



ECTS_consultationresults_05nov07

ECTS KEY FEATURES

Comments received by 1st October (13): AT, DE, DK, FR, IE, NL, NO, RO, TR, UK, UA, EUA, EURASHE

Comments received after 15th October: NL, UK, SE, CH, AT, CY, TR

Comments received after 23rd Oct.: BUSINESS EUROPE, IE, EDUCATION INTERNATIONAL (EI), EURASHE, AD, IS, LI, IT, PL, HR, LT, DE, B (FI and Fr Communities), FR, DK, EUA, FI, EE, CZ, HU, NO

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	<p>General remarks:</p> <p><u>(UK)</u> include more on the role of ECTS in the EQF (lifelong learning) and EHEA</p> <p><u>(EUA)</u> How should ECTS be developed in the context of lifelong learning, and how should this be reflected in the key features?</p> <p><u>(UK)</u> The draft 'key features' omits some important aspects, e.g. no definition of credit or credit level.</p>	<p>We will explain this aspect in the updated Users' Guide.</p> <p>The proposed text of the Key Features refers to lifelong learning and the recognition of learning acquired in different learning contexts. Further explanations and guidance are certainly needed and will find their place in the updated Guide.</p>

¹ Cf. the Memorandum on higher education in the European Community, 1991

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	<p>Suggestion:</p> <p><i>Credit is a quantified means of expressing the volume of learning based on the learning outcomes achieved by an individual learner at a specified level, linked to an appropriate national and international level/cycle descriptor</i></p> <p>The draft does not include the agreed credit ranges for the first two Bologna cycles – this must be part of any key features</p> <p><i>ECTS credits are linked to the levels of the EQF and the Bologna cycles on the following basis:</i> <i>First cycle - EQF level 6 - typically 180-240</i> <i>Short cycle (within or linked to first cycle) - EQF levels 5 & 6 - typically 120</i> <i>Second cycle - EQF level 7 - Typically 90-120 – with a minimum of 60 at second cycle level</i> <i>Third cycle - EQF level 8 - No credit ranges allocated</i></p> <p>(CH, 23 Oct. 07) There is no need to put the Bologna cycles in the key features, the academic year of 60 credits is the key</p> <p>(UK) - There should be a set of ECTS principles and purposes (4 or 5 statements). In addition the features would benefit from more on lifelong learning.</p> <p>Suggestion: <i>ECTS is a meta-credit system that has the potential to facilitate the international measurement and comparison of learning achievements in the context of different</i></p>	<p>This definition omits the link between credits and workload (needed to achieve expected learning outcomes).</p> <p>The Bologna cycle credit ranges will be put prominently in the Users' Guide.</p> <p>Reaction to first sentence: ECTS is not a meta-credit system it is the local credit system in most countries and used for both accumulation (vast majority of user) and transfer (mobile students). Other sentences: these messages are already in the text.</p>

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	<p><i>qualifications, programmes and learning environments. It facilitates lifelong learning when linked directly to qualifications frameworks and learning outcomes. It provides a standardised means of measuring learning between diverse academic programmes, educational sectors, regions and countries.</i></p> <p>(UA) ECTS Key Features presuppose concordance, mutual recognition and common understanding of the basic concepts (ECTS credits, learning outcomes and workload). Therefore, <i>guidelines</i> for the introduction of these should be worked out. Namely:</p> <ul style="list-style-type: none"> - allocation of ECTS credits to a separate module, course unit, study programme; - description in terms of learning outcomes of a module, course unit, study programme, that relate to level descriptors in national, sectoral and European qualifications frameworks; - determination of student workload taking into account basic learning activities (such as lectures, seminars, projects, practical work, exams, self study, etc.) required to achieve the expected learning outcomes. <p><u>After October 15, 2007</u></p> <p>(NL) would like to support the UK and other countries in their request for transparency in the process of redefining key-features by the EU-Commission and supposed later elaboration into documents that can be used as examples, or reference points.</p>	<p>(CH) we strongly support this comment.</p> <p>Indeed, we will explain these aspects in the updated Users' Guide.</p>

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	<p>(UK) - Again regrets the lack of transparency in the way the draft document was presented to the BFUG without any discussion between the experts nominated after the June meeting. Those experts were only asked to comment on the draft in the few days before the BFUG meeting and, in the case of the UK, those comments have essentially been ignored. A proper discussion between the nationally nominated experts should precede the signing off of the Key Features. The EUA position should also be taken into account, as they stated in the Lisbon Declaration that “Universities wish to take a leading role in the further development of ECTS”.</p> <p>(IE) The draft update document is welcome and covers a number of important areas which are essential to the effective use of credit systems</p> <p>(IT) Mrs Sticchi Damiani considers it crucial that this time all Bologna countries provide a clear response to the ECTS issue, after consulting with their ECTS experts. In the past few months I have attended several meetings in various capacities and have witnessed how the discussion on ECTS has been moved around from one table to the other:</p> <ol style="list-style-type: none"> 1. ECTS experts last March. Their conclusions were not accepted by the UK because the experts had not been officially appointed by their countries; 2. BFUG last May in Berlin. Conclusions were incorporated into the London Communiqué 3. Representatives of EU member states last June, 	

