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Mutual Recognition and Credit Transfer in Europe: Experiences and Problems

Ulrich Teichler

Wide recognition was a major policy aim accompanying the increase of student mobility and graduate mobility in Europe since the 1950s. The Council of Europe and subsequently UNESCO and the European Union set more ambitious goals over the years. The 1997 Lisbon Convention calls for recognition of entry requirements, study periods, and degrees, "unless substantial differences can be shown" by country, institutional type or individual institution, and programme. Also, support for student mobility in the framework of ERASMUS is awarded provided that the study achievements abroad are recognized subsequently by the home institution. Finally, the introduction of bachelor's and master's programmes in the "Bologna process" places a strong emphasis on facilitating recognition within Europe, but the call for more competition might imply a steeper stratification of higher education systems, which will raise barriers to recognition.

Keywords: *recognition; recognition conventions; credit transfer; student mobility; ERASMUS; higher education reforms in Europe; diversification of higher education*

THE TRADITIONAL APPRECIATION OF MOBILITY

Boundary-crossing mobility was traditionally held in high esteem in Europe. Staff members and students of the medieval European universities came together from many countries. Also, craftsmen walked around in Europe for some years of an early professional career before they eventually settled.

Mobility always had a vertical dimension. One could move from a place where a high calibre of educational provisions was lacking to get acquainted with a higher level of education somewhere else. But mobility could also have a

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horizontal direction: It was considered desirable to get to know a variety of regions, cultures, educational provisions, and professional practices that were more or less on equal terms.

The positive appreciation of mobility was not confined to international mobility. Mobility between institutions of the same region as well as across regions, countries, and cultures was viewed as desirable. Only when the concept of a nation-state got momentum around 1800, international mobility could emerge as a concept distinct from other ways of spatial mobility.

It would be misleading to claim that educational and professional mobility in medieval Europe was without barriers. There were religious and gender barriers, often social and cultural constraints, and periods of hatred between countries and cultures. Yet in some periods of medieval Europe, the virtues of mobility seem to have been appreciated more highly than in some periods of the modern nation-state.

But the emergence of the nation-state was not the only barrier to mobility emerging in recent centuries. Although we often talk about a modern achievement society, we actually moved toward highly regulated education and credential systems, toward a “degree-ocracy” which tends to accept achievement only if it is based on certain educational paths and if it is certified by credentials. The more regulated education became, the more the barriers grew against mobility, as will be discussed.

Germany belongs to those countries where traditional appreciation of mobility persisted. Traditionally, students in Germany are entitled at any time during their course of study to move from one university to the other. I still remember how much I admired my elder brother who studied German literature at seven universities in Germany and Switzerland within 6 years (1960-1966); when he graduated, he really could claim that he attended seminars of all of the most famous professors of German literature. Student surveys undertaken in Germany during the last few decades actually show that only about 20% of German students move from one university to the other in the course of study. Yet, in international comparison, this demonstrates a high appreciation of mobility.

POLICIES AIMING TO PROMOTE STUDENT MOBILITY AFTER WORLD WAR II

The Hope for Conciliation and Mutual Understanding

After World War II, a shock was felt widely in regard to how inhumanly people had treated each other in the preceding years. One noted that enormous hatred between countries and even genocide had emerged in regions of the world where people had been proud of cultural diversity, had respected human values

and rights across cultures and countries, and where cosmopolitan values were highly appreciated. International mobility under these conditions was expected not only to spread educational and professional achievements vertically and horizontally but also—as a countermeasure to hatred and mistrust—to contribute to furthering universal values and to mutual understanding across countries.

The movement of advocating a “junior year abroad” in the United States as well as the Fulbright programme established in 1948 was based on the hope that study abroad could enhance international understanding (cf. Altbach & Teichler, 2001). When Western European countries began to cooperate in the 1950s, education was viewed as an important means to overcome mistrust. Also, mobility of students in Eastern European countries was considered a means of political integration of the countries politically dominated by the Soviet Union.

Many research projects, however, provided evidence that students neither become more internationally minded nor more friendly to their host country during a short period of study abroad. Yet students interested in international mobility and actually studying abroad are more internationally minded and more open to cultural diversity than those studying in the home country all the time. There seem to be long-lasting socialisation effects toward internationalisation in which mobility during the course of study might play a supporting role (see Opper, Teichler, & Carlson, 1990).

The Actual Development of Student Mobility

United Nations Educational, Scientific, and Cultural Organization (UNESCO) statistics show that about 2% of students study in the country different from that of their citizenship. Although student mobility gained increasing attention in the rich countries of the world in recent years, we should take note of the story the UNESCO statistics tell us.

The absolute number of foreign students grew from less than 300,000 in the early 1960s to more than 1.5 million in the mid-1990s, but the total number of students enrolled at higher education institutions in the world increased at a similar pace. The proportion of foreign students remained more or less constant over the years at about 2% (see Cummings, 1991; UNESCO, 1997).

In the mid-1990s, the proportion of foreign students among all students enrolled was about 7%-8% in countries such as France, Germany, the United Kingdom, and Australia but only about 3% in the United States and about 2% in Canada and Japan. And only about 2% of British, French, German, and Japanese students, about 1% of Australian students, and far less than 1% of U.S. students studied abroad (cf. Teichler & Teichler-Urata, 2000, pp. 42-57).

The UNESCO (1997) data suggest that “vertical” mobility is the most frequent phenomenon: Students from relatively poor countries opt for study in a relatively rich country hoping to gain access thereby to a more advanced quality of higher education (and possibly access to the labour market of the host country).

In the European Union (EU) countries, we might estimate that among the foreign students

- about one third are citizens of other EU countries (cf. Gordon & Jallade, 1996),
- about one sixth are citizens of other highly industrialized countries,
- and about half come from other parts of the world.

The data most frequently referred to in debates on student mobility actually compare the citizenship of the students with the country of study. However, a substantial number of students studying abroad lived in another country than that of their citizenship already prior to study and thus were not mobile for the purpose of study. For example, the majority of foreign students in Japan around 1980 were Chinese and Korean citizens who had their primary and secondary education in Japan.

