

## University Governance and the Threats of Accreditation and Evaluation

On the Sociology of Accountability, Competition and Autonomy in 'Specific Organisations'

**Theodor Leiber**

evalag (Evaluationsagentur Baden-Württemberg), Mannheim, Germany

Dialog der Wissenschaften 2016

**„Der Wert der Universität – als Ort des Denkens zwischen Vergangenheit und Zukunft“**

14.-15. Juli 2016

Fakultät für Humanwissenschaften, Cultural Engineering,  
Otto-von-Guericke-Universität Magdeburg, Germany

- **Research Questions and Goals**
- **Sociology of ‘Specific Organisations’: The Governance Dimensions of Accountability, Competition and Autonomy**
- **Accreditation and Evaluation**
  - **Value: Four Pivotal Goals (Germany)**
  - **Legal Status in Germany**
  - **QA in HE is More Than Accreditation**
- **Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation**
- **Conclusions and Recommendations**

## Research Questions and Goals

- What role do **accreditation and evaluation** play in **governance and quality development** of HEIs?
- What are the **strengths, weaknesses and threats of accreditation**?
- Are **external** evaluations and certifications in HEIs **necessary, dispensable or harmful**, or are they all of this?
- To **clarify certain misunderstandings**, circulating mainly among accreditation critics, the **sociological characteristics, procedural elements and distributed responsibilities** of accreditation and evaluation in HE are characterised
- Typical **complaints** about accreditation and evaluation in HE are **catalogued** and its **pros and cons** are discussed



