Marion Beyer
Dr. Georg Hanf
Fon: 0228-107-2930 / -1602
Fax: 0228-107-2963
beyer@bibb.de, hanf@bibb.de

Arbeitsbereich 1.3
Robert-Schuman-Platz 3

D-53175 Bonn

EQF-Ref
Wp3: EQF Referencing Process – Exchange of Experience

German Case Study

1. Introduction

An overarching *German Qualifications Framework for Lifelong Learning* (German abbreviation: DQR) based on learning outcomes is currently being developed in Germany. It will include qualifications obtained in general education, higher education and vocational education and training. In the first phase only formal qualifications will be referenced to the DQR. In a later phase also informally and non-formally acquired competences will be included. A proposal for the DQR was published in February 2009. This proposal provides the basis for an ongoing (November 2009) extensive testing phase. The Federal Ministry of Education and Research (German abbreviation: BMBF[1]) jointly with the Standing Conference of the Education Ministries of the German Länder (German abbreviation: KMK[2]) have clearly stated that there are no comments on the EQF referencing process in Germany before conclusions are drawn from the results of testing of the proposed set of the DQR descriptors. As regards the 10 referencing criteria of the EQF Advisory Group we therefore make use of the answers given by the members of the national working group on the DQR to another questionnaire. Additionally, we evaluated the Cedefop report "The development of national qualifications frameworks in Europe[3]" from September 2009 concerning the expected timeframe for the referencing process to the EQF in Germany.

2. DQR Development and Implementation
- **Status quo of the development of the NQF/DQR**

In the framework of the Bologna Process a Qualifications Framework for German Higher Education Qualifications was implemented in 2005. The report on the compatibility of the "Qualifications Framework for German Higher Education Qualifications" with the "Qualifications Framework for the European Higher Education Area" was published in September 2008[4]. This report was produced on behalf of the BMBF and KMK and it came to the conclusion that the German Framework conforms to the QF-EHEA.

In December 2005 Germany announced the development of a German Qualifications Framework in the context of the EQF consultation. In October 2006 the BMBF and the KMK agreed to develop a German Qualifications Framework. In June 2007 the BMBF and the KMK established a Coordination Group for the DQR (German abbreviation: B-L-KG DQR), which manages the process of drawing up the DQR. This process involves a large number of stakeholders (about 30) from general education, higher education and vocational education and training, the social partners and experts from research and practice. Together with the B-L-KG DQR these stakeholders form the "National Working Group on the DQR" (German abbreviation: AK DQR). On behalf of the BMBF a DQR Büro (DQR Office) has been set up to provide technical and administrative support to the process. In spring 2008 the stakeholders agreed on essentials of a DQR.
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In February 2009 the AK DQR published a draft DQR[5] which represents the first comprehensive matrix for the referencing of all qualifications in Germany and extends across educational areas. The draft DQR describes professional and personal competences on eight reference levels which direct the referencing of qualifications obtained in general education, higher education and vocational education and training (see figure 1: Standardised structure for the description of the

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[1] www.bmbf.de

[2] www.kmk.org

[3] http://www.cedefop.europa.eu/etv/Upload/Information_resources/Bookshop/562/6104_en.pdf

[4] http://www.bmbf.de/pub/qualifikationsrahmen_erup_hochschulraum.pdf

[5] Discussion proposal for a "German Qualifications Framework for Lifelong Learning"
www.deutscherqualifikationsrahmen.de, read on 2.10.2009

eight reference levels within the DQR and figure 2: Example: Description of level 4 within the DQR). The draft DQR differentiates between the categories "Professional competence", subdivided into "Knowledge" and "Skills" and "Personal competence", subdivided into "Social competence" and "Self-competence". The term "competence" depicts the ability to use knowledge, skills and personal, social and methodological competences in work or study situations and for occupational and personal development. Formulations of the draft DQR already described at a lower level are not mentioned again at a higher level unless enhancement takes place (principle of inclusion). Despite of this, the knowledge and skills of professional competence at each higher level do not necessarily include the knowledge and skills of the level below.