The major comparative data sources on students in Europe, in other words those published by UNESCO, Organization for Economic Cooperation and Development (OECD), and also EUROSTAT (the statistical office of the EU), do not inform about the number of really mobile students. Respective data, however, are available for a few countries. On that basis, a study undertaken in the mid-1990s came to the conclusion that about 73% of those foreign students in EU countries whose citizenships were from other European countries actually were mobile students (Gordon & Jallade, 1996, p. 137), whereas the remaining 27% of the foreign students in the EU with citizenships from other European countries actually were residents of the country of study and/or had acquired their entry qualification in the country of study.

In Germany, for example, about 40% of all foreign students (also including students from other parts of the world) in recent years acquired their secondary school education in Germany, which entitles them entry to higher education (cf. DAAD & HIS, 2001).

Repeated calls were made in Europe to establish a statistical system that really measures student mobility, but up to the present, only some European countries publish respective data. Currently, Ute Lanzendorf and Ulrich Teichler of the Centre for Research on Higher Education and Work in Kassel have undertaken a study on available mobility statistics on behalf of the European Parliament; subsequently, the European Parliament might suggest the

European governments establish a common system of statistics of student mobility.

It might be justified to estimate that somewhat more than 300,000 students being citizens of the economically advanced countries are abroad for the purpose of study. This figure would correspond to only about 1% of all students being citizens of these countries and only about one fifth of the overall number of foreign students (however, we should bear in mind that not all “mobile” students are “foreign”: Some might be returners, that is, students who had lived abroad prior to study and returned to the country of their citizenship for the purpose of study).

The largest and the most visible group among the students mobile between the economically advanced countries are the ERASMUS students. The programme started in 1987/1988 with about 3,000 students and grew to about 27,000 in 1990/1991 (including LINGUA, a similar programme for students enrolled in foreign language fields) and about 60,000 in 1993/1994 (Teichler & Maiworm, 1997, p. 30). In 1997/1998, the figure was about 86,000, and in 2000, about 100,000 students went to another European country with the help of ERASMUS support, which in the meantime had become a subprogramme of the SOCRATES programme (see Teichler, Gordon, & Maiworm, 2001, pp. 177-178; Teichler, 2001b, p. 206).

“Vertical mobility” differs from “horizontal mobility” not only in terms of economic discrepancy or similarity between the home and the host country but usually as well with respect to the duration of study abroad:

- “Vertical mobility” in most cases implies enrollment at the host institution for the whole degree programme because students are often expected to adapt to the quality and the environment of study in the host country in a long-lasting process.
- “Horizontal mobility” is often short term. If institutions of higher education of the home and host countries are viewed to be more or less on equal terms, students can be expected to adapt quickly to standards and the environment and thus gain from a short period of study abroad.

It should be noted, though, that the available international statistics on student mobility refer to foreign students irrespective of duration and thereby include both short-term and long-term mobile students. We only can estimate that more than two thirds of the mobile students within the European Union are short-term mobile students supported by ERASMUS.

It might be added here that professional mobility of graduates is lower than student mobility. About 4% of highly qualified workers in the EU are foreign citizens, among them slightly more than half from other EU countries (Teichler & Jahr, 2001).

THE RATIONALES OF MEASURES OF DETERMINING EQUIVALENCE AND FACILITATING RECOGNITION

We are accustomed to the fact that there are policy measures aiming to facilitate recognition for mobile students and possibly graduates. The need for those types of measures seems to be so obvious that we are not aware of the basic underlying rationales of recognition measures. We even tend to employ the term *recognition* inconsistently.

For example, in analyzing “recognition” as it is used with respect to the ERASMUS programme, I noted four different uses of the term (see Teichler, 1990, pp. 8-11).

- First, recognition as a principle: the readiness to accept or to grant recognition to mobile persons;
- second, recognition as a set of mechanisms: regulations and processes for implementing such acceptance;
- third, recognition as approval of prior learning; and
- fourth, recognition as certification of that approval.

It might be more important, though, to reflect why we tend to discuss matters of recognition and to undertake steps aiming to facilitate recognition.

1. First, recognition is an issue because higher education institutions want to have certified evidence of prior learning achievements of incoming students. This might sound trivial. If, however, institutions of higher education had an open door policy and just would measure achievements demonstrated by the students in the course of study, there would not be any need for recognition of prior study. Similarly, if institutions of higher education employed admission tests for all students wishing to be mobile, recognition procedures were not needed at all. Actually, an open enrollment policy combined with a selective achievement test for incoming students might imply enormous risks for mobile students. Similarly, identical entrance examinations for foreign and home students might be a major barrier to mobile students because those entrance examinations tend to be geared to school curricula of the respective country thus creating a disadvantage for students who were exposed to different curricula at home.
2. Second, the argument stated above leads to a further issue. Recognition is an issue because curricula are often shaped nationally (or specific to individual education institutions). Therefore, students' knowledge is likely to differ by country, even if it is equivalent.
3. Third, recognition is an issue, because it is difficult to measure equivalent knowledge and competence, that is, the degree of “horizontal” (type) and “vertical” (level) similarity or difference of distinct knowledge.
4. Fourth, in the absence of fair measures of different, but possibly similar knowledge, mobile persons are most likely to be treated in a fair manner, if general regulations and procedures are established in determining the “equivalence” of different knowledge.

Some experts claim that regulations and measures are likely to be established with respect to recognition if the actors want to facilitate mobility. However, this is not consistently true: We note many unilateral, bilateral, or multilateral regulations regarding recognition that can be interpreted as demarcating differences and creating barriers to mobility. Activities of setting rules and actual individual recognition decisions are often shaped by chauvinist pride in one's own system and intentions to protect the students from the own country from competition with others.

There are a few further points that ought to be taken into account: They refer to the extent of homogeneity or heterogeneity and the extent of coordination of the countries where a mobile student comes from and goes to.

5. Rules and measures of recognition are most influential in countries characterized by relative homogeneous higher education systems in terms of curricular profiles and well as in terms of the quality of the higher education programmes. If, for example, all universities in Germany are viewed as similar in quality and all universities in Austria are viewed as well as similar in quality, a bilateral recognition convention between Germany and Austria is likely to be well accepted for all cases of student mobility between universities of these two countries.
6. Rules and measures of recognition are powerful in countries in which the higher education system is highly coordinated. If recognition conventions are signed by France, the French universities are likely to follow suit. In contrast, recognition rules and measures are not necessarily interpreted as binding by British universities. As a consequence of the right of the individual British universities to regulate issues of recognition specifically, the British government does not sign any bilateral recognition contract (cf. National Academic Recognition Information Centres [NARIC], 1987, p. 23).
7. Whereas homogeneity facilitates recognition, the need for rules and measures of recognition, in contrast, was strongly felt as a consequence of growing diversification of higher education within the European countries since about the 1960s. Although prior education often had been recognized at ease on the basis of mutual trust among the traditional universities in Europe, the growing diversity created a need for formal procedures of assessment and decision (see Dolezal, 1996).