# Sociology of ‘Specific Organisations’: The Governance Dimensions of Accountability, Competition and Autonomy

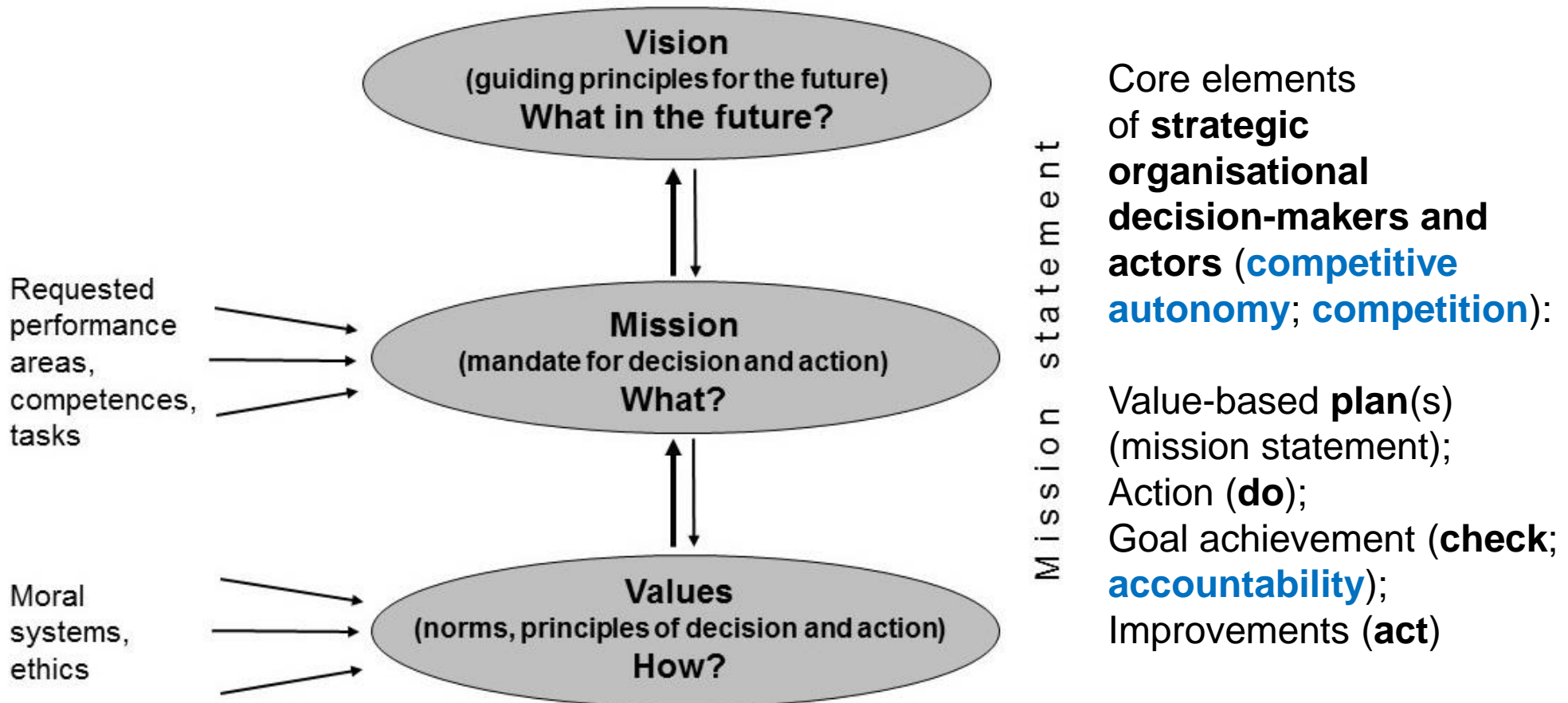
- **Characteristics of ‘specific organisations’** (also cf. Musselin 2007)
  - **Functional loose coupling** of both **learning and teaching** activities and **research** activities
    - Low level of coordination and cooperation in learning and teaching and research activities (in particular intra-university) – subject-specific, department-specific, individual ‘autonomies’
  - But seems **necessary to make coupling ‘less loose’** (or stronger) because of **arguable (though case-dependent) requirements for L&T as joint task; inter- and transdisciplinary study programs and curricula; ECTS-based mobility; research-related L&T; etc.** → some **governance-based coordination and cooperation required**
  - Both **learning and teaching** and **research** are **unclear technologies**
    - **L&T and research** are **complex processes which are difficult to grasp**, partly because of **intrinsic** reasons (it is complex), partly because of **construction** (academics maintain opacity and academic work is still not sufficiently studied)
    - In particular, **causal relationships** between tasks and results are **ambiguous (distributed multiple causation, and partially opaque learning processes)**
  - Seems **possible and desirable to avoid constructed part of unclear technologies** (e.g., by intensified **didactic and pedagogical research** based on evidences of L&T processes), while intrinsic rest will remain

# Sociology of ‘Specific Organisations’: The Governance Dimensions of Accountability, Competition and Autonomy

- **Governance** model of HEIs as ‘specific organisations’ comprises the dimensions of **accountability, competition and autonomy**
  - HEIs can become/are **strategic decision-makers & organisational actors** incl. **quality development** on the basis of an **organisational identity** (QA serves responsible self-governance)
  - An **organisational identity** (an institution’s self-understanding) is developed by **implementing** interwoven features/ abilities of **accountability (responsibility), competition** and **autonomy** (by definition); it is characterised by reasons why the institution exists and what its (general) goals are (**mission**); how it strives for its goals and what its values are as a basis of decision-making and action-taking (**values**); and, finally, where the institution hopes these purposes will lead and what it wants to be or become in the future (**vision**) (Leiber 2016a; Kosmützky & Krücken 2015)
  - **Organisational identity** seems to be indispensable for definition and systematic **development of organisational quality**
  - **Accreditation** and **evaluation** are **key elements** in assuring and **developing quality** in **cooperative, collective, networked societal enterprises** such as HEIs which are responsible, competitive and self-reliant players in complex societies (here: competition for academics, students, research projects and funds etc. in an era of international and global competition of research, welfare, economies, mass-higher education .



