Portability of recognition statements in the EHEA

**Fast lane or detour
to Automatic Recognition?**

February 2020

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Content

Executive summary

This position paper explores and identifies the preconditions that allow for the portability of information provided in recognition statements, including the decision, as well as any possible (legal or practical) restrictions that should be observed. The paper focuses on degree recognition only.

Accepting both the information provided in a recognition statement and the decision itself, is a fairly new idea and currently not a practice in the ENIC-NARIC networks. However, accepting information without an additional procedure would be another way to approach automatic recognition, which is a priority both in the EU and EHEA.

Moreover, accepting information provided by another competent authority would be in line with the subsidiary text of the Lisbon Recognition Convention (LRC) *"Recommendation on the Recognition of Qualifications Held by Refugees, displaced Persons and Persons in a Refugee-like Situation (2017)"*.

In preparation for this paper, the information on 18 recognition statements from 9 different countries was analysed and scored. To determine whether or not the provided information could be accepted, the simple answer choices were 'yes', 'no' and 'not applicable'. At first glance, the simple scoring showed information was portable. However, when examining the comments more closely it appeared that conditions had to be met in order to simply accept the information provided.

The main obstacles identified are:
- National legislation prescribing the entire evaluation procedure has to be carried out by the national centre;
- Statements issued in the language of the partner country, without English translation;
- Differences in educational systems leading to the evaluator in the receiving country having to perform an extra 'translation' step to his/her own education system in order to facilitate portability;
- No NQF/EQF-level provided, only comparison to the national qualification;
- Evaluation statements from countries differ due to different demands in the national context. Therefore, information may be missing and has to be looked up;
- Lack of transparency on how the evaluation procedure was conducted by the centre providing the information (i.e. what sources were used).

The analysis showed that in some cases it can be more time-consuming to decipher the initial evaluation than to make the evaluation again. It was also noted that a more experienced evaluator may be able to identify the accuracy of the information more easily and therefore accept the information provided.

The paper concludes that when considering further steps, it should be noted that currently very few statements from other centres are included in recognition requests. Moreover, recognition is organized very differently across the EHEA. Therefore, the recommendation for the time being is to focus on those elements of portability that assist other priorities:

- Include information about system level recognition:
  - ☐ Accreditation decision (in English);
  - ☐ Inclusion of EQF level (in English);
- Ensure legislation is in line with the LRC, including the subsidiary texts on Recognition of Qualifications Held by Refugees (2017);
- Offer transparency about the recognition procedures used. ENIC-NARIC centres provide a service to society. In line with the LRC, these procedures should be transparent. The use of the Standards & Guidelines for the ENIC-NARIC networks would help here;
- Streamline recognition practices following the LRC. The EAR manual and the use of Standards & Guidelines for the ENIC-NARIC networks could help here.

1. Introduction

In some cases, application files from persons seeking recognition of their foreign qualifications include evaluations completed by other evaluating authorities. These are submitted in addition to the educational documents, such as diploma and transcript.

How can these evaluations be used? Can they be accepted at face value, making it unnecessary to carry out an evaluation of their own? Or should ENIC-NARIC centres or other competent authorities start the evaluation process all over again, reviewing all supporting documents themselves?

This paper aims to shed some light on these and other questions by exploring the possibilities of portability of 1) recognition decisions and 2) the information provided in the statement delivering the decision. The focus is to identify the preconditions that allow for the portability of both, as well as any possible (legal or practical) restrictions that should be observed. The scope is degree recognition.

Note that when we speak in this paper about 'recognition decisions' we refer to the outcome of an evaluation, regardless of whether this is legal or advisory in nature. When we speak about information, we refer to the information that is provided in the statement in which the decision is delivered.

This chapter provides a quick introduction to automatic recognition and its relation to portability, and next describes how this paper explores portability.

1.1 What is Automatic recognition?

Automatic recognition is a priority both in the European Higher Education Area (EHEA) and the European Union's 'European Education Area 2025'. Automatic recognition is system level recognition; the acceptance of quality and level of a foreign qualification without an additional procedure. This is the definition both used in the EHEA as well as by the European Union.

In general four different implementation models can be distinguished in the EHEA:
- Legal bilateral and multilateral agreements;
- A legally binding unilateral list of degrees;
- Non-legal bilateral and multilateral recommendations;
- 'De facto' automatic recognition.

The last model, 'de facto' automatic recognition entails the acceptance of bachelor and master qualifications from quality assured comparable degrees in the EHEA when three meta criteria are met.

Portability of recognition decisions and/or information is a variation of de facto automatic recognition, because the idea is that the information is provided by another ENIC-NARIC without a formal agreement.

