

NOKUT's Research and Analyses

ORION

Proposed adjustments to criteria for the general recognition of
foreign higher education

February 2019



NOKUT 

NOKUT's work is intended to contribute to public confidence in the quality of Norwegian higher education and tertiary vocational education, as well as recognised foreign higher education. NOKUT wants the report series "NOKUT's Research and Analyses" to contribute further knowledge about issues related to higher education and tertiary vocational education that have a bearing on the quality of study programmes and about issues related to the recognition of foreign education in Norway. The data on which NOKUT bases its reports are obtained through regular surveys such as the National Student Survey (Studiebarometeret), the Teacher Survey, and other surveys initiated by NOKUT. Information is also obtained from interviews, literature studies, registers and portals. In addition to this, NOKUT uses results from its evaluation, accreditation and recognition activities.

We hope that NOKUT's analyses and results will prove useful with respect to the recognition of foreign education and inspire and stimulate higher education institutions in their work on quality assuring and developing their study programmes.

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Preface

NOKUT's work is intended to contribute to public confidence in the quality of recognised foreign higher education. Recognition schemes and information about foreign qualifications are basic requirements if Norway is to make use of international qualifications brought into the country.

Higher education in Europe has undergone major changes due to the Bologna Process. We are witnessing similar developments in other parts of the world. Norway has committed to following up international agreements such as the Lisbon Recognition Convention and its supplementary texts, in the area of recognition. Recognition schemes have been established for the purpose of facilitating greater academic mobility and labour market mobility across national borders. It is therefore important that NOKUT's general recognition scheme changes in line with international guidelines in order to remain relevant.

In 2015, NOKUT changed the criteria for recognition of foreign doctoral degrees. In the ORION project (From Input to Output in Recognition), which was funded through Erasmus+, NOKUT also wanted to apply many of the principles on which the new criteria for recognition of foreign doctoral degrees were based to the first and second cycle (bachelor's and master's levels) of higher education. At the same time, a supplementary scheme for the automatic recognition of qualifications from the Nordic countries has been established. It will be possible to expand this scheme to include more countries in the European Higher Education Area once the adjusted recognition criteria have come into effect.

However, before NOKUT's proposed adjusted criteria can come into effect, amendments must be made to the national Regulations regarding Quality Assurance and Quality Development in Higher Education and Tertiary Vocational Education (Quality Assurance Regulations), which explicitly state that NOKUT's decisions "shall state the general number of credits [...] granted". NOKUT and the Ministry of Education and Research are in discussions about which process will be required to accomplish this. It is considered likely that NOKUT's proposed adjusted criteria will come into effect during 2019.

This report describes the principles on which the proposed adjustments to NOKUT's criteria for recognising foreign higher education have been based. At the same time, the proposed set of criteria is in line with the Bologna Process's intentions regarding recognition.

We hope that the report will provide valuable input for other stakeholders' work on recognising foreign education, both in Norway and abroad.

Summary

NOKUT's criteria for the general recognition of foreign higher education have remained largely unchanged since 2003. NOKUT has drawn up proposed adjustments to the recognition criteria in its Erasmus+ ORION project. The criteria reflect the developments in international practices in the field, which Norway has committed to following in accordance with the Lisbon Recognition Convention and its supplementary texts.

The proposed adjustments to the criteria entail:

- a) A broader approach to assessing “substantial differences”, which is a key concept in the Lisbon Recognition Convention. We want to achieve this by introducing qualification-based recognition. Therefore, we have toned down the focus on workload (principle of time parity) and placed greater emphasis on what an education/degree qualifies in terms of continued studies in the country of origin (access to the next level).
- b) As an extension of a broader approach to what constitutes substantial differences, we will hereafter assess degree equivalence against a broader selection of the master's degrees currently offered in Norway. This means that more applicants will be able to gain master's degree equivalence because our assessments will be based on all of the degrees described in the Regulations concerning Requirements for Master's Degrees.
- c) We are moving away from granting credit recognition in NOKUT's decisions in that completed qualifications will be recognised in relation to a degree. If full degree equivalence cannot be granted, the education will be partially recognised in terms of whole and half years of study. The same rule applies for incomplete studies, where NOKUT will introduce a requirement that the minimum assessable education, measured in terms of study workload, be set at one half year/one semester.

In addition to adjusted assessment criteria, the project has reviewed the layout of NOKUT's recognition decisions. The new decisions document, which will be implemented in connection with the adjusted criteria coming into effect, is simpler in form and content. The goal is to make it easier to use for applicants, employers and any other users of the document.

The proposed adjusted criteria will not result in significant changes to the result for most applicants. Some applicants, e.g. those holding certain types of foreign master's degrees, will experience a better result due to the proposed adjusted criteria. Other groups of applicants will not be given recognition to the same extent as earlier under the proposed adjusted criteria, e.g. applicants with assessable education of under one half year and applicants holding certain four-year first-cycle qualifications.

The purpose of NOKUT's general recognition is to help ensure public confidence in the quality of foreign higher education. NOKUT's decisions give applicants an assessment of their foreign degree compared with the Norwegian degree system, facilitating mobility across national borders. The proposed adjusted criteria comply with current interpretations of what constitutes a “substantial difference” between foreign and Norwegian education. This means that NOKUT's recognition scheme will be changed in line with current international guidelines.

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1 Background

1.1 Introduction

NOKUT has proposed adjustments to the current criteria for the general recognition of foreign higher education. This report is based on the assumption that the criteria will be approved by NOKUT's board and thereafter be introduced during 2019. The goal of the revision was to change NOKUT's criteria in line with developments in national and international education, including developments through the Bologna Process, and developments in international recognition practices based on the supplementary texts to the Lisbon Recognition Convention and practices at other European recognition agencies (ENIC-NARICs).¹

The criteria represent an operationalisation of the current rules under Norwegian legal acts and regulations. Since 2003, NOKUT has been mandated to assess foreign higher education for general recognition pursuant to the Act relating to Universities and University Colleges (Universities and University College Act) of 1 April 2005, No. 15, Section 3-4. An assessment results in an individual decision. General recognition involves an assessment of level and scope of the study programme and the evaluation results in a statement of recognition in terms of credits in relation to degrees and professional qualifications that are granted pursuant to the Act Relating to Universities and University Colleges in Norway. Recognition should also express whether or not, in terms of level and scope, an education is equivalent to a Norwegian degree or education.

NOKUT's recognition is currently based on criteria that were drawn up in the 1990s. They were given their current form in 2003 when NOKUT was established and granted decision-making authority. Since then, changes have taken place both within higher education and within the area of recognition, nationally and internationally. These changes are not adequately reflected in our criteria.

NOKUT's strategy plan for 2016-2020 emphasises the following:

*NOKUT will reference the criteria for recognising foreign higher education to qualifications frameworks/learning outcomes and the principles of automatic recognition.*²

In 2015, NOKUT updated the criteria for the general recognition of foreign doctoral degrees. The previous criteria were formalistic and excluded many foreign doctoral degrees from recognition. The criteria for general recognition of first and second cycle education (bachelor's and master's, respectively) were not examined at that time. The proposed adjusted criteria for general recognition of education in the first and second cycle follow similar principles to those that were applied in 2015.

Over the last 20 years, international processes have led to the harmonisation of degree structures and education, while new recognition tools have also been developed. The 2015 Yerevan Communiqué requires all countries in the European Higher Education Area (EHEA)³ to develop systems for the automatic recognition of education from EHEA countries. A similar recommendation was given by the

¹ ENIC – European Network of Information Centres in the European Region
NARIC – National Academic Recognition Information Centres in the European Union

² <https://www.nokut.no/siteassets/om-nokut/nokuts-strategiplan-2015-2020.pdf>

³ EHEA - European Higher Education Area

EHEA Pathfinder Group on Automatic Recognition in 2014.⁴ Their report recommends a system of automatic recognition of higher education within the EHEA. The report also suggests that more use should be made of learning outcome descriptions and qualifications frameworks as recognition tools.

Furthermore, the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) emphasises that the recognition of foreign education should be part of the institutions' quality assurance work.⁵

NOKUT receives a large number of applications for general recognition of foreign higher education every year. In 2018, NOKUT received around 7,000 such applications. NOKUT's recognition criteria must ensure the most accurate and relevant assessment possible of foreign educational qualifications, so that the competencies these qualifications represent can be utilised in the best possible way in Norway.

The report describes the current regulations for general recognition, NOKUT's current criteria and the challenges associated with this set of criteria. It proposes a new set of adjusted criteria, and outlines the considerations on which the proposal is based. The report concludes by describing the consequences of the proposed changes.

1.2 The Erasmus+ ORION project

The proposal concerning the new criteria was drawn up in the ORION⁶ (From Input to Output in Recognition) project. The project ran from October 2016 to February 2019 and was funded by the EU Erasmus+ education programme. The formal owner of the project was the Norwegian Ministry of Education and Research.

The goal of the project was to develop a new approach to NOKUT's recognition practices that gives greater importance to developments in national and international education, including:

- The Bologna Process
- Developments in international recognition practices
- The Lisbon Recognition Convention's supplementary texts
- Practices at other European recognition agencies (ENIC-NARIC)

We wanted, to a greater extent than before, to move away from measurable input factors when assessing an education (e.g. admission requirements, nominal length of study and credits). We also wanted to take into account which qualification an applicant had achieved, the rights the qualification provides in the country of origin, and where the qualification is placed in the country of origin's national qualifications framework. Another goal in the project was to explore the possibility of implementing automatic recognition.

NOKUT received assistance on the project from recognition experts from other Nordic ENIC-NARIC agencies and Norwegian higher education institutions.

⁴http://www.ehea.info/media.ehea.info/file/2015_Yerevan/72/3/EHEA_Pathfinder_Group_on_Automatic_Recognition_January_2015_613723.pdf

⁵<http://www.ehea.info/page-standards-and-guidelines-for-quality-assurance>

⁶<https://www.nokut.no/om-nokut/internasjonalt-samarbeid/erasmus-projekter/orion/>

The ORION working group consisted of the following people:

Andrea Lundgren, senior adviser, NOKUT

Valborg Holten Jørgensen, senior adviser, NOKUT

Tonje Tangen Kemp, adviser, NOKUT

Hanne-Gerd Nielsen, head of section, NOKUT, until May 2018

Joachim Gümüs Kallevig, head of section, NOKUT, from June 2018

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Cecilia George, senior credential evaluator, Swedish Council for Higher Education, Sweden

For further information about the project and the project group's work, please see the project website at: <https://www.nokut.no/om-nokut/internasjonalt-samarbeid/erasmus-projekter/orion/>

1.3 Methodology

NOKUT analysed the challenges associated with the current criteria. NOKUT also arranged a Nordic workshop to map recognition practices in the various Nordic countries (see Chapter 4). In addition to this, NOKUT visited its UK NARIC colleagues in order to learn more about their recognition practices.

