

## **Chancen und Grenzen eines Qualifikationsrahmens**

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Workshop:

**Die Rolle des Qualifikationsrahmens für die Qualitätssicherung/  
The Significance of the (National) Qualifications Framework for Quality  
Assurance**

**Output-Orientierung in der Akkreditierung von Studiengängen/  
Outcomes Orientation and Accreditation of Study Programmes**

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## **I. Scope of Topic: Specific and General Aspects**

When bearing the conference context in mind, and more so when adhering to the headlines and the specific questions outlined by the organizers of this conference, this presentation is supposed to be both focussed and general.

It is expected to be specific in that it should cover the significance of the outcome oriented approach of the national qualifications framework for accrediting study programmes in Germany. And to that end, particular questions were asked, such as: how can the switch from input to outcome orientation in evaluation and accreditation processes be operationalized; and what is the significance of the national qualifications framework to that end?

At the same time the presentation is expected to be overarching in that it puts the aforementioned aspects into the wider context of the overall significance of outcomes orientation for quality assurance, which is not identical with evaluation and accreditation since the term also covers the element of developing study programmes ab initio and enhancing their quality permanently at institutional level irrespective of accreditation or – external – evaluation. Above all, finally, there should be a comment on the overarching headline “opportunities and limits of a qualifications framework”. All in all, that is an ambitious undertaking!

Let me start by addressing the specific items mentioned since these automatically lead to matters of basics and principles anyway.

## **II. Significance of Outcome Oriented National Qualifications Framework for Accreditation, and its Operationalization**

What, then, is the significance of an outcome oriented approach of national qualifications frameworks for accrediting study programmes? And if there is a specific significance, how can outcome orientation be operationalized in accreditation processes?

Asking a law professor these questions provokes a simple answer in the first place. A national qualification framework, once established and quite irrespective of its specific orientation, will be a normative standard. The basic consequence of this fact is that a national qualifications framework demands observance, if not obedience. In short, as far as accreditation procedures and decisions are concerned, applying the rules and criteria of the national qualifications framework as indispensable prerequisites for accreditation is the essential significance of the national qualifications framework. And as for operationalizing this fact in concrete accreditation cases, the simple answer is: by comparing the template, i.e. the national qualifications framework and its stated characteristics, with the study programme in question in order to make a statement on compliance, i.e. by indicating whether the latter matches the defining elements of the national qualifications framework. Compliance, then, will lead to accreditation, provided all other accreditation provisos that exist are met as well.

Is it that simple? Basically yes, unless the national qualifications framework is not prescriptive. Can the national qualifications framework be non-prescriptive? Why not, may be asked, in particular since the European qualifications framework, which is the meta level reference of the nation qualifications frameworks, purports not to be prescriptive in a legal sense. However, there is a major difference between the European and the nation qualifications frameworks both legally and politically, which bars the assumption that those reasons preventing the European qualifications framework from being prescriptive also apply

to national qualifications frameworks. Legally, the European qualifications framework is not backed by a European authority in which law making powers are vested, it is a product of the Bologna process which in essence is a formalized inter-state understanding of elements and processes contributing to the creation of a European higher education area. And politically speaking, it may be assumed that the nation state actors in Europe are not prepared to cede their respective national authority to any such pan-European level. At least this is the status quo, although the question on the table is how and when the European Union moves in on the issue, e.g. through the Copenhagen process, the creation of an overarching European qualifications framework and activities related to developing specific subject related benchmark statements.

However, there still is a positive case to be made why in fact national qualifications frameworks should or indeed must be prescriptive. The essential reason is the purpose they serve. A national qualifications framework is part of a strategy – indeed one of the core Bologna process objectives – to provide easily readable transparency tools for the sake of international mobility and employability based on – formal or de facto informal – recognition of national learning experiences and degrees. To that end, any description of a specific learning experience or degree in a given individual case must be gauged reliably against a meta-level set of descriptors which places the given case into the context of its educational or societal environment. In brief: understanding the individual case is relational to understanding the system it has emerged from. To that end, both the system characteristics have to be identified – that is, the characteristics of the national system, i.e. a national qualifications framework, should be described and made public – and, equally as important, these characteristics must be applied steadily, coherently, reliably – that is, in a prescriptive manner – from case to case. And eventually, the fact that this has been accomplished in the given case needs to be certified; and this is the significance, purpose, and result of accreditation.