AREAS OF RECOGNITION

With respect to higher education, a need to establish regular modes of recognition was felt in Europe in recent decades with respect to the following areas:

- recognition of secondary education credentials as entry requirements for higher education institutions;
- recognition of prior courses for the purpose of temporary study in another country;
- recognition of temporary study in another country on return by the home institution;
- recognition of individual courses, stages, or intermediate qualification for the purpose of continuing study and graduating in another country;

- academic recognition of higher education diplomas and degrees, that is, recognition in case the graduates want to continue study on an advanced level in another country;
- professional recognition of higher education degrees and diplomas; and
- the right to bear a title conferred abroad.

The first, fourth, fifth, and seventh areas were often addressed by bilateral and multilateral conventions between European countries, most frequently under the auspices of the Council of Europe and UNESCO. Recognition in the third and fourth areas is expected to be granted by all institutions of higher education participating in ERASMUS student mobility. Finally, the EU puts a strong emphasis on professional recognition of higher education credentials (sixth item) as a means of facilitating occupational mobility.

A SHORT HISTORICAL OVERVIEW

The Initial Conventions on Both Sides of a Politically Divided Continent

The Council of Europe, an intergovernmental organisation founded around 1950 for the purpose of cooperation between the democratic (non-Communist) countries of Europe in the areas of culture, education, and science, was active from its beginning in the area of higher education recognition. As a result, three European conventions were signed in the 1950s and subsequently ratified by most member countries (cf. the overview in NARIC, 1987).

The “European Convention on the Equivalence of Diplomas Leading to Admission to Universities” was signed in 1953. The convention provides that each signatory “shall recognize for the purpose of admission to the universities situated in its territory, admission to which is subject to state control, the equivalence of those diplomas awarded in the territory of each other Contracting Party which constitute a requisite qualification for admission to similar institutions in the country in which these diplomas were awarded.”

The “European Convention on the Equivalence of Periods of Study” was signed in 1956. The convention provides that where the state is competent in matters of equivalence, each signatory “shall recognize a period of study spent by a student of modern languages in another member country of the Council of Europe as equivalent to a similar period spent in his home university provided that the authorities of the first-mentioned university have issued to such a student a certificate attesting that he has completed the said period of study to their satisfaction.” Initially, the convention covered only modern languages; over the

years, though, the fields of study addressed were extended in additional conventions. Finally, a convention signed in 1990 covered all fields of study.

The “European Convention on the Academic Recognition of University Qualifications” was signed in 1959. The convention provides that where the state is competent in matters of the equivalence of university qualifications, the signatories “shall grant academic recognition to university qualifications conferred by a university situated in the territory of another contracting party.” Such recognition will entitle the holder “(a) to pursue further university studies and sit for academic examination on completion of such studies with a view to proceeding to a further degree, including that of a doctorate, on the same conditions as those applicable to nationals of the Contracting Party, where admission to such studies and examinations depends upon the possession of a similar national university qualification; (b) to use an academic title conferred by a foreign university, accompanied by an indication of its origin.” This convention addressed only universities, that is, not other institutions of higher education.

The practical relevance of these conventions faded over the years because more precise bilateral conventions were signed in large numbers and because other multilateral conventions gained momentum. Initially, however, these conventions of the 1950s were important steps of underscoring equivalence of study programmes in Europe (cf. Deloz, 1986; Dolezal, 1996, p. 14).

Similarly, the countries of the Warsaw Pact enacted a large number of bilateral treaties. They also signed the Prague Convention in 1972. Among multilateral conventions of regional neighbour states, the most specific one was signed by the Nordic States in their treaty of cooperation in 1962.

Europe-Wide Conventions

In the late 1960s and early 1970s, UNESCO began to explore the possibility of studying the comparability and equivalence of studies, diplomas, and qualifications aimed at establishing an international recommendation or convention. The aim turned out too ambitious, and UNESCO turned to the promotion of regional cooperation in this respect. This led to various regional conventions since 1975, among them by the States of the Europe Region in 1979 (including at that time also Israel, the United States, and Canada).

The “Convention on the Recognition of Studies, Diplomas and Degrees Concerning Higher Education in the Europe Region” addressed issues of recognition of entry qualification, study periods, and interim qualifications as well as academic degrees and titles in a similar way as the predecessor conventions signed under the auspices of the Council of Europe. Beyond that, the UNESCO

convention advocated flexible criteria for the evaluation of equivalences, suggested to improve the system for the exchange of information regarding recognition, and encouraged the national authorities to recognize credentials as well professionally (without, however, calling explicitly for a clear professional recognition) (cf. Dolezal, 1996, p. 15).

It should be noted that mobility was viewed at that a time as a means of helping bridge the European political divide. In the final act of the Conference on Security and Co-operation in Europe held in Helsinki 1975, international mobility in education was referred to as a means that aims access, under mutually acceptable conditions, for students, teachers, and scholars of the participating states to each other's education educational, cultural, and scientific institutions "in particular by . . . arriving at the mutual recognition of academic degrees and diplomas either through governmental agreements, where necessary, or direct arrangements between universities and other institutions of higher learning and research" and also by "promoting a more exact assessment of the problems of comparison and equivalence of academic degrees and diplomas." (cf. Jablonska-Skinder & Teichler, 1992, p. 92).

