



European Commission
Directorate General for Education and Culture A3 - Skills and qualifications Strategies;
Multilingualism policy
J 70 03/125
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Vienna, 11 April 2014

Position of the Austrian Association of Universities of Applied Sciences (FHK) on the consultation document concerning the “European Area of Skills and Qualifications”

To whom it may concern,

The FHK would like to take the opportunity to follow your invite and share our opinion on the consultation document concerning the “European Area of Skills and Qualifications”.

First of all we would like to state that we welcome the attempt to explore current obstacles to the recognition of qualifications within Europe. We are very aware that there are several obstacles concerning the recognition of qualifications not only across Europe but also within one country and thereof within one sector.

At the same time we have experienced that there are lots of providers in Europe offering highly questionable programmes that don't fit standards and requirements to be fully recognised by Austrian higher education institutions mostly because of the exorbitant recognition of prior learning at non-academic level, resulting that many times degrees are awarded after just one third of the actual programme duration. Nevertheless these providers give the impression that completing one of their (costly) programmes entitles their alumni to take a consecutive study programme at an Austrian higher education institution.

Therefore we would like to emphasise that although we are fully supportive of the recognition of prior learning we also need to consider the context in which qualifications have been obtained and that it is not always possible to consider qualifications of different contexts equal. We want to stress that a degree in higher education can't be obtained by putting together qualifications like pieces of a puzzle. There need to be certain standards.

If you have any questions or concerns, please do not hesitate to contact us (nicole.guthan@fhk.ac.at). We hope you will take into account our contribution.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Holzinger'.

Dr. Helmut Holzinger
President

A handwritten signature in black ink, appearing to read 'Kozelnik'.

Mag. Kurt Kozelnik
Secretary General