

# Alternative Providers

## Discussion Paper

for the EQAR Members' Dialogue, 3/4 February 2022

Register Committee

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## 1. Introduction

As the European higher education landscape diversifies, an increased number of alternative providers are externally quality-assured in a process based on the ESG.

A number of existing EQAR-registered agencies have already devised ESG-aligned certification processes for further education courses, micro-credentials, short courses or similar learning opportunities other than traditional full degree programmes. At least 7 EQAR-registered agencies (QQI, ANECA, IAAR, IQAA, FIBAA, evalag, AQU) have separate procedures for evaluating non-traditional programmes. Additionally, 9 registered agencies (NOKUT, SAAHE, QAA, NVAO, EKKA, AAQ, UKA, SQAA, IEP) are already covering non-traditional programmes/courses through their external QA activities (EQAR self-evaluation questionnaire, 2020).

Some EQAR-registered agencies' activities only cover such offers by traditional higher education institutions, but some agencies already offer certification or evaluation to other type of providers as well, e.g. private companies or training centres.

These trends have the potential to grow considering the expected popularity of micro-credentials and the need for life-long learning and development. Given the reputation of EQAR registration, providers might be increasingly keen to seek evaluation or certification by an EQAR-registered agency.

## 2. Definition

In the context of this paper, an **"alternative provider"** is understood as **an entity (e.g. private companies, NGOs, public-sector organisations) that is not a formally recognised higher education provider according to existing national/sub-national schemes, while the learning opportunities (e.g. micro-credentials) it offers are at higher education level in terms of their learning outcomes.**

In contrast, the term **"higher education institution"** or **"institution"** is used for an entity that has formal recognition as any sort of higher education provider in at least one higher education system.

As a generic term encompassing both higher education institutions and alternative providers, the paper uses **"provider"**.

### 3. Why this Consultation

Thus far, the Register Committee has considered this a "grey area". The Committee accepted that some agencies considered the external QA of alternative providers to be within the scope of the ESG and thus decided to align their respective processes with the ESG (e.g. FIBAA, ACQUIN, ZEvA, IAAR), while other agencies considered the external QA of alternative providers to be outside the scope of the ESG (e.g. AI).

In line with the current Policy on the Use and Interpretation of the ESG<sup>1</sup>, the Register Committee has followed the agencies' own classifications and assessed such processes against the ESG where they were agreed to be in scope, or disregarded them otherwise.

At the same time, the external QA of alternative providers has so far mostly been a small side activity of registered QA agencies. On DEQAR, external QA reports on alternative providers are currently not visible due to the lack of an adequate way of presenting alternative providers.

Recently, the Register Committee received for the first time an application by an agency with a substantial part of its activity in the realm of alternative providers. Given the precedent this case will set and the possible policy implications the Register Committee thus decided to consult EQAR members on certain potential principle issues before making a decision.

### 4. Scope of the ESG

The ESG specifically stress that they aim to cover "higher education in its broadest sense, including that which is not part of a programme leading to a formal degree".

As the ESG do not specifically limit what "higher education" means, but refer to it "in its broadest sense" and explicitly include education that does not lead to a "formal degree", the scope of the ESG might be determined by the quality and level of the education provided, not the legal status of the provider. That is, if a provider offers learning opportunities with learning outcomes at higher education level, defined by the QF-EHEA descriptors or EQF levels 5-8, the ESG can be considered applicable as a framework for its quality assurance.

There seems to be an emerging consensus that the ESG could be used in the QA of alternative providers. The Microbol Recommendations, for example, state:

*Quality and quality assurance are central elements for other aspects, like recognition. A register of trustworthy providers could be a useful tool for supporting acceptance and recognition of micro-credentials. [...] This register could also include alternative providers, if they deliver micro-credentials on higher education level, that are evaluated by an EQAR registered QA agency. The evaluation process should be based on the ESG with fit-for-purpose and flexible procedures that could be developed*

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<sup>1</sup> Available at <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

See: <https://microcredentials.eu/outputs/microbol-outputs/>, Joint Document Recommendations

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Similarly, the report of the EU ad-hoc consultation group on micro-credentials noted:

*"When micro-credentials are issued by a non-higher education provider, including providers outside the formal education and training system, quality assurance is also essential. The ESG could, in principle, be used in this area, as there is nothing in the standards that is 'exclusive' to higher education. At the same time, there are also other ways of ensuring their quality."*

See: <https://op.europa.eu/en/publication-detail/-/publication/7a939850-6c18-11eb-aeb5-01aa75ed71a1>, p. 15

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Even though it is widely accepted in Europe that the ESG can be used in the realm of alternative providers, this should not be an obligation. This takes account of different current and forthcoming approaches and national policies, which might establish other existing or new, specific QA frameworks.