If so, accreditation has to take into account whether or not a given study programme is in compliance with the national qualifications framework. If it fails to do so, the programme cannot be accredited, or at least not without explicit statement that it is not positioned within the national qualifications framework. Denying (full) accreditation, however, does not mean that the programme cannot be offered at all since freedom of teaching and learning guaranteed by the constitution and, possibly if a liberal view is adopted, also institutional autonomy encompass the right to offer non-accredited programmes. Whether public funding will be provided for such non-accredited programmes, whether institutions should be obliged to lay open the non-accredited nature of the programme explicitly, and whether uninformed students can hold providers of such programmes liable are different matters again.

### **III. Golden Rules for Drafting a (Normative) National Qualifications Framework**

With the yardstick for accreditation being whether or not there is compliance of study programmes with the descriptor elements of a normative national qualifications framework, proper drafting and designing of the national qualifications framework becomes crucial. Accreditation cannot, from case to case, rectify mistakes of the national qualifications framework to which it is subjected. Bearing this in mind, the key issue rests with the layout of the national qualifications framework, and here there are two main challenges.

Firstly, the national qualifications framework must fully cover all choices of programme design that the national system is prepared to accept, without being over-preclusive, i.e. unduly restrictive, and without being over-inclusive, i.e. carelessly indifferent. Secondly, while being specific enough in order not to be rendered meaningless it must give scope to

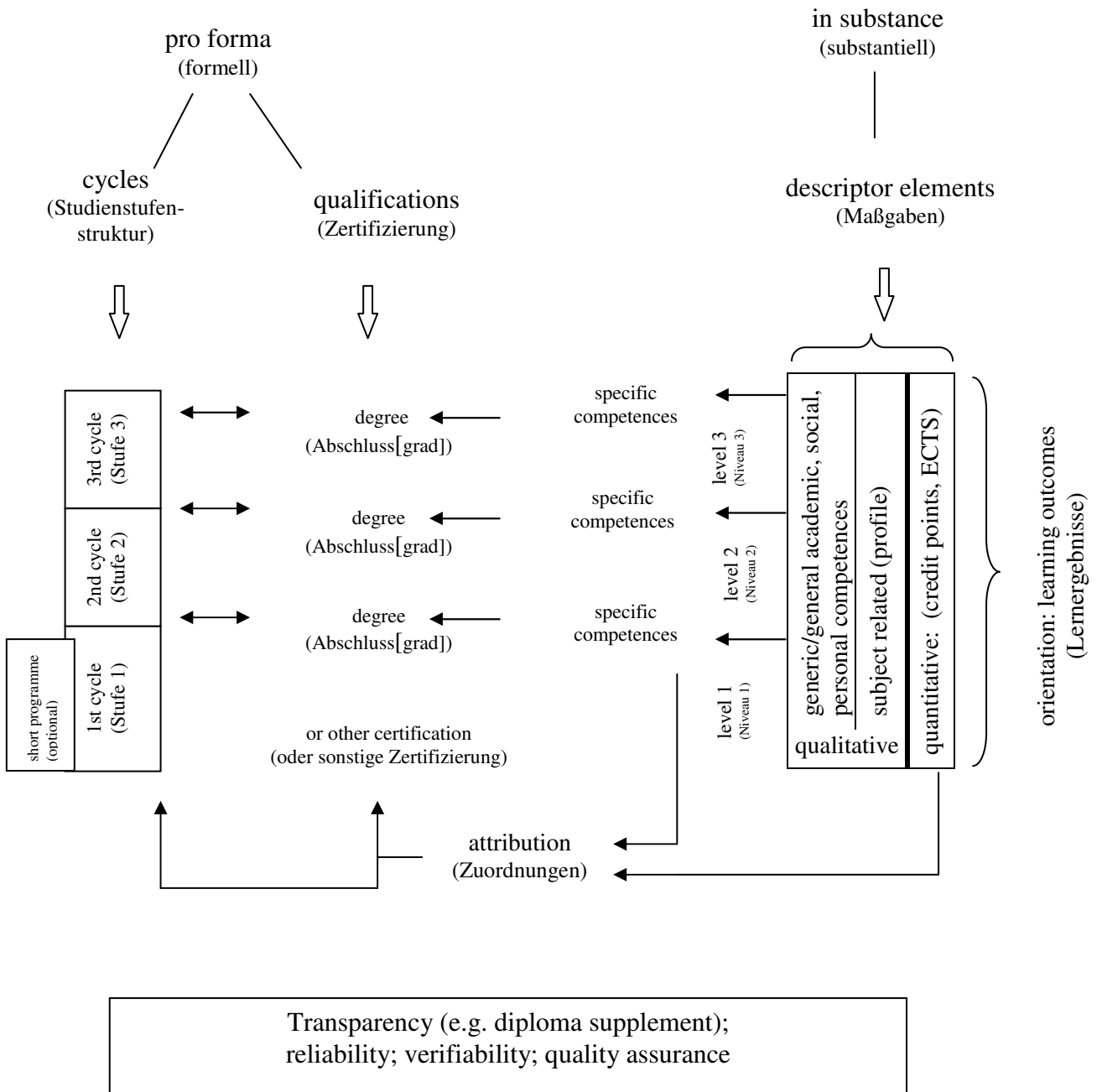
differentiation and profile by providing the right balance of open terminology (Beurteilungsspielraum) and discretion (Ermessen). Both these aspects need to be scrutinized in more detail. This effort will take the debate to a closer look at the overarching question of outcome orientation as the focal point of the European and national qualifications frameworks, and what it really means for accrediting study programmes in a “hands-on” operational sense.