Inspired by the visit to UK NARIC, a qualifications matrix for case officers has been developed. The matrix and the proposed new recognition criteria have been tested by NOKUT's case officers. Each case officer was asked to assess a certain number of applications, using both the old and the proposed new criteria. The proposed new criteria were used to assess both simple and complicated educational pathways. The feedback from the case officers was that the new criteria were easier to apply than the current criteria.

In autumn 2018, the set of criteria was circulated for consultation purposes to the education sector, the national recognition agencies for regulated professions, employer organisations, and other stakeholders. The deadline for submissions was 28 December 2018. The consultation process and NOKUT's assessment of the feedback are discussed in Chapter 6.

The working group held a total of four meetings: a start-up meeting, a Nordic workshop, a meeting on the proposed criteria, and a final meeting.

2 NOKUT's remit for the recognition of foreign higher education

This chapter describes the current legal basis for NOKUT's recognition of foreign higher education. It outlines NOKUT's current criteria for recognition, and discusses relevant elements in NOKUT's assessment of foreign higher education.

NOKUT's general recognition is mandated by the Universities and University College Act, Section 3-4. Since 2003, NOKUT has granted academic, general recognition of foreign higher education to individuals based on applications. General recognition is a system-based assessment that compares foreign higher education with Norwegian higher education. NOKUT assesses the level and scope of the foreign higher education.

Until now, NOKUT has applied the principle of time parity in general recognition. This means that 1 year of successfully completed education corresponds to 1 year of education in Norway. Only education above the minimum requirement for admission to higher education in Norway (the so-called GSU requirement) is recognised as higher education. The minimum requirement for admission for each country is specified in the GSU list.⁷

NOKUT makes a decision that states the level, credit recognition and, if applicable, degree equivalence in relation to the Norwegian degree structure.

One statutory criterion for recognition is that NOKUT must assess the foreign education's level and scope. The regulatory criteria for recognition include, among other things, provisions that NOKUT must assess the general credit recognition in relation to degrees and that the foreign education must be accredited or official recognised as higher education in the country of origin.

NOKUT's current criteria for recognising foreign higher education have been operationalised in accordance with national acts and regulations. The criteria are published on NOKUT's website and can be found in Annex 1 to this report.

2.1 Legal basis

2.1.1 Universities and University Colleges Act

The Act relating to Universities and University Colleges (Universities and University Colleges Act) entered into force on 1 April 2005. The Act states NOKUT's purpose and remit, and describes the system for general recognition and a national qualifications framework. The various provisions will be discussed below.

NOKUT's objective

The objective of NOKUT's activities is given in Section 2-1 (2) of the Universities and University College Act:

“NOKUT's objective is to monitor the quality of higher education and tertiary vocational education, to recognise foreign higher education and to stimulate quality development that ensures that the institutions provide education at a high international level. NOKUT's work is intended to enable public trust in the quality of Norwegian higher education, tertiary vocational education and recognised foreign higher education. In its work, NOKUT shall strive to assist the institutions in their development work.”

⁷ <https://www.nokut.no/databaser-og-fakta/nokuts-landdatabase2/GSU-listen/>

NOKUT's objects clause states that NOKUT must help ensure public confidence in the quality of recognised foreign higher education.

NOKUT's remit

NOKUT's remit for recognition is given in Section 3-4 of the Universities and University College Act:

“NOKUT decides, after individual applications, whether qualifications awarded by foreign institutions of higher education or Norwegian institutions not subject to this Act, shall be given general recognition so that the education in level and scope is recognised as equivalent to accredited Norwegian higher education. The appeals body may not review NOKUT's assessment of the level and scope of the education.”

NOKUT's remit is to provide general recognition of foreign higher education. This is a system-based recognition based on a comparison of education systems and an assessment of the level and scope of the qualification. This is not a recognition in relation to a specific Norwegian degree, which would also include an evaluation of the content of a degree programme. NOKUT's definitions of level and scope are discussed below in section 3.1.3.

Section 3-4 of the Universities and University College Act also states that NOKUT assessments are individual decision, cf. Section 2 (b) of the Public Administration Act.

2.1.2 The Public Administration Act

NOKUT's general recognition of foreign higher education is an individual decision that includes a right of appeal pursuant to the Public Administration Act. The Public Administration Act governs the implementation of all administrative procedures in public administration in Norway.

2.1.3 The Quality Assurance Regulations

The Regulations concerning Quality Assurance and Quality Development in Higher Education and Tertiary Vocational Education (Quality Assurance Regulations) entered into force on 1 February 2010. The Quality Assurance Regulations state specific criteria for recognition and NOKUT's duties within the area of recognition. Relevant provisions are discussed below.

Publicly recognised education

Section 6-1 (3) of the Quality Assurance Regulations states that:

“In the case of a general recognition of foreign qualifications, NOKUT shall ensure that the education for which recognition is being sought is accredited or publicly recognised as higher education in the country in question. Exceptions to this provision may be made in special circumstances.”

The phrase “accredited or publicly recognised” means that the foreign education must be quality assured and accredited as higher education by a competent body.

General recognition in credits

Section 6-1 (1) of the Quality Assurance Regulations state that:

“The recognition shall state the general number of credits in relation to degrees and professional qualifications that are granted pursuant to Section 3-2 of the aforementioned Act, and whether the level and scope of the qualification is equivalent to a Norwegian degree or qualification.”

Up to now, NOKUT has interpreted the provision in the sense that we have stated all the credits obtained by the applicant, not just the number of credits required for the Norwegian qualification that the foreign qualification is equivalent to.

In our work on the criteria, dialogue was established with the Ministry of Education and Research on amending the Quality Assurance Regulations, with the aim of eliminating the provision on general credit equivalence from the Quality Assurance Regulations. The challenges associated with credits are described in section 3.1.5.

Authority to issue application and documentation guidelines

Section 6-1 (2) of the Quality Assurance Regulations states that:

“NOKUT may issue more detailed guidelines on the requirements regarding applications and documentation.”

The Ministry of Education and Research has authorised NOKUT to establish guidelines for the requirements regarding applications and documentation. The requirements are laid down by NOKUT’s Director General.

NOKUT’s duties

NOKUT’s duties include the following, cf. Section 1-5 (4) of the Quality Assurance Regulations:

- *To recognise higher education (general recognition).*
- *To facilitate coordinated national practices for recognition pursuant to Section 3-5 (5) of the Universities and University Colleges Act, and to advise the institutions.*
- *To disseminate information about the institutions’ decisions concerning recognition of higher education.*
- *To serve as and run an information centre pursuant to the Lisbon Convention, and be Norway’s representative in the ENIC network, cf. Article X.3 of the Lisbon Convention.*
- *To keep and maintain a list of higher education entrance qualification for applicants with a foreign education (the GSU list).*

Section 6-1 (5) of the Quality Assurance Regulations states that:

“NOKUT shall monitor that Norwegian interests and obligations pursuant to international agreements regarding the recognition of and information on higher education are safeguarded. NOKUT may be assigned national tasks in this area.”

The requirement that NOKUT must follow up on commitments according to international agreements is associated with, among other things, the provisions of the Lisbon Recognition Convention, under which NOKUT has been assigned the role of national ENIC agency.

2.1.4 The Lisbon Recognition Convention

The Convention on the Recognition of Qualifications concerning Higher Education in the European Region (Lisbon Recognition Convention)⁸ was ratified by Norway in April 1999 and entered into force in Norway in June that year. The convention's purpose is to facilitate greater academic mobility. The goal is to achieve joint solutions to practical problems related to the recognition of qualifications in higher education. Countries that sign up to the convention commit, among other things, to having transparent and fair processes for the recognition of higher education. In addition to the convention text, there are also recommendations from the Lisbon Recognition Convention Committee in the form of supplementary texts,⁹ as well as the EAR Manual, which gives detailed recommendations for the operationalisation of the principles in the convention.¹⁰

The Lisbon Recognition Convention stipulates requirements concerning transparency and fair processes. Article III.2 states that convention parties must ensure that the procedures and criteria used in the recognition of qualifications are transparent, coherent and reliable.

The convention stipulates a specific requirement that the criteria for recognition must be well founded, that they should be reviewed regularly, and that they must take account of developments in the areas of education and recognition. If NOKUT wants to change the criteria for recognising foreign higher education, it is important that the changes are well founded and a mechanism for regular evaluation of the criteria is established.

NOKUT has been assigned the role of national ENIC office for Norway.¹¹ This means that NOKUT must provide information about the education systems in Norway and the other parties to the convention, provide advice in recognition cases, promote the use of the Diploma Supplement, and promote the Lisbon Recognition Convention's principles in recognition cases.

The Lisbon Recognition Convention specifies criteria for how a foreign education should be recognised. The vast majority of the provisions in the convention are consistent with Norwegian law, although the convention contains a greater level of detail than Norwegian law. Below, NOKUT describes the main principle that supplements the Norwegian rules.

⁸ https://www.regjeringen.no/globalassets/upload/kd/vedlegg/uh/lisboakonvensjonen/f-4260_web.pdf

⁹ Supplementary texts include: [Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Explanatory Memorandum](#), 2001, revised 2010; [Revised Code of Good Practice in the Provision of Transnational Education](#), June 2007; [Recommendation on the Use of Qualifications Frameworks in the Recognition of Foreign Qualifications](#), June 2013; and [Recommendation on Recognition of Qualifications Held by Refugees, Displaced Persons and Persons in a Refugee-like Situation](#), November 2017.

¹⁰ The EAR Manual: http://eurorecognition.eu/manual/EAR_manual_v_1.0.pdf

¹¹ ENIC – European Network of Information Centres

Substantial difference

The main principle in the Lisbon Recognition Convention is that “...each Party shall recognise the higher education qualifications conferred in another Party, unless a substantial difference can be shown between the qualification for which recognition is sought and the corresponding qualification in the Party in which recognition is sought.”¹² This principle of “substantial differences” is something we are committed to follow in our recognition practices.

The key concept of “substantial differences” is not specifically defined, but the Lisbon Recognition Convention and its supplementary texts provide general statements regarding how the term “substantial differences” should be understood. It recommends that when assessing the existence of any substantial difference, one must look at learning outcomes, access to further activities, and differences in key elements in the programme, as well as whether the quality of the programme or institution offering it may constitute a substantial difference from the equivalent Norwegian qualification.¹³

2.1.5 The Bologna Process and the EHEA

Norway is actively involved in the Bologna Process, which is an intergovernmental partnership between 48 European countries aimed at creating a common European area for higher education,¹⁴ the European Higher Education Area (EHEA). Via the Bologna Process, the participating countries and the EU are collaborating on a voluntary process for greater cooperation, transparency and convergence between the countries’ higher education systems.

