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# ECTS AND ECVET: COMPARISONS AND CONTRASTS

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## ECTS AND ECVET: COMPARISONS AND CONTRASTS AN UPDATE, SEPTEMBER 2011

### 1. Introduction

In 2010, TUNING published my article entitled, 'ECTS and ECVET, Comparisons and Contrasts'. This article was an annex to the final report for sectoral project in the Social Sciences<sup>1</sup>. It was produced, on request, as a background to the possible attribution of ECTS credit ranges to qualifications in this sector at EQF levels 3 and 4, that is at the two levels immediately preceding the most frequent entry point of learners into higher education. The attribution of such credit ranges was one of the six major intended outcomes of the project. Given the great uncertainty about ECVET still pertaining at the moment the project moved towards its conclusion and, principally, the uncertainty concerning the way in which ECVET credits would be allocated in practice, it was thought impossible to pursue in depth this intended outcome of the project<sup>2</sup>. Such a judgment was effectively inevitable given that the long-promised Users Guide for ECVET, a guide, which, it was hoped, would furnish answers to all the questions and doubts about ECVET raised in my article, and by others, had not yet been published.

This uncertainty still prevailed when the last adjustments were made to the article in early September 2010. Obviously, this situation still obtained at the time that this HUMART sectoral framework project held its initial meeting shortly after in early October 2010. The potential for making proposals for possible ECTS credit ranges for EQF levels 3 and 4, on the basis of equivalent ECVET credits, for this sector, could only be seriously advanced, during the course of the project, if greater clarification about ECVET were forthcoming and if this demonstrated real compatibility, in practical and not just theoretical terms, between ECVET and ECTS credits<sup>3</sup>.

Since that initial meeting, two groups of important documents have been published. The first group, The *ECVET Users Guide* has been prepared by the ECVET Users Group. It comes in two parts:-

1. *Get to know ECVET better: Questions and Answers*
2. *Using ECVET for Geographical Mobility*<sup>4</sup>

The second group has been provided by the Banking, Insurance and Finance group and comes, again, in two parts.

1. *The Users Guide to ECVET: Banking Insurance Finance (B.I.F) Project*, December 2010.

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<sup>1</sup> *Sectoral Framework for the Social Sciences: Final Report 2008-2010*, pp. 73-97, available both in print (Deusto & Groningen, 2010) and on the TUNING website.

<sup>2</sup> *Ibid.*, pp. 40-51.

<sup>3</sup> Reference must be made here to the most important publication by the UNICA group of universities entitled, *ECVET-ECTS: Building Bridges and Overcoming Differences* (July 2010) available on the internet. Unfortunately, this paper, which appeared too late for reference to be made to it in our article, is more concerned with establishing the theoretical compatibility of ECVET with ECTS, and particularly in demonstrating the compatibility of the Dublin Descriptors with the EQF descriptors for levels 5 - 8, than in looking at the practicalities of running the two systems side by side and at the questions involved in translating credits from one system into those of the other.

<sup>4</sup> The first document was made available from April 2011 and the second from August 2011. See [www.ecvet-team.eu/en/content/ecvet-users-guide](http://www.ecvet-team.eu/en/content/ecvet-users-guide)

2. The *ECVET Vademecum for the Banking & Insurance and Financial Sector*, 31 March 2011<sup>5</sup>.

The first group of documents furnishes a great deal of useful information of a general nature on ECVET. It provides answers to several of the questions which were raised in our article, concerning, for example, memoranda of understanding between providers, learning agreements and personal transcripts for learners. On the other hand, the information which is given on credit allocation, both at the level of overall qualifications and for individual units within qualifications, whilst very clear, is brief and not particularly informative on the precise processes involved in such allocation<sup>6</sup>. For a more informative approach to this central question, one needs to turn, therefore, to the second set of documents produced by the BIF group.

The general information given in these two BIF documents is, naturally, in accord with the descriptions given in the first group of documents. It may, therefore, be safely assumed that the ECVET credit allocation system described here is intended to be a reference point for other sectors. These documents are of such central importance that they require the production of a postscript to my article.