In 1997, after about 5 years of preparation, the "Convention on the Recognition of Qualification Concerning Higher Education in the European Region" was signed in Lisbon under the joint auspices of the Council of Europe and UNESCO; the convention also addressed the European Community as a potential signatory party. The Lisbon convention calls for recognition with a more demanding voice and is far more specific with regard to the implementation of these goals than all preceding multilateral conventions regarding recognition in higher education in Europe (see Council of Europe, 1997). The Lisbon convention states with respect to access to higher education:

- "Each Party shall recognise the qualifications issued by other Parties meeting the general requirements for access to higher education in those Parties for the purpose of access to programmes belonging to its higher education system, unless a substantial difference can be shown between the general requirements for access in the Party in which the qualification was obtained and in the Party in which recognition of the qualification is sought";
- periods of study as well that they should be recognized "unless substantial differences can be shown" and
- higher education qualifications: "To the extent that a recognition is based on the knowledge and skills certified by the higher education qualification, 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."

By June 2002, the convention was signed by 43 states and actually ratified by 28 states. Among the states having signed but not yet ratified the conventions are Germany, Italy, and the United Kingdom, the United States, and Canada.

The EU's Support for Student Mobility

The predecessor organisations of the EU, the European Coal and Steel Community established in 1951, the European Economic Community (EEC) and the European Atomic Energy Community both established in 1957, and eventually the European Community established in the early 1980s, did not play any significant role in matters of cooperation and recognition in the domain of higher education. In the early years, matters of professional recognition for the sake of facilitating occupational mobility as well as a certain degree of coordination of vocational education were the only educational issues addressed (see Neave, 1984).

From the 1970s onward, the European Community became the most active political actor in Europe in stimulating border-crossing mobility of students and reinforcing recognition of study in another European country (see de Wit, 2002; European Commission, 1994; Smith, 1996; Waechter, Ollikainen, & Hasewand, 1999). In 1971, the first meeting of ministers of education in the EEC framework took place, and the ministers proposed to draft a community action programme in the field of education. Eventually in 1976, the European Council, that is, the assembly of national government heads of the EEC member states, agreed that the EEC should play a role in select matters of education and adapted the first "Education Action Programme." Accordingly, cooperation between member states should be realized notably with regard to measures related to the problem of youth unemployment. With respect to higher education, a decision was taken to establish a pilot programme of cooperation and mobility in higher education, the so-called Joint Study Programmes (JSP). These steps were undertaken with the understanding that the activities of cooperation should not create pressure toward a convergence of the national higher education systems but, on the contrary, should respect and reinforce the cultural diversity of Europe. Being exposed to contrasting study experiences in other European countries fit well into this concept (see Opper & Teichler, 1989; Smith, 1979).

The JSP provided financial support from 1976 to 1986 to a few hundred multinational networks of departments from institutions of higher education cooperating in curricular and organisational matters for the purpose of improving the value of temporary study at a partner department in another European country and ensuring a high level of recognition on return. Evaluation studies confirmed

impressive results of this pilot scheme (Dalichow & Teichler, 1986; Opper, Teichler, & Carlson, 1990) but argued that temporary student mobility in Europe only was likely to become popular if student scholarships were provided.

Between 1986 and the early 1990s, the European Community established 14 programmes aiming to provide support for European cooperation in education (see the detailed overview in B. M. Kehm, 1994). The largest one and certainly the most successful one, the ERASMUS programme (acronym for European Community Action Scheme for the Mobility of University Students), was established in 1987. ERASMUS notably provided scholarships for a period of up to 1 year to students mobile in the framework of cooperating departments and provided financial support for various activities of the networks of cooperating departments under the conditions that the networks strive for organisational improvement as well as curricular coordination with the aim of assuring the recognition of the study achievement at the host institution on return by the home institution. Additionally, support was made available for activities of curricular innovation, teaching staff exchange, information activities, and so forth (see Teichler & Maiworm, 1997, pp. 3-16).

In the mid-1990s, after educational activities had been endorsed as a regular domain of EU policy in the Treaty of Maastricht signed in 1992, the various European educational programmes were restructured and merged into large umbrella programmes of SOCRATES for education and LEONARDO DA VINCI for vocational training. ERASMUS as a support scheme for higher education became a subprogramme of SOCRATES. Continuous support was provided for student mobility, again under the condition that recognition was provided for and support was enlarged for teaching staff mobility and for projects of curricular innovation. However, institutional support was not anymore granted to networks of cooperating departments but rather to the individual institutions of higher education under the condition that they formulate European policies and safeguard a good quality of cooperation with partner institutions through bilateral contracts (see Barblan, Kehm, Reichert, & Teichler, 1998). Altogether, ERASMUS support was expected to strive more strongly in the past for the enhancement of a "European Dimension" in the course programmes and to serve also the nonmobile students (cf. Teichler et al., 2001).

Beginning in 1989, the European Community supported the establishment of a European Credits Transfer System (ETCS). For a few years, support was provided for a pilot scheme of 15 or a few more departments each in five fields of study. Subsequently, the EU recommended all institutions of higher education awarded ERASMUS support to grant recognition by means of credit transfer (see Wuttig, 2001).

Other EU Activities in Support of Recognition

Already in the early 1980s, the European Community's support for cooperation and mobility activities was supplemented by support of information activities that sought to contribute to the quantitative expansion and to the quality of study in another European country as well as to ensure recognition. Many of the information activities were undertaken in cooperation between the European Community, the Council of Europe, and UNESCO.

- The European Community provided support for a student handbook (Commission of the European Communities, 1981), which the Council of Europe supplemented by a corresponding handbook on member countries of the Council of Europe not being members of the European Community (Council of Europe, 1992). A decade later, the European Community published a handbook on higher education programmes and qualifications (Wijnards van Resandt, 1991), and UNESCO published a handbook on higher education credentials of all European countries (Jablonska-Skinder & Teichler in cooperation with Lanzendoerfer, 1992). On initiative and with financial support of the European Commission, a NARIC (National Academic Recognition Information Centres) network was established. The network aims to establish cooperation among national agencies designating by their governments to provide information on study programmes in various countries, to offer information on study abroad opportunities as well as to assess foreign institutions and programmes for decisions regarding academic recognition. Subsequent to the Lisbon convention in 1997, the Council of Europe and UNESCO formed the ENIC network (European Network of Information Centres), which since then regularly meets and cooperates with the NARIC network. In 2002, 42 member countries were represented in ENIC, among them Australia, Canada, Israel, the United States, and some non-European countries, successors of the former USSR.
- The European Commission also launched a project in 1998 aiming to promote and to implement the so-called Diploma Supplement. A proposal was made jointly by a recognition expert and a higher education researcher in 1987 that all institutions of higher education should not only provide the traditional certificate on graduation but also a more detailed supplement suitable to help a foreign reader, for example, a foreign employer, to understand the course programme and the achievements of the holder (Berg & Teichler, 1988). The Diploma Supplement was endorsed by the Council of Europe and UNESCO in 1988, but initially the European countries and higher education institutions moved slowly in implementing this idea. In the meantime, some countries have introduced the Diploma Supplement at all institutions of higher education, some countries are in the process of implementing such a system for all institutions, and in some countries institutions are recommended to introduce such a document (see Haug & Tauch, 2001). Altogether, more than half of the countries of the European region have introduced the Diploma Supplement comprehensively or in part or are in the process of implementation.

