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## **Recognition at universities**

**HRK** German Rectors' Conference  
The Voice of the Universities

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## I. Introduction<sup>1</sup>

Open universities are particularly responsive to the diversity of their students and express this in their values. They are characterised by their focus on learners and stand for an open, welcoming culture. Universities welcome prospective students who already have knowledge and skills equivalent to university level and value them. They offer their students flexible lifelong learning paths locally, regionally, internationally or even virtually and promote their professional and personal development. Regardless of the biographical backgrounds of their students, they integrate diversity into their profile of an academic research and teaching institution. In this way, universities make an important contribution to society.

The guiding principle of a university open to diversity and heterogeneity ("heterogeneity sensitivity") is fundamental to establishing a culture of recognition supported by all university members. In this way, universities show that they value existing competences and contribute to individual academic pathways for students at home and abroad by quality-assured, transparent and fair recognition. Nevertheless, the specifics of higher education must be taken into account in all recognition processes, which are genuine tasks of universities.

It is true that the COVID-19 pandemic has resulted in a noticeable decline in academic exchange, and climate change gives cause to reflect on the reasons for and intensity of the international mobility of students and other university members practiced to date. Nevertheless, it has become clear that the development of academic skills – especially in times of crisis – contributes to social, scientific and cultural progress. Academic competences, including generic and intercultural competences, are key to understanding the diversity of different perspectives and approaches. Although virtual exchange is an enrichment for studying and teaching, it cannot replace personal interaction.

A prerequisite for a permeable education system that reciprocally credits competences and achievements is the formal equivalence<sup>2</sup> of the two education sectors: vocational education and training (VET) must therefore value competences from other education contexts in the same way as higher education and recognize them regardless of the place and context of competence acquisition. In this way the education system contributes to flexible learning paths and promotes lifelong learning.

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<sup>1</sup> This recommendation is based on recommendations from the expert group on quality criteria of the HRK-project MODUS and was supplemented by the HRK Standing Committee on Teaching and Learning and recommended to the HRK General Assembly for adoption. The long version "Anerkennung und Anrechnung: Herausforderungen und Perspektiven" is available at [www.hrk-modus.de](http://www.hrk-modus.de) (German version only).

<sup>2</sup> Cf. Resolution of the Senate of the German Rectors' Conference (2016): "Universities as organisational centres of the research system and key players in society - Key considerations on the role of, and challenges facing, the higher education system"

## II. Definition and legal framework

In practice, academic recognition and the recognition of prior learning mean that a university compares learning outcomes achieved elsewhere or in another context with the learning outcomes in the degree programme in question at the request of students or prospective students. In case of a positive decision, the recognising institution treats the learning outcomes obtained elsewhere as if they had been achieved at the institution itself. Recognition can take place both when starting a study programme, as a basis for admission, and during a course of study with the aim of replacing individual modules.

However, there are also differences between academic recognition and recognition of prior learning. They each relate to competences developed in different systems and contexts:<sup>3</sup>

- **Academic recognition** relates to the applicant's competences gained at universities at home and abroad.
- **Recognition of Prior Learning** relates to all competences of applicants developed outside universities in formal, non-formal and informal contexts.

Recognition and crediting are administrative acts depending on the corresponding regulations of German administrative law. Both are regulated in more detail in the higher education laws of the federal states. While the provisions on academic recognition refer to a nationally applicable legal basis, the so-called Lisbon Recognition Convention,<sup>4</sup> those on recognition of prior learning are generally based on the joint requirements of the federal states within the framework of the resolutions of the KMK of 2002 and 2008. There are three key differences between academic recognition and recognition of prior learning in higher education laws: the assessment criterion, the burden of proof and the limitation in scope. For academic recognition, the assessment criterion of substantial difference applies, and the burden of proof in rejecting an application lies with the institution; for recognition of prior learning, the assessment criterion of equivalence essentially applies, and the burden of proof for the approval requirements lies with the applicant. Furthermore, in contrast to academic recognition, there is usually an upper limit on the number of credit points to be credited.

In the future, there could be a standardisation of the content-related assessment of academic recognition and recognition of prior learning if the Global Convention on the Recognition of Qualifications concerning Higher Education adopted by the General Conference of UNESCO in November 2019 would be ratified by Germany. This is because it provides

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<sup>3</sup> The underlying system-oriented definition of recognition and credit offers the advantage that it is clear at first glance which learning outcomes are being examined. However, alternative determinations of the two terms are still in use. In particular, the higher education laws of the federal states partly deviate from the system-oriented use of the terms.