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	<p>consulted on request of the UK. Their conclusion was to entrust the Commission with the drafting of ECTS documents in consultation with ECTS experts</p> <p>4. BFUG 2-3 October. The UK declares the Commission's drafting procedure not transparent and the consultation with newly appointed ECTS Experts not satisfactory. A new round of consultation of Bologna countries is requested and the contribution of their experts is invited.</p> <p><u>Meanwhile</u>, ECTS has been kept in a limbo, creating enormous uncertainty for all those who are committed to national implementation and counselling in the various countries.</p> <p>As for the content of the "ECTS Key Features" proposed by the Commission, I am convinced, like all the other ECTS Experts I know (some are new) with the exception of the British, that a balance between learning outcomes and student workload is the best possible solution for ECTS, especially if we consider that learning outcomes are a totally new concept for the vast majority of countries and it will take them many years to incorporate it into their academic cultures. I have always expressed these ideas clearly and openly, not to serve any national interests but as the result of my field work in a very large number of Bologna countries and institutions.</p> <p><u>(DE)</u> Preliminary note</p> <p><i>The role of the universities</i> is central to the implementation and use of ECTS. This is all the more necessary since ECTS has become part of the Bologna Process and has also evolved into an instrument for planning and credit</p>	

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	<p>accumulation. The success of the Bologna Process mainly stems from the fact that it is stakeholder-driven. Universities must therefore be partners in the evaluation and redefinition process of ECTS.</p> <p>(EUA) In line with the EUA Lisbon Declaration and given the importance of ECTS for EUA members, EUA believes that it is the responsibility of the universities to redraft the Users' Guide in consultation with the other stakeholders, building upon the outcomes of Trends V and Bologna with Student Eyes. EUA considers that the overall document should include: 1. Key features, 2. Principles of ECTS implementation, and 3. Guidance for implementation in institutions. EUA believes that while the EC document provides a good starting point, further thought is required on the elements that should be included in these "key features".</p> <p>EUA offers following 6 principles as essential elements of ECTS to be included in the drafting of ECTS "key features" as well as a revised version of the text incorporating these principles (cf. Annex I):</p> <p>i) The role of the European level is to provide reference points and not unnecessary prescription, in line with the spirit of the Bologna process;</p> <p>ii) It is essential to take account of the achievements of the implementation of the Bologna process in recent years, therefore including referring to and relating ECTS to the existing Bologna Qualifications Framework for the EHEA – thus to cycles, levels and credit ranges – and mentioning</p>	

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	<p>also the European Standards and Guidelines for Quality in the EHEA (ESG)</p> <p>iii) Specific reference should be made to the context of lifelong learning and the role of ECTS in facilitating LLL i.e. facilitating flexible learning paths, including the recognition and validation of learning that takes place outside higher education (thus making the link to ECVET)</p> <p>iv) A clear definition of credit transfer and credit accumulation should be included building on the agreement reached by EUA members in Zürich in 2002;</p> <p>v) The role and responsibility of universities in introducing institutional level procedures for the recognition of credits that have been awarded elsewhere/in other contexts should be underlined;</p> <p>vi) Credits are based upon expected learning outcomes and the notional student workload needed to achieve them. In view of the enormous diversity across Europe, the need for transparency and the importance of counteracting the perceived recent increases in student workload related to the introduction of ECTS it would be important to explore the alternative of a minimum reference level of workload hours instead of including in the key features the rather arbitrary reference to a credit range of 1500 – 1800 hours. An alternative designed to achieve consensus at European level would be to include reference to an average workload of 1500 hours, in line with previous discussions.</p> <p><i>There is still considerable work to do in supporting universities in the implementation of ECTS as TRENDS VI</i></p>	

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	<p><i>and Bologna through Student Eyes have demonstrated. Only when universities share the ownership of ECTS with students, can ECTS be implemented and further developed properly. EUA is committed to a transparent further development of ECTS and ready to take up responsibility on behalf of universities.</i></p> <p>EUA's proposal: Objectives</p> <p><u>For the purposes of credit transfer, ECTS:</u></p> <ul style="list-style-type: none"> • Facilitates student mobility and the transfer of credit between higher education institutions in different European countries and promotes the European dimension in higher education¹ • Facilitates transfer from outside the higher education context, promoting greater flexibility and mobility throughout lifelong learning <p><u>For the purposes of credit accumulation, ECTS:</u></p> <ul style="list-style-type: none"> • Supports curricular reform and student mobility within and between institutions, national systems and internationally <p><u>In conjunction with other Bologna transparency tools, ECTS:</u></p> <p>Enhances the transparency and comparability of European systems, thus promoting the international attractiveness of European higher education</p>	

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<p>ECTS is a learner-centred system for credit accumulation and transfer based on the transparency of learning outcomes and learning processes. It aims to facilitate planning, delivery, evaluation, recognition and validation of qualifications and units of learning as well as student mobility. ECTS is widely used in formal higher education and can be applied to other lifelong learning activities.</p>	<p>(UK) The use of ECTS for '<i>planning, delivery, evaluation, validation</i>' is mostly a matter of local competence. ECTS is a meta-system in relation to comprehensive local and national credit systems (where detailed regulations and practice is decided by autonomous bodies).</p> <p>Suggestion:</p> <p><i>ECTS is a meta-credit system that is designed to improve international transparency, recognition and mobility by linking comprehensive national and local credit systems. ECTS does not replace national or local credit systems but augments them by providing a series of overarching reference points that ensure mutual compatibility.</i></p> <p>The 'key features', do not clarify the distinction between credit transfer and accumulation - ECTS 'key documents' (mentioned in the last line) do <u>not</u> relate to both. Suggestion:</p> <p><i>The two functions 'credit transfer' and 'credit accumulation' are linked but they have different purposes and applications. Credit transfer refers to the process where the credits and grades obtained during an approved period of study away from the home institution are transferred and accepted as part of the home programme of studies - either between institutions in a national system, or between institutions in different countries (the traditional Erasmus mobility).</i></p> <p><i>Credit accumulation is more comprehensive than credit transfer in that it refers to the credit-based organisation of learning whereby credits are achieved and accumulated over time in relation to any planned programme of study,</i></p>	<p>ECTS is not a meta-credit system it is the local credit system in most countries.</p> <p>The Key Features explain the double function of a single instrument. Credit transfer is a subset of credit accumulation, not a very distinctive phenomenon. ECTS Key Documents serve both transfer and accumulation.</p> <p>(CH) we support this comment. Transfer and accumulation functions are close to each other in their principles and instruments.</p>