For a full description of all the models consult the publication "A short path to Automatic Recognition" (Nuffic et al, 2018) and for de facto automatic recognition specifically "The Triangle of Automatic Recognition" (Nuffic et al, 2020).

1.2 Exploring portability

To explore the portability of information and recognition decision, chapter 2 ('Methodology') outlines the approach taken to examine the concept. Next, Chapter 3 ('Outcomes') analyses the results of the survey used. Chapter 4 describes the conclusions of the analysis and provides recommendations on how to take portability forward. Lastly, chapter 5 provides more information about the AR-Net project as part of which this paper was developed.

2. Methodology

Portability of recognition decisions is a new driver on the path of automatic recognition. Therefore, there are not many references or examples of real and documented portability of recognition decisions.

This ambiguous starting point put some pressure on the project team to pursue a strong research-based and convincing approach to explore the concept of portability. This chapter on methodology describes the approach chosen.

2.1 Scope
Right at the start, the project team decided to further widen the initial scope on recognition decisions, and focus both on:
1. The portability of the recognition advice or decision,
2. The portability of the information provided by the ENIC-NARIC centre about the qualification.

The LRC subsidiary text *"Recommendation on the Recognition of Qualifications Held by Refugees, displaced Persons and Persons in a Refugee-like Situation"* (2017), provided a good starting point for broadening this scope as it calls for the acceptance and use of information already provided by other competent recognition authorities that are party to the LRC:

"The portability of the background document is likely to facilitate the assessment and recognition of refugees' qualification for further study or for employment purposes. The principle should be that information on qualifications held by refugees is collected as early as possible as to put the first and often difficult period of their time as refugee to positive use. Parties should therefore accept information on, and where relevant assessment of, such qualifications established by competent recognition authorities in other Parties so that refugees do not need to repeat the process of compiling information (see also paragraph 12) and that public authorities do not dedicate resources to repeating the work already undertaken by other Parties".

Even though this text is geared to recognition of qualifications from displaced persons and persons in a refugee-like situation, there is no reason why acceptance of information provided by other competent authorities should not also apply in other situations where recognition of qualifications is required.

2.2 Leading question
Next, the project team identified the leading question as: *What are the preconditions for ENIC-NARIC centers to accept each other's recognition decisions or evaluations?*

This question was specified further in the following two sub questions:
1. under which conditions is portability of information gathered by a competent authority possible?
2. under which conditions is portability of a recognition decision from a competent authority possible?

2.3 The sample

To find an answer to the identified questions, the team decided to use a sample of real life recognition statements and score different elements on their portability.

For the sample, two recognition statements were collected from the ENIC-NARIC centres represented in the project team: Czech Republic, Denmark, Ireland, Italy, Lithuania, the Netherlands, Norway, Portugal and the UK NARIC:

- one statement on a qualification awarded by a country within the European Higher Education Area (EHEA);
- one statement on a qualification awarded outside the EHEA.

This distinction between statements from EHEA and non-EHEA countries was made to see if recognition statements from EHEA qualifications would be treated differently.

Collectively, the statements from the 9 centres represented a geographical spread and different type of statements (i.e. legally binding, advisory). In total 18 statements were reviewed.

2.4 Scoring portability

Next, for each case, partners indicated whether or not they would accept the information from the statement, without double-checking it themselves. They were asked to motivate their answer. The following elements of each evaluation file were scored as "Yes, accepting", "No, cannot accept" or "Not applicable":

- Personal information (name, birth date, etc.)
- Description of the qualification obtained
- Quality (accreditation)
- Level
- Workload
- Profile
- Learning outcomes
- Information on authenticity
- Recognition advice/decision given by competent authority

The scoring was done via a survey. At the end of the survey, partners were asked to give close consideration to two final questions:
1. Under which conditions is portability of information provided by a competent authority possible?
2. Under which conditions is portability of a recognition advice/decision from another competent authority possible?

After completion of the survey, the answers were analysed by the project team. The next chapter provides the outcomes, shedding light on the automatic acceptance of information and decisions, as well as the suggestions how acceptance can be improved.

3. Outcomes survey

Scoring each statement gave a general impression of the portability (or lack thereof) of information and decisions, but the comments in which partners explained their answers were particularly revealing.

After analysing the surveys, a general conclusion is that while many partners indicated during scoring they would accept the information/assessment provided by another centre without checking it first, many of the comments gave the opposite impression. Either the information would always have to be checked again, or the information could only be accepted provided certain conditions were met.

Almost all partners agreed that the information and evaluation provided in the initial evaluation would be taken into consideration, but checked for accuracy. These reactions were repeated in the final two questions.

The outcomes of the survey showed no discrimination between statements for EHEA and non-EHEA qualifications.