# Sociology of 'Specific Organisations': The Governance Dimensions of Accountability, Competition and Autonomy



(cf. Leiber 2016a)

# Accreditation – Value: Four Pivotal Goals (Germany)

Education – Relations between man and the world, to other people, to himself  
**Quality – academic values – public interest**

## Life education and vocational training

- **Personality development** (self-competence; social competence)  
(cf. Leiber 2016b)
- **Scientific or artistic qualification** (expert c.; methodological c.)
- **Qualification to take up a qualified employment** (professional c.; expert c.)
- **Qualification for societal engagement** (social c.; self-c.)

(cf. Akkreditierungsrat 2013; also cf. Dörpinghaus et al 2013; Meyer 2011)

# Accreditation – Legal Status in Germany

## Aspects to be revised

- **Legal anchoring** of the accreditation process (criteria and procedures) and its actors (Accreditation Council, Accreditation Agencies):
  - Structure, composition and distribution of responsibilities of actors and bodies in the accreditation system, e.g.
    - Science adequate composition of the Accreditation Council
    - Role of science
    - Requirements for expert groups/ peers
    - Institutionalisation/ organisation and configuration of legally compliant decisions
    - Legal protection
  - Determination of accreditation objectives
  - (Re-)Accreditation of agencies
  - Procedural organization of program (re-)accreditation (external and internal)
  - Complaints procedures
  - Follow-up



# Accreditation – Legal Status in Germany

## Possible development(s)

- (Federal) **State Treaty on Constitution-compliant ‘legalization’ of accreditation**
- **More detailed ‘legalization’ of accreditation in (15?) Federal State Laws for HE**
- Probably **no substantial change in accreditation practice**, however, **revision of standards**, stronger orientation towards quality development and counseling (audits; evaluations), decrease in formalities, ...

# Accreditation – QA in HE is More Than Accreditation

- Contribute to strengthening of self-governance and quality culture in HEIs
- Support HEIs' engagement in high quality of teaching, learning and research etc.

|   | Accreditation/<br>Certification   | Evaluation /<br>Audit   | Organisation<br>development  | Services for the<br>improvement of<br>science  | Knowledge transfer, further<br>education, competence<br>development, HE research   |
|---|---|---|--|--|--|
| National<br><br>and<br><br>inter-<br>national | Program accreditation<br>System accreditation<br>Certification of further education<br>International program accreditation<br>International institutional accreditation<br>International certification of further education | Evaluation <ul style="list-style-type: none"> <li>• Subjects</li> <li>• Programs</li> <li>• Projects</li> <li>• Institutions</li> <li>• Strategies</li> </ul> Audit of quality management | Implementation and further development of QA and quality management in <ul style="list-style-type: none"> <li>• Teaching and learning</li> <li>• Research</li> <li>• Libraries and other service units</li> </ul> Strategy building<br>Personelle development and management<br>Controlling/reporting<br>Preparation for and accompanying through system accreditation | Coordination of assessment and award procedures of public third-party funding and enterprise foundations | Seminars/workshops for HEI members<br>Seminars/workshops für peers<br>Presentations<br>Publications<br>Applied HE research<br>(e.g., impact research on a European level: IMPALA – EACEA LLP Project 'Impact Analysis of External Quality Assurance in Higher Education Institutions') |

# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

Empirical evaluation of German accreditation system (Suchanek et al 2012a; 2012b; Pietzonka 2014; 2015)

- Accreditation work of several German agencies in Niedersachsen
- Accreditation reports of 1,380 accredited programs and its conditional accreditations and recommendations
- 3,947 complaints, **376 (9.5%) not attributable to accreditation criteria/standards (90.5% attributable to criteria)**
- Online survey: 509 surveyees, 189 (37%) respondents (e.g., assessments of German accreditation system; appropriateness of accreditation standards; problems with realisation of criteria; suggestions for improvement)
- 74% of programs accredited with conditions, between one and 13 (mean: two conditions)

# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

## Basic types of **weaknesses** and **threats** of accreditation and evaluation

- **‘Poor procedural elements’**: standards, rules, criteria are in need of improvement
- **‘Poor execution’**: the practices of the accreditation council, the accreditation agencies and the participating peers are in need of improvement
- **‘Poor understanding and non-empirical objections’**: the understanding and fairness of arguments of stakeholders are in need of improvement
- **‘Bad idea at all’**: accreditation and evaluation as such should be abolished altogether

# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

‘**Poor procedural elements**’: standards, rules, criteria are in need of improvement

- **Complex accreditation specifications**
  - Accreditation criteria refer to further specification papers which refer to further documents (**curable**)
  - Redundancies in these sources (**curable**)
  - Länder-specific specifications must be observed which bring in their own priorities and specifications
- Lack of communication
  - HEIs criticize deficient communication by agencies – however, partially rather a consequence of prohibition of counseling during accreditation (**curable**)
- Lack of counseling
  - HEIs criticize lack of counseling (which is systematically excluded from accreditation procedure) – partially in contradiction to call for independence

# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

## ‘Poor procedural elements’:

- **(Danger of) Lacking ‘Act’/ follow-up**
  - Discrepancies between self-assessment report and factual program are not (easily) discovered
  - Implementation of conditions is not always sufficiently checked (checkable?)
  - ‘Not at all easy’ to look sufficiently deep into quality processes, in particular in teaching and learning (e.g., L&T processes complicated, opaque, foreclosed by academic freedom; (too) high effort required in time and know-how)

# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

‘**Poor execution**’: the practices of the accreditation council, the accreditation agencies and the participating peers are in need of improvement

- In the course of time, agencies complain **increasingly more violated accreditation criteria** (2004: 60% of programs accredited with conditions; 2009: 90% accredited with conditions) – **quite expectable**
- **Inconsistencies of accreditation decisions** in and between agencies because of **deficient interpretation of accreditation specifications**
  - Varying requirements about distribution of ECTS credits among semesters (**curable**)
  - Varying requirements about fixing or non-fixing of examination formats (depending on number of course participants) (**curable**)
  - Various upper limits for credits of a module (ranging from below 12 to 24) (**curable**)
  - Various extensions of modules over semesters (from one to four and more) (**curable**)
  - Complete ignorance of modularisation (**curable**)

# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

## ‘Poor execution’:

- Sometimes agencies seem to bring in own **specifications which are illegitimate** (e.g., referring to research) (curable)
- Trends of **formalisation and bureaucratisation**
  - Agencies only exceptionally complain about too few options for choices in curricula, but often criticize ‘too many’ possible choices (‘too much workload’)
  - Students see too much workload AND too few options for curricula choices
  - **Sometimes unimportant and bureaucratic conditions** imposed: conditions with no connection to quality (e.g., ‘module descriptions should be available not only in WORD but also in PDF’) (curable)
- **Imprecise differentiation of accreditation conditions and recommendations**
  - E.g., recommendations referring to personelle decisions and denominations are possible, while formulated as accreditation conditions they may be in contradiction to the freedom of teaching and research according to the German Constitution (curable)



# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

## ‘Poor execution’:

- **Observed ineffectivenesses of agencies**

- Wrong interpretation and application of accreditation specifications (curable)
- Deficient question guide for accreditation (curable)
- Poor organisation of accreditation procedure (curable)
- Lacking standardisation of accreditation procedure (but partly in contradiction to requested flexibility!)
- Formal, linguistic and orthographic deficiencies and unintelligible conditions (curable)

- **Observed ineffectiveness of peers**

- Competence and expertise differences with peers (e.g., knowledge and know-how of procedure and criteria; (ideological) attitude towards QA; individual role understanding; etc.) (curable)

# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

## ‘Poor execution’:

- **(Systematic?) Quality reduction**
  - Sometimes programs seem to be accredited (by certain agencies?) although it seems that they do not fulfill core quality requirements (Pietzonka 2015, 95) **(curable)**

# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

‘**Poor understanding and non-empirical objections**’: the understanding and fairness of arguments of stakeholders are in need of improvement

- Seemingly high cost & poor effort-benefit ratio
  - Interview partners say: ‘immoderate excessive bureaucracy’ („maßlose Überbürokratisierung”), ‘endless’ time investment etc. – **non-empirical statements** (curable)
  - However: in **2013 direct accreditation expenses** (10 Mill €) **are 0.02 % of total HEI expenses** (46 Mrd €) (Akkreditierungsrat 2016) (curable)
  - Program accreditation is rather experienced as a **permission procedure** than a procedure of **quality development** – fault of whom or what is not always easy to say (also attributable to ‘poor execution’) (curable)

# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

**‘Bad idea’ at all:** accreditation and evaluation as such should be abolished altogether

- An example largely (if not completely) free of argument!

„Die deutsche Universität hat in den Jahrhunderten ihres Bestehens ein System der Qualitätssicherung entwickelt, dessen Strenge ihresgleichen sucht. **Der Weg zur Professur ist in Deutschland lang, schmal und steinig. Wer ihn hinter sich gebracht hat, ist nachweislich qualifiziert, nun seinerseits sinnvolle Studiengänge zu konzipieren.** Dieses System der Qualitätssicherung wurde aus der Wissenschaft **selbst** heraus **organisiert. Es hat sich bewährt.**

Im Jahr 1999 aber kam der Bologna-Prozess, und mit ihm kam die Verkündung, es dürfe keinen Studiengang mehr geben, der nicht zuvor die **Gnade einer privatwirtschaftlich organisierten Akkreditierungsagentur** gefunden habe. So wurde es uns eingeredet, und so wurde es von den Landesregierungen in allen Bundesländern **oktroiert**. Seither **drehen** sich die Universitäten **pausenlos** im **Akkreditierungsrad. Eine Evaluation jagt die nächste.** Nun endlich, am 17. März 2016, hat das Bundesverfassungsgericht diesem Kontrollwahn einen Riegel vorgeschoben. Die **deutsche Akkreditierungspraxis**, so zeigt sich, **ist in weiten Teilen verfassungswidrig.** Dem Gesetzgeber ist es damit aufgegeben, die gesamte Qualitätskontrolle der Lehre neu zu ordnen.

Leider steht nicht zu erwarten, dass die **Akkreditierungsagenturen ihre Pfründe** kampflos aufgeben werden, die **ihnen bisher mehr als eine Milliarde eingebracht** hat. Man wird uns ein weiteres Mal einzureden versuchen, es bedürfe einer außeruniversitären Aufsicht über alles, was in Deutschland studiert werden kann. Für die **Freiheit der Wissenschaft** ist es uns deshalb unerlässlich, jede derartige **Anmaßung** klar und deutlich zurückzuweisen und an dieser Stelle festzuhalten:

# Evidence-Related Key Results: University Governance and the Threats of Accreditation and Evaluation

## Das Unwesen der Akkreditierung...

1. ...verletzt die Freiheit von Forschung und Lehre und zerstört die Hochschulautonomie;
2. ...führt zu universitärer Planwirtschaft, einem Exzess an Bürokratie und zur Selbstherrlichkeit einer niemandem verantwortlichen Akkreditierungsoligarchie;
3. ...hindert Wissenschaftler daran, sich mit ungeteilter Aufmerksamkeit ihren eigentlichen Aufgaben in Lehre und Forschung zu widmen, und raubt den Studenten kostbare Zeit für ihr Studium;
4. ...hat die Landesparlamente in der Hochschulpolitik weitgehend entmachtet, die Kulturhoheit der Länder zerstört und den hochschulpolitischen Föderalismus außer Kraft gesetzt;
5. ...verschwendet Steuergelder in unvorstellbarem Ausmaß und, die besser in die Schaffung dringend benötigter Professuren investiert würden. entzieht den unterfinanzierten Hochschulen enorme Geldsummen.