Figure 1: Standardised structure for the description of the eight reference levels within the DQR

Level indicator			
Structure of requirements			
Professional competence		Personal competence	
Knowledge	Skills	Social competence	Self-competence
Depth and breadth	Instrumental and systemic skills, judgement	Team/leadership skills, involvement and communication	Autonomy/responsibility, reflectiveness and learning competence

Please find attached to the draft DQR a glossary which explains the key terms.

Figure 2: Example: Description of level 4 within the DQR

Level 4			
Be in possession of competences for the autonomous planning and processing of technical tasks assigned within a comprehensive field of study or field of occupational activity subject to change.			
Professional competence		Personal competence	
Knowledge	Skills	Social competence	Self-competence
Be in possession of deeper general knowledge or theoretical professional knowledge within a field of study or field of occupational activity.	Be in possession of a broad spectrum of cognitive and practical skills which facilitate autonomous preparation of tasks and problem solving and the evaluation of work results and processes according to alternative courses of action and reciprocal effects with neighbouring areas. Provide transfers of	Help shape the work within a group and the learning or working environment of such a group and offer ongoing support. Justify processes and results. Provide comprehensive communication on facts and circumstances.	Set own learning and work objectives, reflect on and assess such objectives and take responsibility for them.

	methods and solutions.		

At the beginning of May 2009 the education committee of the German Bundestag discussed the draft DQR. As a result the representatives from different parties described the draft DQR as a good basis and welcomed the participation of the entire educational system in Germany.

Since the end of May 2009 the functionality of the draft DQR has been tested by referencing a selection of about 50 qualifications from 4 domains across all educational sectors and all levels. The aim is to review the structure of the draft DQR matrix and the validity of the descriptive categories. The referencing of qualifications takes place with the principle that each qualification level may be accessible via various educational and training pathways. Afterwards the DQR will be referenced to the EQF. At first, all formal qualifications are included in the testing phase. A further objective is to take account of the outcomes of informal and non-formal learning. Legal aspects will also be investigated in the development. For this purpose the Federal Ministry (BMBF) commissioned a study which shall check the legal impact of the European and the German Qualifications Framework. The presentation of the report on the legal impact of a DQR is expected for autumn 2009.

The testing phase of the DQR started with the working group meetings of the following four testing areas:
- Metal/Electric,
- Trade,
- Health,
- IT.

In this testing phase the level of exemplary qualifications shall be identified and whether and how the draft DQR matrix should be revised. For each of the four testing fields a working group was formed whose members will refer the selected qualifications to the draft DQR matrix according to an expert vote. The working groups are going to meet three times.

The working groups shall explain the arguments for the referencing and describe referencing difficulties. There is no standard method, however comparable elements, for the referencing work in the working groups. In principle, it is an interpretive method. Curricula, training regulations and other relevant documents are analyzed with regard to contents and terminology of the draft DQR for the selected qualifications. For each qualification 5-10 activity areas are identified. Learning outcomes for each of the areas are then tested against each of the descriptors in the 4 columns of the draft DQR. At first the referencing is carried out per activity area, only then for the complete qualification. The referencing work is to be based on the criteria effort, (Europe-wide) transparency, traceability and objectivity. This requires an exact documentation of the work steps and reasons for the outcome descriptions and the referencing. In the end the final result would be a rather different referencing for qualifications not just the referencing based on a mathematic average of the various results. This would contradict the logic of a learning outcome based framework at least in the German understanding. The chairmen of the working groups report to the AK DQR about the results at the end of the process.