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	<p><i>with or without a transfer element. It impacts on all students within an institution or country and not just those full-time students taking a part of their qualification in another country.</i></p> <p>(SE) To add: ECTS or ECTS compatible credit point systems are widely used in formal higher education and can be applied to other lifelong learning activities.</p> <p>(DE) We appreciate the definition pointing out the whole range of objectives. However, the term "application" to other lifelong learning activities may lead to misunderstandings. As a quantitative indicator ECTS cannot be extended to other learning contexts because their time scale will differ too much to allow for comparisons. Here, validation or recognition can only be based on learning outcomes.</p> <p style="padding-left: 40px;">Thus: "ECTS is widely used in higher education and can support validation or recognition of other lifelong learning activities."</p> <p>(EUA) ECTS is a learner-centred system for credit accumulation and transfer based on the transparency of learning outcomes and learning processes. It aims to support institutions in planning, delivery, evaluation, recognition and validation of qualifications and units of learning as well as student mobility. ECTS is widely used in formal higher education and can be applied to other lifelong learning activities.</p>	

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ECTS credits		
<p>ECTS credits are based on expected learning outcomes and the workload students need to achieve them.</p>	<p>(RO) ... the <u>average</u> workload students need ...(supported by <u>IE</u>, <u>NL</u>) + <u>CH</u></p> <p>(UK) The latest draft still does not integrate the concept of learning outcomes in a meaningful way and workload is still considered the dominant factor in ascribing the number of credits. There is no acknowledgement of the fact that the same learning outcomes can be achieved within different time frames. The workload ranges for an academic year are an unhelpful and misleading part of the Key Features if there is no reference to learning outcomes as a determining factor. Suggestion:</p> <p><i>ECTS credits are expressed in terms of learning outcomes. Sixty credits are attached to the learning outcomes and associated notional workload of a typical full-time year of formal learning (an academic year) and 30 credits are attached to a semester. However, learning outcomes can be achieved in different time-frames depending on e.g. the</i></p>	<p>Okay: ECTS credits are based on expected learning outcomes and the <u>average</u> workload students need to achieve them.</p> <p>Not workload per se, but workload needed to achieve the expected learning outcomes. The text fully acknowledges the other timeframes (contexts). Workload ranges provide reference. Learning outcomes are determining only via the needed workload (in a formal context).</p> <p>Exceptions will be explained in the updated Users' Guide. In formal learning, credits will remain linked to workload needed to achieve the expected learning outcomes.</p>

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	<p><i>design of the programme and admission criteria, etc.</i></p> <p><u>After October 15, 2007</u></p> <p><u>(UK)</u></p> <ul style="list-style-type: none"> - Again regret that the Key Features do not show a well-balanced relationship between workload and learning outcomes. Workload is still considered the dominant factor in ascribing the number of credits and there is no acknowledgement of the fact that the same learning outcomes can be achieved within different time frames, although this was explicitly agreed by European Ministers, when they agreed to establish the Framework for Qualifications in the EHEA; - They believe the workload ranges for an academic year to be an unhelpful part of the Key Features if there is no reference to learning outcomes as the determining factor - If a reference is to be made to notional hours in the Key Features, it should be based on actual data. Research done by the Swiss Confederation of Rectors (CRUS) shows that the average of working weeks across Europe is different from the one used to calculate ECTS workload. They share the view of EUA that further research into and understanding of workload ranges across Europe is necessary and it would be important to arrive at a consensus with universities and students on this crucial issue. - The idea that credits are based on <u>expected</u> learning outcomes and the workload students need to achieve them is fundamentally mistaken. Whilst the process of planning for credit allocation may need to be based on intended learning outcomes, the awarding of credit 	

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	<p>cannot be based on “expected” learning outcomes, but only on actual learning outcomes. If the learning outcome is not achieved, credit should not be given. We propose that there should be an explicit statement that “Credits can only be awarded on the basis of achieving the specified learning outcomes.”</p> <ul style="list-style-type: none"> - Credit should therefore not be ascribed on the basis of the workload to achieve the learning outcomes, but on the actual achievement of the learning outcomes. The learning outcome is the determining factor. Duration and expected workload can provide an indication, but it is possible to achieve the same learning outcomes within different time frames. Students may acquire their learning at a different time and pace and in different ways. It is essential that this is also made explicit in the Key Features. - The development of ECTS cannot be undertaken in isolation from the development of ECVET. There is a need to ensure that the principles underlying both systems are compatible and coherent or else we will be moving further away from realising an integrated approach to lifelong learning. - We would urge everyone in BFUG to get comments from their national experts on the latest draft and particularly to seek advice on whether they believe the new document genuinely responds to the Ministerial request that ECTS should be implemented properly based on learning outcomes and student workload. <p>(SE) suggests placing the following definitions here: <u>ECTS credits</u> are based on the workload students need to achieve the expected learning outcomes.</p>	