Aus diesen Gründen rufen wir allen politischen Entscheidungsträgern zu: Haben Sie Mut, sich des Karlsruher Urteils zu bedienen! Schaffen Sie das Akkreditierungsmonster jetzt ab, wie Ihr Kollege Mathias Brodkorb öffentlich gefordert hat! **Das Qualitätssicherungssystem der deutschen Universitäten hat sich glänzend bewährt.** Tragen Sie dazu bei, dass es dies auch in Zukunft wieder in vollem Umfang kann!“

„Diese Petition wird versendet an: An die Wissenschaftsminister und die Landtage aller Bundesländer **Brodkorb/ Prof. Nida-Rümelin** startete diese Petition mit einer einzelnen Unterschrift und hat nun **2.097 Unterstützer/innen [0,06 %]**. Starten Sie heute eine Petition, um sich für Ihr Anliegen einzusetzen.“

ProfessorInnen/Lehrende, alle Hochschulen in Deutschland 2014: 45.631 (Quelle: *Freie Presse*, 28.08.2015)

Mitarbeitende, alle Hochschulen in Deutschland 2014: fast 530.000 (Quelle: *Freie Presse*, 28.08.2015)

Studierende, alle Hochschulen in Deutschland 2015/16: 2.755.408 (Quelle: *statista*, 30.06.2016)

Summe: **3.331.039**

## Conclusions and Recommendations

It was argued for the following hypotheses:

- Governance of HEIs is possible and appropriate, because it is the way to assure and develop **responsible, competitive and self-reliant organisational** (rationally restricted) **decision-makers and actors**.
- These abilities are indispensable because universities have to play their **social roles in knowledge societies** (e.g., education and training; research; Third Mission) and **‘sustainable’** (social; economic; ecological) **globalisation**.
- Effective governance – **autonomy; competition; responsibility/ accountability** – seems to **depend on systematic (external) QA** – including accreditation and evaluation – because it requires systematic quality development (in the sense of the Deming cycle).
- However, **accreditation** has its **weaknesses and threats**, among them the problems of rigor(ousness), possible conflicts of interest, lack of information to the public, discouragement of innovation, high expenditure and burden and encouragement of ‘compliance’ behaviour. These seem to be **curable in part**. Non-curable features of evaluations are basically those which are ‘system immanent’ and rooted in human sociology.
- Overall, it is argued that **simple black-or-white**, exclusive alternatives such as ‘accreditation or quality development’ and ‘Bologna or education’ and ‘evaluation or innovative science’ **ban themselves**. Nevertheless, they mark fields of tension which must be tackled carefully.

## Conclusions and Recommendations

- **External accreditation and evaluation alone can not** and should not **guarantee quality (higher) education** (requested: more than standards; internal quality culture)
- Under certain conditions, quality education may be achievable without accreditation
- **Some** members of some HEIs (in the range of few percent or less?) **strongly criticize** (German) accreditation system – but by far not a majority, some even praise external QA (though probably not always ‘in public’)
- From a global and international perspective, in view of mass HE worldwide and in international comparison (**responsible competition and autonomy**), **some external** and summative measures of **QA** (and formative measures of **quality development**) seem to be **indispensable** (widespread wisdom in organizational development)
- **Most of the weaknesses, deficiencies and threats of German accreditation seem to be immanent to any external QA**; therefore, improvements are usually possible but deficiencies are not completely avoidable

## Conclusions and Recommendations

- Recommendations
  - Agencies' work quality and QM should be improved
  - Resources of Accreditation Council should be improved – of course, depending on its new role which is not yet known
  - Binding templates for accreditation decisions could be implemented ('objectivity')
  - Further development of the accreditation system: gradual replacement of program accreditation by 'system accreditation' and quality auditing procedures – this will take place anyway, and has already started
  - In view of the complexity of the problem, one should never expect that there is or will be a certain QA procedure with no weaknesses and threats
  - In view of the complexity of the problem, one should be ready to accept the simultaneous existence of various diverse QA procedures for various needs of a variety of HEIs
  - Another option is more calmness to the decisions of a university for or against certain forms of QM