This chapter highlights the main obstacles identified for accepting the information and decision, and a few suggestions on how to overcome these.

National legislation
The barriers presented by national legislation were mentioned numerous times. In some countries, laws and regulations require that the entire evaluation procedure be carried out by the national centre. Evaluations done by other centres may be taken into consideration, but would always have to be done again.

In addition, based on national legislation in some countries, recognition statements are legally binding. This official status makes the portability of evaluations even more problematic, since the statements have to comply with the legal requirements and the centre has to be absolutely certain all of the information is accurate.

Language
Several of the evaluation reports were issued in the language of the partner country, without translation. In order for portability of evaluations to take place, the evaluator in the receiving country obviously has to be able to read the language used in the report.

Terminology in context
As foreign qualifications are always compared to a qualification in the national education system, terminology used in one national system can mean something different in another. For example, the word 'vocational' was mentioned to indicate a different level and type of education, depending on the country of evaluation. There are conceivably other terms which could cause confusion when interpreting evaluations in different countries.

Differences in educational systems

The issue of differences in educational systems was mentioned several times, particularly when an evaluation is carried out in a country with a binary system of higher education and transferred to a country with a unitary higher education system, and vice versa. The evaluator in the receiving country has to perform an extra 'translation' step to facilitate portability and it may be easier to start the process all over again.

No NQF/EQF-level provided

Some partners commented that foreign qualifications were compared to national qualifications (bachelor/master) and not to the EQF/NQF, which was preferred. The point was made that comparing the qualification to an overarching framework made it easier to determine the level in the educational system of the receiving country.

Different formats and content

Evaluation statements differ between countries. Some centres include an extensive amount of information (a report), others provide little more than the final assessment and still others provide a generic description of the qualification based on the level in the NQF.

In addition, the final assessment also differs from country to country. Some reports mention only the level on the qualifications framework, some mention the comparable qualification (bachelor, master) and in some reports the field of study is also indicated ("master's degree in history").

Therefore, information that is normally included in evaluation statements conducted by the receiving country may be missing and has to be looked up. This hampers portability.

Lack of transparency

Most reports do not mention the information resources that have been consulted and almost none include explicit information on the status of the institution (is it accredited) or the authenticity of the qualification. The latter could partially be explained by the fact that a statement would not be provided in cases where the institution is (or was at the time of the award) non-accredited/ unrecognized).

Therefore, the reader has to assume that the evaluator in the first country consulted the relevant resources and checked information. The reader also has to assume that the evaluation never would have been carried out if the institution was not recognized or the qualification fraudulent, even if this information is not explicitly stated.

For many centres, accepting the initial evaluation based on these assumptions was a step too far. The point was also made that all evaluators have a professional responsibility regarding the accuracy of the evaluations they issue and the information on which those evaluations are based. Unless information resources are explicitly stated, this makes it necessary to check the evaluation carried out by another centre and the information on which it is based.

Differences in evaluation methodology

Although we assume that all evaluators in the EHEA apply the principles of the LRC in the evaluation process, the survey pointed out that differences in the methodologies used do exist. In some countries, assessment is based on the duration of study rather than the learning outcomes and a different centre "may evaluate a foreign degree harder or more lenient than your own national standards".

Efficiency

Several colleagues made the point that in some cases, it can be more time-consuming to decipher the initial evaluation so that the information and assessment can be adapted to the form and content of evaluations in the receiving country. It was more efficient to start the evaluation procedure from the beginning than to try to understand the process and assessment carried out by another centre.

Expertise of evaluator

The expertise of the evaluator in the country reviewing the previously evaluated file was mentioned as a factor that could facilitate or impede the portability of evaluations. If the evaluator is familiar enough with the qualification and/or the educational system in which it was awarded, it is more likely that she or he can determine the accuracy of the initial evaluation without having to check all of the information. Evaluators in the receiving country with no knowledge of the qualification or educational system, would be more inclined to check everything themselves.

4. Conclusions

The main question of this paper is to examine under what conditions portability of information and decisions on recognition statements would be a possibility.

The survey conducted in the framework of the project shows there are obstacles in terms of
1) legislation requiring the evaluation be done entirely by the national centre (in a few cases),
2) transparency about the procedure and sources used, and 3) the information required for the own context, due to language barriers, different education systems and statement formats. Considerations to keep in mind when finding solutions to remove these obstacles include:

1. Recognition statements of other centers are typically not requested as part of the application process and rarely submitted by applicants. This may be explained because applicants often apply simultaneously in different countries. Consequently, the statements to be submitted from other centres are not ready yet. Any measures to achieve portability of information and recognition decisions should be proportional to this situation;

2. Portability of information is already promoted in the LRC subsidiary text to article VII. When including portability of information in the subsidiary text, the LRC Bureau assumed that information would be accepted based on the fact that it was provided by another competent recognition authority. The monitoring carried out on the implementation of the LRC shows that virtually all ENIC-NARIC offices doing recognition decisions/statements put great and similar emphasis on the hard facts of the qualifications being evaluated: Personal information (name, birth date, etc.), Quality (accreditation), level, workload in terms of nominal duration and/or credits completed and information on authenticity.