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	<p><i>[Comment. ECTS is primarily based on the workload needed to achieve the learning outcomes, not on the learning outcomes themselves. The proposed change brings the wording closer to the rest of the text. For Swedish higher education the definition of a credit point is of fundamental importance since it has impact on administration, planning and financing. It will be difficult for Sweden to use a fully ECTS compatible credit system in case ECTS changes character so that it is primarily based on learning outcomes.</i></p> <p><i>Using a learning outcomes based definition of a credit point will per definition render the ECTS system more complicated and less transparent. It will lead to a system where the credit points awarded for a module will either be negotiable or that a very centralized system for assigning credit points to learning outcomes is created. In the Swedish point of view the qualification frameworks are, and should be, learning outcomes based, while the credit system still should be based on workload. This way the two systems will complement each other.]</i></p> <p><u>Workload</u> indicates the time an average student needs to complete all learning activities (such as lectures, seminars, projects, practical work, exams, self study, etc.) required to achieve the expected learning outcomes.</p> <p>(CH): Contrary to UK, we think that the link between learning outcomes and workload as well as the importance of learning outcomes is made clear in the key features. However, In practice workload is unfortunately often calculated without adequately taking into account learning</p>	

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	<p>outcomes but this is an implementation problem. Therefore, and despite a certain redundancy, it might be helpful to add that “learning outcomes are the basis for calculating workload”.</p> <p>(AT) ECTS credits must remain a quantitative measure of the workload! They have been established as such in the course of a year-long pilot project and make perfect sense as the basis for the recognition of studies conducted elsewhere.</p> <p>The problem addressed by Keith that the well-balanced relationship between learning outcomes and workload does not exist in ECTS should not be a problem, if ECTS is correctly implemented.</p> <p>ECTS credits record the quantitative requirements which are necessary to arrive at qualitative learning outcomes. These outcomes in the form of knowledge, skills, and competences are built into curricula and are reflected in national qualification frameworks.</p> <p>(CY) Cyprus agrees with the comments of Austria and would like to point out that the ECTS credits are awarded on the successful completion of a learning component (subject) and therefore correspond to the evaluated and tested learning outcomes. Perhaps the reference that «ECTS credits are based on expected learning outcomes...» should be rephrased to correspond to this reality.</p>	

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	<p>(IE) The feedback circulated by Henri Luchian regarding the need for an emphasis on <i>average</i> workload is an important contribution to the draft</p> <p>(EI) It is important that the description of workload as it stands in the original text is kept. It is important to outline that the ECTS is made up both of workload and learning outcomes making the system predictable for students and provides support for teachers when designing courses. In this EI agrees with the comment sent by the Austrian national BFUG on the 22nd of October. If the ECTS system is implemented correctly there should be no problem regarding the balance between workload and learning outcomes. It is already the practice that ECTS credits are only awarded in case of successful completion of a process of learning. Successful implies that the learning outcomes have been achieved.</p> <p>The proposed wording from RO, NL and IE regarding the use of the word “average” to describe the time needed for students to reach a certain number of credits should be replaced by the word “typical”. This describes better the aim of RO, NL and IE and also avoids complicated mathematical exercises.</p> <p>(EURASHE) In addition to our comments made earlier on the draft document on ECTS Key Features, we find the latest comments and arguments of G. Bacher (Austria) forming a well balanced and reasonable approach to</p>	

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	<p>workload and learning outcomes in terms of ECTS.</p> <p>(AD) We would precise that as the ECTS represent the working volume of the student in a relative way, not absolute, so about the term of “average” we agree with the perspective of EI. On the other hand, we agree with the Austrian purpose that if the ECTS system is implemented correctly there should be no problem regarding the balance between workload and learning outcomes in the terms that they had described the relation between workload and learning outcomes. For us the ECTS indicate the working volume required to surpass every unit of course. They translate the working volume that every unit of course requires in personal work in relation to the necessary working total volume to complete a year of studies in a center, that is, magisterial lessons, practical works, seminars, periods of practices, fieldwork (in libraries for example), thus as the examinations or other possible methods of evaluation.</p> <p>(PL) Poland has implemented the credit transfer and accumulation in the national legislation, according to the rules presented by the European Commission in Key Features.</p> <p>As defined by our decree (3rd October 2006) one credit corresponds to the learning outcomes requiring 25 to 30 hours of work from an average student, so the workload of the full time student ranges from 1500 up to 1800 hours per academic year. The statement in the decree is formulated in such a way that credits are prescribed to the learning</p>	

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	<p>outcomes but the number of credits prescribed to them depends on the workload an average student needs in order to achieve them.</p> <p>In our understanding it is a well balanced relationship between learning outcomes and the workload. Having in mind that there is the direct link between the credit and learning outcomes we use the workload to "measure" learning outcomes. Without the relationship -one year of full time formal education = 60 credits = 1500 - 1800 hours of workload we have no basis to prescribe specific number of credits to the particular learning outcomes. At the transition period of changing the education from course content to learning outcomes, from teaching hours to the workload, "from teacher driven provision towards student-centred higher education" we need the reference point for the credit system, it means a typical, average workload for the learning outcomes of one credit.</p> <p>(HR) There is a possible ambiguity in the sentence: "ECTS credits are based on expected learning outcomes and the workload students need to achieve them". From this sentence it may be concluded that ECTS credits are <u>allocated</u> on the basis of the expected learning outcomes and the workload needed to achieve them. This does not seem in line with the perceived intention of the document, in which ECTS credits are allocated on the basis of the quantitative workload which is required for the students to achieve qualitative learning outcomes (and in this we agree with the Austrian colleagues). There seems to be agreement that in practice ECTS credits are most often allocated on the basis of workload. The workload, however, cannot be determined without knowing the expected learning outcomes, which means that learning outcomes</p>	

