



Lessons from KOMPASS: Why Germany's Training Subsidies Never Ask What Works. **And How They Could.**

An analysis of the quality architecture behind Germany's largest federal subsidy programme for the solo self-employed, with five recommendations for funding policy, professional associations and corporate buyers.

Based on the programme's funding directive (Federal Gazette, BAnz AT 28.02.2025 B3), the relevant accreditation standards (German Social Code Book III; AZAV, the German accreditation ordinance for employment-related training; ISO) and current market studies.

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Executive Summary

Five findings, five recommendations

KOMPASS, the federal ESF-Plus subsidy programme for the solo self-employed, was Germany's most important funding instrument for the continuing training of independent professionals. Since spring 2026, voucher issuance has been rationed nationwide. This paper is not looking for culprits. It draws lessons, and it draws them from the programme's own documents.

Data basis. KOMPASS funding directive (Federal Gazette, BAnz AT 28.02.2025 B3, full text), official programme pages (esf.de, accessed 11 June 2026), accreditation standards (German Social Code Book III, AZAV, the ISO family of standards, the Ö-Cert guidelines, eduQua:2021), verified market studies (Haufe 2025, Studytube 2026), and a search of parliamentary records and trade press (as of 12 June 2026). The reliability of every source is classified in the annex (A/B/C).

- 1. The word "evidence" does not appear in the funding directive.** Providers qualify by meeting one of three formal routes: statutory recognition, a quality model such as AZAV or ISO 9001, or simply having their own teaching staff and a course plan (directive, section 4.2.1).
- 2. Even these requirements are no hard barrier.** Clause 7.1 allows reimbursement "even where the prerequisites are not met", provided the advisory centre has counselled the applicant with due care.
- 3. The accepted seals audit processes, not content.** None of the quality systems standard in the market (AZAV, ISO 9001, ISO 21001, ISO 29993, LQW and others) examines the scientific validity or effectiveness of what is taught. The exceptions are instructive: Ö-Cert, the Austrian quality framework, at least maintains a negative barrier against pseudoscience, and personnel certification under ISO/IEC 17024 tests the actual competence of individuals.
- 4. The programme measures its effectiveness through self-reporting by grant recipients** (directive, section 7.6). The same pattern runs through corporate learning: what gets measured is satisfaction at the end of the seminar; only 32.1% of companies systematically use evaluation results for investment decisions (Haufe Akademie 2025).
- 5. No one has named this gap so far.** On the quality and impact of the subsidised qualifications there is no parliamentary inquiry, no evaluation report and no trade press coverage worth mentioning (as of 12 June 2026). Statistics on which content was funded were never collected. The non-collection is the finding.

The five recommendations at a glance

1 · Anchor impact criteria at programme level, not as new red tape for providers. 2 · Record what is being funded. 3 · Introduce an evidence floor modelled on the Austrian example. 4 · Professionalise impact measurement instead of relying on self-reports. 5 · Use purchasing power: companies and public buyers actively demand proof of impact. Chapter 5 sets these out in full.

IMPLICATION

Training providers were never the problem. The system simply never asked them the question of impact.

Chapter 1

KOMPASS: an appreciation, and a situation report

The ESF-Plus programme KOMPASS (Kompakte Hilfe für Solo-Selbstständige, "compact assistance for the solo self-employed"), run by the Federal Ministry of Labour and Social Affairs (BMAS), reimbursed solo self-employed professionals 90% of their training costs, up to €4,500 per person. It met a real need: by March 2025, more than 2,500 training vouchers had been issued, and the programme was extended until February 2028 (BMAS, 19 March 2025). Then demand exploded. Since spring 2026, voucher issuance has been, in the words of the official programme page, "limited nationwide in the period from May until presumably October 2026" (esf.de, accessed 11 June 2026; translated from the German original).

This paper is not a reckoning. The author says so openly: our own qualification programme was listed on one of the leading brokerage platforms for KOMPASS-funded offerings, and the concern that a 90% subsidy would attract mainly windfall effects has not been borne out in our experience. Those who came were committed colleagues investing in their own professionalism. Writing the programme off wholesale does its beneficiaries an injustice.