Although the EU can only issue recommendations regarding academic recognition or withdraw support for mobility activities not being recognized, it has the legislative power to issue “directives” according to which persons having attained certain qualifications have the right to be professionally active in other member states of the EU (“*effectus civilis*”). This right was awarded to the EEC by its member states in 1958; if a respective directive is enacted, the member states are obliged to change their national legislation correspondingly.

Altogether, the EU issued more than 60 directives for individual professions, among them for medical doctors, veterinary doctors, pharmacists, and architects (see Dolezal, 1996, pp. 20-24; Waechter, Ollikainen, & Hasewand, 1999, pp. 66-67). Some of these directives are too general to ensure professional recognition; for example, medical doctors are expected to have studied 6 years or 5,500 hours. In some cases, for example, in the domain of mechanical engineering, preparatory activities for a directive did not succeed because representatives from different European countries could not agree on core elements of a common European curriculum in this domain that were considered essential for a directive in this area.

In December 1988, the European Council, the highest decision-making organ of the European Community, issued a “Directive on the Recognition of Higher Education Diplomas Awarded on Completion of Professional Education and Training of at Least Three Years’ Duration.” This directive, in principle, assures graduates of higher education programmes comprising 3 or more years that they can be professionally active in all occupations requiring at least 3 years of study. Waechter et al. (1999) describe the essence of the directive as follows:

The directive represented a shift from detailed regulation and harmonisation of educational courses towards a looser framework arrangement, based on mutual trust in the quality of qualifications granted by other member states. In principle, qualifications granting access to a profession in one member state must be recognised in others, too. In unclear cases, the job-seeker may turn to national authorities nominated for this purpose. The directive also provides for the recognition of substantial working experience (if acquired in a member state where the profession in question is not regulated) in the absence of formal education. In cases where the education received in the country of origin is at least one year shorter than in the host member state, an aptitude test or an adaptation period can be required before granting recognition. (p. 67)

In 1992, a similar directive was approved regarding programmes shorter than 3 years, and activities are under way of establishing a directive covering both predecessor directives. It should be noted, though, that the respective national legislations were not changed in the subsequent 3 years, as stipulated, and the full implementation is not in sight.

Pressures of Globalisation and the Move Toward a European Higher Education Space

All activities of the three intergovernmental and supranational bodies undertaken from the 1950s to about 1997 headed into a similar direction. They encouraged the higher education institutions, the governments, and to a certain extent the representatives of the employment system to accept prior achievements of students generously based on mutual trust, if the students were defined by the respective country as qualified for entry to higher education and if they have studied successfully a certain required period of study. In some cases, it was considered appropriate to take into consideration different types of higher education institutions, whereas in others this even was considered as a superfluous barrier to mobility. This encouragement implies trust that quality differences are not too substantial to be unacceptable. Also, it suggests that the diversity of the substance of higher education programmes should not be viewed as a barrier to mobility but rather as an opportunity because it provides a valuable experience of contrast for mobile students and can serve a rich pool of desirable qualifications.

In fact, the readiness is widespread in Europe of accepting "equivalence" within a certain range. This is based on mutual trust that the level of higher education programmes often is similar and that the existing differences of institutional and programme structures as well as curricular substance as a rule would not cause any harm. Of course, we note that not all countries follow these policies as wholeheartedly as others, and we observe quite a diversity of national policies with respect to Europeanisation, internationalization, and globalisation of higher education (see Haug & Tauch, 2001; Kaelvemark & van der Wende, 1997). Finland is often named as a country widely accepting the supranational policies (see Ollikainen, 1999), whereas the United Kingdom and Greece for different reasons were least supportive of these policies. In the United Kingdom, more attention tends to be paid to students from other parts of the world (see, for example, House of Lords, 1998; Humfrey, 1999); universities often complain that they cannot have revenues from incoming ERASMUS students, and interest of British students in study abroad is relatively low. In Greece, participation in European activities remained a controversial issue within the universities. Also, Germany repeatedly criticized EU higher education policies as too heavily pressing for convergence or as interfering with the rights of the individual countries (those critiques were voiced initially with respect to the introduction of a credit transfer system and with the introduction of a "contract" between the European Commission and the individual universities at the time of the inauguration of the SOCRATES programme (see B. B. Kehm & Teichler, 1994; B. M. Kehm, 1997). Finally, the reluctance in transforming the 1988 directive on pro-

fessional recognition into national legislation underscores that there are limits of trusts into an “equivalence” of the European higher education programmes.

These reservations against generous recognition based on mutual trust within Europe, however, were not viewed as so serious that the direction of the recognition policies was likely to be revoked in Europe. Therefore, the shift toward a partly contrasting policy that culminated in the “Bologna Declaration” of the education ministers in 1999 came somewhat as a surprise. This shift was triggered off by the notion that European higher education should position itself in a global framework (cf. Scott, 1998). Global pressures were interpreted as suggesting structural convergence of higher education programmes in Europe, as triggering off greater diversity of higher education, as calling the emphasis on mutual trust into question and accepting less friendly competition as the rule of the game, and as looking at issues of equivalence and recognition with a less generous perspective.

THE IMPACT OF THE RECOGNITION POLICIES

The Recognition Conventions and Mobility in Europe

The European conventions regarding recognition in the domain of higher education claim that the entry qualification to universities as well as study within universities in Europe are by and large equivalent. Therefore, as a rule, a secondary school graduate and a university student from another European country should be treated in any European country like a home student, unless, as the Lisbon convention of 1997 points out, there is clear evidence that this case is an exception from the rule.