**The fundamental question arising from these two BIF documents is, therefore, whether they establish, in practical terms, the desired compatibility between ECVET and ECTS credit theory, attribution and arithmetic so that credits may readily be transferred between the two credit accumulation and transfer systems.**

## 2. How are ECVET credits allocated in the BIF sector?

**The General Approach.** The *Users Guide to ECVET* seems most reassuring in this respect. The organigramme on page 10 boldly restates the principle that 'ECTS for higher education and ECVET will be complementary.' This assertion is not affected by a distinction made, more sharply in ECVET vocabulary than in that of ECTS, between ECVET 'points', which reflect student workload, and ECVET 'credit', which reflects the successful acquisition, demonstrated through assessment, of the learning outcomes of units or parts of units<sup>7</sup>. The close relationship between 'points' and 'credit', in practice, is reflected in the subsequent frequent use in these two documents of the term 'credit points', a term often employed also by those using ECTS.

**Credit Attribution in the BIF Sector.** It is, however, when one turns to the *Vademecum* that it becomes much clearer how ECVET points, purportedly equivalent to ECTS credits, will actually be allocated. It is stated (page 9) that the 'BIF Project Partnership decided to test a methodology of ECVET credit points attribution by analysing two important qualifications in the BIF Sector that will be referenced as future benchmarks for this sector.'

Before proceeding further, the reader is reminded (page 10) that ECVET [like ECTS] operates on the notion that each year of student learning is estimated to be equivalent to 60 credits, since '...a three-year training programme can allocate an amount [*sic*] of 180 credit

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<sup>5</sup> Both documents are readily available on the internet at <http://www.befebtn.eu>, even if, strangely, one is obliged to register in order to be able to download these documents.

<sup>6</sup> The information is given in *Get to know ECVET better*, pp. 74-74

<sup>7</sup> Obviously, this last statement means that units may consist of subsections or 'mini-modules' each of which has its own assessment, thus enabling assessors to ascertain that the learning outcomes, of that particular part of the unit, have been successfully mastered by the learner. In other words, each part of a unit may be discrete.

points and a four-year programme can allocate 240 credit points.' Unfortunately, no attempt is made to define what constitutes a learning year. It is stated that, 'Similarly to other projects (i.e. VQTS) the BIF Project Partnership recommends **the attribution of 1 credit point for 30 hours of learner's workload**' [in bold in the text]<sup>8</sup>. This figure is commensurate with the top end of the ECTS norms of 25 to 30 hours per credit, and gives an annual student workload of 1800 hours. In addition, it is made explicit (page 11) that, as in ECTS, there can be no award of credit points to learners unless there is an assessment method – a great deal is said on assessment method later in the document. If this assessment method is accepted and implemented, then there is no distinction between successful learning whether it is formal, non-formal or informal. So, non-formal and informal learning can be valued equally with the formal<sup>9</sup>.

After these basic points are established, the matter of credit point attribution becomes somewhat more complex. A first complicating factor arises even before the *Vademecum* proceeds to demonstrate how the BIF sector proposes a methodology for credit attribution to units within the two chosen exemplary qualifications, it is, first, deemed necessary (pages 11-12) to make a distinction between two different kinds of VET units:-

- first, there are units for 'iVET', that is initial vocational education and training
- secondly, there are units for 'cVET', that is continuing vocational education and training.

The importance of this distinction, which generally, but not always, coincides with training BEFORE entering working life for the former and AFTER entering working life for the latter, only becomes apparent subsequently because the procedure for credit attribution is not exactly the same for the two types of VET. This difference results from the way in which it is proposed to apply coefficients to credit points (page 14 ff.)

**Coefficients.** Two types of coefficient are applied to the baseline credit points which are estimated, as stated above, on the notional learner workload of each unit. The first of these is the **EQF coefficient** and the second is the **complexity of unit coefficient**. It is with the EQF coefficient that a distinction is made between iVET and cVET credits.

- **The EQF coefficient** results in the initial credit numbers of a unit, based on notional learner workload, being increased or decreased according the EQF level of the individual unit. In iVET, the base level (at which the initial learner workload credits are multiplied by coefficient 1) is fixed at EQF level 4. The coefficient of each successive level **BELOW** EQF 4 is decreased by a factor of 0.2, so that level 3 is coefficient 0.8 whereas level 2 is coefficient 0.6 and level 1 is coefficient 0.4. Each level **ABOVE** EQF 4 is multiplied by an added factor of 0.2 so that EQF level 5 has a coefficient of 1.2 whereas level 8 has a coefficient of 1.8<sup>10</sup>. On the other hand, the benchmark coefficient 1 is set in cVET at EQF level 5, so that the coefficient for level 4 is, in this case, not 1 but 0.8. For level 6 the coefficient is 1.2 and for level 7 it is 1.4. It should be noticed that these EQF coefficients may either be applied to the credits of a whole qualification or they may be applied to the credits of each unit within a qualification where the individual units are not deemed to be all at the same EQF level.