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	<p>are a precondition of establishing ECTS credits.</p> <p>As a result, we suggest that this particular sentence is changed in a manner that will make it less ambiguous.</p> <p>One possible alternative may be: <i>"ECTS credits are based on the typical workload that students need to achieve expected learning outcomes"</i>.</p> <p>This wording would also be in line with the sentence later on in the document that deals with the manner of allocating credits to components of study programmes. It would also partly accept the suggestion made by Switzerland on page 9 of the table from 23 October 2007, which aims to emphasize that "learning outcomes are the basis for calculating workload", and the one made by Sweden on page 13 of the same table, which emphasizes the foundation of the ECTS on the workload that the students need in order to achieve learning outcomes.</p> <p>(LT) Lithuania supports the proposed "ECTS Key features" and sees it as a simple and comprehensive document that should foster ECTS implementation. The changes for wording proposed by other countries are minor details that might be corrected. In reality they do not affect much the general approach to ECTS. However the comments of UK seem to favour different ECTS philosophy from the one that has been guiding the system. These comments, though quite understandable in the context of the Life Learning, are not feasible, as proper introduction of ECTS requires clear reference points. Once proper emphasis of the workload as well as hours range for the academic year will be removed there will be no "common currency" for</p>	

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	<p>understanding. The learning outcomes are a very important factor for credit allocation but:</p> <ul style="list-style-type: none"> a) Learning outcomes are far more difficult to quantify; b) So few countries have them properly implemented and it is not clear how the work will proceed around Europe and of what quality the learning outcomes will be in the future; c) What is the proposed methodology to connect credit and learning outcome if the workload is removed? <p>Lithuania supports the Swedish and Austrian views that credit must remain the <i>quantitative measure of the workload that leads to the achievement of learning outcomes</i> if we are to understand what happens in the formal education sector in other countries. We see no danger only advantages in emphasizing both the learning outcomes and the workload as in the proposed text. These two notions are related in a comprehensive manner with clear basis for connection. In our view workload and Learning outcomes are given equal emphasis and this might be a powerful tool for QA and transparency.</p> <p>The ECTS Users' guide should explain in a detail how credits that are used in formal education should be applied and used in non-formal, informal and experiential learning. Instead of removing the only element that provides the grounds for understanding each other, we propose to develop ECTS further, so that it could be easily applied in other educational contexts.</p>	

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	<p>(DE) 2nd paragraph: "ECTS credits are..."; 5th paragraph: "60 ECTS credits..."; debate on quantitative dimension of ECTS</p> <p>Learning outcomes are the pivotal category in all application contexts of ECTS. This is true for accumulation in study programs, recognition or validation of learning outcomes achieved in different national education systems or educational sectors as well as in informal learning. Credits can only be assigned to <u>attested</u> learning outcomes of students. However, it is useful to <u>complement</u> the description of learning outcomes by a quantitative indicator based on students' workload.</p> <p>Workload is a helpful, complementary dimension in planning, delivering and evaluating study programs as well as in recognition and validation within the higher education sector (see above). References for average yearly workload are useful as well. In practice, the range provided for working hours and for credits per cycle allow for sufficient flexibility. Empirical evaluation of assigned, estimated workload is essential and thus obligatory for every study programme. Workload-based credit points especially help to avoid too voluminous study programs, they are to be understood as an important tool for the learner-centred approach of designing curricula.</p> <p>Thus: No change</p> <p>(FR) These ECTS Key Features, the FR team of Bologna Experts agreed on, clearly show that ECTS is based on two</p>	

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	<p>core principles, learning outcomes (LO) and workload, which are also in line with a system of credit transfer and accumulation for lifelong learning. These Key Features make it clear that LO is what matters eventually, with ECTS based on workload in order to achieve LO. They will therefore enable a better implementation of the ECTS in the future, as shown by the latest Trends Report and required by the London Communiqué for 'a proper implementation of ECTS based on learning outcomes and student workload'.</p> <p>(DK) We would like to support the reactions to the draft ECTS key features made by Gottfried Bacher, Austria. We agree that ECTS credits must remain a quantitative measure of workload. ECTS are only awarded to students after successful completion of a period of study and appropriate assessment of the learning outcome.</p> <p>(EUA) <u>ECTS credits</u> are based on expected learning outcomes and the notional student workload needed to achieve them.</p> <p>(HU) <u>ECTS credit is a quantified means of expressing the volume of learning based on the workload of an individual learner.</u></p> <p><u>ECTS credits</u> establish relation between expected learning outcomes and the workload students need to achieve them.</p>	

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<p><u>Learning outcomes</u> describe what a learner is expected to know, understand or be able to do after successful completion of a process of learning. They relate to level descriptors in national, sectoral and European qualifications frameworks.</p>	<p>(AT) Many countries do not yet have finalised national qualification systems.</p> <p>(TR) ... learner is expected to know, understand <u>and</u> be able to do...</p> <p>(DE) ... level descriptors in national, sectoral and European qualifications frameworks.</p> <p>(CH) cf. remark above regarding an additional explanation on link LO-workload</p> <p>(DE) Qualifications will be related to qualification frameworks, not individual learning outcomes.</p> <p style="padding-left: 40px;">Therefore: Second sentence ("They relate to...") to be discarded.</p> <p>(EUA) <u>Learning outcomes</u> describe what a learner is expected to know, understand or be able to do after successful completion of a process of learning. They relate to module, level and cycle descriptors in course documentation and in national, sectoral and European qualifications frameworks.</p> <p>(HU): <u>Learning outcomes</u> describe what a learner is expected to know, understand <u>and</u> be able to do after successful completion of a process of learning. They relate to level descriptors in national, sectoral and European qualifications frameworks.</p>	<p>They will in the foreseeable future.</p> <p>Okay</p> <p>Okay</p>

