



To  
EQF Advisory Group  
European Commission

No. \_\_\_\_\_

Date \_\_\_\_\_

Dear members of the EQF AG,

Ss. Cyril and Methodius No. 54  
1000 Skopje  
Republic of Macedonia

Thank you for the joint EQF AG/Cedefop/ETF/CoE note of February 2016 on the EQF Referencing Report of the Macedonian Qualifications Framework and Self-certification to the QF-EHEA. Your note with clearly stated remarks and suggestions has paved the way to further dialogue and discussions in the country and has widened the opportunity to increase the trust in the referencing process. Added value to the dialogue provides the deeper involvement of considerable number of members of the EQF AG, as experts, in the activities on referencing and further development and implementation of the Macedonian Qualifications Framework (MQF).

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The national team with the stakeholders have seriously addressed the comments and suggestions in the note. This resulted in the fine-tuned Referencing Report and the Roadmap for Further Development and Implementation of the MQF, as well as in updated content of relevant web sites. All stakeholders have contributed to the process by active participation in meetings, workshops, seminars, conferences and public debates. Specific answers to your comments are provided in the form that follows the structure of the note.

### Scope and the basis of the referencing report

Three terms are added in the glossary of the fine-tuned Report (pages: 106 and 107)

- **Type of qualification** – main grouping of qualifications according to the purpose, type of documents issued, type of programmes and volume. In the MQF there are two types of qualifications: educational and vocational qualifications.
- **Educational qualification** – qualification obtained by completing publicly adopted educational programme within the formal education system, with necessary qualification volume, and documented with a diploma/certificate. It enables



continuation of education, employment and personal development.

- **Vocational qualification** – qualification obtained by completing part of publicly adopted educational programme (modules, courses, etc.), a special programme for adult education, or through validation of non-formal learning. It is documented with a certificate and enables employment and personal development.

For better understanding of the concept of vocational qualifications in the national context, additional explanation is provided on page 66 (*Classification of qualifications*):

“**Vocational qualification** – is a qualification acquired for part of a publicly adopted education programme (modules, courses, etc.), by completing a special programme for adult education, or through validation of non-formal learning. The achieved learning outcomes are documented with a certificate. They contain competences relevant for the labour market presented within one or more standards of occupations. These qualifications aim to enable employment and personal development. By their nature, these qualifications, in principle, do not provide access to vertical progression in the formal education system. Vocational qualifications can be acquired for all MQF levels and sublevels, except level VIII. This type of qualifications in some countries is known as ‘partial qualification’.”

In the column **Types of qualifications, cycles and awards** of Table 40 **Summary of the EQF referencing to Criteria 3, 4 and 5** information on educational and vocational qualifications is added.

### **Responding to referencing criteria**

#### ***Criterion 1: The competence of the relevant bodies***

Brief information on the involvement of quality assurance bodies and the labor market actors is added at the end of the text on the response to Criterion 1 (page 74):

“The NQF Law applies as of 30 September 2015. On 20 October 2015 the Government established the National Board for the



Macedonian Qualifications Framework. Representatives of the quality assurance bodies and labour market actors are involved as members of the MQF Board and the Sectoral Qualifications Councils. Establishment of Sectoral Qualifications Councils is in progress. Higher Education Accreditation and Evaluation Board has full mandate for quality assurance in Higher Education. National Board for MQF is responsible for registration of qualifications based on evidence and procedures provided by the Higher Education Accreditation and Evaluation Board.”

The work on harmonization of the legislation is in progress.

### ***Criterion 2: Linking the NQF and the EQF***

The correspondence between the MQF levels to the EQF levels is summarised on page 80:

“The key elements of each level and their correspondence to the EQF are the following:

- MQF level descriptors are elaborated into more details.
- For the level descriptors of the MQF level I there are no substantial differences to the level descriptors of the EQF level 1. We conclude that the MQF level I fully corresponds to the EQF level 1.
- We find that all three domains of the level descriptors of the MQF level II, level III and level IV are slightly more demanding compared to the respective level descriptors of the EQF level 2, level 3 and level 4. The MQF level descriptors include creativity as an additional characteristic. The level of autonomy and responsibility is slightly higher.
- The level descriptors of the level V of the MQF correspond very well to the level descriptors of the level 5 of the EQF. The EQF level descriptors use the terms management and supervision, while the MQF level descriptors use the terms organise, communicate and control.
- The level descriptors of the MQF level VI, level VII and level VIII correspond to the respective level descriptors of the EQF level 6, level 7 and level 8. The Dublin descriptors were the basis for developing these level descriptors.”



Explanation on the restructuring of five domains of the HE framework into three domains of MQF for LLL is presented on the same page:

“Table 42 presents the comparison between the NQF HE level descriptors and the Dublin Descriptors. Five domains of the level descriptors for higher education (knowledge and understanding, applying knowledge and understanding, making judgements, communication and learning skills) have been restructured into three domains of the NQF LLL (knowledge and understanding, skills and competence):

- The *knowledge and understanding* domain from the NQF HE fully corresponds to the *knowledge and understanding* domain of the NQF LLL.
- *Applying knowledge and understanding* from the NQF HE is integrated into the *skills* domain of the NQF LLL.
- *Making judgements* domain from the NQF HE is incorporated into all three domains of the NQF LLL.
- *Communication* domain from the NQF HE is incorporated into the *skills* and the *competence* domain of the NQF LLL.
- *Learning skills* of the NQF HE is incorporated into the *skills* and the *competence* domains of the NQF LLL.”