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<sup>8</sup> For VQTS (the Vocational Qualifications Transfer System) see [www.vocationalqualifications.net/vqts/](http://www.vocationalqualifications.net/vqts/)

<sup>9</sup> This ensures that the BIF sector is in accord with the recommendations of the *European Guidelines for validating non-formal and informal learning*, published by CEDEFOP in 2009, both in print and on the CEDEFOP website.

<sup>10</sup> One wonders how many iVET units will, in practice, be found at EQF level 8, unless they are designed for postgraduates entering the BIF sector for the first time.

- **The complexity of unit coefficient** is founded on the notion that ECVET credits may be calculated on the relative importance of certain units within a qualification. BIF sees this not as an alternative method of credit allocation (which is how many people understood the final proposals for ECVET of 2009) but rather as an additional method. The relative complexity of a unit is measured as against the overall difficulty of the whole qualification. The coefficient ranges from 0.75 to 1.25 and, unlike the EQF coefficients, is exclusively applied at unit level.

**Illustrations of how coefficients are applied.** Realising, no doubt, that the application of these two coefficients to the baseline workload points constitutes a rather complex method of credit point allocation, the authors of the *Vademecum* seek to make matters clearer by providing two illustrations, as promised. The first is for the *European Foundation Certificate in Banking*, which is iVET. The second is for the *European Financial Advisor (EFA)*, which is cVET. In each case, a three-step process is followed in order to reach the definitive number of credits for qualification:

- **Step 1** requires, for each unit within the qualification, a calculation of the ECVET points indicated by the workload measured in notional hours of work. One credit is awarded, as prescribed, for every 30 hours of work.
- **Step 2** requires the application to these basic workload points of both the EQF and complexity coefficients in order to produce the final number of credit points for each unit. Of course, the application of two coefficients to the credits for workload may result in some credit totals which are not round figures. So, guidelines are laid down for rounding up or rounding down such figures. As in ECTS, this is an attempt to avoid unnecessarily complex and potentially confusing credit arithmetic.
- **Step 3** requires that the credits for all units be totalled in order to arrive at the overall number of credits for the qualification.

All the illustrative calculations for the two qualifications extend over pages 16-19.

Finally, it is stated that the attribution of ECVET points to other qualifications in the BIF sector should proceed in exactly the same three-step manner, thus ensuring that there will be overall conformity of qualifications within the BIF sector. However, it is not discussed in the document whether the BIF sector expects other sectors to follow the same methodology.

### **3. Does this BIF methodology result in ECVET credits points which are compatible with ECTS credits?**

When the ECTS and ECVET methodology are compared, it is clear that these are based on different parameters, given the straight forward way credit allocation takes place in ECTS and the complex way this is done in ECVET. In effect, BIF methodology represents a major divergence from that of ECTS. Taken either individually or together, the BIF coefficients have the result that the desired compatibility of credit arithmetic between these two credit accumulation and transfer systems is not achieved. Therefore, the conclusion has to be drawn that BIF ECVET credit points are not readily compatible with ECTS credits

**First, the EQF level coefficient.** In ECTS, the number of credits allocated to individual units is never determined, in any degree, by the Bologna cycle to which an individual teaching/learning unit belongs. In this sense, ECTS credit arithmetic is cycle/level neutral. The number of credits for individual teaching/learning units is determined purely by relative student workload, workload which stands for the learning outcomes that are mastered by successful learners. The 'level' of individual units is expressed on an ECTS transcript of record and/or diploma supplement by the identification of the Bologna cycle of the qualification in question and, where it is appropriate, the level of the unit in question within the given Bologna cycle. This latter identification is, of course, frequently made by HEIs,

since many qualifications, especially for the first cycle, extend over several semesters/years, even if progressive levels within a cycle do not necessarily coincide perfectly with those semesters/years. This identification is often achieved in short hand by having code numbers for individual units, numbers which, among other things, indicate the cycle and the intra-cyclical level of each unit.