ORIGINAL TEXT	COMMENTS AND AMENDMENTS PROPOSED	REACTION AND CONCLUSION PROPOSED BY EUROPEAN COMMISSION ON 1 ST OCTOBER
<p><u>Workload</u> indicates the time an average student needs to complete all learning activities (such as lectures, seminars, projects, practical work, exams, self study, etc.) required to achieve the expected learning outcomes.</p>	<p>(RO) Workload indicates the <u>average time needed</u> to complete all learning activities(supported by IE, NL + CH)</p> <p>(NL) Workload indicates the <u>average time of all the participating students</u> to complete all learning activities ...</p> <p><u>After October 15, 2007</u></p> <p>(UK) The underlying principle remains workload: this is not the balanced approach that Ministers requested in the London Communiqué.</p> <p>(SE) suggests suppressing this definition altogether here as it has already been defined before.</p> <p>(EUA) <u>Notional student workload</u> indicates the time an average student at a given level needs to complete all learning activities (such as lectures, seminars, projects, practical work, exams, self study, etc.) required to achieve the expected learning outcomes.</p> <p>(HU) <u>Workload</u> indicates <u>the average time a student needs</u> to complete all learning activities (such as lectures, seminars, projects, practical work, exams, self study, etc.) required to achieve the expected learning outcomes</p>	<p>Workload indicates the average time needed to complete all learning activities (such as lectures, seminars, projects, practical work, exams, self study, etc.) required to achieve the expected learning outcomes.</p>

ORIGINAL TEXT	COMMENTS AND AMENDMENTS PROPOSED		REACTION AND CONCLUSION PROPOSED BY EUROPEAN COMMISSION ON 1 ST OCTOBER
<p><u>60 ECTS credits</u> are attached to the learning outcomes and the associated workload of a full time year of formal learning (academic year). Normally, student workload ranges from 1500 to 1800 hours for an academic year, and one credit corresponds to 25 to 30 hours of work.</p>	<p>(RO) ... for an academic year, <u>hence one credit corresponds</u></p> <p>(EURASHE) Would it not be wiser to put 60 credits as a general (average) reference, and <u>put more emphasis on obtaining the degree of 180 credits?</u></p> <p>(TR) Normally, <u>average student workload ranges from 1360 to 1680 hours for an academic year, and one credit corresponds to 23 to 28 hours of work.</u></p> <p>(EUA) Is the key features document the appropriate place to define the number of hours per credit / the number of hours per academic year?</p> <p><u>After 22 October</u></p> <p>(SE): A suggestion is: <u>60 ECTS credits</u> are attached to the workload of a full time year of formal learning (academic year) and the associated learning outcomes. Normally, student workload ranges from 1500 to 1800 hours for an academic year, and one credit corresponds to 25 to 30 hours of work.</p> <p>(TR) Contrary to what was said before and based on the returns from universities in Turkey to the Council of Higher Education, the range of student workload is between 1500 to 1800 hours for one academic year.</p>	<p>No chan</p>	<p>Not necessary</p> <p>The Bologna cycle credit ranges will be put prominently in the Users' Guide.</p> <p>The Current range met with general approval during the consultation.</p> <p>The Current range met with general approval during the consultation.</p>

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	<p>(IE) From a national perspective, it is noteworthy that the National Qualifications Authority of Ireland published its <i>Principles and Operational Guidelines for the Implementation of a National Approach to Credit in Irish Higher Education and Training</i> in 2006. This document was based on extensive consultation with all of the stakeholders in Irish higher education. As a result of this consultation it was recommended that the credit systems of national providers should operate on the basis that one credit equals 20-30 hours of notional time (or equivalent).</p> <p>(DE) Differences in the number of teaching weeks as revealed by CRUS do not necessarily correlate with differences in student's working time. ECTS explicitly goes beyond teaching times. The German example shows that the rest of the academic year is destined and used for dissertation work, internships and other autonomous learning activities. Thus: No change</p> <p>(IT) Italy has adopted ECTS as a national credit system and has incorporated it into its legislation. Credits are based on learning outcomes and on the student workload, required to achieve them. One credit corresponds to 25 hours of student workload, so 60 credits correspond to roughly 1500 hours of student workload per year.</p> <p>Italy is also in favour of indicating general ranges of workload hours per credit and per year.</p> <p>(ER) On the basis that the semester is a core notion in</p>	

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	<p>Bologna, a precision should be added <u>after 60 ECTS credits :- (for a full time academic year based on 2 semesters, with 30 ECTS credits each)-'</u> ;</p> <p>(EUA) 60 ECTS credits are attached to the learning outcomes and the associated notional student workload of a full time year of formal learning (academic year).</p> <p>(FI) In Finland, the Act of the Council of State concerning University Degrees (2004) defines that the base for the crediting of studies is a credit point. Study modules are credited based on the work load required. One academic year requires an average 1600 hours of work and corresponds to 60 credits. So, even though not written out, one credit point corresponds to about 27 hours of student's work (1600/60).</p>	

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<p>Use of ECTS</p>	<p>(DK) add “<i>The use of ECTS might be subject to further regulations at national level</i>”.</p> <p>The reason why we would like to add this sentence is the use of ECTS by Danish non-formal institutions and institutions that are not on a higher education level. There might be a national legislation on its way in Denmark, that entitles the national authorities to interfere with the use of ECTS.</p>	<p>National authorities are free to do so. No need to mention this in the Key Features.</p>
<p><u>Credits are allocated to entire qualifications or study programmes as well as to their educational components</u> (such as modules, course units, dissertation work, work placements, laboratory work, etc.). The number of credits ascribed to each component is based on its weight in terms of the workload students need to achieve the learning outcomes in a formal context.</p>	<p>(RO) ... based on its weight in terms of the <u>average workload</u> students need to achieve (supported by IE, NL)</p> <p>(TR) ... achieve the learning outcomes <u>expected</u> in a formal context...</p> <p>(DK) ... workload students need to achieve the learning outcomes in a formal context</p> <p><u>After 22 October</u></p> <p>(SE):suggests to underline and/or mark part of the definition: The number of credits ascribed to each component is based on its weight in terms of the workload students need to achieve the learning outcomes in a formal context.</p> <p>(IS) We find it reasonable to add average workload, as Romania has suggested.</p>	<p>dealt with before</p> <p>dealt with before</p> <p>Okay (educational components are in a formal context)</p>