The first two working groups meetings have already taken place. The third working group meeting will be in November. At the first working group meeting the experts worked out suggestions on a first referencing of the exemplarily selected qualifications to the levels of the draft DQR. In the second meeting open questions of the referencing were discussed once more. General methodical questions will be in the foreground of the expert work in the third meeting. A possible adaptation

in the draft DQR matrix (e.g. concerning matrix structure, categories, and descriptors) and the appropriate referencing of the qualifications are part of it. The descriptors will be validated with regard to their function to reference qualifications to the DQR levels. The experts will also work out suggestions to guarantee the accordance of the results with the EQF. As an additional task orientation lines shall be developed for the later referencing of further qualifications and of recommendations for the design of a DQR guide. The work will be completed with a result report of the four working groups which shall be available in the first half of 2010. After the end of the testing phase in summer 2010 the AK DQR will advise whether and to what extent the draft DQR shall be revised. Furthermore, Federal Government and Federal States most likely will decide in 2010 which formal and institutional basis the DQR shall have. They most likely will present a final proposal for a DQR in 2011 (which is one year later than initially planned).

3. EQF Implementation

3.1 General Information
- **How is your country planning to refer or link the DQR to the EQF?**

The DQR aims to achieve proper consideration of the specific characteristics of the German educational system. Moreover, the DQR shall accomplish appropriate comparability for German qualifications in Europe. By the implementation of the DQR Germany should come closer to the principle that the important thing is what someone can do, not where he or she has learned to do it. The DQR shall promote the mobility of learners and employees between Germany and other European countries. In the same way as the EQF the DQR focuses on selected characteristics which are relevant for successful action within a field of work or study. Since the DQR has the same number of levels as the EQF the linking of levels is already fixed ex ante.

- **What has been decided or done already?**

The Coordination Group for the DQR set up by the Federal Government and the States in 2007 is in charge of the referencing process – advised and coordinated by the DQR Büro. After the presentation of the draft DQR in February 2009 the testing phase of the DQR started at the end of May 2009. Experts are examining the compatibility of the DQR with the EQF in this testing phase and work out suggestions for the compliance of the results with the EQF. In 2010 all qualifications will be referenced to the DQR. Afterwards the DQR will be referenced to the EQF. The draft referencing report is expected to be prepared by 2010 and the final report will be submitted by 2011. In 2010/2011 the Federal Government and States will decide on the formal and institutional basis of the DQR and put it into force. Until 2013 the implementation of the DQR will take place.

- **What is the timeframe for this process?**

The expected timeframe is as follows:

Timetable NQF/DQR Development and EQF Implementation
2005   Qualifications Framework for German Higher Education Qualifications (related to QF-EHEA) was implemented

December 2005	EQF consultation: Germany announces the development of a German Qualifications Framework for Lifelong Learning (DQR)
October 2006	Agreement of Federal Government and States on the development of a DQR
June 2007	Coordination group and national working group for the development of a DQR established
Spring 2008	Agreement on essentials of a DQR
September 2008	Report on the compatibility of the "Qualifications Framework for German Higher Education Qualifications" with the "Qualifications Framework for the European Higher Education Area" was published
February 2009	A draft DQR is available: www.deutscherqualifikationsrahmen.de
May 2009/ Summer 2010	Testing of the draft DQR by an exemplary referencing of qualifications in the four areas of metal/electric, trade, health and IT. Afterwards the DQR will be referenced to the EQF.
Autumn 2009	Presentation of the report on the legal impact of a DQR
2010/2011	Federal Government and States decide on a formal and institutional basis of the DQR and put it into force. The draft referencing report is expected to be prepared by 2010 and the final report will be submitted by 2011.
2011 / 2013	Implementation of the DQR

3.2 "Experiences and available results"
- **Are there any (preliminary) findings available regarding referencing national levels to EQF levels?**
- **Are there any results available from national pilot projects in the context of EQF referencing?**

- **Transnational project TransEQFrame**

  The testing phase in 2008 of the transnational project TransEQFrame (Trans-European Qualifications Framework Development), www.transEQFrame.net, focused on referencing national VET qualifications from Austria, Bulgaria, Germany, Denmark, Finland and the Netherlands to the EQF levels. The results of the EQF referencing can be summarized as follows:

