**ANNEX TO THE MISSION REPORT**

**RECOMMENDATIONS TO THE DEPARTMENT OF ACCREDITATION AND NOSTRIFICATION (ANO)**

Some aspects of the ANO recognition procedure are not in-line with the Lisbon Recognition Convention and its subsidiary texts and represent an outdated practice that is no longer applied (looking at the contents of the programme subject by subject). It was also noticed that recognition decisions may be based not only on the research into the foreign systems of education and their comparability to the national system (as is the usual practice), but also on certain technical steps in the recognition procedure (verifying language skills and checking border crossings).

The following steps should be taken to ensure that ANO’s practice is in line with the Lisbon Recognition Convention and bet recognition practice in the European Higher Education Area:

*Eliminating nostrification and transitioning to recognition based on learning outcomes*

Contents of the programme are no longer one of the criteria used for recognition in the best recognition practice in the European Higher Education Area (EHEA). Verification of the contents of the programme makes the procedure very cumbersome, prevents recognition of many comparable awards, hinders mobility or, at times, makes it even impossible. It can also lead to mistakes in decisions because titles of the subjects can be misleading or may be misinterpreted (especially for modular systems) and it requires in-depth subject specific knowledge from the assessors. This also does not allow recognising qualifications that do not fall into the classification of subject fields provisioned in the national legislation. This, among others, includes interdisciplinary awards and awards offered in the specialisations that do not exist in Azerbaijan, but are on demand.

It is recommended that, on the national level (ANO), comparability of generic learning outcomes (related to the level and type of award) should be considered in the process of recognition. The profile or field of the programme can be noted and/or described in the recognition decision as additional information for higher education institutions and employers.

Comparability of field or subject specific learning outcomes should be considered in a flexible manner on the level of higher education institutions or employers when the decision regarding admission to a programme or access to a certain profession is made.

*Flexibility in applying the concept of substantial difference*

A large reliance on national legislation and the expectations for the foreign award to meet the requirements of the Azerbaijani national legislation was noticed. Recognition authorities should be aware that qualifications awarded in the foreign systems of education will differ and should not be expected to fully comply with the national requirements of the receiving country.

The concept of substantial difference is one of the key concepts of the Lisbon Recognition Convention that allows recognition of qualifications, which are different, but comparable. It is, therefore, recommended to apply a flexible approach in recognition and allow differences that are not substantial and would not prevent the holder of the award from successfully continuing to further education or employment. For example, the flexible approach should be applied to qualifications, which do not meet national requirements in terms of duration, but follow the requirements for the Bologna cycle structure or foreign qualifications, which are awarded in the fields traditionally not offered in Azerbaijan.

*Applying the learning outcomes approach to recognition*

The learning outcomes approach to recognition is the best practice in recognition promoted in the EHEA. It promotes focusing on the overall result, not on the process of how the qualification was achieved. This approach allows countries to recognise different forms and modes of learning, which are becoming more and more varied, including non-traditional learning and distance learning. It is agreed that the learning outcomes of a quality assured award (awarded by a recognised institution through an accredited programme (if provisioned)), should be considered as valid without detailed scrutiny into how the award was achieved. This approach should allow for recognition of properly quality assured qualifications awarded through distance learning or other non-traditional learning because they have comparable outcomes with the traditional awards.

*Recognition decisions should be based on criteria directly related to the qualification*

According to the Lisbon Recognition Convention’s Explanatory report, the convention is aimed at recognition of documented competence, knowledge and skills without recourse to repetition of assessment, examination and testing of such competence, knowledge and skills. The practice of verifying aspects that are not directly related to the award should be reviewed. Those include:

* Checking language
* Checking border crossings.

The experts would recommend getting rid of verifying these aspects entirely because they are not directly related to the academic merits of the award. However, the mission interviews have revealed that there is general agreement among all stakeholders (the ministry, ANO, and higher education institutions) that additional checks are necessary for the purpose of battling certain types of regional fraud. In light of this, experts would recommend using more appropriate instruments to achieve similar goals, such as:

* More detailed application form where the applicant could be asked to provide additional information;
* Research into the authenticity of the awards (including contacting the issuing institutions);
* Research into the quality assurance system of the country of origin and status of the institution and programme of the awarded qualification;
* Border crossing checking and interview should be resorted only to those who do not pass the aforementioned steps and there are substantiated doubts regarding their study;
* The interview should not consist of language checking, but should be directed to determining specific aspects of study (such as asking questions related and/or to organisation of studies). In case of further doubts, the final decision should rely on a competent assessment of skills and competences.

*Institutional capacity building*

In order to facilitate the achievement of the aforementioned objectives the following should be taken into consideration:

* An internal review of ANO processes for compliance with the Lisbon Recognition Convention.

This can be done internally by taking advantage of the EAR Manual and ENIC/NARIC quality assurance tool developed through the family of SQUARE projects. In the future, it is recommended to consider participating in the external peer-review exercise within the ENIC/NARIC network usually coordinated by the NUFFIC (the Dutch ENIC/NARIC).

* Participation of ANO employees in the NARIC on-line training course for Evaluation of Foreign Courses, Diplomas and Qualifications, which is offered in the spring of each year free of charge; the call to participate in the training is sent through the ENIC/NARIC Listserv.
* Activate participation of ANO in the activities of the ENIC/NARIC network through the meetings, projects, and various initiatives. This will raise awareness and will allow to develop the knowledge and the know-how of the best practice in recognition.

Additional recommendations are provided as comments to the draft of the new legislation governing recognition annexed to this report.