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	<p>(HR) There may be need for clarification of the terms used for tying ECTS credits to educational components of study programmes: the terms used in the Key features are "ascribed", "allocated" and "attached", with no clear description of the difference in use.</p> <p>(EUA) <u>Credits are allocated to entire qualifications or study programmes as well as to their educational components</u> (such as modules, course units, dissertation work, work placements, laboratory work, etc.). The number of credits ascribed to each component is a reflection of the approximate quantity of work each component requires in relation to the completion of a full academic year of study in the programme</p> <p>(HU) The number of credits ascribed to each component is based on the workload students need to achieve the learning outcomes in a formal context.</p>	

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<p><u>Credits are awarded to individual students (full time or part time) after completion of the learning activities required by a formal programme of study or by a single unit and the successful assessment of the expected learning outcomes. Credits may be accumulated in view of obtaining qualifications as decided by the degree awarding institution.</u> If students have already obtained the expected learning outcomes in other learning contexts (formal, non-formal or informal), the associated credits can be awarded after successful assessment, validation or recognition of these learning outcomes.</p>	<p>(RO) replace "unit" by "educational component" (supported by NL+ CH; IR suggested educational activity)</p> <p><u>"All credits allocated to an educational component have to be awarded to a student simultaneously."</u></p> <p>(TR) ... other learning environments (formal, non-formal or informal)...</p> <p>(DK) The appropriate number of credits can be awarded after successful assessment ...</p> <p><u>After October 15, 2007</u></p> <p>(SE): "May" be awarded instead of "can": If students have already obtained the expected learning outcomes in other learning contexts (formal, non-formal or informal), the associated credits may be awarded after successful assessment, validation or recognition of these learning outcomes.</p> <p>(AT) Credits are awarded to individual students only in case of successful completion of the required workload and appropriate assessment of the learning outcomes. This means that credits not only verify the time spent to achieve certain competences; they also reflect the learning outcome, the competences achieved at a certain level of study! And if ECTS is used in a proper way, learning outcomes are described in the information package/course</p>	<p><u>Credits are awarded to individual students (full time or part time) after completion of the learning activities required by a formal programme of study or by a single educational component and the successful assessment of the expected learning outcomes. Credits may be accumulated in view of obtaining qualifications as decided by the degree awarding institution.</u> If students have already obtained the expected learning outcomes in other learning contexts (formal, non-formal or informal), the associated credits can be awarded after successful assessment, validation or recognition of these learning outcomes.</p> <p>Explanation for conclusion proposed 1) consistent use of words. 2) Associated credits are "appropriate"</p>

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	<p>catalogue.</p> <p>So it should be clear that the British demand of connecting workload and learning outcomes can be perfectly accommodated within the ECTS; if one respects the rules which govern the ECTS system, all the UK demands can be perfectly met.</p> <p>(HR) There is an ambiguity in the second part of the sentence: "Credits are awarded to individual students (full time or part time) after completion of the learning activities required by a formal programme of study or by a single unit and <u>the successful assessment of the expected learning outcomes</u>." This may cause confusion because it may be understood to mean that we are assessing the process through which the expected learning outcomes were developed. For the purpose of clarity, it may be useful to say: "... <i>the successful assessment of the <u>achievement of the expected learning outcomes</u></i>". Any other wording that would achieve the same purpose would of course also be valid.</p> <p>(EUA) <u>Credits are awarded to individual learners (full time or part time) after completion of the learning activities required by a formal programme of study or by a single unit and the successful assessment of the expected learning outcomes. Credits may be accumulated in view of obtaining qualifications as decided by the degree awarding institution.</u> Detailed arrangements for credit accumulation,</p>	

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	<p>including the use of notional workload, are determined at national and institutional level, within the parameters of ECTS.</p> <p>If students have already obtained the expected learning outcomes in other learning contexts (formal, non-formal or informal), the associated credits can be awarded after successful assessment, validation or recognition of these learning outcomes.</p> <p>The use of ECTS by institutions falls within the scope of the Standards and Guidelines for Quality Assurance in the European Higher Education Area.</p> <p><u>(HU)</u> Credits are awarded to individual students (full time or part time) after the successful assessment of the expected learning outcomes.</p>	