The Bologna process has introduced a number of structural changes in the countries’ education systems, exemplified by the introduction of the new degree system in the 2003 Quality Reform in Higher Education in Norway.

For the current period, 2018-2020, the ministers of education from the participating countries have identified three key commitments:

- The introduction of a three-cycle degree system in higher education (bachelor’s/master’s/doctoral degree);
- Enhanced quality assurance; and
- Easier recognition of qualifications and periods of study in line with the LRC.

The Yerevan Communiqué

The 2015 Yerevan Communiqué¹⁵ underlined the need to “ensure that qualifications from other EHEA countries are automatically recognised at the same level as relevant domestic qualifications.”¹⁶ A

¹² The Lisbon Recognition Convention: https://www.regjeringen.no/globalassets/upload/kd/vedlegg/uh/lisboakonvensjonen/f-4260_web.pdf

¹³ The Lisbon Recognition Convention: Revised Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications https://www.regjeringen.no/globalassets/upload/kd/vedlegg/uh/lisboakonvensjonen/f-4260_web.pdf

¹⁴ <http://eha.info/>

¹⁵ The communiqué following the ninth ministerial meeting of the Bologna Process in Yerevan, Armenia, May 2015: <http://bologna-yerevan2015.ehea.info/files/YerevanCommuniqueFinal.pdf>

¹⁶ <https://www.norden.org/sv/nordiska-ministerraadet/ministerraad/nordiska-ministerraadet-foer-utbildning-och-forskning-mr-u/deklarationer-och-foerklaringar/nordisk-deklaration-om-erkaennande-av-bevis-avseende-hoegre-utbildning-reykjavik-deklarationen-reviderad-2016>

similar call was made by the EHEA Pathfinder Group on Automatic Recognition in 2014. Their report recommends that an automatic recognition system should be established for higher education within the EHEA, with greater use of learning outcomes and qualifications frameworks as recognition tools.¹⁷

The Paris Communiqué

At the tenth ministerial meeting in Paris in 2018, the education ministers approved a goal of ensuring that a qualification from one EHEA country would automatically be recognised as a qualification on the same level in another EHEA country for the purposes of access to further study or work.¹⁸

As mentioned above, particular attention has been paid to recognition in the current period (2018-2020).

2.1.6 The Reykjavik Declaration

On 9 June 2004, Nordic education ministers signed the Nordic Declaration on the Recognition of Qualifications concerning Higher Education (The Reykjavik Declaration).¹⁹ The declaration was based on the Lisbon Recognition Convention and was aimed at contributing to closer cooperation on the mutual recognition of qualifications within higher education in the Nordic region.

The revised Reykjavik Declaration from 2016 maintains that goal and underlines that comparable qualifications from higher education in the region should be recognised in the other Nordic countries.²⁰ The text supports the goal of the automatic recognition of qualifications, as this is described in the Yerevan Communiqué. Specifically, the revised Reykjavik Declaration states that comparable qualifications in the Nordic region should be automatically recognised in other Nordic countries.

2.1.7 Qualifications Framework

The Norwegian National Qualifications Framework (NQF) provides an overview of the education system in Norway and shows at which level Norwegian qualifications are placed in relation to each other. The NQF is mentioned in Section 3-2 (1) of the Universities and University Colleges Act and referenced to the European Qualifications Framework. Qualifications frameworks are an instrument that may aid in the comparison of Norwegian and foreign qualifications.

According to the Lisbon Recognition Convention's supplementary text from 2013, qualifications frameworks should be used as a transparency tool in the recognition of foreign qualifications.²¹

The Lisbon Recognition Convention's supplementary text, item 35, states:

In the case of a qualification belonging to a foreign system of education, the assessment should take into account its relative position and function compared to other qualifications in

¹⁷ https://norric.org/files/agreements/reykjavik_en

¹⁸ http://www.ehea.info/media/ehea.info/file/2018_Paris/77/1/EHEAParis2018_Communique_final_952771.pdf

¹⁹ https://norric.org/files/agreements/reykjavik_en

²⁰ <https://www.norden.org/sv/nordiska-ministerraadet/ministerraad/nordiska-ministerraadet-foer-utbildning-och-forskning-mr-u/deklarationer-och-foerklaringar/nordisk-deklaration-om-erkaennande-av-bevis-avseende-hoegre-utbildning-reykjavik-deklarationen-reviderad-2016>

²¹ Subsidiary text to the convention: "Recommendation on the use of qualifications frameworks in the recognition of foreign qualifications", 19 June 2013

*the same system. Where available, the competent recognition authorities should also refer to the National Qualifications Framework, European Qualifications Frameworks and other similar Qualification Frameworks as part of the assessment process.*²²

Recognition authorities must thus take account of qualifications frameworks when assessing foreign higher education, if a qualifications framework is available.

2.1.8 Other rules that are relevant for recognition

Regulations concerning Admission to Higher Education

Section 2-2 (6) of the Regulations concerning Admission to Higher Education (Admission Regulations) states: “*The GSU list is binding for admission to higher education.*”

NOKUT has been tasked by the Ministry of Education and Research with administering the GSU list²³ in relation to the Admissions Regulations, pursuant to Section 1-5 (4) of the Quality Assurance Regulations. The GSU list gives the minimum entrance requirements for access to higher education in Norway for applicants with a foreign education.

The GSU list is relevant for general recognition in that only education that exceeds the minimum entrance requirements for access to higher education can be recognized as higher education by NOKUT. This means, for example, that a 3-year Indian bachelor’s degree is normally granted general recognition equivalent to a Norwegian 2-year university college candidate degree, since the GSU requirement for India is completed upper secondary school plus 1 year of higher education.

Regulations concerning Requirements for Master’s Degrees

The Regulations concerning Requirements for Master’s Degrees (Master’s Degree Regulations)²⁴ stipulate requirements for master’s degrees for institutions subject to the Act relating to Universities and University Colleges, cf. Section 1. The Master’s Degree Regulations contain provisions that stipulate what sort of master’s degrees Norwegian higher education institutions can offer. According to the Master’s Degree Regulations, the following master’s degrees can be offered in Norway:

- Master’s degree pursuant to Section 3, with a nominal length of study of 2 years
- Master’s degree pursuant to Section 4, with a nominal length of study of 5 years
- Experience-based master’s degree pursuant to Section 5, with nominal length of study of 1.5-2 years
- Master’s degree pursuant to Section 7, with a nominal length of study of 1-1.5 years

The most common master’s degrees offered by Norwegian institutions are 2-year, discipline-based master’s degrees and 5-year, integrated master’s degrees. Such master’s degrees qualify for access to a

²² http://www.enic-naric.net/fileusers/Recommendation_for_Recognition_Foreign_Qualifications.pdf

²³ GSU: General basis for admission for applicants with foreign education

²⁴ <https://lovdata.no/dokument/SF/forskrift/2005-12-01-1392/%C2%A72#§2>

PhD programme, although higher education institutions also have the autonomy to consider other qualifications for admission.

The Master's Degree Regulations do not explicitly state that NOKUT must refer to the Regulations when assessing foreign education. Nevertheless, NOKUT has used the Master's Degree Regulations for general recognition in order to achieve a genuine comparison with the Norwegian master's degree structure. Up till now, NOKUT has only evaluated foreign master's degrees against 2-year discipline-based master's degrees and 5-year integrated master's degrees.

3 Review of the criteria and practices up to now

3.1 Introduction

This chapter gives an overview of the criteria for the general recognition of foreign higher education that have been applied by NOKUT from 2003 up to the present day. It also discusses challenges that the current practices present. The complete set of criteria is included in an annex to this report.

3.1.1 Application requirements: Individual applicant with documented education

An application for recognition of foreign higher education must contain documentation of the higher education, proof of identity and certificates from upper secondary school. The requirements for documented education are authorised by Section 6-1 (1) of the Quality Assurance Regulations.

NOKUT has drawn up general documentation requirements that apply to all countries, as well as specific documentation requirements for some countries.²⁵ NOKUT's documentation requirements have not been changed in the proposed adjustment to the criteria. NOKUT evaluates the authenticity of submitted documentation.

NOKUT has prepared special guidelines for applicants with university and/or university college education without verifiable documentation. The recognition scheme for applicants without verifiable documentation, an interview-based procedure, also leads to a decision on general recognition of foreign higher education. Applicants are referred to this procedure based on an individual assessment. For more information, see: <https://www.nokut.no/utdanning-fra-utlandet/Godkjenningsordning-for-personer-uten-verifiserbar-dokumentasjon/>

3.1.2 Education must be publicly recognised or accredited

Pursuant to Section 6-1 (3) of the Quality Assurance Regulations, NOKUT defines education as accredited or publicly recognised as higher education if it fulfils one or more of the following criteria:

²⁵ <https://www.nokut.no/utdanning-fra-utlandet/nokuts-generelle-dokumentasjonskrav/>
https://www.nokut.no/soknader--utdanning-fra-utlandet/godkjenning-av-utenlandsk-hoyere-utdanning/#_3

- The education/qualification must be a part of the system of higher education in the country of origin.
- The institution must be officially recognised as self-accrediting at the relevant level. Alternatively, the study programme must be officially recognised/accredited as higher education.

NOKUT employs specific guidelines for countries without a system for official recognition of higher education. This is authorised by Section 6-1 (3) of the Quality Assurance Regulations.

NOKUT's practices in this area have not been changed in the proposal for adjusted criteria.

3.1.3 Assessment of level and scope

According to Section 6-1 (1) of the Quality Assurance Regulations, the educational programme must be at the same level as Norwegian higher education in order for NOKUT to be able to grant general recognition. The term "level" has two meanings in NOKUT's work:

- 1) Education at the same level as Norwegian higher education means education in excess of the minimum admission requirements for higher education in Norway (as set out in the GSU list, see 2.1.8)²⁶.
- 2) Three different cycles of higher education have been defined in Norway, in accordance with the Bologna structure: bachelor's degree, master's degree and doctoral degree level (first, second and third cycle).

As far as level is concerned, NOKUT examines which level the foreign education is at in the education system in its country of origin. This level is compared to the Norwegian education system and the Norwegian degree structure (including university college candidate degree, bachelor's degree, master's degree and doctoral degree). NOKUT's criteria for assessing foreign degrees in relation to Norwegian degrees are mandated by Section 3-4 of the Universities and University Colleges Act.

For education where the admission level for higher education in the country of origin is regarded as lower than in Norway, NOKUT will, based on the GSU list, only be able to grant general recognition of the education that exceeds the GSU requirements. For example, a 4-year US bachelor's degree will normally be recognised as equivalent to a 3-year Norwegian bachelor's degree, since the requirement for admission to Norwegian higher education with a US education is completed high school and 1 year of higher education.