  On the one hand the project partners found that the concepts and terminology of the EQF have been functioning in principle in the test referencing of VET qualifications to the EQF levels. All partners were able to carry out the test referencing. The partners realised that although the levels of qualifications in the different countries seem to be different at the first glance they have similar core activity areas as a common basis for comparison. Those core activity areas constitute sub-units of the qualification that represent the tasks that are typical for the qualification/occupation looked at. Problems of identifying similar core activity areas across national qualifications were found rather minimal. For this reason the project partners stated that one way of referencing qualifications to the EQF levels could be

to start with the selection of core activity areas and to analyse learning outcomes for those core activity areas. Thus, the EQF could manage to "translate" national qualifications which are different, but have similar cores.

On the other hand, it was a challenge to relate qualifications to the EQF on the basis on national documents for all project partners. National documents are not easy to be interpreted in EQF terms. For example, there are ambiguities between the EQF and the national use of terms, in particular for the term competence. Partners learned through the project that transparency in the process of referencing will be of crucial importance to achieving mutual trust. One of the crucial aspects in the EQF referencing process is certainly the question of extent of evidence provided: What kind of information has to be provided, how much details are necessary to establish mutual trust?

- **Federal Government Initiative ANKOM**

  The BMBF launched in 2005 the Initiative ANKOM – Credit of vocational competences towards higher education study programmes[6], http://ankom.his.de/index.php. The overall goal was to foster learning pathways from VET to Higher Education. Concrete examples of the recognition of competences and qualifications acquired on the job as study equivalents were developed and piloted. The initiative ended in 2008 and showed that, in principle, the credit point system facilitates the recognition of competences in higher education that have been acquired informally.

- **Federal Government Initiative DECVET**

  The aim of the BMBF pilot initiative DECVET (http://www.decvet.net/) for the development of a credit system for vocational education and training in Germany which started in 2007 is to improve permeability. Ten pilot projects in different branches from different regions develop and test transferable procedures for the accreditation of competences and learning outcomes.

3.3 Information related to the criteria and procedures for referencing national qualifications levels to the EQF developed by the EQF Advisory Group

The BMBF jointly with the KMK have clearly stated that there are no comments on the referencing process in Germany before conclusions are drawn from the results of testing of the proposed set of the DQR descriptors. As regards the 10 referencing criteria we therefore make use of the answers given by members of the national working group on the DQR to another questionnaire in the context of another project. Members of this working group are representatives of the Federal Government and States, employers' organisations, trade unions, academia, training providers, the Federal Employment Agency and research experts. Their answers give insight into the discussion for the development of the DQR and implementation of the EQR which currently takes place in Germany.

Additionally, we took the information from the latest Cedefop report on the development of national qualifications frameworks in Europe concerning the expected timeframe for the referencing process to the EQF in Germany.

Criterion 1

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[6] (German: Anrechnung beruflicher Kompetenzen auf Hochschulstudiengänge)

> *The responsibilities and/or legal competence of all relevant national bodies involved in the referencing process, including the National Coordination Point, are clearly determined and published by the competent public authorities.*

The responsibilities and/or legal competence of all relevant national bodies involved in the referencing process are not clearly determined and published yet by the competent public authorities in Germany. The Coordination Group for the DQR (B-L-KG DQR) is designated as the National Coordination Point and will be in charge of referencing.

The answers of the members of the national working group on the DQR which can be related to the responsibilities/legal competence in the context of the EQF implementation are different. A VET research expert thinks that the DQR should represent a reference framework without legal obligation. The umbrella crafts organisaiton (German abbreviation: ZDH[7]) highlights that the DQR should be a voluntary instrument. The umbrella organisation of chambers for industry and commerce (German abbreviation: DIHK[8]) is of the opionion that the DQR should only be used in broad agreement. The ZDH rejects new authorities which are responsible for the DQR on Federal Government or States level. This would lead to higher costs and an increase of bureaucracy in the educational area. The approved structures and their know-how should rather be applied to implement the DQR with existing quality assurance mechanisms.