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<p><u>Credits awarded in one programme may be transferred into another programme.</u> Such a programme can be offered by the same or another institution. This transfer can only take place if responsible staff recognises the credits acquired elsewhere. Partner institutions should agree in advance on the recognition of periods of study abroad. Credit transfer and accumulation are facilitated by the use of the ECTS Key Documents (Course Catalogue, Student Application Form, Learning Agreement and Transcript of Records) as well as the Diploma Supplement.</p>	<p>(TR) ... (Course Catalogue, Student Application Form, Learning Agreement and Transcript of Records, <u>Proof of Recognition</u>)....</p> <p>(DK) Partner institutions should agree ... What about students who wish to transfer their credits from one programme to another without the two institutions being partners? I would suggest another phrasing instead of "partner institutions" or a sentence about free movers.</p> <p><u>After October 15, 2007</u></p> <p>(NL) What is the status of the documents between brackets+Diploma Supplement? The sentence suggest that the BFUG agrees on the content of these documents. Suggestion: to omit the sentence and suggest that the application of ECTS will be elaborated in more detail (the referred documents can play a role in that elaboration)</p> <p>(DE) Credit points are the "currency" of mobility and recognition. Thus, it is necessary to collate the points acquired in a given learning context for purposes of credit transfer. However, credit transfer always requires the equivalence of learning outcomes which has to be assessed beforehand, in the framework of mobility programs, or afterwards.</p> <p>Thus: Modification of the third sentence "This transfer can only take place if responsible</p>	<p>The Proof of Recognition (in the files of the institution) will end up in the Transcript of Records and the Diploma Supplement.</p> <p>Free movers are covered by the two preceding sentences.</p>

ORIGINAL TEXT	COMMENTS AND AMENDMENTS PROPOSED	REACTION AND CONCLUSION PROPOSED BY EUROPEAN COMMISSION ON 1 ST OCTOBER
	<p>staff recognises <u>equivalence of learning outcomes associated to</u> the credits acquired elsewhere."</p>	
	<p>(AT) Suggests including definition/ description of key documents. Our appeal is to keep the ECTS key features, including the checklist. And in the last paragraph, "responsible staff" should be replaced by "the degree awarding institution". It should not be left to the whims of individual administrators to deal with such a vital and sensitive matter.</p> <p>(HR) We would like to express our concern with the wording that places the responsibility of recognising credits gained at other institutions into the hands of individual staff members rather than the student's home institution as a whole.</p> <p>(ER) France supports what Austria suggested, namely the mention of <u>'the degree-awarding institution'</u> instead of <u>'responsible staff'</u>.</p>	<p>The Key Documents will be defined and explained in the updated Users' Guide.</p>

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	<p>(EUA) <u>Credits awarded in one programme may be transferred into another programme.</u> Such a programme can be offered by the same or another institution. This transfer can only take place if the responsible institution recognises the credits acquired elsewhere. Partner institutions should agree in advance on the recognition of periods of study abroad by means of a learning agreement. Credit transfer and accumulation are facilitated by the use of the ECTS Key Documents (Course Catalogue, Student Application Form, Learning Agreement and Transcript of Records) as well as the Diploma Supplement.</p>	
	<p>(NO) explicit overall approval of the text</p> <p>(HU) <u>Credits awarded in one programme may be transferred into another programme.</u> Such a programme can be offered by the same or another institution. This transfer can only take place if responsible staff recognises the credits acquired elsewhere. <i>Home institution, host institution and mobile student should agree in advance on the recognition of learning outcomes the student is going to achieve in host institution. Partner institutions running joint programmes should agree in advance on the recognition of periods of study abroad.</i> Credit transfer and accumulation are facilitated by the use of the ECTS Key Documents (Course Catalogue, Student Application Form, Learning Agreement and Transcript of Records) as well as the Diploma Supplement</p>	Thanks

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	<p><u>General remarks</u></p> <p><u>After October 15, 2007</u></p> <p>(IE) We note the feedback that the UK has provided and would suggest that some of these comments have merit. Linked to this is our own feedback that nationally the credit range is between 20-30 hours - this point that does not appear to be reflected in the summary of country feedback.</p> <p><u>After October 23, 2007</u></p> <p><u>Business Europe:</u> approval of the Commission's proposal</p> <p>(EI) The document drafted by the Commission to the BFUG in Lisbon 2-3 October is well balanced and outlines the features of ECTS in a good manner. The comments are mainly regarding the written comments submitted by a number of countries.</p> <p>(AD) In addition to the comments done, we consider that the Commission document is well balanced and outlines the features of ECTS.</p> <p>(IS) Iceland agrees with the Commission's proposal</p> <p>(LI) Liechtenstein agrees with the Commission's proposal.</p> <p>(IT) Overall approval, without the UK amendments. Italy is also in favour of indicating general ranges of workload</p>	

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	<p>hours per credit and per year.</p> <p>(PL) We agree and support the ECTS Key Features as presented by European Commission.</p> <p>(HR) Croatia would like to support the proposal for the ECTS Key Features as was presented by the European Commission, including the changes that the Commission proposed in the October 1 response to comments from the Bologna Process members. As regards the issues put forward by the UK, we think that Austria's response addresses those issues in an appropriate manner: if the expected learning outcomes are defined well, then there need be no problem with maintaining a balanced approach to learning outcomes and workload in the ECTS.</p> <p>(LT) Lithuania supports the proposed "ECTS Key features" and sees it as a simple and comprehensive document that should foster ECTS implementation.</p> <p>(B- FI and Fr Com.): support the Commission's proposal with the amendments proposed by Austria, on replacing "responsible staff" by "degree-awarding institution".</p> <p>(FR) : France agrees to this proposal about ECTS Key Features with 2 amendments (Paragraphs 2 and final)</p> <p>(FI) Finland can agree with the European Commission's proposal for ECTS Key Features. However, we see that Austria's proposal for rephrasing the text "responsible staff" by "the degree awarding institution" in the last paragraph,</p>	

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	<p>would clarify the text.</p> <p>(EE) The Estonian delegation supports the European Commission's proposal for ECTS Key Features. And similarly to many colleagues we advocate the change proposed by Austrians regarding degree awarding powers.</p> <p>(CZ) The CZ agrees with the suggested concept of Key Features. We agree with those countries which feel that the dominant items are "learning outcomes" and ECTS credits should be measuring the "average" workload linked to the learning outcomes, competences and level.</p>	