#### **IV. Focal Point No. 1: Layout of Programmes in General – Challenges to Designing the National Qualifications Framework or to Accreditation?**

As for the first point – i.e., programme design at large – as part of a policy issue to be addressed by the design of the national qualifications framework, it must be borne in mind that, in essence, the European qualifications framework, though it is understood not to be prescriptive, is de facto binding as far as designing the national qualifications framework is concerned. This is the case due to procedural reasons because self-certification of the national qualifications framework must credibly address the question as to what extent it respects the European qualifications framework. And moreover, this is so in substance because non-compliance will largely render the national qualifications framework useless as a device for calibrating national learning experiences and qualifications in international contexts. This would entirely miss the point of the key Bologna objectives behind the whole undertaking. So, and this observation takes us back to one of the general elements of this conference on “opportunities and limits”, the European qualifications framework clearly limits the scope of any national qualification framework.

So there needs to be a closer look at the European qualifications framework as the debate stands today between the Copenhagen conference in January and the Bergen conference in May. It looks to be as follows, put into a nutshell overview:

# The European Qualifications Framework: System Survey



With this survey in mind, it seems obvious that the present German study programme system and its degree system have a few questions to answer. Some of them are: how to locate traditional “Magister” or “Diplom” programmes, or Staatsexamen programmes, if these were to be continued as such and more or less as we know them. It seems feasible that they may be attributed to second cycle level by using the learning outcomes approach. However, with the European level descriptors of learning outcomes being in place there may be some thorough questioning as to why there is no prior identifiable and meaningful qualification and degree available which is established at the level of first cycle in the understanding of the European qualifications framework.

To give an utterly provocative example, while abstaining from formulating more than mere questions: why are there four-year, i.e. 240 ECTS, study programmes for physicians in England and probably soon in Ireland, while this option is practically not even considered in Germany although the system can barely fund well over thirty fully-fledged medical programmes of over six years` duration and although there may be a call for more general practitioners serving as “system scouts” in the healthcare system? Does it really matter that these programmes are considered to be postgraduate ones in the English or Irish systems when they are analysed from the viewpoint of levels of learning outcomes rather than from the formalistic question whether students are required to have completed a different, not necessarily substantially related degree beforehand?

To add another provocative case, again without answering the questions raised: why is the law Staatsexamen programme subdivided into two columns, one pertaining to general formation of legal competence and one concerned with electives of considerable size, without making full use of a two-cycle system in the formal understanding of the European qualifications framework although the present system would easily fit into such a frame? Looking at the learning outcome aspirations as required by both the European and the national qualifications framework may make reconsidering present choices a challenging task.

It is easy to see, for instance, that also the positioning of teacher training needs to be reconsidered in view of the design of the national qualifications framework. How can job-related professionalism be secured in conjunction with more flexible qualification paths? This indeed is the challenge to be faced.