## Conclusions and Recommendations

- The subject is complex (diverse) and complicated (difficult)
- Therefore hardly (or not at all) overseable for any single individual
- We meet many overly reductionist positions which often seem to face each other 'unforgivingly'
- ...
- ...
- ...
- Howsoever, impossible to 'completely or consensually solve' the controversial character of accreditation and evaluation in HE

## References (choice)

- Akkreditierungsrat, 2013, Rules for the Accreditation of Study Programs and for System Accreditation [in German], DRS AR 20/2013 (Bonn, Akkreditierungsrat). Available at: [http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR\\_Regeln\\_Studiengaenge\\_aktuell.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Regeln_Studiengaenge_aktuell.pdf) (access: 27 June 2016).
- Akkreditierungsrat, 2016, German accreditation system low-cost [in German], press release (Bonn, Akkreditierungsrat). Available at: [http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Pressemitteilungen/AR\\_Pressemitteilung\\_2016-5.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Pressemitteilungen/AR_Pressemitteilung_2016-5.pdf) (access: 27 June 2016).
- Dörpinghaus, A., Poenitsch, A. & Wigger, L., 2013, *Introduction into the Theory of Education* [in German] (Darmstadt, Wissenschaftliche Buchgesellschaft).
- Kosmützky, A., & Krücken, G., 2015, Sameness and difference. Analysing institutional and organisational specificities of universities through mission statements, *International Studies of Management and Organisation*, 45(2), pp. 137–149.
- Leiber, T., 2016a, Mission statements and strategic positioning of higher education institutions. A case study of 29 German universities, in R. Pritchard, A. Pausits & J. Williams (eds.), *Positioning Higher Education Institutions. From Here to There*, pp. 99-124 (Dordrecht, Sense Publishers).
- Leiber, T., 2016b, Persönlichkeitsentwicklung als elementares Bildungsziel. Methodische Optionen der Umsetzung und Bewertung im Hochschulbereich. *die hochschullehre. Interdisziplinäre Zeitschrift für Studium und Lehre 2* (in press).
- Meyer, K., 2011, Education [in German] (Berlin, de Gruyter).
- Musselin, C., 2007, Are universities specific organisations?, in Krücken, G., Torca, M. & Kosmützky, A. (eds.) *Towards a Multiversity? Universities between Global Trends and National Traditions*, pp. 63-84 (Bielefeld: transcript).
- Pietzonka, M., 2014, *Design of Study Programs in the Context of Bologna. The Implementation of the Study Program Reform and the Effectiveness of Accreditation* [in German] (Wiesbaden, Springer VS).
- Pietzonka, M., 2015, Limitations and possibilities of study program accreditation as an instrument of quality management – evaluation of the German accreditation system [in German], in Vettori, O., Salmhofer, G., Mitterauer, L. & Ledermüller, K. (eds.) *A Question of Effectiveness? Quality Management as a Driving Force for Change at Universities* [in German], pp. 83-102 (Bielefeld, Universitätsverlag Webler).
- Suchanek, J., Pietzonka, M. Künzel, R. & Fütterer, T., 2012a, *Bologna (aus)gewertet. Eine empirische Analyse der Studienstrukturreform*. (Göttingen, Vandenhoeck und Ruprecht).
- Suchanek, J., Pietzonka, M. Künzel, R. & Fütterer, T., 2012b, The effect of accreditation on the (Bolognoa) reform of study programs in Germany [in German], in W. Benz, J. Kohler & K. Landfried (eds.), *Handbuch Qualität in Studium und Lehre*, pp.1-30 (Berlin).