3. The outcomes of the survey reveal a certain conservatism towards acceptance and trust of other competent authorities, that may need to be addressed;

4. Information included in statements varies from country to country, depending on the 'recognition structure' in place (i.e. with different mandates for the ENIC-NARIC centre and with different demands from stakeholders. In other words, information in statements depends on the context. This should especially be kept in mind when exploring ways to uniform information. One option would be to seek common denominators that would anyways be good practice to include. This could be further explored.

Recommendations to move towards portability are:
- In line with the LRC subsidiary text article VII it is good practice to **trust the information gathered by your fellow competent recognition authority (in this case an ENIC-NARIC) and accept this information without additional procedure.**
- The Standards and Guidelines ("S&G") offer the centres of the ENIC-NARIC networks a tool to review and improve compliance with the LRC through self-evaluation and peer review. **Information provided in a statement by an ENIC-NARIC centre that underwent the peer review**

and complies with the evaluation standards for the S&G, should always be trusted and accepted without any additional procedure by another competent authority;

- However, use the information provided with discretion. If it takes longer to decipher information due to language issues, differences in the use of terminology and/or the differences between binary and unitary higher education systems than doing the evaluation yourself, obviously the latter is preferred for reasons of efficiency.

- The ENIC-NARIC networks should continue to build a culture of trust in each other's practices. The ENIC-Bureau and NARIC Advisory Board have an essential role to play to promote the message of trust, facilitate the dialogue, and identify and support measures to build trust where needed. Specific attention should be given towards the implementation of the LRC and instruments like the Standards & Guidelines that enable centres to review compliance;

- ENIC-NARIC centres should check if their national legislation allows for acceptance, and if not, promote an amendment to allow national legislation to accept information from other competent recognition authorities, in line with LRC subsidiary text to article VII.

- Respecting different contexts, ENIC-NARICs could be encouraged to include information in English about the EQF level and the recognition decision, including a reference to the main source(s) used. This information is similar across systems and could be standardized. However, this should always be in line with the end user's needs, that may be specific to the national situation and not result in an overload of technical information that makes the document less accessible.

5. About AR-Net

This paper is being written as part of the Automatic Recognition in the ENIC NARIC networks 2020 ("AR-Net") project. The main objective of AR-Net is to support the implementation of automatic recognition of foreign qualifications in the EHEA.

While there are four models for implementation in the EHEA (see Chapter 1 Introduction), the AR-Net project focused on the de facto model. This is the model that can be implemented most easily on the level of the ENIC-NARICs.

Apart from this position paper on the portability of recognition decisions and information, AR-Net supported the implementation of automatic recognition by developing guidelines for the ENIC-NARIC networks on how to implement the de facto model.

The AR-Net consortium is composed of the following representatives from the ENIC-NARIC network: NARIC The Netherlands (Nuffic, coordinator) NARIC Lithuania, NARIC Denmark and NARIC Portugal. NARIC Italy, UK-NARIC, NARIC Norway, NARIC Ireland and NARIC Czech Republic, as well as the European University Association (EUA) and European Consortium for Accreditation in higher education (ECA).

AR-Net started in March 2018 with a duration of two years. The project is co-funded by the Erasmus+ Programme, Key Action 3, NARIC call, of the European Union.

Colofon

AR-Net consortium:
- Nuffic (Coordinator) - The Dutch organisation for internationalisation in education
- Centro Informazioni Mobilita Equivalenze Accademiche (CIMEA)
- Dearbhú Cáilíochta agus Cáilíochtaí Éireann - Quality and Qualifications Ireland (QQI)
- Direção-Geral do Ensino Superior - Directorate-General for Higher Education Portugal
- European University Association (EUA)
- France Education International
- Ministerstvo školství, mládeže a tělovýchovy - Ministry of Education, Youth and Sports Czech Republic
- Norwegian Agency for Quality Assurance in Education (NOKUT)
- Studijų kokybės vertinimo centras (SKCV) - Centre for Quality Assessment in Higher Education Lithuania
- Styrelsen for Forskning og Uddannelse - Danish Agency for Science and Higher Education
- European Consortium for Accreditation

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