<sup>4</sup> The Lisbon Recognition Convention was ratified by the Federal Republic of Germany and incorporated into federal law with the "Act on the Convention of 11 April 1997 on the Recognition of Qualifications concerning Higher Education in the European Region" on 16 May 2007 (Federal Law Gazette Part 2, No. 15 of 22 May 2007).

for the assessment criterion of substantial difference both for competences acquired at and outside universities.

### III. Challenges

In order to promote lifelong learning at universities, it is necessary to consider the central fields of action at universities:

- Organisational development
- Promotion of mobility
- Designing permeability
- Quality development
- Procedural design

Each field has specific challenges but they are ideally considered holistically in universities.

#### 1. Organisational development: living a culture of recognition

Heterogeneity-sensitive universities in the European Higher Education Area enable mobility and permeability for their students. Quality-assured academic recognition and recognition of prior learning therefore express their values and are a response to changing societal and individual educational demands resulting from global economic, technological, demographic and social change. These values can be found, for example, in the recommendations of the German Council of Science and Humanities for higher education,<sup>5</sup> of the European Commission for a European Area of Lifelong Learning<sup>6</sup> and in the statements of student interest groups.<sup>7</sup> Universities are therefore faced with the challenge of facilitating intercultural and lifelong learning and offering sufficient freedom to combine studies, work and family or other aspects of personal life.

Among the challenges for the development of a university's own recognition culture are uncertainties and concerns of university members about competences acquired elsewhere. This is due in part to a lack of information and the difficulties of knowledge transfer between university administration and teaching staff, which is partly caused by frequent staff changes. The complexity of competence- and learning outcome-oriented programme development adds to the difficulty.

#### 2. Promoting mobility: removing hurdles

The promotion of mobility in higher education should contribute to the internationalisation of higher education and research, the recruitment of excellent academics at all career levels, and the promotion of foreign language skills and the development of intercultural and personal

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<sup>5</sup> German Council of Science and Humanities (2019): Recommendations on continuing higher education as part of lifelong learning. Vierter Teil der Empfehlungen zur Qualifizierung von Fachkräften vor dem Hintergrund des demographischen Wandels [Fourth part of the recommendations concerning the qualification of skilled employees in the light of demographic change]. (Drs. 7515-19) Berlin 2019

<sup>6</sup> European Commission (2001): Communication from the Commission. Creating a European area of lifelong learning. Brussels. 21/11/2001

<sup>7</sup> See for example European Students' Union (2019): Internationalisation and Mobility Policy Paper. Board Meeting 76 Sofia.

competences among graduates. However, while student mobility is often associated with an international change of location, the focus should also be on mobility within Germany as well as virtual mobility. The latter has been given a particular boost by the European University Networks and developments prompted by the COVID-19 pandemic, and this should be further expanded in the future.

Students are given the opportunity to move physically or virtually to higher education locations in Germany, Europe and around the world and gain experience of different learning environments to further develop their educational biographies. However, for the students' organisational efforts to be worthwhile, a certain degree of planning security is required. It should also be possible to have acquired competences recognised afterwards. This means that the clearest possible recognition regulations are one of the most important prerequisites for student mobility, which universities must provide to remove hurdles at an early stage.

For universities, this results in three fundamental challenges:

- Lack of study structures that promote mobility: Recognition obstacles are often caused by the fact that study programmes are not designed and described in a competence-oriented way or are divided into units that are too large. It is also an obstacle for students if the curriculum is very narrowly defined and provides hardly any opportunities for mobile phases. Furthermore, the status of virtual students is unclear, which makes the curricular integration of virtual models more difficult.
- Lack of organisational embeddedness: Unclear responsibilities and processes as well as non-transparent communication cause disorientation among staff and students and complicate the processes. This also applies to the digitalisation of procedures (e.g. with regard to the Online Learning Agreement), which is an additional task. There is a lack of financial and human resources for the organisation of processes and the digitalisation of mobility to initiate and sustainably anchor any necessary change management processes.
- Sustainable institutionalisation of university cooperation: Cooperations often arise between individual university members who are committed to them at their own university. However, there is usually a lack of human resources for a sustainable institutionalised foundation based on mutual exchange and trust. The European University Networks, too, can only become a model for institutionalised cooperation with strong structural interlocking if support is intensified and sustained.