So, here are opportunities for a fresh learning outcomes oriented approach to study programmes. But whether or not these are opportunities for accreditation processes depends entirely on the scope of the national qualifications framework. If the latter closes the door prematurely on the learning outcome oriented level options sketched in, for instance, these two cases mentioned here by being over- or under-prescriptive, by being too exclusive or too inclusive, and thus conserving long-standing programme designs as de jure or de facto exclusive profiles of the national qualifications framework, accreditation is bound to miss opportunities as to addressing the question why concrete study programmes to be accredited fail to consider more closely possible choices between different profiles determined by aspiring to different learning outcomes.

## **V. Focal Point No. 2: Room to Move for Accreditation re Learning Outcomes Orientation/Development of Competences**

The second challenge is the right balance between concrete and open definitions of learning outcomes. This challenge, in legal terminology, comes under the headlines “Beurteilungsspielraum” and “Ermessen”, open terminology and discretion, both of which

must be aptly applied when defining learning outcomes in the national qualifications framework, while there needs to be substantial concretion at the same time in order not to render nothing but empty words which provide no criteria at all.

### **1. The Issue of Generic Competences (“Dublin Descriptors”)**

This task is a hard one. The reason for the difficulty is that the European qualifications framework, which the national qualifications framework will have to observe in this context, is based on a learning outcomes concept which attributes learning outcomes characteristics as defined by the so-called “Dublin Descriptors” to specific levels of learning which are correlated to specific study cycles and qualifications acquired. Hence the pivotal point are the Dublin Descriptors. While there may be good reason to be critical in principle, from a practical point of view the Dublin Descriptors are in place and endorsed, and since in practice – as has rightly though perhaps regrettably been observed – it is authority and not wisdom that makes the law, they provide the yardstick *de lege lata*, so to say, for the time being.

But what do we do with them? In order to arrive at some indication there needs to be a closer look at them, which will here be limited to their basic principles and what is derived from these as far as the first and second cycle descriptors are concerned.

The Dublin Descriptors are based on a multi-tier facetting of competences to be developed as outcomes of a learning experience. These competences are related to the following elements:

- Knowledge and understanding;
- Applying knowledge and understanding;
- Making judgments;
- Communication skills;
- Learning skills.

This translates into the following competences characteristic to the qualifications acquired after completion of the first cycle:

- Demonstrating knowledge and understanding in a field of study that builds upon students` general education, and is typically at a level that, whilst supported by advanced textbooks, includes some aspects that will be informed by knowledge of the forefront of their field of study;
- Applying knowledge and understanding in a manner that indicates a professional approach to their work or vocation, and having competences typically demonstrated through devising and sustaining arguments and solving problems within their field of study;
- Having the ability to gather and interpret relevant data (usually within the related field of study) to informed judgments that include reflection on relevant social, scientific or ethical issues;
- Being able to communicate information, ideas, problems, and solutions to both specialist and non-specialist audiences;
- Having developed those learning skills that are necessary for them to continue to undertake further study with a high degree of autonomy.

As for the second cycle, the descriptor set reads as follows:

- Demonstrating knowledge and understanding that is founded upon and extends and/or enhances that typically associated with the first cycle, and that provides a basis or opportunity for originality in developing and/or applying ideas, often within a research context;

- Applying knowledge and understanding and problem solving abilities in new or unfamiliar environments within broader (or multidisciplinary) contexts related to their field of study;
- Having the ability to integrate knowledge and to handle complexity, and formulate judgments with incomplete or limited information, but that include reflecting on social and ethical responsibilities linked to the application of their knowledge and judgments;
- Being able to communicate conclusions, and the knowledge and rationale underpinning these, to specialist and non-specialist audiences clearly and unambiguously;
- Having the learning skills to allow them to continue to study in a manner that may be largely self-directed or autonomous.

All these aspects of competence are to be applied to the four overarching and most essential objectives of academic learning and research which are not part of the Dublin Descriptors as such but served explicitly as a backdrop of the debate on the European Qualifications Framework. These were formulated and have been promoted for years by the Council of Europe, and they will possibly be included in the Bergen proceedings to indicate more than mere visions but to describe the core of educational goals. These are:

- Developing and maintaining a broad, advanced knowledge base;
- Ensuring personal development;
- Preparing for the labour market, or in a more comprehensive sense, to be relevant for society;
- Preparation for life as active citizens in a democratic society.