Which is precisely why a closer look is worthwhile. A programme that moves public money on this scale, and is now fighting for its own continuation, leaves behind a question that reaches well beyond KOMPASS: **how does the state know whether what it funds actually works?**

The answer can be found in the programme's own documents. It is remarkable.

"Only training providers that offer the qualification measure in Germany and verifiably meet the following quality requirements are eligible for funding: a) recognition of the provider or of the measure on a statutory basis (for example a continuing-education act of a federal state, or the Social Code in conjunction with the Accreditation and Licensing Ordinance for Employment Promotion, AZAV) or b) proof of the application of a recognised quality model or c) teaching staff with their own course plan and evaluation."

KOMPASS funding directive, section 4.2.1, Federal Gazette announcement BAnz AT 28.02.2025 B3 (abridged; the wording of the three alternatives quoted in full; translated from the German original)

Three routes, all three formal: a statutory status, a management-system seal, or the mere existence of teaching staff and a course plan. None of the three routes contains any substantive requirement regarding what is taught. The word "evidence" appears nowhere in the entire directive.

Chapter 2

A funding logic without a concept of evidence

One might object that the directive does at least require quality standards. Yet the programme itself does not treat them as a hard barrier. The most remarkable clause of the directive sits in section 7.1:

"For establishing whether the qualification requirements under number 4.2.1 [...] are met, the findings made by the advisory centres in the course of a careful examination and recorded in the counselling protocol are, as a rule, decisive. Where these requirements for the examination by the advisory centres are satisfied, the expenses for the qualification may be reimbursed even where the prerequisites [...] are not met."

KOMPASS funding directive, section 7.1 (ellipses unchanged); translation by the authors; German original: „Für die Feststellung des Vorliegens der Qualifizierungsanforderungen in Nummer 4.2.1 [...] sind die im Rahmen einer sorgfältigen Prüfung und im Beratungsprotokoll getroffenen Feststellungen der Anlaufstellen grundsätzlich maßgebend. Sind diese Anforderungen an die Prüfung durch die Anlaufstellen gegeben, können auch bei Nichtvorliegen der Voraussetzungen [...] die Ausgaben für die Qualifizierung erstattet werden.“

In plain terms: even the formal quality requirements can be waived in the individual case, as long as the counselling is documented. What gets examined is the protocol, not the qualification.

And the impact?

The programme's effectiveness is assessed by the grant recipients themselves, as part of the reimbursement process (directive, section 7.6); added to this is the standard monitoring under the ESF regulation, built on output indicators. An independent evaluation of whether the subsidised qualifications demonstrably benefited their participants is not envisaged. A programme designed to professionalise the training sector measures its own impact with the very instrument whose weakness training research has documented for decades: the satisfaction self-report.

What was never recorded

Which content the vouchers actually paid for cannot be established from public sources: no statistics on approvals by training content exist, and the programme budget was never published. On the relevant brokerage platforms, alongside many solid business qualifications, methods whose scientific evidence base research has long regarded as thin were also competing for KOMPASS customers. Whether and to what extent such offerings were funded, nobody knows. **That is precisely the point: it was never recorded.** A system that does not record what it finances can learn as little from its successes as from its mistakes.

IMPLICATION

What gets checked is whether a course plan exists. Not whether what is written on it is true.

Chapter 3

The seals audit processes, not content

The directive leans on "recognised quality models". What do these models actually examine? Across all the systems standard in the market, the answer is the same:

SYSTEM	WHAT IT EXAMINES	SUBSTANTIVE EVIDENCE CHECK?
AZAV provider accreditation (section 178 of Social Code Book III, section 2 AZAV)	Organisational capability and reliability, formal staff qualifications, quality management system	No
AZAV measure accreditation (section 179 of Social Code Book III, section 3 AZAV)	Plausibility of the concept ("gives reason to expect successful participation"), labour-market relevance, duration, cost rates	No (plausibility of a forecast, not proof)
ISO 9001	Quality management processes, sector-neutral	No
ISO 21001 / ISO 29993	Management systems and service processes of educational organisations	No
LQW, QVB, Wuppertaler Kreis	Learner-oriented organisational development or voluntary self-commitment	No
eduQua (CH)	Management system; requires a didactic <i>rationale</i> , yet the benchmark remains the provider's own concept	No
Ö-Cert (AT)	Austrian quality framework with its own assessment grid that excludes esoteric and pseudoscientific offerings (guidelines, section 3.2.3.6)	Partly: a negative barrier
ISO/IEC 17024 (personnel certification)	Actual competence of individuals, established in an objective, independent examination	Categorically different: tests ability