### **3. Promoting permeability: creating transitions**

In the European Education Area, great importance is attached to lifelong learning and permeability between the education sectors, as they make individual competence development and qualification as well as the place and time of the same more flexible. This creates opportunities for everyone to participate in further education and training, independent of

time and place. However, to give unrestricted access to all those who are willing to learn it is necessary to create certain preconditions. One prerequisite is the mutual opening of the vocational and higher education sectors to enable flexible learning paths. Despite efforts to achieve reciprocal permeability in Germany, challenges remain:

- For example, universities hardly receive any additional financial resources to further promote mutual permeability,<sup>8</sup> which means that the number of programmes of this type is rather low.
- Despite the emphasis on the formal equivalence of the two education sectors, the legal requirements and thus the scope of competences and qualifications to be recognised are different for higher education and VET.
- The recognition of extracurricular competences at universities, such as vocational education and training, further education and training, paid employment, internships, family time or voluntary work, only takes place to a rather small extent.
- In addition, flexible study formats such as part-time or continuing education bachelor's programmes, part-time programmes, certificate programmes and shorter, potentially digital, learning formats that facilitate access to higher education for non-traditional students can be further developed.

#### **4. Quality development: strengthening trust**

As part of the quality assurance of universities, it is assessed whether their implementation of recognition complies with legal requirements, which can be found in state higher education legislation, the State Treaty on the Accreditation of Studies and the corresponding state legal ordinances and European standards such as the European Standards and Guidelines. Quality assurance also covers the competence- and learning outcome-oriented design of study programmes. This is an essential prerequisite for the university's own control of recognition because it includes the ratio between core, supplementary and complementary competences in the degree programme which is determined in advance and learning outcomes can be described more specifically or more openly at module and degree programme level. There is a consensus that core competences must be fulfilled, but more freedom should be allowed for supplementary and complementary competences.<sup>9</sup>

In this context, writing competence-oriented descriptions of learning outcomes with the help of instruments such as qualification frameworks or taxonomies of learning objectives, which are intended to facilitate such comparability, also poses difficulties.

The different legal regulations on academic recognition and recognition of prior learning as well as the lack of binding interpretations of state higher education legislation make it difficult to implement them at HEIs in conformity with the standards. The requirements of heterogeneous

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<sup>8</sup> Larger funding programmes, such as "Advancement through Education: Open Universities" or "Crediting of Vocational Competences towards Higher Education Courses" (ANKOM), have been concluded in the meantime.

<sup>9</sup> While supplementary competences result from the individually taken elective and supplementary areas of the study programme, complementary competences are those that cannot be covered by the study programme itself but fit the intended study goal.

students which increasingly demands the certification or validation of competences developed elsewhere also pose a challenge with regard to quality-assured recognition and credit transfer procedures. This requires information on other educational institutions to better assess the quality of their study programmes and to be able to recognise competences and qualifications. Especially in the case of foreign franchise models, it should be examined in detail whether and to what extent the quality assurance instruments applied by the university also apply to the non-university partner. However, this information is usually difficult to find and thus hinders the recognition assessment.

The increased volume of applications also requires modern, digitally supported administrative processes to facilitate both the application processes and their documentation. Ideally, these should also enable cross-university comparability of learning outcomes by creating up-to-date module descriptions of degree programmes. Universities are thus faced with the task of adapting their own IT infrastructure to supra-locally organised information processes.

### **5. Procedural design: improving processes**

universities are free in designing their recognition procedures within the given regulatory framework and in compliance with state-specific legislative requirements. Depending on the scope of regulation, there are more or less opportunities for faculties and departments to define their own processes, present them transparently and implement them in a resource-efficient way. Unclear or inadequate regulations lead to non-transparent processes and unclear responsibilities, as well as problems in the cooperation between the actors involved. If processes have not already been coordinated across the university based on common quality standards it becomes more difficult to achieve the cross-university goal of digitalising all administrative processes. It is problematic for students if they cannot find the right contact person or if there are inadequate regulations, for example with regard to deadlines, duration of proceedings, appeal regulations or dealing with grades.

