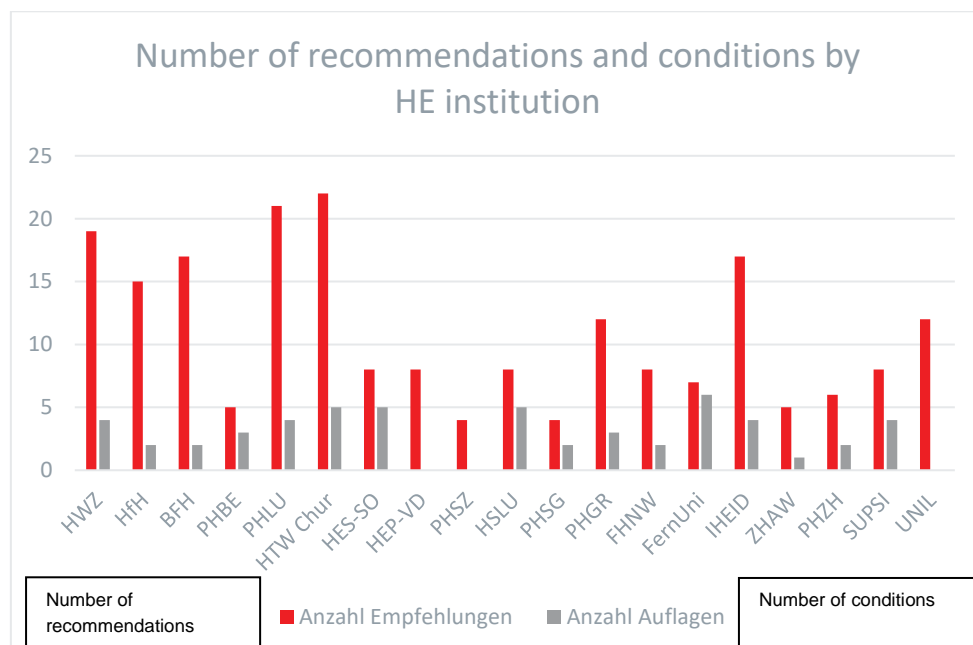
Total: 206 recommendations

The tendency was for more recommendations to be made during the early procedures. The AAQ subsequently aimed for more consistency between procedures and raised awareness of this among expert groups. The AAQ accompanies the expert group when compiling the report in

⁹ The last meeting of the Swiss Accreditation Council was held on 25.06.2021. This report contains information on all institutional accreditation decisions made and published between 2015 and the above date.

the sense that it submits the first draft and makes suggestions without any form of censorship. Ultimate responsibility for the content of the report always lies with the expert group. This means that there may be increasingly big differences between the various procedures (in the future, too) if, for instance, an expert group decides to formulate more recommendations. As already mentioned in section 1.1, the expert group has full autonomy as far as the formulation and use of recommendations is concerned. It may make one or more recommendations for a standard or combine them into a single recommendation, whilst another group will take a completely different approach. This puts the significance of the number of recommendations into perspective to a not inconsiderable extent.

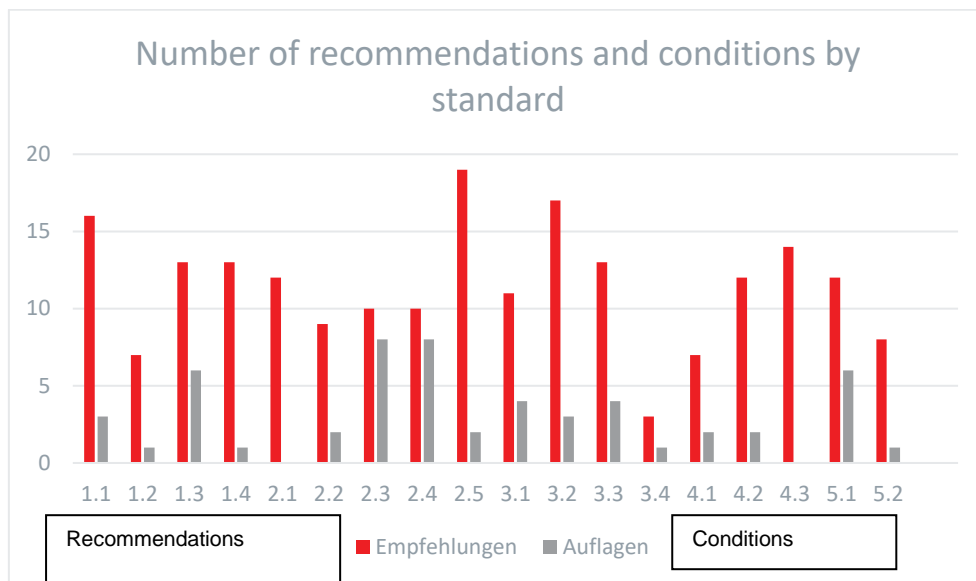
The following chart gives an overview of the number of recommendations made, together with conditions per procedure (by HE institution, in chronological order).



The number of recommendations per HE institution is between 4 and 22, with an average of 10.8. There are 206 recommendations in total. The number of conditions is between 0 and 6, with an average of 2.8, out of 54 conditions in total. There is no correlation between the number of recommendations and the number of conditions.