Two clarifications are owed in fairness. First: these systems do what they promise. A management-system audit audits management systems; that is not deception, it is their stated purpose. The problem arises only when a funding system reads process seals as proof of substantive quality. Second: even the two exceptions are no full evidence review. Ö-Cert draws a floor against gross pseudoscience but does not test effectiveness. And personnel certification under ISO/IEC 17024 attests independently verified competence of people, not the scientific soundness of a curriculum. Anyone claiming more, even in their own favour, leaves the ground of evidence.

IMPLICATION

With a single administrative provision, Austria shows that an evidence floor is feasible. Germany does not have one.

Chapter 4

The satisfaction chain: a system that measures mood, not impact

The finding would be half as significant if it were merely a problem of public administration. It is, however, the pattern of the entire training landscape:

- **The subsidy programme** measures its effectiveness through self-reporting by grant recipients (KOMPASS directive, section 7.6).
- **Companies** predominantly measure training through satisfaction sheets at the end of the seminar. Only 32.1% systematically use evaluation results for investment decisions (Haufe Akademie Benchmarking 2025); only 21% link their learning strategy to business goals (Studytube Germany 2026, n=1,815).
- **The market** rewards the pattern: where nobody asks about impact, offerings compete on visibility, price and pleasantness.

EXHIBIT 1

Impact is claimed, but not measured

Share of companies, in percent

have a learning strategy

71%

systematically use evaluation for investment decisions

32.1%

link their learning strategy to business goals

21%

Sources: Haufe Akademie Benchmarking 2025; Studytube Germany 2026, n=1,815. Accessed June 2026.

Satisfaction recorded right after a seminar mainly captures how pleasant the event was: a legitimate service metric, an unfit proof of impact. Yet the impact question has never been easier to answer; validated instruments, pre-post designs and digital data collection have cut the effort dramatically. What is missing is not the method. What is missing is the place in the system that asks.

IMPLICATION

End-of-seminar satisfaction is a service metric. Anyone using it as proof of impact is measuring the quality of the catering along with it.

Chapter 5

Five lessons from KOMPASS

First, because it matters most: none of these recommendations means new red tape for solo providers. The impact question belongs at programme and system level. For training professionals who do good work, every one of these lessons is an advantage, because it finally makes quality visible.

1 · To funding policymakers: anchor impact criteria at programme level

Future programmes should apply a substantive minimum threshold when admitting qualifications, and should evaluate impact through independent spot checks rather than multiplying forms across the board. The money for this is there: it currently sits in the funding of things nobody examines.

2 · To the funding administration: record what is being funded

A simple categorisation of the approved training content would turn any programme into a learning programme. The non-collection of these data under KOMPASS turns every quality debate into speculation, including the well-meaning kind.

3 · To the legislator: an evidence floor modelled on Austria

Ö-Cert has demonstrated for years that a negative barrier against pseudoscientific offerings works in administrative practice without stifling methodological diversity. A comparable clause in the AZAV measure accreditation and in funding directives would be a one-paragraph step forward.

4 · To the professional associations: make impact measurement a professional standard

The professional bodies of trainers, consultants and coaches could equip their members with evaluation standards and validated instruments, and so furnish the proof of quality before policymakers mandate it. Those who set the standard will not be caught off guard by it.

5 · To companies and public buyers: ask for proof of impact

The fastest reform requires no legislation: anyone purchasing training can make pre-post data, validated instruments and evidence of transfer a condition of award. Budget pressure and accountability requirements are already in place; all that is missing is the resolve to apply them to provider selection.

Where this can go

An invitation to the conversation

This paper is no final word. It is the start of a discussion our profession should lead itself, before others lead it about us.