However, how can these descriptors be handled, both in the national qualifications framework and in concrete accreditation cases? If they are accepted as right and complete, are they indeed anything but just trivial, thus calling for concretion to make them both “real” and operational?

As far as the national qualifications framework is concerned, at least at this stage of the debate there may be good reason to abstain from being much more concrete than the European qualifications framework. If at all, there may be a point in being more specific on these counts when considering concrete study “profiles”, as the European qualifications framework debate and indeed the Berlin Communiqué calls it, which in fact is the concrete subject-related element of a given study programme. This item will be referred to later.

Indeed addressing and verifying these elements could be left largely to the realm of accreditation, which requires the national qualification framework not to be too regulative on this count. This moves the question of operationalisation to accreditation procedures. Leaving subject-related specificity aside here, accreditation can meet this challenge in a hands-on situation by just asking the programme providers:

- Reflectiveness and completeness: Did you consider all the aforementioned spheres of competence development as learning outcomes of your programme?
- Concreteness: What is your substantial answer to these considerations in the context of the programme in question?
- Validation: Why do you arrive at these answers, and based on which evidence?
- Programmatic consequence: How do your programme elements and your learning environment contribute to achieving the desired learning outcomes?
- Implementation: Do you in fact do what you intend to do?

- Revision: How do you know that the desired effect is in fact achieved, and how do you keep readdressing the issue?

So, the ultimate answer here is that in concrete accreditation processes the qualifications framework does not provide concrete answers but is operational as a checklist questionnaire which poses concrete challenges to the programme to be accredited, with open answers, yet operational in as much as there is completeness and systematics of accreditation criteria in view of validating concrete, yet individual answers to concrete, predictable, and qualitatively valid questions.

## **2. The Issue of Subject Benchmarks (“Profile”, First Aspect)**

The second “blackbox” is the issue of “profile” in the terminology of the Berlin Communiqué. This issue is related both to subject-benchmark questions and to specific orientation vis-à-vis addressees, i.e. namely their academic and professional requirements. As for these items, the specific challenge and the particular risk lies in the fact that the European qualifications framework is not specific on these items, so there seems to be open playing field for all sorts of national regulation. However, beware of the European Union in this respect! The commission is presently not going idle when it comes to developing pan-European templates for a set of academic fields, making rich use of projects like the tuning project. Let us look at the subject benchmark issue first.

There is ample reason to warn against serious risks inherent to overstretching subject-related overload of the national qualification framework. To start with, inclusion of subject-related templates in the national qualifications framework will be “mission impossible” in view of thousands of individual programmes with specific focus, namely after the first cycle but more and more also in first cycle programmes. Moreover, due to normative effects of subject-related templates as part of the national qualifications framework they will be detrimental for continuous quality enhancement, i.e. for example and in particular for permanent updating study programmes by swift integration of new research results or methodology. There will be an overload of bureaucracy busying itself with updating and completing the task. It will be detrimental to the concept of the “entrepreneurial university” since it hinges on the freedom to develop individual profile. It will not encourage universities to accept responsibility for their programmes but rather encourage them to play “copycat”. Hence it does not contribute to developing quality culture. In other words: do we want to reintroduce the “Rahmenprüfungsordnungen” through the back door under the headline “profile”, just under a new label provided by the national qualifications framework?

If at all, there seems to be only one way out of the dilemma, if indeed subject benchmark statements are wanted. We should take the term “statement” really seriously. That is to say that any subject-related specification is definitely not normative, and that this status must be made clear in the national qualifications framework itself. I suppose that the British are luckier than we have been over centuries since here matters tend to solidify too soon into rules and regulations instead of leaving matters as “reference points” or “recommendations” in a true sense of openmindedness to deviations.

The answer could be that subject benchmark statements may be considered as elements of the national qualifications framework subject to an express statement of two elements. Firstly, that following any such subject-related statement may ease the burden of proof of subject-matter quality issues in the course of accreditation. However, secondly, that this is the case notwithstanding the right to offer variants and to have these accredited. And furthermore, not

withstanding the need for programme providers who simply implement the subject benchmark statement to state reasons why indeed they abstained from introducing a more individual programme in view of addressing the issue of institutionally profiled learning outcomes.