**Secondly, the complexity of unit coefficient.** In ECTS, credit arithmetic for individual units is never calculated according to some predetermined formula, which reflects the perceived importance or 'weight' (whether greater or lesser than the perceived norm) of a unit within a programme, either as an alternative or as an additional method of credit attribution. If a given unit within a qualification is deemed to be 'weightier' than others within the same cycle/level, then it is clear that the time taken by the average learner to master the learning outcomes will be greater than for a unit of lesser difficulty. The notional number of hours required to master the learning outcomes of such a unit will result, in itself, in the relative workload of that unit being greater than that of other units. The same is true in the opposite case. This fact will lead automatically either to an increase or to a decrease in the number of credits allocated to such units. This is not surprising since it is axiomatic in ECTS that the notional learning hours must be sufficient, to permit the student of average academic ability to master the learning outcomes<sup>11</sup>.

If it should happen that a planned new unit, for which accreditation is being sought, is deemed to be of exceptional difficulty for students, then it may ultimately be determined that it is being offered to students at the wrong level within an overall qualification or, even worse, within the wrong cycle. In other cases, the learning outcomes may be deemed to have been devised for the correct cycle/level but to be unachievable within the number of hours of work, and thus the number of credits, allocated to that unit<sup>12</sup>. In all of these cases, the planned unit will need to be rethought or even abandoned<sup>13</sup>. The same is true in the opposite direction of units of lesser difficulty which may be in danger of acquiring the reputation of being too light.

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<sup>11</sup> For a most interesting discussion of the issue of giving students sufficient time to master learning outcomes, see KARJALAINEN, Asko, ALHA, Katarina, JUTILA, Suvi, *Give me Time to Think : Determining Student Workload in Higher Education.*, Oulu University Press, 2006 (also available on the internet). The need to give students sufficient time to master a given set of learning outcomes is emphasised time and time again in the literature on open and distance learning, especially where it is e-learning or m-learning. An abundant list of such works can be found in the bibliography of my article 'ECTS Credits: Relating Learning Outcomes to Calculating Student Workload in the European Higher Education Area', in *III Jornados Universitarias de Innovación y Calidad : Buenas Prácticas Académicas para la Innovación del Proceso de Aprendizaje en el Espacio Europeo de Educación superior (EEES)*, 17-19 de Septiembre de 2007 (Deusto, Spain).

<sup>12</sup> For a hypothetical example of the miscalculation of learning outcomes and, therefore, workload within a predetermined number of credits for a module in the U.K. Open University, see CHAMBERS, Elie, 'Work-load and the quality of student learning', *Studies in Higher Education*, vol. 17, 1992, pp. 141-153. It is salutary to remember that in modular systems, the number of credits allocated to individual learning units are predetermined. Such modular systems would be impossible to construct if the number of credits were left to the discretion of the individual teachers planning units. Teachers align the content and learning outcomes of their units according to the number of credits and not *vice versa*. This is, of course, the sense of Elie Chamber's article cited above.

<sup>13</sup> It is a casual constant within HEIs that some teachers will always argue either a) that their unit is weightier or more difficult than those of other teachers and ought to receive a greater number of credits or b) since they operate within a modular system and the numbers of credits allocated to their unit cannot be increased, that their fellow teachers should nevertheless recognise that their unit requires, *de facto*, that students devote a greater proportion of their overall time to its study. Such arguments are normally rejected since, in truth, most teachers/subject areas could find reasons why THEIR units are more important or more difficult than those of their colleagues and, thus, deserve more credits...

Here in the BIF sector, added or lesser difficulty is rewarded by an increase/decrease in the number of credits awarded, calculated in formulaic manner, without there being a commensurate increase or decrease in the number of hours of study time allotted to the unit in order to allow students to achieve the learning outcomes<sup>14</sup>. In this way, some units, as a by-product of this methodology, become fast-track and others become that which one may term 'slow-track'.

**Consequences to be drawn from the application of these two coefficients to credits in the BIF sector.** There is no doubt that the respective merits of these two different approaches by ECTS and ECVET in the BIF sector to credit allocation could be debated at considerable length. It does not, however, require great perspicacity to realise that the method of credit allocation in ECTS has the inestimable advantage of being far more simple, transparent and equitable, because less arbitrary, than that proposed by the BIF sector for ECVET credits.