This means, first, that a foreign person having successfully completed the type of secondary education that prepares for university study in his or her European country of origin, should have the same opportunities to study as a young person of the home country with such a type of secondary qualification. The different years of schooling up to this level—12 years in some European countries and 13 years in other European countries—do not make any difference.

For example, as a German who has passed the Abitur is entitled to enroll in economics at any German university, any Austrian having passed the Matura in Austria or any Dutch having completed secondary education (VWO) in the Netherlands is entitled as well to enroll in economics at any German university. If an economics programme in Sweden requires a certain number of upper secondary education courses in foreign languages and in mathematics, the foreign

applicant has to provide evidence of having taken those courses or might have to take such courses prior or parallel to his or her studies in Sweden.

Second, the conventions suggest that the required length of the course programme is the major currency of equivalence. A student successfully completing 3 years of study of a 4-year university programme in one European country has a qualification equivalent to the award of a bachelor's degree based on a 3-year university programme in another European country. Therefore, different lengths of programmes were not viewed as a major barrier to mobility.

Of course, these two pillars of recognition still leave ample room for interpretation, uncertainty, and barriers. Four issues are not resolved on the basis of these conventions.

- a. The entry qualification might have been acquired in a secondary education programme that is not the main route to higher education, secondary education might have specialized in certain areas, or universities might require certain subjects to be given emphasis in secondary education.
- b. Study programmes of an identical field of study might be so diverse in substance and areas of specialisation that a receiving university will not be willing to accept all prior study taken at another university in the same field as equivalent to study at the receiving university.
- c. Study at one type of higher education institution might not be considered equivalent to study at another type of institution. For example, German universities would not consider study at a Dutch HBO as fully equivalent to study at their institution—in the same way as they do not accept 3 years of study at a German Fachhochschule as equivalent to 3 years of study at a German university.
- d. One country might have highly stratified higher education programmes and institutions, as far as the quality level is concerned, and therefore the highly selective universities might not be willing to accept all secondary school leavers or students from other European countries.

Many of these issues are resolved to some extent in bilateral conventions. They are more specific than the multilateral ones, for example with respect to access to higher education of mobile students with different types of secondary schooling or with respect to the equivalence or difference of study programmes at different types of higher education institutions. Most member states of the EU have signed bilateral or regional (for example among Nordic states) conventions on recognition in the area of higher education studies with the majority of other EU member states (cf. NARIC, 1987). Additionally, as will be discussed below, recognition of study in another European country is expected to be facilitated through advisory activities of the national information centres (NARIC/ENIC) as well as by various other means of information.

Information in Support of Recognition

Various information measures are viewed in the framework of cross-national intra-European cooperation as instrumental in making appropriate and possibly supportive decisions with respect to recognition of mobile students' prior study. As already mentioned above, student (or study) and diploma handbooks, the so-called Diploma Supplement, ECTS as well as the information and advisory activities of NARICs/ENICs are the most prominent tools of information.

Study and diploma handbooks inform on national systems of higher education, thereby describing the structure of institutions of higher education and course programme, entry requirements and admission regulations, fields of study, types of degrees, and so forth, as well as conditions for foreign students. These handbooks tend to be formal, official, and sticking to the logic of the recognition conventions. They neither provide information on differences in the reputation between universities, on the different labour market value of programmes, nor on the existence of tertiary education institutions, though not being officially recognized by the state are in high esteem by the students and employers (for example, the large number of private universities of offshore campuses of foreign universities in Greece). The information thus provided by handbooks might be helpful in facilitating student mobility in Europe, but it does not help the students to get a realistic view of the subtle barriers to mobility as well as on the differential prestige and "market value" of study opportunities in other European countries.

In recent years, ministers of education, university rectors, and other actors agree also in recommending institutions of higher education to introduce ECTS or any kind of credit system that can be viewed as ECTS compatible. It is hoped that this will lead to a more or less standardized "booking" of study activities and achievements in terms of workload, subject matter, and grades. A greater transparency of prior study is expected to make recognition (in this case called credit transfer) more likely.

The advisory activities of NARICs/ENICs for universities as well as for students and employers are expected to step in when equivalence of study between two countries is not obvious. The NARICs/ENICs might inform neutrally, but they also might advise whether equivalence should be assumed or whether differences are too substantial to trust in equivalence. Therefore, the European Commission provided funds for mutual visits and cooperation among NARICs: It was hoped that the advisory activities might be better in quality but also more supportive for recognition if the national administrators in charge of information and advice would know their fellow administrators in other European countries and their ways of thinking and working.

Recognition in the Framework of ERASMUS

When the JSPs were supported from the mid-1970s to the mid-1980s as well as when ERASMUS started in the late 1980s, recognition issues of temporary study abroad were viewed as different from recognition issues addressed in the conventions on recognition of study periods and degrees. The normal mode of mobility in ERASMUS is a student who

- already has studied at least 1 year at his or her “home” university (in more than 90% at the university of the country of his or her citizenship),
- spends a study period abroad of 3-12 months in another European country with ERASMUS support at a “host” university, and
- returns to the home university to continue his or her study there up to a degree.

In the framework of ERASMUS, the host university (or other institution of higher education) is expected to admit students from the partner institutions just for the ERASMUS-supported period of study, to provide them appropriate study opportunities and to assess their achievements. The host university, however, is not obliged to offer the ERASMUS students the opportunity of remaining there up to a degree. An ERASMUS student wishing to stay might be subject to a specific additional admission procedure. Thus, the issue of recognition is less sensitive and complicated for the ERASMUS host institutions with respect to temporary students than with respect to students wishing to be eventually awarded a degree.

The home institution is expected to recognize on return all study achievements that their students had acquired during the ERASMUS-supported temporary study period abroad. This readiness for recognition of achievements during the ERASMUS-supported period is officially the most important precondition for eligibility of a university or department for ERASMUS support. The principle of recognition of the temporary study period abroad on return underscores the view that a temporary study period should not be considered an add-on qualification that might require additional time and energy but rather as a regular component of a study programme (see Teichler & Maiworm, 1997).

As recognition is such a crucial issue of success of ERASMUS, it was addressed in representative surveys of ERASMUS students of the academic years 1988/1989, 1990/1991 and 1998/1999 (see Teichler 2001b; Teichler et al., 2001; Teichler & Maiworm, 1997) and was also taken up in a survey of ERASMUS departmental coordinators and finally in surveys of former ERASMUS students a few years later when most of them were employed (Maiworm & Teichler, 1996).