As for accreditation processes, this solution promises to be operationable. A subject benchmark statement, if available in the given case, may be referred to by the institution seeking accreditation in order to substantiate its claim to being a provider of a quality programme as far as the academic content of the programme is concerned. Yet it does not bar being questioned on the issue as to what extent the institution has actually developed “ownership” and “responsibility” vis-à-vis the subject-related issues by addressing the issue of institutional profiling, nor does it prevent accrediting individual programmes which deviate from the reference model.

The true and only yardstick in the end then, and this holds true for all accreditation decisions, is and remains the “fitness of purpose” plus, subsequently, the “fitness for purpose” approach, if properly understood and applied. That is to say: with the question of valid purposes, i.e. learning objectives, and the question of fitness of programme design and implementation for matching these purposes, i.e. objectives, being answered with respect to accomplishing valid – subject related and generic – learning outcomes by developing relevant competences. If this is the lesson to be learnt from the learning outcomes orientation of the European qualifications framework, we should ensure that our national qualifications framework has indeed learnt the lesson and adheres to it.

### **3. The Issue of “Academic” vs. “Professional” Programmes (“Profile”, Second Aspect)**

Finally, there needs to be a critical look at the notion of “profile” with a view of subdividing programmes into “academic” and “professional” within academic disciplinary or interdisciplinary subject areas. Binary systems feel the specific need to address this issue from an institutional point of view, and that puts an extra burden on this debate.

The national qualifications framework must be very clear on understanding and formulating what is meant here. Seeing “academic” as contrary to “professional” does in fact not make sense, neither in theory nor in practice, nor is this distinction operational in a strict either-or scheme. Indeed, due to dire mistakes concerning the right programmatic consequences the attempt, or misunderstanding, to simply dissociate “practice” from “theory” in the context of higher education studies gives rise to serious concern if it is this distinction which lies behind the frequently used distinction between “academic” and “professional” programmes. Any concept centred around these terms, if they are – as seems to be the case – understood as opposing concepts, is bound to be misleading, to say the least.

There are a number of reasons for this concern and for demanding precision here when considering the national qualifications framework. This is true even when abstaining from linguistic pondering on the understanding of “professional” in English, which is closely linked to “academic profession” such as medicine, law, accountancy and not to “vocation”, “trade”, or “practice” as such. For any concept that dissociates “theory” from “practice” under whatever headline, e.g. headlines like “academic” and “professional”, is basically flawed when seen as opposites. Firstly, putting the concept to the test indicates its failure immediately, for instance when analysing almost all university programmes at all levels. Secondly, even in “Bologna theory” such a concept is bound to fail because it would need to identify the difference between “professional – non-academic” and “academic, yet relevant to

the labour market”, with the latter characteristic, in “Bologna theory”, being a desired feature of all study programmes.

However, the essential reason why this concept is blurred lies in the essence of the features of employability which characterize academically trained personnel. They are expected to engage in leadership and innovation. Both require, as far as academic competences are concerned, the mental ability to break new ground. This can best be achieved by applying methodic approach in exploring novelty and system-based competence in localizing novelty inside or beyond a given set of experience and knowledge. Both these competences are the essence of academe. In this sense, Immanuel Kant stated the quintessential over two centuries ago when denying the difference between “theory” and “practice” in his treatise “Über den Gemeinspruch: Das mag in der Theorie richtig sein, taugt aber nicht für die Praxis”, stating that wherever “theory” is felt to be deficient in view of “practice” this is merely due to “too little theory”. When identifying “theory” with “academic” and “practice” with “professional”, Kant still holds true also in the “Bologna context”.