The representative of one of the Federal States, however, is of the opinion that the DQR should be more than a non-binding recommendation of the Federal Government and States. Moreover, the National Coordination Point should be equipped adequately with rights and resources. The umbrella organisation of charity organisations (training providers) demands that the DQR should be judged as a political innovation instrument. It should be communicated accordingly to ensure a broad social acceptance. According to the main adult education association (German abbreviation: DVV[9]) the Federal Government, States and the local authorities should proceed as driving force behind the development and provide a broad public information. The Accreditation Council[10] thinks that the qualification framework itself should become a natural source of information. According to one trade union (IGM[11]) the debate on the development of a DQR should be broadly held. All who are affected should be included in the disscussion. In their view, at the moment the discussion is very restricted to experts.

Criterion 2
There is a clear and demonstrable link between the qualifications levels in the national qualifications framework or system and the level descriptors of the European Qualifications Framework.

Concerning the link between the qualifications levels of the DQR and and the level descriptors of the EQF the feedback of the stakeholders is as follows:
According to the BMBF, the Federal Employment Agency[12] (German abbreviation: BA), the German Council of Science and Humanities[13] and the German Rectors' Conference[14] (German abbreviation: HRK) the DQR should be compatible with the EQF. The representative of one

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[7] www.zdh.de

[8] www.dihk.de

[9] www.dvv-vhs.de

[10] http://www.akkreditierungsrat.de/

[11] www.igmetall.de

[12] www.arbeitsagentur.de

[13] www.wissenschaftsrat.de

[14] www.hrk.de

of the Federal States believes that there should be a compendium in addition to the DQR. According to the Accreditation Council the descriptors of the DQR should be suitable to describe qualifications from different educational areas. The DIHK believes that there should be only one integrated qualifications framework and no sectoral frameworks. The DQR could depict all qualifications, sectoral approaches would not lead to a transparent educational system. In the opinion of the ZDH the DQR will be initially used by the authorities which are responsible for the education and training. As soon as the DQR is referenced to the EQF the learners, employees, employers and training providers would also benefit from the DQR by comparing different levels of education and training from different countries and educational systems.

According to the KMK the EQF should be compatible with the QF-EHEA. Levels 6-8 should correspond to the three levels of the EHEA (Bachelor, Master, Doctoral studies)[15].

Criterion 3
The national qualifications framework or system and its qualifications are based on the principle and objective of learning outcomes and linked to arrangements for validation of non-formal and informal learning and, where these exist, to credit systems.

Basis and aim of the DQR and its qualifications are learning outcomes. In Germany, the central idea is that all levels should be accessible through a variety of different pathways. The draft DQR also aims at improving opportunities for the recognition of informally acquired learning outcomes and strengthening lifelong learning. Model and research projects concerning credit-systems have been running to support further development.

According to the BMBF the DQR should foster the orientation of the qualifactions towards competences and learning outcomes. The German Education Union[16] (German abbreviation: GEW) and the DVV think that the DQR should embrace non-formally and informally aquired competences. According to the GEW public certification authorities should be established for the recognition of these competences. The ZDH thinks that graduates of VET should be able to study at university without a formal entrance qualification. Qualifications which have already provably aquired should be credited to the studies. It is important that all levels of the DQR are open to qualifications of all educational areas. Level 6-8 should not be exclusively reserved for higher education. According to the representative of one of the Federal States the DQR is the prerequisite for the introduction of credit systems and the equivalence of VET, general and higher education. The IGM believes that the universities in particular should be obliged to rearrange their curricula and to recognize the knowledge and experience acquired in VET. The DVV suggests to fund examplary classification methods in particular in the informal and non-formal area. According to a VET research expert non-formal acquired qualifications require a referencing solution (e.g. by means of credits) which could be only created by accepted recommendations. Such recommendations should be developed.