The term "scope" means a full-time study workload during the education. NOKUT examines what the institution itself specifies as the nominal length of study and takes this into account when assessing how many credits can be recognised.

If the level and scope of a foreign qualification match the level and scope of a Norwegian degree, NOKUT can grant general recognition in the form of degree equivalence. For example, a "licencjat"

²⁶ <https://www.nokut.no/databaser-og-fakta/nokuts-landdatabase2/GSU-listen/>

degree from Poland, with its scope of 3 years, is normally granted general recognition as equivalent to a Norwegian bachelor's degree.

If the level and scope of a foreign qualification are not equivalent to the level and scope of a Norwegian degree, NOKUT may provide recognition in the form of credits. For example, a 1-year graduate diploma from Australia will normally be granted general recognition as 60 credits/1 year of higher education, since it does not satisfy the criteria for a degree in Norway.

Challenges in assessing level and scope

As mentioned earlier, harmonisation processes have been implemented for both education systems and recognition practices under the Bologna process. These developments should be reflected in NOKUT's recognition practices. The current criteria are based on a mathematical approach in which measurable input factors determine our recognition decisions. The consequence is that our assessments provide very little room for taking account of how other countries' education systems are built up. In addition to this, the current criteria do not place enough weight on whether the qualification gives access to studies in the next cycle in the country of origin. This results in a limited interpretation of the term "substantial differences", which is a central concept in the Lisbon Recognition Convention and its supplementary texts.

The current criteria primarily give emphasis to measurable input factors such as nominal length of study and the number of credits completed. This means that we can recognise an education as equivalent to a bachelor's degree if the nominal length of study is 3 years, irrespective of whether the education leads to a bachelor's degree or not in the country of origin. In other words, if the programme does not lead to a bachelor's degree and does not provide access to the next level in the country of origin, NOKUT's recognition can currently grant the foreign education academic rights it does not have in the country of origin.

There are also examples of the contrary being true: if the nominal length of study of a foreign master's degree is less than 5 years, NOKUT is currently unable to recognise the qualification as equivalent to a Norwegian master's degree. In our opinion, this practice is unfortunate, since it fails to take account of the academic rights the qualification confers in the country of origin and only assesses it on the basis of its scope. This heavy emphasis on measurable input factors prevents other factors associated with a qualification also being taken into consideration in an assessment.

Access to the next level

One important aspect of an academic qualification is that it provides – or does not provide – access to apply for admission to the next level in the educational system. For example, a bachelor's degree will normally give access to a master's programme within the same field.

At the same time, many countries offer qualifications that are primarily targeted at the labour market and do not provide access to the next cycle in the educational system. These nuances are not reflected in NOKUT's current criteria.

Based on the ongoing work in the ORION project, NOKUT decided to make a minor adjustment to the recognition criteria in 2017, such that access to subsequent doctoral degree study programmes in the

country of origin became a requirement for a foreign education to be recognisable as equivalent to a Norwegian master's degree.

No corresponding change in the general recognition of education at bachelor's degree level has been implemented. The consequence of this is that in some cases NOKUT recognises foreign undergraduate education as equivalent to a Norwegian bachelor's degree, despite the qualification not having the same academic status as a bachelor's degree in the country of origin. One example of this is the 3-year diploma education from Canada. This qualification is not a bachelor's degree, but can be incorporated into a bachelor's degree in Canada. Recognising such a qualification as equivalent to a Norwegian bachelor's degree can be misleading, since the qualification does not give access to the master's level in Canada.

3.1.4 The principle of time parity

Education that is at the level of Norwegian higher education has, until now, normally been recognised according to the principle that one year of full-time academic studies in the country of education is equal to one year of full-time study in Norway. The principle of time parity assumes that the nominal length of study for the foreign qualification is given for full-time study.

Challenges presented by the principle of time parity

The principle of time parity is a simple recognition tool and is intended to ensure equal treatment of the applicants. However, in our experience, the principle can also hinder a comprehensive assessments of qualifications and even lead to unintended results.

NOKUT bases its recognition practices on the full-time nominal length of study. This presents numerous challenges. Education with a somewhat shorter nominal length of study than what is required for a degree in Norway, has until now not been recognised as equivalent to the corresponding Norwegian degree due to the principle of time parity. This applies despite the fact that the other elements of the education match those of the corresponding Norwegian qualification. It is thus difficult to claim that there are substantial differences between the foreign education and the Norwegian qualification.

At the same time, nominal length of study is not as easily determined as one might believe. In many countries, institutions do not use nominal length of study in relation to degrees. For example, the degree may be achieved after a certain number of courses or credits. One example of this is a master's degree from the US, which can be achieved after 36 credits within specific fields, regardless of any nominal length of study. Some study programmes are also offered on a part-time basis, and it can be difficult to calculate what the education corresponds to in terms of a full-time workload. Credit equivalency based on the principle of time parity is correspondingly difficult.

We have also seen examples where students are admitted to education on the basis of various qualifications and are provided with an individually adapted course of study of varying length based on previous education. For example, a bachelor's degree from India can be taken in 3 years after completion of upper secondary school or in 2 years after a diploma education. The qualifications

obtained are the same, but the pathways to obtaining the degrees vary in length. According to the principle of time parity, the degrees could be assessed differently, even though the qualification obtained is the same. This demonstrates how it sometimes can be difficult to substantiate differences in length as substantial differences, especially if you also include considerations of what the qualification provides access to in the country of origin.

3.1.5 General recognition in terms of credits

According to Section 6-1 of the Quality Assurance Regulations, NOKUT's recognition must state the "general number of credits" in relation to degrees and professional qualifications that are granted pursuant to Section 3-2 of the aforementioned Act, and whether the level and scope of the qualification is equivalent to a Norwegian degree or qualification.

Up to now, NOKUT has interpreted the provision to the effect that we have stated all the credits that the applicant has completed, not just how many credits are required for the Norwegian qualification to which the grade is equivalent.

Challenges presented by general credit equivalence

Counting credits

Based on the current criteria, NOKUT grants general recognition in the form of degree equivalence with a Norwegian degree and an indication of the nominal length of study for the degree in question. We also give an individual assessment of each applicant education by indication of the number of credits²⁷ attained in cases where credits have been granted, primarily in the form of ECTS²⁸ in the student's education documents. One example of this is a Swedish candidate exam standardised at 180 ECTS credits where the student has obtained 192 ECTS credits during the course of his or her studies. In such cases, NOKUT has recognised the education as equivalent to a Norwegian bachelor's degree (180 credits) and also given supplementary recognition of the 12 credits in excess of the requirements for the bachelor's degree.

It can be argued that the counting credits in excess of degree requirements adds little to the value of a recognition statement for the applicant or a potential future employer. The 12 extra credits do not confer any greater academic rights or other benefits in NOKUT's opinion. In some complicated cases, the applicant will have completed a course of study in which several qualifications have been partially incorporated into each other. In such circumstances, NOKUT's practice has been not to count the same course twice if it is included in more than one education. This means we have granted degree equivalence, but "deducted" credits based on the amount of credits from a previous qualification that have been incorporated in the qualification in question. Furthermore, finding reliable information about the amount of credits that has been incorporated can be difficult and in some cases impossible. In sum, counting credits sometimes has the unintended consequence of making NOKUT's recognition decisions harder to understand for employers and higher education institutions.

²⁷ 1 Norwegian credit = 1 ECTS credit

²⁸ European Credit Transfer and Accumulation System. 1 credit = 1 ECTS.

Incorporation of postsecondary vocational education in an academic degree

The incorporation of postsecondary vocational education in an academic degree is very common in many countries, and Norwegian universities and university colleges are also allowed to incorporate prior learning of this kind into their own degrees. When NOKUT grants general recognition of a completed degree, we do not differentiate with respect to whether the entire education has been taken at a university/university college, or whether parts of the education have been incorporated from, among other things, a postsecondary vocational education.

However, in cases where Norwegian postsecondary vocational education has been incorporated in a foreign bachelor's degree, NOKUT has followed a different practice. In such cases we have granted degree equivalence, but at the same time the applicant has only be given credits for the time spent at a higher education institution. This practice is supported by several Norwegian higher education institutions, who have not wanted to grant admission to master's degrees based on a bachelor's degree that includes Norwegian postsecondary vocational education.

The disparity in the assessment of Norwegian and foreign postsecondary vocational education in NOKUT's current recognition practices, has resulted in some unfortunate outcomes. For example, the incorporation of postsecondary vocational education is common practice in Australian 3-year bachelor's degrees. An Australian degree incorporating 2 years of Norwegian postsecondary vocational education will, under the current criteria, be recognised by NOKUT as a bachelor's degree with a credit equivalency of 60 credits. In contrast, an Australian degree incorporating 2 years of Australian TAFE education²⁹ will be recognised as equivalent to a bachelor's degree with a credit equivalency of 180 credits. The students obtain the same qualification, but receive two widely different decisions from NOKUT. These differences in treatment of identical qualifications are difficult to justify.

Use of ECTS/credits in recognition decisions

The European Credit Transfer System, ECTS, was developed to facilitate academic mobility and the Norwegian credit system applies the same scale and workload calculations as ECTS³⁰. However, we do see instances where higher education institutions in other countries apply ECTS differently than is the case in Norway. The EAR Manual, which is a tool for higher education institutions and recognition agencies, describes the challenges in using workload and credits in a recognition context as follows:

Workload is sometimes a problematic issue in comparing qualifications because, in spite of being a quantitative measure, it is calculated in different ways in different systems. For example, within the Bologna signatory countries the defined student workloads within an academic year vary by up to 40%³¹.

The EAR Manual also points out that the variations mean that relying the nominal number of hours, credits or years is not appropriate in a recognition context. Workload should be considered as one of several elements for achieving a qualification's learning outcome.³²

²⁹ TAFE: Training and Further Education, a generic term for a number of post-secondary study programmes in Australia.

³¹ From the EAR Manual for Higher Education Institutions, page 22 <http://eurorecognition.eu/Manual/EaR%20HEI.pdf>

³² Ibid.

NOKUT has close ties with other recognition agencies in Europe. Our European colleagues recognise foreign higher education in terms of the degree system in their own countries, and we have not found examples of equivalent bodies to NOKUT that grant credit equivalency in their recognition practice. It is also not required by the Lisbon Recognition Convention.

3.1.6 Periods of study and incomplete studies

According to current practice, people who have completed a period of study abroad, or who have incomplete studies, can apply to NOKUT for general recognition. What is included in a period of study, or an incomplete studies, can vary greatly, from a single passed course unit to a nearly completed qualification.