According to these studies undertaken as part of monitoring and evaluation activities within the ERASMUS programme, departmental coordinators (mostly

professors) estimated that about 95% of temporary study abroad in the framework of ERASMUS is recognised on return. Students, however, reported on average a substantially lower proportion of recognition. The authors of the evaluation study come to the conclusion that the teachers overestimate the extent of recognition they actually grant.

In the student surveys, the ERASMUS students were asked three questions with respect to recognition to measure:

- the extent of recognition: the proportion of achievements reached abroad that were actually recognized on return,
- the extent of correspondence: the proportion of achievements abroad granted recognition on return in comparison to those expected to be achieved during a corresponding period at home,
- the extent of nonprolongation (or in reverse: how much the overall period of study up to graduation would be prolonged as a consequence of the temporary study period abroad?).

Actually, the survey of 1990/1991 showed that on average about three quarters of study abroad was recognised on return according to the first and second criteria, whereas the students expected that the overall study period would be prolonged by almost half of the duration of study period abroad on average. Graduates eventually believed that the extent of prolongation was about 40% on average (Teichler, 1996, pp. 166-170).

Detailed analysis of the material available suggests that some limitations of recognition could be viewed as normal. There are many obstacles to full recognition. Some of them are on the part of the students: Not all ERASMUS students are linguistically well prepared for study in another country, they often take somewhat fewer courses abroad, and some students cannot cope well with changing conditions. On the other hand, the differences in the extent of recognition by individual university, by fields of study, and by countries suggest that the universities themselves are to a varying degree inclined to grant recognition. For example, in all three studies students returning to their German home universities reported a relatively low extent of recognition.

It is interesting to note that the majority of former ERASMUS students believe that they had a higher academic progress abroad than during a corresponding period of study at home. This could in theory lead to a situation that study abroad counts more than 100% of the study achievements students are expected to reach in such a period at home. However, many students seem to be impressed by the broadening of horizon and reflection, whereas teachers might put a stronger emphasis on the accumulation of concrete knowledge.

In the logic of the ERASMUS programme, the universities are expected to support the mobile students administratively and academically in a way that makes the temporary study period abroad most successful and therefore most likely to be recognized. In this context, curricular measures might play a role. For example, the home university might expect the students to take courses abroad that are very similar to those at home to grant recognition at ease. In some cases, on the contrary, students are encouraged to take courses substantially contrasting those at home to widen their horizon. In some cases, the cooperating departments developed new curricula jointly that differ from those dominating in the participating countries. The more study abroad differs from traditional study at home, the more innovative conceptual efforts might be needed by cooperating departments to justify recognition. The surveys provide evidence that the extent of recognition is higher on average if the cooperating departments cooperate closely in developing curricular concepts and advising the students carefully which courses they should take—either those matching the courses at home or those contrasting them.

But, it is obvious that in many cases a high degree of recognition is only reached through “detours”: For example, some universities encourage their students to take the compulsory programme at home and recognize the courses taken abroad in exchange for the elective courses at home. Notably, some British universities offer a 3-year bachelor’s programme without a study abroad component along a 4-year bachelor’s programme with a 1-year study abroad component. In this way, the study abroad period is “recognized” but does not offset any courses of the home programmes; it leads to a longer study period without letting this look as individually caused prolongation.

Altogether, we can say that organisational support and curricular coordination within ERASMUS should help to increase the value of learning during the study period in another country thus also leading to a higher degree of recognition. Curricular coordination could mean making the programmes of the partner universities more similar or accepting contrasts as beneficial. But even if partners moved to similar or even joint curricular options, this does not necessarily call for a convergence between the national education systems in Europe. Often, in contrast, networks of departments from different European countries developed jointly new “European” curricula, which did not fit smoothly into any of the participating countries’ curricular frameworks. One could argue that increasing curricular cooperation in European networks is bound to contribute to a decrease of national standardisation of curricula in higher education.

The pilot programme of introducing credits (ECTS) was hoped to lead to a higher extent of recognition. The pilot programme started in 1989 with support for 15 departments each in five fields of study. The underlying rationale (cf. Gehmlich, 2000; Wuttig, 2001) was that a detailed and transparent mode of recording achievement was likely to facilitate and eventually to increase recognition on return. ECTS set rules in terms of

- calculating the students' work load of one academic year as 60 credits,
- making sure that all study achievements abroad are certified, and
- agreeing on a joint grading scale.

Moreover, the participating departments of the ECTS pilot scheme were expected to provide an "information package" on study opportunities well ahead of the actual study period. Students were expected to choose the courses to be taken abroad in advance in agreement with their supervisors at home; they also had to get approval by their home supervisors if they wished to change the programme while abroad.

Finally, ECTS was viewed not only to be a means of assuring recognition on return. Rather, ECTS credits also should be recognized for any purpose of mobility. A university participating in one of the pilot networks also was expected to allow the incoming students to complete their studies at the host institution if they wished to do so without any further screening and approval procedure. The ECTS pilot scheme was generally viewed as a success. For example, student surveys regularly undertaken during the first 3 years of the pilot scheme had shown that the average level of credit transfer was about 85%, that is, about 10% higher than otherwise in ERASMUS (Maiworm & Teichler, 1995). Or in reverse: Two fifths of nonrecognition could be avoided with the help of calculating achievements abroad in terms of credits.

Therefore, the European Commission suggested all universities participating in SOCRATES/ERASMUS to introduce ECTS. In fact, half the ERASMUS 1998/1999 students surveyed reported that their achievements abroad were documented in ECTS credits. The extent of recognition for those students for whom achievements were documented in terms of credits was 87% and for other students 74%. As a consequence of the spread of ECTS, the average recognition had increased from about 75% in 1990/1991 to 81% in 1998/1999 (Teichler, 2001b, p. 209). Also, ECTS students expected less prolongation of the overall study period as a consequence of the study period abroad than other ERASMUS students.