**The Register Committee is considering to continue following the principle that an applicant quality assurance agency might choose whether to align the external QA of alternative providers with the ESG or not, and thus whether to have that compliance recognised officially through EQAR registration.**

If the agency chooses to align with the ESG, its processes will be assessed against the ESG and it may upload the reports/results to DEQAR.

If the agency chooses otherwise, the processes will not be assessed by EQAR and the reports/results cannot be uploaded to DEQAR.

## 5. Principles for Clarity and Credibility

The following sections discuss a number of possible principles that aim to:

1. ensure clarity and transparency, especially about the formal status of providers listed on DEQAR;
2. avoid confusion of potential students or the public about the nature of different providers;
3. respect the principle that micro-credentials and similar offers should complement, but not replace traditional higher education;
4. ensure that the basic values and principles underpinning higher education are upheld regardless of the type of provider.

### 5.1 Clear and Transparent Communication

In order to uphold credibility of the education system, the difference between formally recognised HEIs, awarding formally recognised qualifications, on one side and alternative providers on the other side should be absolutely clear for stakeholders and the general public.

The Register Committee is considering whether specific rules are needed that QA agencies ensure such clarity in their communication, e.g. when explaining their processes or when listing quality assured providers on their website.

In particular, it could be required that agencies take specific measures to prevent that their external quality assurance of alternative providers is misunderstood or misrepresented in such a way that these were HEIs rather than alternative providers.

## 5.2 Protection of Established Terms

Many terms are widely understood as implying formal recognition as a higher education institution, e.g. "university", "university college" or "higher education institution" itself. Similarly, the terms "Bachelor", "Master", "Doctorate" or "PhD" are widely regarded as belonging to the domain of recognised HEIs. In many EHEA jurisdictions, some or all of these terms are legally protected.

In the interest of credibility and transparency, a clear distinction should be ensured between HEIs that award official qualifications (within the QF-EHEA / EQF levels 5-8) and alternative providers that offer learning opportunities such as micro-credentials, but no official qualifications.

**The Register Committee is considering whether a specific rule should require that QA agencies ensure that such terms are not used by alternative providers, unless they are explicitly authorised to use such terms or award such qualifications in their jurisdiction, respectively.**

While a QA agencies' means are limited, agencies could reasonably be expected to check this as part of their external QA process and to ensure that their own terminology does not appear to sanction the use of such terms by alternative providers.

## 5.3 Majority of Activity in Recognised Higher Education

Micro-credentials and similar education offers at higher education level are still an emerging field. Different policy documents underline that these offers may satisfy specific demands and complement traditional higher education institutions' degree programmes, but should not be regarded as a replacement for these programmes. The proposal for an EU Council Recommendation states, for example:

*Importantly, micro-credentials do not replace traditional qualifications. Instead, they can complement traditional qualifications and serve as a lifelong learning opportunity to all. Given their flexibility, micro-credentials can be designed and delivered by a variety of providers in many different formal, non-formal and informal learning settings.*

See: <https://op.europa.eu/en/publication-detail/-/publication/92b353bb-59d3-11ec-91ac-01aa75ed71a1>, p. 2

**The Register Committee is considering whether a rule is needed that QA agencies are only eligible for EQAR registration if the majority of their activity is in the domain of recognised higher education institutions.**

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In line with the principle above and considering that a QA agency would need to determine whether the learning outcomes of an alternative providers' offering are indeed at higher education level, it could be argued that a QA agency should have a sufficient understanding of and expertise in the domain of traditional higher education institutions.

For cases of doubt, "majority of their activity" would need to be defined in detail (e.g. by number of providers, by number of students/learners enrolled at those providers, by income or budget).

### 5.4 DEQAR-related Considerations

As the external QA of an alternative provider is within the scope of the ESG, those alternative providers that underwent ESG-aligned external QA by an EQAR-registered agency might appear on DEQAR. This is likely to serve an important function for trust: the Microbol recommendations, for example, call for registers of trusted micro-credential providers and envisage that DEQAR would play that role at European level.

Based on the considerations above, the following principles and restrictions are thus being considered for DEQAR:

- For alternative providers, EQAR cannot draw on ETER/OrgReg or national databases for acquiring basic data, as these providers are not necessarily regulated or monitored. **Registered QA agencies might thus be required to provide themselves the basic data on alternative providers they reviewed, and keep that information up to date.**
- A clear distinction should be made between HEIs and alternative providers also on DEQAR. **HEIs and alternative providers might thus be distinguished from each other prominently**, for example by the use of specific icons or listing in a clearly separated section.
- For programme-level external QA reports, a distinction might be made between level of the learning opportunity, and level of the resulting qualification. **The indication of short, first, second or third cycle as a resulting qualification level might be reserved for programmes of recognised HEIs**; for alternative providers, the resulting qualification would always be "other".