While academic recognition procedures are governed by the assessment criterion of substantial difference and the associated reversal of the burden of proof, recognition of prior learning procedures based on the criterion of equivalence are characterised by a further challenge: the learning outcomes being assessed do not belong to the same context as those they are being compared to. If universities decide on procedures for lump-sum recognition, the results must be reviewed regularly for the purposes of quality assurance. This underlines the importance of an appropriate formulation of learning outcomes and competences in documents from education pathways outside higher education.

A further challenging factor in recognition is that different actors in universities are involved and have to cooperate with each other: in advising and supporting students before and during the application process, in the learning agreement process, in different areas of

administration to ensure that the process is legally compliant, and within degree programmes to decide on applications.

#### **IV. Recommendations**

##### **1. General recommendations**

For all actors involved, it is recommended:

- Network regularly both within the university and with other responsible persons regarding recognition to create a welcoming culture and continuously develop the processes;
- Work to implement competence- and learning outcome-based teaching/learning activities and forms of assessment at all educational institutions.

##### **2. Recommendations to universities**

For all university leaders, it is recommended:

- Establish a recognition culture at their institution that builds on the guiding idea of the heterogeneity-sensitive university in the European Higher Education Area. This heterogeneity-sensitive university should
  - o welcome all learners, regardless of their educational background, origin or gender, and provide them with competence- and learning outcome-based teaching and flexible study conditions;
  - o enable individual academic education paths for all those entitled to access in an open manner, i.e. it is both permeable in all directions and mobility-friendly;
  - o consciously consider recognition as important components of study and teaching.
- Integrate the concept of the heterogeneity-sensitive university into the university strategy and actively manage change, promoting recognition;
- Conclude framework agreements for partnerships with other universities and for cooperation with non-university (education) actors;
- Regulate recognition in a binding manner throughout the whole university and provide student-friendly deadlines as well as regulations for the consideration of grades;
- Ensure that all stakeholders are involved in the development of procedures and that functioning interfaces are established;
- Provide sufficient funding for sufficient and permanent staff in all organisational units dealing with recognition. Additional resources are needed for the digitalisation of recognition and processes;
- Consider collaborating with other universities to pool resources, particularly with regard to digital support for processes and information provision;
- Initiate transparent communication with respect to recognition.

For **departments** or **faculties** and **subjects**, it is recommended:

sign study programmes and modules in a competence- and learning outcomes-oriented manner. Opportunities for individual and mobile study programme design should be considered at the design stage, for example by planning suitable module sizes, mobility windows, professionalisation, competence and elective areas and additional so-called "container" modules;

- In terms of quality assurance, pay attention to consistent competence orientation in recognition and use the Qualifications Framework for Higher Education Qualifications (HQR) as a basis;
- Introduce flexible study formats, such as part-time or certificate courses,<sup>10</sup> or part-time or continuing bachelor's courses, and consider the potential of shorter learning formats (such as micro-credentials<sup>11</sup>);
- Develop study programmes together with German and foreign partner universities and to support strategically important partnerships specifically at the faculty or department level;
- Carry out systematic equivalence comparisons when introducing lump-sum recognition procedures and to regularly review the fulfilment of the defined competence targets;
- Use reference systems (qualification frameworks, learning objective taxonomies) consistently when assessing recognition according to their respective assessment criteria;
- Offer advisory services for students and prospective students on recognition as well as on the opportunities offered by the mobility-friendly and open university.

For **student administration**, it is recommended:

- Implement the university's recognition procedures in a student-friendly manner. This includes, in particular, process flexibility and short processing times. Information on appeal possibilities for applicants should be offered by the university;
- Provide implementation tools for all actors involved, e.g. in the form of guidelines. These should clearly show processes and responsibilities and state that decisions are ideally to be documented in a database that can be accessed across the university;
- Support examiners of requests for recognition by providing information and advice on the relevant assessment criteria;
- Communicate the recognition procedures of the university jointly at a central place;
- Bring together and disseminate information on different forms of mobility and available options. The information should be reliable, easy to find and published at least in German and English. In addition to regular information events, a central information platform is suitable for this purpose, which could also be jointly operated by an association of universities to promote mobility;

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<sup>10</sup> Cf. Deutsche Gesellschaft für wissenschaftliche Weiterbildung und Fernstudium (2018): Struktur und Transparenz von Angeboten der wissenschaftlichen Weiterbildung an Hochschulen in Deutschland, p. 2 Overview grid.

