

**External Review 2007 of the
Austrian Accreditation Council**

**Comment to the Recommendations
of the Review Report**

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1 Background

In 2007, the Austrian Accreditation Council (ÖAR) subjected itself to an external review for the first time in its history. In this evaluation, national requirements as well as the *European Standards and Guidelines for External Quality Assurance Agencies/ENQA Membership Criteria* and the *ECA-Code of Good Practice* were used as reference.

ÖAR would like to thank the panel of experts for drafting their review report. In compiling their evaluation, the panel did not only rely on their own findings, but also on interviews with stakeholders and on documentation material provided to them. ÖAR believes this methodological approach to be sound and fair. ÖAR highly appreciates the fact that the panel extensively familiarised themselves with the particularities of the Austrian legal system.

2 Comment to the Recommendations

ÖAR comments to the recommendations listed in the report as follows:

ad 1. The definition of “university“; the status of accredited “Private University“

“The panel disagrees with the alleged obsolescence, as it was put forward by a discussant from a Private University, of the integration of research and teaching, and is in favour of a high standard in this respect, as long as one uses the term “Universität”, which in the Austrian context means that there should be an interwovenness between research and teaching. A third point in case is the academic freedom, which is not guaranteed to be respected without explicit standards for the way Private Universities are governed. The panel feels that Austria might take a risk in not defining “university” in a more precise way in the law, or in the regulations used by the ÖAR itself. An alternative option would be to introduce a distinction between universities and other institutions of higher education. The review panel recommends that the ÖAR be given a (legal) position enabling it to define what does and what does not constitute a university, to integrate this definition in its standards and guidelines, and to act accordingly. Also, the panel recommends for the ÖAR to uncompromisingly adhere to the mandatory use of “Privatuniversität” as component parts of an accredited institution’s German name.”

ÖAR agrees with the panel's assessment on this point and feels confirmed in the approach it has adopted so far, as well as in its demands. ÖAR has already taken a stand to this effect in its position paper (cf. *Proposals for the Amendment of the Austrian University Accreditation Act, October 2006, item 1*)¹ on questions such as the critical mass, integration of research and teaching, and the definition of the term “*university*“.

Expanding the definition contained in the University Accreditation Act², ÖAR, within its sphere of competence, has given consideration to these elements in the definition of its basic criteria.

ÖAR equally considers the guarantee of academic freedom as a central quality in the definition of a university and verifies this quality in the accreditation process.

ÖAR will continue to demand private universities to adhere to the use of “*Privatuniversität*” as component part of their German name (cf. Guideline: *Naming of Private Universities*)³.

The following measures will be taken:

- The guarantee of academic freedom in the university structure will be explicitly integrated in ÖAR's basic criteria.
- ÖAR supports the recommendation to the legislator to define the term “*university*” more precisely and, following the example of other countries, to introduce other categories of private higher education institutions.

ad 2. The role of students

“Recommendations:

Have students participate in teams of external experts at least in cases of reaccreditation. Make it mandatory – through inclusion in the ÖAR's standards and guidelines - for Private Universities to arrange for students to participate in their internal quality assurance.”

ÖAR recognises a need for improvement as identified by the panel on these points and will therefore take up these two recommendations.

The following measures will be taken:

- ÖAR will, in the future, have students participate in teams of external experts, at least in cases of re-accreditation.
- ÖAR will adopt a guideline which provides for the mandatory participation of students in the internal quality assurance structures of universities.

¹ *Vorschläge zur Novellierung des UniAkkG, Oktober 2006, Pkt.1*

² *Bundesgesetz über die Akkreditierung von Bildungseinrichtungen als Privatuniversitäten (Universitäts-Akkreditierungsgesetz - UniAkkG), BGBl I Nr. 168/1999, in der Fassung BGBl I Nr. 54/2000.*

³ *Richtlinie: Bezeichnung von Privatuniversitäten*

ad 3. Composition of the Council: representatives of private universities
“Private universities, in their feedback on the external experts who visited and assessed them, are sometimes negative on the fact that most are from traditional universities...

However, the review panel realises that a recommendation to that effect would not be feasible, given the modest number of private universities in Europe to recruit experts from.”

“Recommendation: have one or more representatives of non-Austrian private research universities join the Council. ... As for the Federal Minister appointing the ÖAR’s president and vice-president (4.4), the panel recommends the nomination of candidates by the Council.”⁴

As to the composition of the expert teams, ÖAR nominated representatives of non-Austrian private universities for the accreditation process on several occasions. Given the small number of institutions with a proven quality record, this has been possible to a limited extent only.

The nomination of ÖAR members is not a matter for ÖAR to decide, but lies within the sphere of competence of the Austrian Federal Ministry of Science and Research (BMWF) and the Austrian Rector’s Conference (ÖRK).

The following measures will be taken:

- ÖAR will continue its efforts to have representatives of non-Austrian private universities join expert teams as members.
- ÖAR supports the panel’s recommendation to the Austrian Federal Ministry of Science and Research (BMWF) and the Austrian Rector’s Conference (ÖRK), to consider representatives of non-Austrian private universities with a strong research focus for future nomination as members of the ÖAR Council.
- ÖAR supports the panel’s recommendation to the Austrian Federal Ministry of Science and Research (BMWF) to grant the members of the Council a right of nomination in the appointment of ÖAR’s president and vice-president.

ad 4. Submission of improved applications; addition and modifications of documents during the accreditation procedure

“Recommendations:

Discourage (too) frequent reapplications by charging a considerable fee for each application. Make an end to the practice of addition and modification of application documents during the accreditation process.”