In the *Vademecum* no explanation is found of why the BIF sector has thought it necessary to opt for such a complex procedure, a procedure which, through its two coefficients, decouples the vital relationship between notional hours of work (representing the learning outcomes of units), on the one hand, and credit arithmetic, on the other hand. What specific problems do these procedures address and how do they provide a solution to them?

It is clearly true that various qualifications in non-HEI vocational education and training consist of units which are not all deemed to be at the same EQF level. However, one might pose the question why it was thought appropriate to play with the arithmetic of ECVET credits through the EQF coefficient when EQF levels could have been reported on a transcript of record? Equally, the relative complexity of units could have been simply taken into account when calculating student workload. Moreover, no explanation is forthcoming as to why the precise coefficients chosen by BIF were selected.

In addition, both kinds of BIF coefficients are arbitrary in nature. Why, for example, are different EQF coefficient levels fixed at different EQF levels for iVET and cVET when it is conceded that iVET and cVET do not necessarily coincide with pre and post entry into the workplace? In respect of the complexity of unit coefficients, nowhere does the *Vademecum* explain exactly how coefficient 1 is established, around certain specific individual units within a qualification, as the norm against which other units receive a coefficient of less or more than 1.

Overall, one might fear that the application of these coefficients on such a formulaic basis is likely to cause those who attribute credits to be rather lazy about calculating student workload in terms of notional hours which are as close as is humanly possible to real hours. It is, of course, well known that calculating student workload is an immensely difficult task. Estimating work time for intellectual activities, which imply a great deal of personal reflection, is obviously far more difficult than totalling the overall time taken to achieve what are often dull and repetitive industrial or business tasks<sup>15</sup>. A recent TUNING publication has drawn

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<sup>14</sup> In discussing my fears, as an ECTS counsellor, with many French teachers about the possible distorting effect of applying, in certain circumstances and on a purely internal basis, coefficients to assessments of units within the BTS short cycle qualification, coefficients which effectively recognised and increased the 'importance' of certain units, I have always received assurances that really serious efforts had been made to ensure that the coefficients were a fair reflection of the extra workload demanded by the units in question and not just a subjective reaction to the 'perceived importance' of those units within a given programme. It is, however, a clumsy practice which will certainly disappear now that all BTS qualifications are to be 'modularised' and to have ECTS credits attached to all teaching units under the auspices of the French Ministry of Education.

<sup>15</sup> On thinking time, see the article cited above note 11.

attention to the need for a great deal more research into the question of estimating student workload with far greater precision<sup>16</sup>. However difficult calculating student workload may be in practice, that is, nevertheless, no reason, in estimating notional hours, to abandon a serious attempt at verisimilitude. As suggested in my article cited above, hours of work are in ECVET, with its alternative/additional methods of calculating credits, likely to become 'notional' to the point of being rather meaningless, as has happened in some CATS in other parts of the world<sup>17</sup>. Indeed, this outcome seems all the more likely because this complex procedure for ECVET credits in the BIF sector must result in making the task of arriving at a total of 60 credits to represent a year's work a very haphazard business.

To return to the EQF coefficients, there seems to be a better way to achieve the desired effect with respect to credit arithmetic. Non-HEI VET qualifications and their constituent units should be better defined not through the application of arbitrary level coefficients to credit attribution and arithmetic but, as in qualifications offered by HEIs, by their specific programme requirements. These formal requirements, which regulate individual qualifications in HEIs consist of the following:-

- a statement of the **minimum overall** number of credits required to achieve the given qualification within one or other of the Bologna cycles
- a definition of the **minimum** number of credits which must be achieved at the various levels within a given qualification. The setting of **minimum** numbers of credits at the higher levels automatically sets the **maximum** number of credits which may be normally accumulated at the lower levels of the programme
- a determination, where appropriate, of which units are obligatory and which are optional and/or free electives, with **minimum and/or maximum** numbers of credits being laid down for each of these three categories of units
- a statement, where appropriate, of the **minimum** requirements, in terms of the numbers and the level of credits, for different groups of modules according to their subject matter.

These programme requirements, naturally become more elaborate the greater the choices offered to students within qualifications.