The Lisbon Recognition Convention defines periods of study as follows:

Any component of a higher education programme which has been evaluated and documented and, while not a complete programme of study in itself, represents a significant acquisition of knowledge or skill.³³

It is further emphasised that the period of study must represent “a significant acquisition of knowledge” in order for the qualification to provide a basis for recognition. What is meant by “significant” is not defined in either the EAR Manual or the recommendations in the Lisbon Recognition Convention. One reasonable interpretation could be that a single subject equivalent to a few credits should not be regarded as significant. On the other hand, a nearly completed degree where, for example, only the final dissertation is missing, could be regarded as significant.

According to current practice, people who have completed a period of study, or who have incomplete studies, can apply to NOKUT for general recognition. The current practice involves a very inclusive interpretation of the rules, where NOKUT has recognised all periods of study/incomplete studies that can be documented. This also applies in cases where a minimum of 1 credit has been completed and the education otherwise satisfies NOKUT’s criteria for recognition.

Challenges presented by the recognition of periods of study and incomplete studies

Incomplete studies are assessed in the same way as a completed degree. As with completed education, NOKUT must first investigate whether or not the institution/study programme/ subject or course is accredited. In order to give an exact credit equivalence, we must also find out how many credits the person concerned has actually completed. In the case of older education, where the applicant has only submitted a transcript of grades without specified credits, or education from countries where no form of credits is in use, we will have to obtain curricula and other documentation to check how many credits the different subjects could represent. In other words, incomplete studies require more work than completed education since the education is less well documented than a completed degree.

In addition to this, a decision regarding the general recognition of, for example, 5 credits, will not result in any rights for the applicant in Norway. In NOKUT’s experience, such a decision is of little

³³ https://www.regjeringen.no/globalassets/upload/kd/vedlegg/uh/lisboakonvensjonen/f-4260_web.pdf s. 12

value in a work context or for admission to further education. If an applicant wants to use these credits in an application for admission or for credit transfer to an educational programme offered by a Norwegian institution, the Norwegian institution will in any case independently assess the education prior to admission or granting credit transfer.

3.1.7 Current criteria for general recognition as equivalent to a Norwegian degree

University college candidate degrees

NOKUT can, according to the current criteria, grant recognition of a foreign qualification as equivalent to an accredited Norwegian university college candidate degree if the education can be recognised as at least 2 years/120 credits of higher education in Norway. In addition, the foreign qualification must be a completed degree, or a completed integrated educational pathway, in the country of origin.

Bachelor's degrees

NOKUT can grant general recognition of a foreign qualification as equivalent to an accredited Norwegian bachelor's degree if the qualification can be recognised as at least 3 years/180 credits of higher education in Norway. In addition, the foreign qualification must be a completed degree, or a completed integrated programme of study, in the country of origin.

Master's degrees

Up until June 2017, NOKUT stipulated the following requirements:

NOKUT can grant recognition of foreign education as equivalent to an accredited Norwegian master's degree, cf. the Master's Degree Regulations, if it is a completed master's degree, or other graduate degree, and also satisfies one of the two following criteria:

1. The master's degree programme has a scope of at least 120 credits/2-year nominal length of study and includes independent work of a scope of at least 30 credits. The admission requirement for the programme is education equivalent to a Norwegian bachelor's degree.
2. The education is an integrated study programme with a scope that can be recognised as at least 300 credits/ 5-year nominal length of study and includes independent work of a scope of at least 20 credits.

As a consequence of the work in the Orion project, the requirements for recognition as equivalent to a master's degree were adjusted in June 2017. Following the Nordic workshop, NOKUT saw a clear need both to introduce a more flexible interpretation of the scope of independent work and to introduce a requirement that the master's degree must provide access to further study programmes. This adjustment is in line with recognition practices in other Nordic countries. The following criteria have applied since June 2017:

NOKUT can grant recognition of a foreign qualification as equivalent to an accredited Norwegian master's degree (second cycle), if it is a completed master's degree, or other graduate degree, and also satisfies the following criteria:

1. The total course of study to be recognised must normally have a nominal length of study of 5 years/300 credits, either as separate degrees or as an integrated degree.
2. The degree must comprise a piece of independent work.
3. The degree must qualify for admission to doctoral/PhD studies in the country of study.

Doctoral degrees

NOKUT can grant recognition of a foreign education as equivalent to an accredited Norwegian doctoral degree/PhD if it is a completed doctoral degree that satisfies both the general minimum requirements and the specific requirements for degree equivalence.³⁴ NOKUT's criteria for the general recognition of foreign doctoral degrees were revised in 2015.³⁵

Challenges associated with education that is not granted degree equivalence

NOKUT recognises foreign higher education in relation to the established degree structure in Norway. When recognising foreign master's degrees, we have only assessed the foreign master's degree in relation to master's degrees pursuant to Sections 3 and 4 of the Master's Degree Regulations.³⁶ In other words, master's degrees that require a scope of 2 years/120 credits or 5 years/300 credits. NOKUT has not granted degree equivalence for other types of master's degrees that are offered in Norway (1-year, 1.5-year and experienced based master's degrees) and described in the Master's Degree Regulations.

In other words, the current criteria only grant master's degree equivalence in those cases where the foreign degree is a 2-year master's degree following a 3-year bachelor's degree, or an integrated 5-year master's degree, that includes independent work. When a foreign master's degree differs from Norwegian master's degrees pursuant to Sections 3 and 4, the foreign master's degree has not been given master's degree equivalence, but only given credit recognition. This is in spite of the fact that in Norway, based on the Master's Degree Regulations, it is permissible to offer master's degrees that have lower workloads in terms of credits than the discipline-based master's degrees of 120 credits or integrated master's degree of 300 credits.

We have also seen some examples of degrees where the standardised study time is shorter than the corresponding Norwegian degree or the degree structure differs slightly, but where the degree gives the same academic rights in the country of origin. In principle, such a degree has no "substantial differences" in relation to a Norwegian master's degree. The consequence of such cases is that

³⁴ For more information, see: <https://www.nokut.no/utdanning-fra-utlandet/nokuts-kriterier-for-generell-godkjenning-av-utenlandsk-utdanning/>

³⁵ <https://www.nokut.no/utdanning-fra-utlandet/nokuts-kriterier-for-generell-godkjenning-av-utenlandsk-utdanning/>
NOKUT's report on revising the criteria for the general recognition of foreign doctoral degrees:
https://www.nokut.no/contentassets/a7779b54401f4e5a8557c55c2a9c7fcc/lundgren_andrea_jorgensen_valborg_h_fra_fintelling_av_studiep_oeng_til_laringsutbytte_04-2015-1.pdf

³⁶ Regulations concerning Requirements for Master's Degrees: <https://lovdata.no/dokument/SF/forskrift/2005-12-01-1392>

NOKUT does not adequately recognise the academic rights that this degree provides in the country of origin.

3.1.8 Current interpretation of the concept of “substantial differences”

The review of our criteria shows that NOKUT interprets the concept of “substantial differences” within a limited framework based on measurable input factors. NOKUT wants to introduce an adjusted set of criteria based on a broader understanding of the concept in line with the intentions of the Lisbon Recognition Convention and its supplementary texts.

4 Nordic and European perspectives

4.1.1 Nordic workshop on recognition practices

In May 2017, NOKUT held a Nordic workshop on recognition practices with participants from the recognition agencies in all five Nordic countries, as well as the ORION project working group. In advance of the meeting, NOKUT prepared a comprehensive questionnaire in order to map various aspects of the Nordic countries’ recognition practices. All of the agencies answered the questionnaire. We also sent out example cases with individual educational pathways for assessment in each of the countries’ recognition systems.

The topics in the questionnaire were discussed in more detail in the workshop. Through a discussion of the different individual cases we have identified similarities and differences in recognition practices in the five Nordic countries. Although the countries share a common understanding of the recommended recognition principles pursuant to the Lisbon Recognition Convention, the differences in national regulations, laws and degree systems mean that the outcome of the recognition cases could vary from country to country. At the same time, despite the partial overlap in degree structures, NOKUT stood out as having more narrowly operationalised the concept of “substantial differences”, especially with respect to the recognition of master’s degrees.

The summary from the workshop showed that:

- NOKUT is the only agency that counts credits and gives individual credit recognition. All of the other recognition agencies assess qualifications in relation to a degree, with the exception of Denmark and Sweden, which can also provide equivalency in the form of years.
- NOKUT is the only agency that assesses incomplete studies.
- NOKUT applies the principle of time parity most precisely and consistently. Denmark and Sweden can grant recognition in the form of year; other countries only grant recognition in relation to a qualification.
- NOKUT assesses foreign education in relation to university college candidate, bachelor’s degrees, master’s degrees (2-year and 5-year) and doctoral degrees. Other Nordic agencies also assess foreign degrees in relation to other, and a wider range of types of qualifications in their home country. For example, Denmark can grant recognition both in relation to a

“bachelor” and “professionsbachelor” within the same subject area. Sweden can recognise education as equivalent to various professional qualifications and also assesses education in relation to artistic degrees and both 1-year (“magister”) and 2-year master’s degrees. Iceland recognises foreign master’s degrees in relation to both 1-year master’s degrees without a dissertation and 2-year master’s degrees with a dissertation. Finland recognises foreign master’s degree in relation to professional requirements for certain occupations, while Finnish higher education institutions are responsible for granting academic recognition.

- NOKUT is the only agency that does not give weight to whether the degree provides access to the next level in the country of origin.

The review shows that NOKUT gives greater weight to measurable factors in its assessments than the other agencies.

4.1.2 Study trip to UK NARIC

NOKUT visited UK NARIC in November 2017. The purpose of the visit was to gain a better insight into how the UK recognition agency assesses education. UK NARIC is one of the European recognition agencies that receives the most applications and has developed a comprehensive database of education systems and recognition practices. NOKUT has made use of this database for many years. NOKUT spent a week at UK NARIC and gained a thorough insight into its recognition practices.

As a basis for its own practices, UK NARIC has produced a comprehensive matrix, a band framework that shows where foreign qualifications can be placed and compared with UK vocational and academic qualifications. This sort of matrix is a tool that contributes to transparency and equal treatment across national borders because specific requirements have been drawn up to facilitate comparisons between the various qualifications in the matrix. Inspired by the British tool, NOKUT has produced a qualifications matrix tailored to Norwegian conditions. The purpose of this matrix is to ensure the equal treatment of applicants across national borders and to be a useful recognition tool for NOKUT’s case officers.

5 NOKUT’s proposal for adjusted criteria and practices for the general recognition of foreign higher education

5.1 Broader framework for assessing “substantial differences”

The proposal for adjusted criteria entails, among other things, a broader framework for assessing whether substantial differences exist between a foreign educational qualification and comparable Norwegian qualifications.