Although the recommendations are not subject to any requirements and do not therefore have to be linked to standards, they are and were each attached to a standard in the reports. The conditions on the other hand must always have a standard as a basis for being a requirement. The following chart gives an overview of the number of recommendations and conditions that were made for each of the different standards.¹⁰ It is also possible to formulate several conditions or recommendations in relation to the same standard within a single procedure. Consideration must also be given to the following: If a condition has already been set for a standard, there is in principle less reason to add a recommendation as well.

¹⁰ Conditions are sometimes attached to several standards. However, the chart only shows the first-mentioned standards so that there are no duplications. The totality of the conditions shown corresponds to the number of conditions set to date.



To date, recommendations have been formulated for all standards. In contrast, there are two standards (2.1 and 4.3) for which no conditions have (yet) been set. Nevertheless, 12 and 14 recommendations respectively have been issued for these.

In no case is the number of conditions for a standard higher than the number of recommendations. More recommendations than conditions have been formulated for all standards.

The pattern of recommendations by standard is not in accord with that of conditions by standard, as might have been expected. So it is not the case that more recommendations are formulated in the case of standards for which more conditions are set. The same applies in reverse so that more conditions cannot be expected in the case of standards with more recommendations.

In the case of recommendations, standards 1.1, 2.5 and 3.2 stand out with 16, 19 and 17 mentions respectively. This is notable when one considers that 19 procedures are included in the analysis. Here too, however, it must be pointed out that a standard can be mentioned multiple times within the same procedure. In relation to standard 2.5, for example, recommendations are not made in every procedure. The images below are visual representations of the recommendations relating to these three standards.

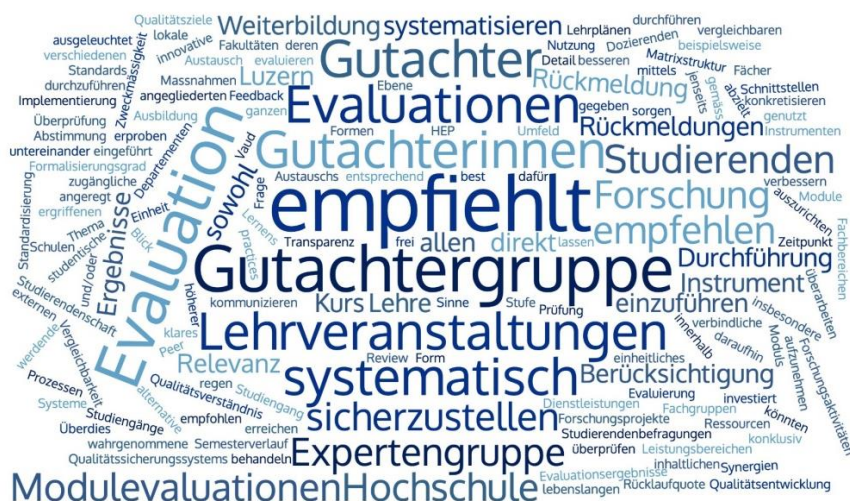
Standard 1.1 requires the HE institution to have defined its quality assurance strategy. In addition, these guidelines must include an internal quality assurance system in order to promote the quality of activities as well as quality development and the development of a quality culture.¹¹

The following image shows a word cloud¹² from the recommendations that have been formulated for standard 1.1.

¹¹ For the exact wording see: HEdA Accreditation Ordinance, Appendix 1, Quality standards for institutional accreditation, 1.1.

¹² A word cloud gives greater prominence to the most frequently mentioned words in a text, whilst words that are mentioned less frequently or only once are correspondingly smaller. To improve comparability, the

Standard 3.2 requires the HE institution to evaluate teaching, research and services on a regular basis.¹⁴ The following word cloud from the recommendations is a clear illustration of this topic. By way of example, more "systems" and the introduction of new instruments are recommended.



6. Conclusions

The AAQ has noted that there are some big differences in how recommendations are made in individual procedures. Above all, the number of recommendations differs greatly. As a result, conclusions are (can be) drawn about the individual HE institutions in a way that was not intended. The AAQ does not want to define a fixed and binding framework for the number of recommendations. The recommendations are to continue to serve the further development of HE institutions. However, they should be clearly focused and realisable. Rankings should also be avoided. This means that the AAQ, in cooperation with the expert groups, has made sure for quite some time, and will continue to do so in the future, that an approximate balance is kept between the various procedures in terms of the number of recommendations.

Similarly, the AAQ has noted the concern among HE institutions that recommendations in subsequent procedures (reaccreditation, second accreditation) could be assessed as conditions. The AAQ would like to emphasise that such a procedure would have no sustainable foundation. The sole purpose of the recommendations is to develop the quality of HE institutions. Their implementation is optional, and non-compliance has no implications for subsequent procedures. They cannot and should not serve as a means of control and inspection. The AAQ will also ensure in the future that there is no deviation from this procedure.

¹⁴ For the exact wording see: HEdA Accreditation Ordinance, Appendix 1, Quality standards for institutional accreditation, 3.2.

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