Taking up a positive interpretation of “academic” versus “professional”, those advocating this distinction probably try to characterize elements of a binary system, although in essence it is independent of the institutional structure of a given higher education system. Such a dual understanding of the link between academe and employability which makes sense can best be described as follows:

Academic programmes in the narrow sense, which are usually attributed to universities in the traditional understanding of the term, can be characterized as: programmes designed to educate people who are able to achieve scientific, cultural, entrepreneurial, social, and political innovation and who can take up a leading role in turning such innovation into reality. To this end, there is a need to develop “meta-competence” beyond subject-related knowledge and the ability to learn independently. Such “meta-competence” comprises namely creativity and methodology required to explore novelty, understanding systems in order to localize expertise, inter- and transdisciplinary capabilities both as to intellect and as to working techniques in order to integrate expertise and social demands, awareness of premises in order to identify the limited validity of any mode of understanding and as a requirement for the opportunity or the need to transcend existing systems. These intellectual characteristics must be accompanied by personality features required to instrument social interactivity; such interactivity is necessary to create expertise and to bring about its optimal implementation in complex, job-sharing democratic societies.

By contrast, there are study programmes – in binary systems they tend to be attributed to universities of applied science, but this is not the essence of the issue and just an institutional corollary – which aim at educating people who must be able to solve problems in research-based fields of activity by applying adopted research-based expertise from case to case and by incremental enhancement from case to case within a given system. This type of programme may succinctly be called “academically based”. Competence is largely determined by the availability of subject-related expertise based on knowledge derived from research results taken over as a given base, and by the ability to add to this expertise within the given paradigm of the field in question and to make it operational.

Describing programme distinction in such a way makes sense, but the difference is fatally missed and blurred when relating it to “academic” versus “professional” seen as programmatic contrasts. Instead, it may be strongly proposed to describe the essential difference more succinctly by labelling the programmes as geared towards “research-based

practice” and “research-driven practice”. In both terms, the word “practice” may also be replaced by “employability”, and “research” by “academic”.

It will be the task of the national qualifications framework to formulate very clearly what exactly is meant here if in fact such a distinction is seen as relevant at all. Relevant criteria were stated above.

Once this is done, concrete accreditation procedures will be reasonably operational also in that respect. If so, this effect is again largely due to a learning outcomes approach. For the essential question to be answered in the course of scrutinizing a given programme is its focus as to developing particular competences of its graduates vis-à-vis their ability either to break new ground, both intellectually and from a leadership perspective, or to master a set field of expertise.

## **VI. Envoi**

To sum up: Learning outcomes orientation with a view towards developing valid competences is operational in the course of accreditation processes. However, there are two provisos.

One is the correct limitation of the normative coverage of the national qualifications framework, which can either be accomplished by abstaining from regulating certain matters at all or at least by using open terminology that leaves room to interpretation, or else by explicitly stating the non-normative character of its elements as mere reference point statements. However, on the other hand the national qualifications framework must not be too lenient as far as matters of overall programmatic design is concerned. And it may be even less lenient on prerequisites concerning matters of transparency of programme characteristics; for the reduction of standardisation for the sake of enhancing choice and institutional profile must be balanced by enhanced visibility of differences and specific qualities.

The second element is a proper approach to accreditation criteria. However, learning outcome – or competences – orientation, as the yardstick essential both at the European and the national level, is merely a different terminology for what is known as accomplishing – valid – objectives. Basically, the learning outcomes debate and its results offer little more than a checklist of what could and should be considered as valid learning objectives. If accreditation processes adhere to this template and follow the full cycle from identifying the existence of valid objectives of a given programme, the existence of a coherent concept which serves as a plausible device towards achieving these objectives, credible implementation and finally the ability to keep monitoring the effective outcomes and re-addressing the issues thus raised in changing environments, accreditation is highly operational – that is, manageable and qualitatively successful, yet liberal – indeed due to a methodic approach based on learning outcomes orientation. So, in the end accreditation owes a great deal to the onset of the European – and hopefully, also to the subsequent national – qualifications framework.

A final remark beyond the issue of this presentation may be added. Even more important than accreditation, which is an ex-post supervisory activity, is the ex-ante perspective of developing and enhancing quality programmes by higher education institutions. If these adopt the methodology outlined here for accreditation at the stages of designing, implementing, and monitoring their study programmes quite thoroughly, a lot would be gained. It is proper institutional quality management covering the “quality cycle” as described above, embedded in a deeper notion of quality culture, which is needed more than external accreditation or evaluation. If this were accomplished by thorough in-house orientation on learning outcomes

and by focussing internal debates clearly and explicitly – and not just implicitly, as may be assumed to have been the case to date – on competence development rather than placing input first, matters would look much brighter, and programme accreditation might proceed to adopting a much lighter touch.