The Lisbon Recognition Convention's supplementary text³⁷ recommends that an assessment should be based on the following five aspects of a qualification:

Quality

This is based on an assessment of whether the higher education institution and/or qualification is part of the country of origin's higher education system. In practice this involves an assessment of whether the higher education institution and/or qualification are accredited/recognised by the agency tasked with determining this in the country of origin.

Level

This refers to bachelor's, master's or doctoral level, first, second and third cycle in the Framework for Qualifications of the European Higher Education Area (QF-EHEA), or levels 6, 7 or 8 in the European Qualification Frameworks/National Qualifications Framework (EQF-LLL/NQF).

Workload

This is a quantitative measure of learning activities. In many countries this is defined as the student workload and is often expressed in credits or ECTS.

Profile

This indicates the purpose of the programme: Is it an academic programme that prepares someone for further study/research, or is it a professional programme that prepares for someone for professional practice? One example of this is a Norwegian master's degree, which pursuant to the Master's Degree Regulations can be either discipline or experience-based. While the discipline-based master's degree gives access for admission to doctoral degrees, the experience-based master's degree does not necessarily give access.

Learning outcome

This is used indirectly via the qualification's relationship to a qualifications framework. This is used in the assessment when it is relevant, in other words when the country of study has/had a qualifications framework.

Under the current criteria, NOKUT has assessed the aspects described as quality, level and workload. In the proposed adjusted criteria, NOKUT would also include profile and learning outcome in its assessments. This entails NOKUT adopting a more flexible approach to substantial differences. Both profile and learning outcome help to indicate which qualifications give access to the next level. We assess the learning outcome through how the qualification is referenced to the qualifications framework in those cases where this is relevant. In the case of qualifications from countries without qualifications frameworks, we will consider the other aspects of the qualification.

The proposed changes are in line with the guidelines in the EAR Manual. The EAR Manual underlines that differences in input factors, such as workload and programme structure, do not necessarily constitute substantial differences.³⁸

³⁷ Revised Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications, https://www.coe.int/t/dg4/highereducation/recognition/Criteria%20and%20procedures_En.asp

³⁸ The EAR Manual 2012, s 45, http://eurorecognition.eu/manual/EAR_manual_v_1.0.pdf

The changes affect three assessment factors in NOKUT's current interpretation of substantial differences:

- Profile
- Access to the next level
- Workload

5.2 Profile

Norway does not have a binary system for higher education despite the fact that we have both academic and professional education. NOKUT's recognition practices, therefore, do not differentiate between academic and professional higher education. In other European countries, there is a clear division between academic and professional educational pathways.

Since NOKUT's remit is limited to granting general recognition of foreign higher education, NOKUT cannot make subject specific assessments. The foreign education is measured against degrees that exist in the Norwegian degree system. NOKUT's general recognition thus does not reflect the difference between professional and academic education from abroad, as is the practice of some of our sister agencies. The proposal regarding the adjusted criteria continues NOKUT's practice in this area.

The exception to this rule is education at master's degree level. The Universities and University College Act allows differentiation between shorter professional/vocational master's degrees with a duration of 1-2 years and the traditional discipline-based 2-year/5-year degrees. Many countries have vocational specialisations at master's degree level that provide different rights to those provided by an academic master's degree in the same country. In other words, such education has a different profile to that of academic master's degrees. As far as the general recognition of foreign specialisations at master's degree level is concerned, NOKUT has previously only granted recognition in the form of credits at master's degree level and not in the form of equivalence to a Norwegian master's degree. According to the proposed criteria, NOKUT would be able to recognise such education as equivalent to a 1-year/1.5-year master's degree.

NOKUT has been tasked with granting general recognition of foreign tertiary vocational education since 1 January 2019. In connection with this new recognition scheme, clarifications will have to be made which qualifications are covered by each of the two recognition schemes. The profile of a qualification will be one of the criteria.

5.3 Access to the next level

One important aspect of an academic qualification is that it provides, or does not provide, access to apply for admission to the next level in the degree system (cf. 3.1.3 above). For example a bachelor's degree will normally provide access to apply for admission to a master's degree programme within the same field, while a diploma education³⁹ does not necessarily provide the same rights, even when the education is at the same level/cycle of the education system. Many countries offer qualifications that are primarily targeted at the labour market and do not provide access to the next level in the degree system.

³⁹ Diploma education: A shorter, professional education that does not lead to an academic degree.

NOKUT is, therefore, proposing the introduction of the requirement that a qualification must provide access to the next level of education in the country of origin in order to be eligible for degree equivalence. This assumes that the qualification satisfies the other requirements for recognition. NOKUT has already introduced access to doctoral degree programmes as a condition for recognising foreign education as equivalent to a Norwegian master's degree (2-year or 5-year). NOKUT will introduce the same requirement for bachelor's degrees.⁴⁰ This change will result in NOKUT's recognition decision better reflecting the status of the education in the country of origin.

A diploma education which, up to now, has been recognised as equivalent to a bachelor's degree, despite the fact that the diploma does not provide access to further studies at master level, will, under the proposed criteria, be recognised as a university college candidate degree. This is despite the fact that a university college candidate degree may have a shorter nominal length of study than the diploma education. However, the status and profile of a diploma education is more comparable to a university college candidate degree than a bachelor's degree. This change could result in NOKUT not granting full recognition for every year of the education.

For example, a 3-year diploma education from Canada can be incorporated into a bachelor's degree at a Canadian higher education institution, but on its own the education does not provide access to master's degree programmes in Canada. In other words, the profile and other rights associated with such a diploma education differ from those associated with a bachelor's degree, and NOKUT is, therefore, proposing that our general recognition should reflect these differences.

5.4 Assessment of workload

5.4.1 Assessment in relation to a qualification

NOKUT's practice has been that one year of recognisable higher education in a qualification is recognised as one year of higher education. Earlier in the report we showed that this can have unfortunate consequences when assessing degrees and academic rights that have been obtained.

NOKUT wants to tone down the current precise application of the principle of time parity by taking a more flexible approach to assessing nominal length of study, study and placing greater weight on other aspects of the educational pathway. Nominal length of study will remain important in NOKUT's assessments, but other elements will also be taken into consideration.

Many countries have longer or shorter nominal length of study for their degrees compared with the Norwegian degree structure. For example, 4-year "Bakalauras" degrees from Lithuania are achieved with on completion of 240 ECTS and German "Magister Artium" degrees which have a scope of 4.5 years. Degrees such as these which differ in nominal length compared to the Norwegian degrees system, are currently recognised in ways which may give a misleading picture of the qualification. Currently, the that the Lithuanian degree will receive extra credit recognition in addition to bachelor's degree equivalence, while the German degree will not gain master's degree equivalence.

⁴⁰ NOKUT is not introducing the same requirement for education that is recognised as equivalent to a shorter master's degree or an experience-based master's degree since few such degrees provide access to doctoral degree programmes in Norway.

In the adjusted criteria, NOKUT wants to facilitate a more coherent and appropriate recognition practice, with somewhat greater leeway in assessing foreign education in relation to the nominal scope of Norwegian degrees. This means that minor deviations in workload will not prevent an education being granted equivalence to a Norwegian degree.

As far as this point is concerned, the change will be favourable for some and unfavourable for others. The current practice means we make assessments based on full-time nominal length of study. If the foreign education has a somewhat shorter nominal length of study than the comparable Norwegian degree, it is not possible to grant degree equivalence. An education with a somewhat shorter nominal length of study than a Norwegian master's degree can currently not be granted degree equivalence since it does not satisfy the requirement regarding scope. This is in spite of the fact that it provides the same rights as a Norwegian master's degree. This operationalisation does not give sufficient weight to the academic rights the degree provides in the country of origin. In the proposed new criteria, this degree would be recognised as equivalent to a master's degree.

For other applicants who have completed undergraduate education with a higher student workload than the corresponding Norwegian degree, the adjusted criteria would entail that the applicant is given degree equivalence, but no further credit recognition – in other words less than applicants would have achieved today. A 4-year “Bakalauras” from Lithuania would, based on the proposed criteria, be recognised as equivalent to a bachelor's degree. In Norway, the nominal length of study of bachelor's degrees is 3 years. Since the degree is granted degree equivalence to the comparable Norwegian degree, this would not necessarily be regarded as being in the applicant's disfavour. In cases where a foreign education has a significantly longer nominal length of study than the corresponding Norwegian qualification, information on this can be added as a comment in the recognition decision.

5.4.2 Moving away from credit recognition in NOKUT's decisions

NOKUT proposes that a qualification be recognised in relation to a Norwegian degree, or that equivalence be granted in whole and half years of study where full degree equivalence cannot be granted. In other words, NOKUT wants to move away from general credit recognition.

Credit recognition could hinder equal treatment since foreign qualifications may have a larger or smaller scope than the comparable Norwegian qualification. Both 3-year and 3.5-year “licencjat” degrees from Poland will, based on the adjusted criteria, be recognised as equivalent to a Norwegian bachelor's degree. Up to now, a 3.5-year “licencjat” has been recognised as equivalent to a bachelor's degree with 30 extra credits even though a 3.5-year degree does not provide different rights to those provided by a 3-year degree in Poland. The adjusted criteria thus promote equal treatment in the assessment of foreign qualifications. This brings NOKUT's criteria in line with international practice in the field, including in countries such as Sweden, Denmark, the Netherlands and the UK.

We propose moving away from the current practice of counting credits on an individual basis in cases where an applicant has earned more credits than is standard for the degree. Up to now, NOKUT has interpreted the provision in Section 6-1 (1) of the Quality Assurance Regulations to mean that we should recognise for *all* achieved and completed credits, including those credits that are not a formal part of the foreign degree. NOKUT has determined that such a practice is not appropriate.

We have primarily practised this principle for countries that have introduced ECTS or countries that grant credits that are comparable with ECTS. This means NOKUT has developed a practice in which applicants with education from a country in the European Higher Education Area (the Bologna countries) and some other countries have received a higher credit count in their decisions than applicants who come from other regions. NOKUT believes that such a practice is unfortunate. The standard nominal workload and length of Norwegian academic degrees is set down in regulations pursuant to the Universities and University Colleges Act. The amount of credits needed to obtain the various Norwegian degrees is widely known, we will, however, continue to provide information about what the standard workload is for Norwegian degrees in order to contribute to good guidance.

This change will simplify NOKUT's decisions, as we will grant general recognition only in terms of degree equivalence and not in both terms of degree equivalence, individual credit count and in number of years. If degree equivalence cannot be granted, we will grant recognition in terms of the number of semesters/years completed. We believe that this change will make our decisions easier to understand and use. For some applicants, this change will result in NOKUT not recognising all completed credits.