“BOLOGNA” AND THE NEW CLIMATE WITH RESPECT TO RECOGNITION

The New Policy

When the Asian and European heads of governments had their first meeting in the mid-1990s as part of a regular series of meetings, they discussed, among others, matters of international education. It was a shock for the continental European heads of government to hear firsthand that the vast number of mobile students from the newly emerging economies in Asia like to study in English-speaking countries whereas other European countries are not anymore “on the map.” This experience is often said to have triggered off the new debate on internationalisation and globalisation in Europe. At the occasion of an anniversary of the Université de Sorbonne in 1998, the ministers of education of France, Germany, Italy, and the United Kingdom declared jointly that European states have to opt for structural convergence of their systems and to introduce a bachelor’s-master’s stage structure of programmes and degrees to be understood by and to become attractive for students from other parts of the world. In 1999, the ministers of education and representations of institutions of higher education from about 30 countries met in Bologna and signed the Bologna Declaration (“The European Higher Education Area. Joint Declaration of the European Ministers of Education Convened in Bologna at the 19th of June 1999”) reinforcing and specifying what was already said by the four ministers in 1998. In the meantime, a follow-up conference has taken place in 2001 in Prague (the final communiqué was called “Towards the European Higher Education Area”), and another conference is scheduled for 2003 in Berlin. The various declarations might be summarized as calling for

- the establishment of a European higher education area until 2010, which ought to be made attractive in various respects,
- the introduction of 3-4 years bachelor’s programmes and 1-2 years master’s programmes with an overall duration of 5 years,
- support to increase mobility beyond the current level,
- cooperation in matters of curriculum development, ECTS, easily readable degrees and recognition and cooperation in matters of quality assurance (cf. European University Association, 2001; Haug & Tauch, 2001; van der Wende, 2000).

The Change of Climate and the Future of Recognition

The so-called “Bologna-process” is an expression of a basic paradigmatic shift of internationalisation policies in higher education. Before Bologna, the structural variety of higher education in Europe was viewed as an natural out-

growth of cultural and academic variety. Possible inherent barriers to mobility were considered to be marginal as a consequence of a similarity of the quality level, mutual trust as well as accompanying measures for transparency and recognition. Now, higher education in Europe is viewed as an exceptional area of higher education in the world. Higher education in the world is considered as being shaped by enormous, hardly transparent diversity in quality and profile and by fierce competition for quality and market shares (cf. van der Wende, 2001). This is expected to have an impact as well for higher education in Europe: Diversity as well as competition within Europe is expected to increase. As a result, cooperation based on mutual trust is likely to decline, and mobile students and graduates would face increasing barriers to recognition.

The most far-reaching European response to the trends of increasing diversity and thus declining transparency is the effort to create a more or less common structure of programmes and degrees in Europe. If the level and the types of programmes become more diverse, a more or less similar form should help to understand the system. In this way, the spread of ECTS should also provide formal transparency amid substantive diversity. This policy in favour of structural convergence actually was a complete revision of the European policies of the mid-1970s to respect the variety of systems.

This is certainly somewhat surprising because one could argue that formal similarity loses its power of making the system transparent when the substance behind the forms becomes more diverse. But the contrary seems to be the case: If the levels and the profiles are diverse, there seems to be a need that the higher education system is at least transparent in formal elements.

The Bologna policy, however, does not call for a completely new recognition policy within Europe. On the contrary, one could argue that recognition in case of border-crossing intra-European mobility can be facilitated further, if the national systems of higher education in Europe become more similar with respect to the structure of programmes and degrees. A growing recognition can be expected only, however, if the intra-European diversity between universities and programmes does not grow too much.

Most support mechanisms for recognition of mobile persons' prior learning within Europe except for the conventions as such, that is, information material, activities of information and recognition agencies, the diploma supplement, or ECTS, become even more important in this context. They continue to be useful for intra-European mobility, and they can play an important role, if global diversity of higher education grows and if competition increases and thus decisions regarding recognition cannot rely at ease on mutual trust.

One might add that the currently spreading internationalisation policies as a rule do not contradict the policies and activities of "Europeanisation" as pro-

moted by the European Commission. A careful analysis suggests that the EU policy has advocated a strong focus on European cooperation and mobility but has not promoted concepts that the universities could not extend to worldwide cooperation and mobility (see Teichler, 1998, 1999).

It is not yet clear, however, in which direction the increasing European cooperation in matters of evaluation will move. At the present, it should contribute to an exchange of expertise. One cannot exclude, however, that this might trigger off efforts toward activities of common standard setting, for instance, the introduction of an European accreditation system.

Actually, the growing concern about student mobility in a global context has triggered off a reform movement in higher education in Europe. Germany belongs to those countries where a need of reform in higher education is most strongly felt, and many higher education reform activities are under way. Reforms of management in higher education are also viewed as a contribution to the internationalisation of German higher education institutions to improve their conditions and to make themselves more attractive and competitive in a global context (cf. the ideas presented in Hanft, 2001). Major activities are under way in introducing bachelor's and master's programmes and degrees, whereby many reforms affect the programmes substantially (cf. Welbers, 2001). In this context, efforts are made as well to introduce ECTS-compatible credit systems (cf. Schwarz & Teichler, 2000).

There are reasons to doubt, however, that European countries will move rapidly toward an identical structure of programmes and degrees as well as to increasingly similar curricula. First analyses show that reforms in the various countries differ in concepts, speed, and many details (cf. Haug, Kirstein, & Knudsen, 1999; Haug & Tauch, 2001; Teichler, 2001a). Also, the individual universities differ substantially in their concepts and activities of Europeanisation and internationalisation (see Barblan et al., 1998; Barblan, Reichert, Schotte-Kmoch, & Teichler, 2000). We might predict, therefore, that by the year 2010 most European study programmes will fit in a bachelor's-master's structure, but the diversity with respect to the substance of curricula and the range of quality as well as structural details might be more diverse than ever. It will be interesting to note whether mutual trust in similar quality will prevail or even grow and thus facilitate recognition of study achievements of mobile students or whether increasing competition and diversity will eventually lead to an increasing uncertainty. Structural convergence does not necessarily increase mutual recognition.

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ABOUT THE AUTHOR

Ulrich Teichler is a professor and director of the Centre for Research on Higher Education and Work of the University of Kassel (Germany). He was formerly chairman of the Consortium of Higher Education Researchers and EAIR and is member of the Academia Europea and the International Academy of Education. He conducted research on and evaluated various mobility and cooperation programmes. Most recently he edited *ERASMUS in the SOCRATES Programme: Findings of an Evaluation Study* (2002).