<sup>11</sup> HRK Recommendation (2020): Micro-degrees and badges as formats of supplementary digital credentials. Recommendation of the 29th General Assembly of the German Rectors' Conference (HRK) on 24 November 2020. P. 11, C.I.4.

- Transparently publish information on the opportunities offered by the permeable university, for example the recognition of prior learning procedure and flexible study formats, and offer corresponding information events.

For **students** (or prospective students, as the case may be), it is recommended:

- Participate in the design of procedures at all levels of academic self-governance;
- Make recognition, where applicable, an issue of university policy within organised university groups;
- Take advantage of advisory and information services;
- Inform themselves about the quality of educational institutions with the help of advisory and information services, and assess the possible fit of existing competences with the learning outcomes to be achieved before applying;
- Ensure the provision of all necessary information for internal university procedures.

### **3. Recommendations to the federal government and the federal states**

For the **federal government**, it is recommended:

- Strongly advocate for the mutual improvement of permeability between the vocational (further) and academic education sectors, whereby the universities, KMK, BMBF, BMAS and BiBB should cooperate even more closely with each other;
- Initiate funding lines and programmes in coordination with the federal states that financially support the change processes in universities to improve recognition procedures;
- Further develop financial support for students planning to study abroad during their course and for those studying part-time or alongside a family phase.

For the **federal states**, it is recommended:

- Increase the basic funding of universities in line with the additional task and service volumes resulting from the further development of recognition. The introduction of tiered degree programmes and modularisation has created the legal prerequisites for the additional student mobility expressly desired by policy-makers at the level of the degree structure. In addition, the digitalisation of studies and teaching gives opportunities to cooperation, interaction and the individual shaping of academic success. International mobility, change of study location, design of permeability and various forms of digitally supported, individual mobility generate a considerable administrative and financial effort in recognition, among other things. This must be taken into account in the context of the further strengthening of study and teaching, which also includes the HRK's demands for a digital flat rate and for a dynamisation of the Future Contract for Strengthening Studying and Teaching in Higher Education;

- Ensure adequate funding when introducing part-time or continuing bachelor's degree programmes. If continuing education bachelor's study programmes are to be financed with basic funds, the basic funding from the federal states must be increased accordingly. If financing cannot be provided from basic funding, it must be possible to charge fees as an alternative;<sup>12</sup>
- Ensure, within the framework of the respective funding allocation models, that universities and their budgets do not suffer any overall financial disadvantages as a result of student mobility;
- Create uniform legislation for recognition of prior learning valid for all 16 states;
- Assist universities with interpretation for the applicable recognition legislation;
- Enable regulations for the promotion of mobility in state-regulated study programmes and show which actors are in charge during the process.
- Fund studies that deal with university degrees, primarily at bachelor's level, and VET degrees and their mutual recognition from a comparative perspective of higher education, taking into account the importance of continuing education and training for graduates and the (legal) framework conditions required;
- Provide project funds for a possible concentration of service facilities for recognition from different universities;
- Clarify the legal status of virtually mobile students. In this context, the aim should be to achieve a uniform legal status for students in both physical and virtual mobility phases across all countries;
- Clarify the legal status of participants in continuing education programmes (e.g. certificate students) to give them the same rights as other students in the sense of lifelong learning and permeability.

#### **4. Recommendations to non-university education actors**

In order to lay the foundations for increasing two-way permeability, it is recommended to the various non-university education actors, especially those offering vocational education and training:

- Increase the awarding of credit for competences gained through higher education in vocational education and training;
- Promote competence and learning outcome orientation in vocational education and training and implement a modularisation of vocational education and training offers;
- Enter into dialogue with universities to facilitate cooperation in lump-sum recognition;
- Transparently communicate their quality assurance mechanisms for degrees, certificates and achievements;
- Stringently document recognition decisions that have already been made, for example with the help of a database. This could also be made available for information purposes to students who are leaving (or considering leaving) their course.

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<sup>12</sup> HRK Recommendation (2021): Creating and seizing new opportunities: Recommendations for continuing education in science. Recommendation of the 32nd General Assembly of the German Rectors' Conference (HRK) on 16 November 2021.