However, NOKUT would like to emphasize that our information services for higher education institutions and others will be maintained as before. If institutions have questions about credits, they will still be able to contact NOKUT and get an answer, even though NOKUT is moving away from credit equivalence in its decisions.

The Regulations concerning Quality Assurance and Quality Development in Higher Education and Tertiary Vocational Education (Quality Assurance Regulations) must be amended in relation to this point before NOKUT's proposed criteria can enter into force. NOKUT and the Ministry of Education and Research are in discussions about when and which process will be required to accomplish this.

5.5 Recognition of more types of master's degrees

In the adjusted criteria, NOKUT proposes that foreign master's degrees should be assessed in relation to all types of master's degrees offered in Norway and pursuant to the Master's Degree Regulations.

In line with the current criteria, NOKUT has interpreted the Master's Degree Regulations such that we have only granted recognition as equivalent to discipline-based master's degrees pursuant to Sections 3 and 4 of the Master's Degree Regulations. In other words, master's degrees that require a scope of 2 years/120 credits or 5 years/300 credits.

Very many foreign master's degrees do not meet the requirements for discipline-based master's degrees. If a foreign master's degree does not meet the requirements for discipline-based master's degrees, NOKUT has only granted recognition in the terms of credits. NOKUT wants to change this so that the criteria ensure that our recognition practices reflect all of the types of master's degrees that are offered in Norway. This includes master's degree programmes with a scope of 90 credits, cf. Section 5 and the exemption provision in Section 7, with nominal length of study of 1-1.5 years.

In today's practice, a master's degree with a nominal length of study of 1 calendar year (12 months) from the UK, for example, is recognised as 75 credits at master's degree level, since it does not meet our requirements for scope pursuant to Sections 3 and 4 of the Master's Degree Regulations. With the adjusted criteria, this degree would be recognised as equivalent to a 1.5 year master's degree. NOKUT

would like to emphasise that a decision regarding the general recognition of a foreign master's degree will describe what sort of master's degree the education has been recognised as.

The proposal to grant recognition in relation to all types of Norwegian master's degrees will result in more people with foreign master's degrees gaining master's degree equivalence from NOKUT, assuming all of the other requirements for degree recognition are met. Many countries offer both taught master's degrees and research master's degrees that contain a larger amount of independent work. Up to now, NOKUT has practised a requirement that the master's degree must contain a piece of independent work to be eligible for master's degree equivalence. Since there is no requirement for independent work in 1-year master's degrees pursuant to Section 7, we will be able to recognise taught master's degrees without independent work as equivalent to a 1-year master's degree.

Furthermore, master's degrees targeted at the labour market, which do not provide access to doctoral degree programmes in the country of origin, will be recognised as 1-year master's degrees by NOKUT. This is because the 1-year master's degree pursuant to Section 7 does not necessarily provide access to doctoral degree programmes in Norway.

5.6 *Periods of study and incomplete studies*

NOKUT is proposing that the minimum amount of assessable education, measured in terms of workload, be set at half a year/one semester. In NOKUT's proposal, foreign qualifications that do not meet the requirements for recognition in relation to a Norwegian degree will be granted equivalence in the form of semesters or years. In practice this will be done by rounding down to the nearest full semester. In those cases where it is reasonable to round up, this is also possible.

The change means that applications for recognition of periods of study and incomplete education with a workload of less than one semester will not be assessed. Such applications represent a minimal proportion of NOKUT's application portfolio. In case of a possible transfer of credits in further study programmes, universities and university colleges have, pursuant to Section 3-5 of the Universities and University Colleges Act, autonomy to assess and grant transfer credits independently of NOKUT's recognition practice.

5.7 *New layout for decisions*

At the same time as the proposal for adjusted recognition criteria was being developed, NOKUT needed to update the design layout of its legal decisions. NOKUT's decisions are primarily intended for use in the unregulated labour market, although they are also used for admissions/ granting transfer credits for further studies. The decisions are also used by some recognition agencies for regulated professions.⁴¹ The proposed criteria will result in decisions that contain fewer elements and that will, in NOKUT's opinion, be more understandable.

An information letter will also be developed that will provide comprehensive information about NOKUT's decision, the Norwegian education system and ways to proceed for the individual applicant.

⁴¹ <https://www.nokut.no/databaser-og-fakta/yrkesliste/>

6 Consultation and feedback from the sector

NOKUT sent out the proposal regarding adjusted criteria/recognition practices for public consultation on 30 October 2018 with a deadline for submissions on 28 December 2018. The consultation letter and paper were sent to universities and university colleges, student organisations, authorisation agencies, labour organizations for employers and employees, trade unions, as well as other stakeholders.

6.1 Feedback and NOKUT's assessment

NOKUT received 21 submissions from the consultation, all of which were received before the deadline. Several consultative bodies had no comments to make beyond the fact that they support the proposal.

The majority of the consultative bodies view the changes in the set of criteria positively, while some consultative bodies had comments regarding the proposal. The objections raised were generally about two main points: recognition in terms of credits and recognition in relation to more master's degrees/admission to doctoral degrees.

6.1.1 Recognition in terms of credits

Recognition in terms of credits is closely linked to the principle of time parity in NOKUT's processing of applications. Some institutions think it is unfortunate that NOKUT is proposing eliminating credit equivalence since higher education institutions use NOKUT's decision in their case processing related to admission and transfer credits. The University of Oslo (UiO) also suggests that the lack of recognition in terms of credits will "conceal differences" between degrees, for example in the case of a bachelor's degree from Australia where the first 2 years of education are incorporated from Norwegian tertiary vocational education. Up to now, NOKUT has granted degree equivalence, but has only recognised 60 credits for such educational pathways. Under the proposed criteria, such an education would be recognised as equivalent to a bachelor's degree without further specification of the archived number of credits. UiO also believes there is a risk that they will receive more applications for subject specific recognition⁴² if NOKUT only assesses in relation to a qualification and does not differentiate between a 3-year and a 4-year Lithuanian bachelor's degree. Furthermore, the Norwegian State Educational Loan Fund points out that it provides student loans based on the nominal length of study and that the period for which a student receives student loans will not necessarily match the Norwegian nominal length of study for corresponding degrees.

NOKUT's assessment

NOKUT would like to emphasize that we do not want to completely move away from the principle of time parity. Nominal length of study will remain an assessment criterion in our practice, but we want to achieve a broader base for our evaluation by also including other elements. We will still grant

⁴² Pursuant to Section 3-5 of the Universities and University Colleges Act, higher education institutions can conduct an academic assessment of foreign higher education and grant equivalency in relation to their own degrees and education if they wish.

general equivalence in terms of degrees. NOKUT's decisions will contain information about the Norwegian degree system, including the nominal scope of the degrees.

Higher education institutions are autonomous and have their own regulations for admission and credit transfer pursuant to Section 3-5 of the Universities and University College Act. They can choose to admit or reject students and grant transfer credits based on an independent expert assessment. NOKUT's decisions are primarily designed for the unregulated labour market where the needs are different to those of higher education institutions. NOKUT also has an advisory service which institutions can contact regarding individual courses of study. This service will be maintained. If higher education institutions have questions about credit recognition, they will still be able to contact NOKUT via this service.

NOKUT has a remit to grant general recognition of foreign higher education, while educational institutions have a remit to grant subject specific recognition in relation to their own degrees. UiO believes that the university may receive more applications if NOKUT moves away from granting general credit recognition. A 4-year bachelor's degree in English from Poland can, in principle, be recognised as a 3-year bachelor's degree in English at a specific institution. However, higher education institutions cannot grant general recognition for an education in excess of their own degree. Thus, a subject specific assessment will not provide more credits than what NOKUT would grant based on the proposed criteria. Furthermore, NOKUT would like to note that for some time we have received feedback from institutions that the current recognition practice results in an expectation among foreign students in Norway that credits recognised by NOKUT in excess of a degree will also automatically be incorporated into a Norwegian degree at Norwegian universities and university colleges.

With reference to Australian or UK bachelor's degrees in which 2 years of Norwegian tertiary vocational education are incorporated: NOKUT has up to now granted degree equivalence, but only recognised 60 credits, since tertiary vocational education has not been considered higher education. Based on the proposed criteria, we would grant degree equivalence and provide information about the incorporated tertiary vocational education as supplementary information to the legal decision. Higher education institutions are autonomous and can assess themselves whether a degree provides a basis for admission or transfer of credits towards another degree.

The Norwegian State Educational Loan Fund states that the period for which they provide student loans can differ from the period for which NOKUT grants general recognition. This can already be the case where the Norwegian State Educational Loan Fund provides student loans for language courses in advance of a degree, or because the education is taken in a country for which NOKUT does not grant recognition of the first year of a bachelor's degree, for example the US. NOKUT cannot see that the proposed criteria will present challenges for the Norwegian State Educational Loan Fund, since even today there is not full compliance between NOKUT's recognition and the Norwegian State Educational Loan Fund's awarding of student loans. NOKUT discussed this matter with Norwegian State Educational Loan Fund in January 2019.

6.1.2 Recognition in relation to all types of master's degrees/admission to doctoral degrees

Many higher education institutions and organizations are in favour of NOKUT's proposal to assess foreign master's degrees in relation to all types of master's degrees offered in Norway. However, some institutions suggested that this proposal could create uncertainty when it comes to admissions to doctoral degree programmes. It was also suggested that there is a risk that Norwegian students would travel abroad and take shorter master's degrees rather than take a 2-year master's degree in Norway.

NOKUT's assessment

NOKUT's recognition is aimed at the unregulated labour market and we have over time received feedback suggesting that employers have difficulty understanding NOKUT's decisions in those cases where we do not grant degree equivalence. It can be difficult for applicants to understand that NOKUT does not grant degree equivalence for foreign degrees when an equivalent degree pathway exists in Norway. 1-year, 1.5-year and experience-based master's degrees are referenced to the NQF and offered pursuant to the Master's Degree Regulations.

NOKUT would like to underscore that the proposal entails that NOKUT will only recognise education in relation to the various types of master's degrees that are already offered by Norwegian institutions. It cannot be emphasized clearly enough that in its decisions NOKUT will specify which master's degree (1-year, 1.5-year, 2-year and 5-year) an education has been recognised in relation to. As far as admissions to doctoral degree programmes are concerned, institutions are autonomous, and it is their responsibility to assess whether an applicant meets the requirements for admission in line with their own regulations.

NOKUT will ensure that people with foreign education can effectively utilise their competencies in Norway. It is therefore important that NOKUT's future criteria reflect the variation in master's degrees that are offered in Norway.