The question of students wishing to opt to take more than the prescribed maximum number of credits normally allowed at a lesser level within a given cycle may be an important one. Here, in the BIF model, it seems to be implied that a learner may achieve the total number of credits required for a qualification by taking a greater number of units at a lesser EQF level without there being strict rules governing this practice. Such disparities of level are important since each EQF level from 5 to 8 is, of course, equivalent to a whole Bologna cycle. On the other hand, a well-constructed set of programme requirements in an HEI will, in all probability and where it exceptionally permits this practice, oblige a student to accumulate a greater number of credits than the minimum laid down as the norm for the qualification in question. Clearly, strict procedures (often determined *ad hominen/feminam*) have to be followed covering these cases, otherwise a programme which included a large number of units of a lesser level, resulting in a significantly reduced number of credits at higher levels, would risk bringing the qualification in question into disrepute. Unfortunately, no mention is made in the

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<sup>16</sup> See, on the TUNING website, *Reference Points for the Design and Delivery of Degree Programmes in BUSINESS*, esp. Section 4.

<sup>17</sup> One thinks, for example, of the 'student work hour' in North America. For a rapid survey of the history of the development of CATS in North America, see Bahram Bekhradnia, *Credit Accumulation and Transfer and the Bologna Process*, Full report for the UK Higher Education Policy Institute, October 2004, pp. 15 – 22. See, [www.bccat.cu/pubs/13CATFullReport.pdf](http://www.bccat.cu/pubs/13CATFullReport.pdf)

two BIF documents reviewed here of the application of programme requirements to the sector's qualifications.

**The translation of ECVET credits on the BIF model into ECTS credits.** Whatever conclusion one reaches on the difference of methodology between ECTS and ECVET as revealed by the BIF sector methodology, it is clear that, because of the way BIF ECVET allocates credits, allows, ECTS and such ECVET credits cannot simply be exchanged on a 1 to 1 basis<sup>18</sup> or, indeed, on any other set coefficient. ECVET may well be based on a conception of credit compatible with that of ECTS and on the notion that 60 ECVET credits, representing 1800 hours of student effort, are equal to one year's work but, because of the methodology applied, the BIF ECVET credits for individual units are simply not directly compatible with ECTS credits.

Quite to the contrary, one can only conclude that attempting to 'unpick' ECVET credits attributed after the three-step process in BIF, and particularly after the initial credits have been subjected to the two BIF coefficients, in order to attempt to turn them into ECTS credits would be artificial and therefore unreliable in its outcomes in terms of recognition.

Of course, it might be possible that, in other sectors, ECVET credits will be attributed on a simpler basis. That would mean, however, that HEIs would have to know which one of various models had been used, according to this or that sector, for the calculation of the ECVET credits which were presented to them for the purposes of either credit entry or credit exemption into one or other of their programmes. This seems not a very attractive scenario and will add to the risk of being arbitrarily.

#### 4. Conclusion

At the conclusion of this brief survey of credit attribution in the BIF sector, it seems an inescapable fact that it is going to prove no easier to propose ECTS credit ranges for EQF levels 3 and 4 within the HUMART sector than it was for the Social Sciences sector which preceded this project. Unless, of course, further clarification and simplification about ECVET credit attribution over a wide range of VET sectors is forthcoming in the next few months.

This is a disturbing conclusion which might be driving the HEI and non-HEI sectors further apart rather than achieving the greatly-to-be-desired end of bringing them closer together. This is all the more true given the unavoidable further conclusion that quite a number of the other questions about the way in which ECVET will be constructed and operated in practice have not been given satisfactory answers in these two groups of documents.

Nevertheless, it remains possible that the breaking down of barriers between the two educational sectors may still succeed. At best, it would appear that the transfer of credit from further/continuing to higher education is likely to proceed purely on the basis of comparisons of statements of learning outcomes for units which are at equivalent levels/cycles of the EQF and of the QF EHEA. However and because learning outcomes are not of themselves easily measurable and translatable into numbers of credits, this will only be achievable where there is clear and strict pre-agreement between individual further/continuing educational institutions, on the one hand, and individual HEIs, on the other hand. This is something that has been in existence now for some considerable time and before the idea of ECVET was conceived, although very rarely on a cross-frontier basis.

One can only hope fervently that as ECVET evolves, this pessimistic conclusion may prove to be erroneous.

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<sup>18</sup> With the exception, of course, of those course units for which the EQF coefficient and the complexity of unit coefficient both stand at 1. But how does one identify these units on a transcript of record?

Richard de Lavigne  
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