ÖAR shares the panel’s view as regards frequent re-applications and the possibility of submitting additions and modifications of application documents. The recommendation issued by the panel largely echoes the proposals which ÖAR has repeatedly submitted for the amendment of the University Accreditation Act.

⁴ cf. Review Report p 22

ÖAR recognizes the risk identified by the panel that repeated applications may lead to accreditation requirements being formally met *prima facie*, without any substantive improvements in the quality of the application, adding however that such a situation has never occurred in practice. To date, there has been no case where accreditation was granted after several, successively unsuccessful application rounds.

The following measures will be taken:

- ÖAR supports the recommendation to the legislator to charge adequate accreditation fees.
- ÖAR supports the recommendation to the legislator to limit the possibility of amending applications or of re-application.

ad 5. Appeals procedure

“Therefore, the panel recommends to introduce an internal appeals procedure for at least decisions on applications for reaccreditation.”

The official procedure does not provide for an internal appeals procedure, neither does it preclude such a procedure. However, the introduction of a second-instance appellate procedure in which Council decisions may be contested, is incompatible with Austrian law.

The following measures will be taken:

- ÖAR will set up an internal arbitration and complaints board which applicants may turn to in the course of the procedure.

ad 6. Preparation of external experts

“Recommendation: intensify the way of preparing external experts for their role. “

ÖAR takes note of the panel’s assessment that the preparation of expert team members has not always been adequate as regards their roles and duties. In the future, ÖAR will inform the members of expert teams even more systematically and more accurately on their roles and duties.

The following measures will be taken:

- The information material and documents for experts that are currently used will be reviewed and complemented as necessary.
- When preparing site visits, individual information requirements of experts will be better taken into account through direct contact (introduction of an additional feedback loop).

ad 7. Publishing grounds for decisions

“Recommendation: publish the grounds for both positive and negative accreditation decisions.”

ÖAR agrees with the panel’s assessment and feels confirmed by this recommendation in the demands it has already voiced (cf. *Proposals on the amendment of the University Accreditation Act, October 2006, item 8*)⁵.

The following measures will be taken:

- ÖAR supports the recommendation to the legislator to lay down in law the requirement to publish opinions and grounds for all accreditation decisions.

ad 8. Role of the Council member in accreditation process

“The review panel ... recommends the authoring by the Council member of an individual assessment report to be communicated – open for comment - to the applicant institution.”

During the accreditation process, the applicant institution has a right to comment on all established facts which may affect the decision of the ÖAR. The member (rapporteur) who accompanies the process prepares a written assessment report which summarizes all identified facts of which the applicant institution is already aware and/or contains a draft evaluation of these facts in terms of the accreditation requirements. This assessment report is used by the Council as an internal decision-making tool following discussion in the Council plenary and should provide a sound rationale for the decision grounds. This assessment report does not serve to present new facts. Here is where the role of the rapporteur differs fundamentally from that of an expert.

On these grounds, and bearing in mind that this would further prolong the process, ÖAR does not consider it useful to follow up on the panel’s recommendation on this point.

ad 9. Resources

***“Recommendations:
arrange for additional resources to become available in good time;
provide to the ÖAR an own budget, and their own personnel.”***

ÖAR agrees with the panel’s assessment on this point and feels confirmed by this recommendation in its own, repeatedly voiced demands.

The following measures will be taken:

- ÖAR supports the recommendation to the Austrian Federal Ministry of Science and Research to urgently step up personnel at the ÖAR office.

⁵ *Vorschläge zur Novellierung des UniAkkG, Oktober 2006, Pkt. 8*

- ÖAR supports the recommendation to the Austrian Federal Ministry of Science and Research to grant ÖAR greater autonomy concerning its own personnel and budget.

ad 10. External review: 5 year cycle

“The panel recommends to not only consider this mandatory, but lay down a five year external review cycle in an appropriate document, to be published on the ÖAR web site.”

Bearing the European framework in mind, ÖAR has subjected itself to an external review even though there is no current legal requirement of mandatory external reviews.

The following measure will be taken:

- ÖAR will lay down in a document and publish its commitment to undergo regular external reviews.

3 Conclusions

In its report, the panel has concluded that ÖAR is adequately meeting its statutory tasks. The following positive elements were highlighted:

- Professionalism, independence, competence and non-amenability to intervention;
- Professional organisation of work flows and procedures;
- International activities and positioning.

In its report, the panel has also found that ÖAR is complying with the requirements of the *European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* as well as those of the *ECA Code of Good Practice*.

ÖAR sees this evaluation as a confirmation of its approach to date and of its understanding of how it delivers its tasks.

At this point, ÖAR would like to thank the Austrian Federal Ministry of Science and Research for selecting the highly-qualified panel and for arranging the evaluation. ÖAR equally wishes to thank the stakeholders, who contributed to the review during self-evaluation and during the site visit.

ÖAR is planning to publish a report on the implementation of planned measures in September 2008.