7 The proposed adjusted set of criteria

The recognition of foreign education as equivalent to accredited Norwegian higher education is regulated by Section 3-4 of the Act relating to Universities and University Colleges (Universities and University College Act) and Section 6-1 of the Regulations concerning Quality Assurance and Quality Development in Higher Education and Tertiary Vocational Education. NOKUT has been delegated authority to operationalise the regulations by establishing criteria for such recognition.

NOKUT's criteria consist of minimum requirements that a foreign education must meet to be eligible for general recognition and additional requirements that a foreign education must meet to be eligible for degree equivalence with a Norwegian accredited degree.

7.1 Minimum requirements

In order for foreign higher education to be granted general recognition as equivalent to a Norwegian accredited higher education, it must meet the following minimum requirements:

- 1) The education/qualification must be sufficiently documented from the educational institution or the educational authorities in the country of origin.
- 2) The study programme must be accredited or officially recognised as higher education in the country of origin. The education must satisfy at least one of the following requirements:
 - The education/qualification must be a part of the system of higher education in the country of origin.
 - The educational institution must be officially recognised as self-accrediting at the relevant level, or the programme of study must have recognition/accreditation as higher education.

NOKUT employs specific guidelines for countries without a system for official recognition of higher education.

- 3) The educational programme must be at the same level as Norwegian higher education. To assess whether a foreign education is at the same level as Norwegian higher education, the education system in Norway is compared with the education system in the country of origin. If substantial differences exist between the education systems in Norway and the country of origin, the foreign education will not be recognised in full. Normally, only higher education that exceeds the requirements pursuant to the [list of requirements for higher education entrance qualification for applicants with foreign education \(the GSU list\)](#) can be recognised as higher education.
- 4) Education is *normally* recognised on the basis of the principle that one year of nominal length of study in the country of origin equals one year of nominal length of study in Norway.
- 5) Periods of study and incomplete studies must have a minimum scope of one semester's recognisable education in order to be assessed for general recognition.
- 6) The Director General sets out the requirements for documentation. In special cases, the Director General can stipulate exemptions from the provision based on section 1) and 2).

7.2 Requirements for gaining degree equivalence

In order for an education to be granted degree equivalence to a Norwegian accredited degree, the education must also meet the following additional requirements:

Degree	Criteria for gaining degree equivalence
University college candidate degree	Scope: Minimum 2 years that can be recognised as higher education Must be a completed degree or study programme
Bachelor's degree	Scope: Minimum 3 years that can be recognised as higher education Must be a completed degree Must normally provide access to second cycle studies in the country of origin
1-year master's degree	Scope: 1 year Must be a completed degree Must normally have completed a bachelor's degree or equivalent with a minimum of 3 years of recognisable education as the admissions requirement Can provide access to third cycle studies in the country of origin
1.5-year master's degree	Scope: 1.5 years Must be a completed degree Must normally have completed a bachelor's degree or equivalent with a minimum of 3 years of recognisable education as the admissions requirement Can provide access to third cycle studies in the country of origin Must include independent work
Experience-based master's degree	Scope: 1-2 years Must be a completed degree Must normally have completed a bachelor's degree or equivalent with a minimum of 3 years of recognisable education as the admissions requirement in addition to relevant work experience Can provide access to third cycle studies in the country of origin Must include independent work
2-year master's degree	Scope: 2 years Must be a completed degree Must normally have completed a bachelor's degree or equivalent with a minimum of 3 years of recognisable education as the admissions requirement Must provide access to third cycle studies in the country of origin Must include independent work
Longer integrated master's degree	Scope: minimum of 4.5 years* Must be a completed degree Must provide access to third cycle studies in the country of origin Must include independent work * For pre-Bologna degrees with a nominal length of study of minimum 4 years: Can be granted master's degree equivalence following an individual assessment

8 Automatic recognition of selected Nordic qualifications

In June 2018, following an analysis done in the in the ORION⁴³ project, NOKUT introduced voluntary automatic recognition of selected Nordic qualifications. This new practice is in line with the intentions of the Yerevan Communiqué of 2015, which states that EHEA countries should introduce automatic recognition of comparable EHEA qualifications by 2020. The revised Reykjavik Declaration from 2016 also states as one of its goals the introduction of automatic recognition of comparable qualifications in the Nordic region.

In our context, automatic recognition is defined *as a selectable alternative to applying for recognition*. Automatic recognition will not replace the current recognition scheme, but will be a voluntary alternative for applicants. The practical operationalisation is that the applicants receive information via the website that selected qualifications from the Nordic countries are automatically recognised, and that the applicants can download a document showing this.

The recognition involves no application processing or verification, but is only a general statement that selected qualifications from Denmark, Finland, Iceland and Sweden, are equivalent to certain Norwegian qualifications. There is reason to believe that applicants with qualifications covered by the automatic recognition scheme will view this as positive, as they are able to choose between two alternatives for documenting their foreign qualifications.

Assuming that the proposed adjusted criteria come into force, it will be possible to expand the voluntary automatic recognition scheme to include more countries in the EHEA, in line with the ambitions expressed in the Yerevan Communiqué and the 2018 Paris Communiqué.

9 Consequences of introducing the proposed adjusted criteria

9.1 Consequences for recognition practices

The adjusted criteria will not result in changes in NOKUT's recognition for the majority of our applicants. For some applicants, there will be changes in how their foreign education is assessed. Overall, more applicants will receive a better recognition result with the adjusted criteria than those who will end up with less.

⁴³ <https://www.nokut.no/utdanning-fra-utlandet/automatisk-godkjenning-av-utdanninger-fra-danmark-finland-island-og-sverige/>

Applicants with certain foreign master's degrees will receive a better result with the adjusted criteria. These qualifications will be granted master's degree equivalence since, based on the new recognition criteria, we can assess an education in relation to all master's degrees in the Master's Degree Regulations.

Other groups of applicants will receive less based on the adjusted criteria. One example is applicants that are currently granted recognition amounting to equivalence to a bachelor's degree plus one year at bachelor's degree level for a total of 240 credits. With the adjusted criteria, this group would receive recognition of the education as equivalent to a bachelor's degree, but will not receive credit recognition beyond the degree equivalence. Applicants who seek recognition based on shorter periods of study abroad or incomplete studies will also be affected by the introduction of the new criteria.

9.2 Financial and administrative consequences

The adjusted criteria will not significantly change the number of applications received by NOKUT. However, there is reason to believe that applicants who have previously not received master's degree equivalence will reapply to NOKUT for a new assessment.

Besides this, NOKUT also expects a short-term increase in the number of appeals from those groups that will receive less than under the current criteria. At the same time, a reduction in the number of appeals regarding master's degrees is expected. These currently represent that main group of appeals.

Therefore, the overall assessment is that the introduction of the adjusted criteria will have minor financial and administrative consequences for NOKUT.

9.3 Social consequences

The purpose of NOKUT's general recognition scheme is to ensure that applicants can have their foreign education assessed in relation to the Norwegian education system, so that people with foreign qualifications can more easily utilise these in the Norwegian labour market or to obtain further qualifications.

In our opinion, the proposed criteria are transparent and fair, and will make a positive contribution to public confidence in recognised higher education, cf. Section 2-1 of the Universities and University Colleges Act.

The proposed criteria could result in shorter processing times for some groups of applications, which is positive both for applicants themselves and for society at large.

At the same time, it is likely that the proposed criteria will be more understandable for end users such as employers, higher education institutions and government agencies. This is partly due to the proposal for granting degree equivalence for more types of master's degrees. The complexity of our decisions will also be reduced, as NOKUT will cease to grant equivalence in terms of degree equivalence, individual credit equivalence and in number of years simultaneously. The reduced complexity is likely to result in more usable decision of more value to society, and this will indirectly facilitate greater mobility across national borders.

10 Annex: NOKUT's current criteria for the general recognition of foreign higher education

Minimum requirements for general recognition as equivalent to Norwegian higher education

In order for a foreign higher education to be granted general recognition as equivalent to a Norwegian accredited higher education, it must meet the following minimum requirements:

The education must be sufficiently documented from the educational institution or the educational authorities in the country of origin, cf. Section 6-1 (2) of the Regulation.

The educational programme must be accredited or officially recognised as higher education in the country of origin, cf. Section 6-1 (3) of the Regulation.

- a. The education/qualification must be a part of the system of higher education in the country of origin.
- b. The educational institution must be officially recognised as self-accrediting at the relevant level, or the programme of study must have recognition/accreditation as higher education.
- c. NOKUT employs specific guidelines regarding countries without a system for official recognition of higher education.

The educational programme must be at the same level as Norwegian higher education, cf. Section 6-1 (1) of the Regulation.

- a. A comparison of the systems of education in Norway and the country of origin will form the basis for decisions whether the criteria have been met.
- b. Substantial differences between the systems of education in Norway and the country of origin may have as a result in that only parts of the foreign education is recognised as equivalent to Norwegian higher education. The list of requirements for higher education entrance qualification for applicants with foreign education (the GSU list) is a guiding tool for deciding whether a full or partial recognition can be granted.

Credit equivalence

When foreign higher education meets the criteria given for general recognition, the scope of the education will be stated in terms of credits, cf. Section 6-1 (1) of the Regulation.

The education will be recognised on the basis of the principle of time parity. This means that one year of nominal length of study in the country of origin equals one year of nominal length of study in Norway (60 credits).

Specification should be given as to whether the credits are at a bachelor's, master's or doctoral degree level. The level is determined by whether the credits are part of a first cycle degree (giving access to a graduate degree), a second cycle degree (giving access to a doctoral degree), or a doctoral degree in the country of origin.

The criteria for recognition as equivalent to an accredited Norwegian degree are additional to the criteria for minimum requirements and equivalence in credits.

Requirements for recognition as equivalent to a university college candidate degree

NOKUT can grant recognition of a foreign qualification as equivalent to an accredited Norwegian university college candidate degree if the education can be recognised as at least 2 years/120 credits of higher education in Norway. In addition, the foreign qualification must be a completed degree, or a completed programme of study, in the country of origin.

Requirements for recognition as equivalent to a bachelor's degree

NOKUT can grant general recognition as equivalent to an accredited Norwegian bachelor's degree if the qualification can be recognised as at least 3 years/180 credits of higher education in Norway. In addition, the foreign qualification must be a completed degree, or a completed programme of study, in the country of origin.

Requirements for recognition as equivalent to a master's degree

NOKUT can grant recognition of a foreign qualification as equivalent to an accredited Norwegian master's degree, if it is a completed master's degree, or other graduate degree, and also satisfies the following criteria:

- The total course of study to be recognised must normally have a nominal length of study of 5 years/300 credits, either as separate degrees or as an integrated degree.
- The degree must comprise a piece of independent work.
- The degree must qualify for admission to doctoral/PhD studies in the country of study.