Criterion 4
The procedures for inclusion of qualifications in the national qualifications framework or for describing the place of qualifications in the national qualification system are transparent.

In Germany, there are no transparent procedures for the inclusion of qualifications in the DQR so far.

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[15] www.kmk.org/internationales/zusammenarbeit-im-rahmen-der-europaeischen-union/europaeischer-deutscher-qualifikationsrahmen.html, read on 3.11.2009
[16] www.gew.de

The representative of one of the Federal States proposes to establish quality management and documentation systems by the DQR. Curricula and examination requirements should be standardized. Their wording should be oriented to competences to reach the equivalence of VET and higer education.

Criterion 5
The national quality assurance system(s) for education and training refer (s) to the national qualifications framework or system and are consistent with the relevant European principles and guidelines (as indicated in annex 3 of the Recommendation).

In Germany, there are no national quality assurance systems for education and training which refer to the DQR explicitly. According to the HRK the DQR has to be based on comprehensible quality assurance mechanisms regarding the referencing of qualifications. The DQR must not be prescriptive. This would endanger its acceptance as an instrument of transparency. In the opinion of the representative of one of the Federal States all areas of the DQR should be subject of a quality management. The EQARF indicators, for example, could form the basic frame in this context.

Criterion 6
The referencing process shall include the stated agreement of the relevant quality assurance bodies.

The Confederation of German Trade Unions (German abbreviation: DGB[17]) comments on the referencing process in the questioning as follows: All stakeholders who are involved in the development of the DQR should steer the process of referencing in the testing phase together. Finally, the recognition and assessment of qualifications should be transferred to a new authority. This should not be the task of the chambers, the universities or people who are involved in initial and further education and training. Only a new authority which does not have any self-interests in the educational system could give the necessary impulses for reforms. A central control is necessary, which ensures national standards, as well as decentralized authorities which provide the obligatory assessment of certain qualifications. One of the important tasks will be to use suitable instruments for the social and self-competence. In addition, this certification authority could recognize informal and non-formal competences. However, opposition have to be feared against a 'competent body' by the chambers as well as by the Education Ministries of the Federal States.

Criterion 7
The referencing process shall involve international experts.

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Criterion 8
The competent national body or bodies shall certify the referencing of the national qualifications framework or system with the EQF. One comprehensive report, setting out the referencing and the evidence supporting it shall be published by the competent national bodies, including the National Coordination Point, and shall address separately each of the criteria.

According to the German representative in the EQF Advisory Group the draft referencing report is expected to be prepared by 2010 and the final report will be submitted by 2011. The

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[17] www.dgb.de

Coordination Group for the DQR (B-L-KG DQR) is designated as EQF national coordination point (NCP) and will be in charge of referencing[18].

Criterion 9
The official EQF platform shall maintain a public listing of member states that have confirmed that they have completed the referencing process, including links to completed referencing reports.

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Criterion 10
Following the referencing process, and in line with the timelines set in the Recommendation, all new qualification certificates, diplomas and Europass documents issued by the competent authorities contain a clear reference, by way of national qualifications systems, to the appropriate European Qualifications Framework level.

The representative of one of the Federal States thinks that the reference to the EQF/DQR level should be obligatory on certificates etc. According to the BA this proof would serve for the best match of qualification/competence and occupation. Moreover, it would serve employees for the further education and training and lifelong learning as well as for the simpler access to qualifications. The GEW also believes that the certificates should contain the reference to the DQR. However, this is not enough. For recognition on the European labour market everyone should have the possibility to apply for a "balance of skills" which also contains the recognition of non-formally and informally acquired competences.

3.4 Referencing Report

The draft referencing report is expected to be prepared by 2010 and the final report will be submitted by 2011.

3.5 Organisation of the process for preparing the referencing report

Till now, information is not available.

References
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[18] The development of national qualifications frameworks in Europe (September 2009), http://www.cedefop.europa.eu/etv/Upload/Information_resources/Bookshop/562/6104_en.pdf, read on 2.11.2009