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## I. Reform of Quality Assurance System

In its response on the BMWF's Consultative Paper the ÖAR welcomes the goal of establishing one overarching quality assurance institution to integrate the traditional structures of the Higher Education sector into one overall system. From ÖAR's viewpoint, the concept presented in the Consultative Paper however does not provide a sufficient basis for a successful reform. There are a number of **essential key points** which have to be put into practice within a new system:

- the new quality assurance institution should have the status of a **state authority**; its **independence** should be guaranteed by law
- since **consultancy** is **incommensurate with decision making** consultancy should not be part of the new institution's activities
- higher education institutions should have the **freedom** to chose other agencies (e.g. foreign agencies) for conducting external evaluations
- irrespective of who conducts the procedures, the new Austrian institution should be the **decision-making authority** by all means. This guarantees that the state's responsibility - which is a constitutional duty - for the quality of the national education system is assumed. Furthermore it guarantees that **legal certainty** is in force with regard to results and effects of the decision and with regard to possibilities of appeal procedures and that the **decisions are consistent and comparable**.

With regard to the **organisation of the private sector** the Austrian system, which is considered throughout Europe as commendable, should not be abandoned completely but the manifold experiences should be incorporated:

- the combination of institutional and programme accreditation has proved to be successful, but one might think of **more streamlined procedures** (e.g. voluntary audits) for private universities which have already reached a high degree of institutional development.
- a **differentiation** between private higher education providers (private institute and private university *new type*) should ensure that the denomi-

nation 'university' is actually reserved for institutions with a corresponding profile only. But at the same time it should ensure that smaller institutions with high-quality study programmes (especially in the area of further education) can achieve state recognition through quality assurance procedures.

The (German only) comment of the ÖAR can be viewed online:

[http://www.akkreditierungsrat.at/files/downloads\\_2009/Stellungnahme%20Konsultation%20OEAR.pdf](http://www.akkreditierungsrat.at/files/downloads_2009/Stellungnahme%20Konsultation%20OEAR.pdf)

## II. INQAAHE: ÖAR in Good Practice Database

The review teams of the ÖAR are almost exclusively composed of international experts. Furthermore, half of the members of the Accreditation Council itself are foreign experts as well. This practice has been considered to be *Good Practice* and thus has been included into the database of the *International Network for Quality Assurance Agencies in Higher Education* (INQAAHE).

All INQAAHE members can view the database online:

<http://www.inqahe.org/main/member-services-41/gpqa-database-55>

## III. Latest Decisions

The decisions of the Accreditation Council from 30 October and 4 December 2009 are published on our website:

[http://www.akkreditierungsrat.at/cont/en/decisions\\_301009.aspx](http://www.akkreditierungsrat.at/cont/en/decisions_301009.aspx)

and

[http://www.akkreditierungsrat.at/cont/en/decisions\\_4122009.aspx](http://www.akkreditierungsrat.at/cont/en/decisions_4122009.aspx)



MERRY CHRISTMAS!