To our colleagues

Join the discussion. The NET OF BRAINS **Science Lunch**, every Friday from 12:00 noon to 1:00 pm CET, online, is our open forum: free of charge and free of sales pitches. We will put the findings of this paper up for debate there, and we welcome objection, addition and first-hand experience from funding practice. Registration via brain-hr.com.

To companies and public buyers

If you intend to purchase training on the basis of impact and want to know what a workable proof of impact looks like, one that does not suffocate providers: talk to us. We share our methodology openly, with or without a mandate.

To policymakers, administrations and associations

For expert discussions on evidence floors, impact indicators and a learning funding architecture, the NET OF BRAINS Thinktank gladly makes its expertise and its research network available: in hearings, working groups or direct exchange. Austrian administrative practice shows with Ö-Cert that the first step may be small. It only has to be taken.

Invitation to expert review

We expressly invite qualified institutions, associations and expert colleagues to scrutinise the findings of this paper. Substantive reviews will inform subsequent editions and, on request, be acknowledged there by name. Science thrives on contradiction; so does this series.

Outlook: Policy Brief No. 2

One question this paper deliberately sets aside: why highly qualified independent professionals, who carry the continuing education of an entire economy, should depend on subsidies for a €4,500 qualification in the first place. This question about the economic foundation and professional independence of the training profession is the subject of "The Value of Learning Professionals" (NET OF BRAINS Policy Brief No. 2, DOI: [10.5281/zenodo.20670324](https://doi.org/10.5281/zenodo.20670324)).

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Annex

Sources and transparency

CLAIM	SOURCE	DATE/ACCESSED
Funding conditions, quality requirements 4.2.1, clause 7.1, effectiveness measurement 7.6	KOMPASS funding directive, Federal Gazette BAnz AT 28.02.2025 B3	Accessed 12 June 2026
Voucher issuance "limited nationwide from May until presumably October 2026" (translated from the German original)	esf.de, official programme page	Accessed 11 June 2026
More than 2,500 vouchers, extension until 02/2028	BMAS press release	19 March 2025
AZAV audit scope for providers/measures	Sections 178, 179 of Social Code Book III; sections 2, 3 AZAV	Statutory text as of 06/2026
ISO 9001 / 21001 / 29993: management and service process standards	Standard texts/official standard descriptions	Accessed 12 June 2026
Ö-Cert assessment grid incl. exclusion of esotericism	Ö-Cert guidelines, section 3.2.3.6	Accessed 12 June 2026
eduQua: didactic rationale, benchmark is the provider's own concept	eduQua:2021 quality standard, criteria D2, H1	Accessed 12 June 2026
32.1% systematic use of evaluation results	Haufe Akademie Benchmarking 2025	2025
71% learning strategy, 21% link to business goals	Studytube Germany 2026, n=1,815	2026
No parliamentary proceedings traceable on the quality of KOMPASS-funded content	Search of dip.bundestag.de and press	12 June 2026

About NET OF BRAINS

NET OF BRAINS is a think tank for innovation in learning & development: a community of more than 50 researchers, L&D practitioners and executives, winner of the German Demography Award 2022 (category "New Work brought to life"). Its initiator is Dr. Franz Korbinian Hütter (Dr. rer. medic., M.A.), lecturer in Applied Cognitive Neuroscience at the University of Applied Management (Hochschule für angewandtes Management), Teacher Status Member of the American Psychological Association (APA), member of the advisory board of dvct e. V. (the German professional association for trainers and coaches) and of the scientific advisory board of the Bildungswerk der Bayerischen Wirtschaft (the educational institution of the Bavarian business community). Contact for press and enquiries: fh@brain-hr.com · +49 171 99 79 519

Transparency note. This paper was initiated and funded by BRAIN-HR (owner: Dr. Franz Hütter). BRAIN-HR itself offers science-based qualifications as well as software for evidence and impact assessment, and was listed with its own offerings on KOMPASS brokerage platforms. The author therefore has a commercial interest in a stronger impact orientation of the market. All findings of this paper rest exclusively on the public primary sources cited and can be verified independently of the author. Advisory board memberships are biographical details; the organisations named have neither commissioned nor authorised this paper.

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