### ***Criterion 3: Learning outcomes and validation of non-formal learning***

Information about the link to the web site with an example of primary education subject curriculum, in English, is provided on page 81

[http://mrk.mk/wp-content/uploads/2015/07/Programa\\_za\\_III\\_odd.pdf](http://mrk.mk/wp-content/uploads/2015/07/Programa_za_III_odd.pdf)

Regarding the VNFIL a brief explanation is given on page 82:

“Currently understanding of validation of non-formal and informal learning is different in different institutions. Good practice example is the Methodology on the Process of Recognition of Prior Knowledge and Skills developed in the framework of the Horizon 2020 regional project ‘BUILD UP Skills BEET - Builders' Energy Efficiency Training’(Croatia, Greece and the Republic of Macedonia).The system of VNFIL,



including certification of qualifications, will be designed within the next phase according to the Roadmap for VNFIL. This and other examples of good practice will be relevant for the designing process. The work package 4 of the Roadmap for Further Development and Implementation of the MQF is focused on the development and implementation of VNFIL.”

The full text of the Roadmap for VNFIL is provided on the web site [http://mrk.mk/wp-content/uploads/2015/05/VNFIL-Roadmap\\_angl-1.pdf](http://mrk.mk/wp-content/uploads/2015/05/VNFIL-Roadmap_angl-1.pdf)

***Criterion 4: The procedures for inclusion of qualifications and describing the place in the NQF are transparent***

Brief information on the status of the Methodology for allocation of qualifications in the MQF is provided on page 82:

“Specific elements of the Methodology have been tested. For full implementation of the Methodology, adoption by the MQF Board is needed as well as capacity building of stakeholders.”

Answer to the comment on the two types of qualifications is given within this letter, under the **Scope and the basis of the referencing report**.

Leveling of qualifications is based on: entry requirements, expected learning outcomes and credits. The leveling of the pre-Bologna qualifications is explained under the Criterion 4 (QF EHEA) (Page 98 of the Report).

The Synthesis Report as part of the Inventory and Analysis of Existing Qualifications<sup>1</sup> is a very important document and will be put on the web site [www.mrk.mk](http://www.mrk.mk).

***Criterion 5: Quality assurance is in compliance with European principles***

The Higher Education Accreditation and Evaluation Board (HEAEB) is independent in decision making and the process is performed according to the rulebook adopted by the Board. The Ministry of Education and Science provides staff for administrative and technical support. They are not included in the decision

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<sup>1</sup>Inventory and Analysis of Existing Qualifications, Study Supporting the EQF Referencing Process in the Republic of Macedonia, European Training Foundation, May 2014



making process. A new law for quality assurance in Higher Education is under preparation. It will be based upon ESG EHEA 2015. Technical and administrative support to the Board will be provided by a separate service.

Regarding the work on QA in practice and challenges, the implementation of the full quality cycle for primary and secondary education has become a regular practice for nearly a decade (self-evaluation and external evaluation of schools). Example of a VET school self-evaluation Report (in English) is provided on the web site <http://mrk.mk/wp-content/uploads/2015/07/samoevaluacija-20161.pdf>.

Students and parents are involved in self-evaluation and in integral evaluation of schools. Employers are involved in the development of standards of occupations, standards of qualifications, curricula design, implementation of curricula, and in student assessment. This information is already included in the Report (page 85).

#### **Other issues**

***Credits*** - one credit in VET covers all students activities (contact hours, practical work, homework, project, assessment, etc.) needed for achievement of all expected learning outcomes. The reduced time for total learning takes into consideration the average age of the student in initial VET. Brief explanation on ECVET credits is added on page 63 of the Report. So far, credits in VET have not been implemented.

***Language diversity*** - education on minority languages is ensured in primary and secondary schools. Mobility within the sub-systems is ensured (scholarships, accommodation in dormitories, travel costs etc.). The higher education system offers study programmes for teachers in primary and secondary schools for minority languages.

#### ***Sustainability of the frame work and next steps***

Within the draft Comprehensive Strategy of Education 2016-2020 with Action Plan the NQF is part of some main pillars and of the transversal pillar.

The national team and key stakeholders with support of international experts have developed the Roadmap for Further Development and Implementation of the MQF. New local, national and international partnerships were initiated and developed within these activities. Key information on the Roadmap is presented in



*Chapter 8 Challenges and Next Steps* of the Report (pages 104-105):

**WP-1: Conceptual framework**

- Group of activities 1.1: Review and updates of concepts
- Group of activities 1.2: Publication of the glossary and acronyms
- Group of activities 1.3: Dissemination.

**WP-2: Governing the MQF and stakeholder involvement**

- Group of activities 2.1: Analysis of stakeholders' involvement
- Group of activities 2.2: Consideration of recommendations
- Group of activities 2.3: Institutional setup of the MQF
- Group of activities 2.4: Development of a publication on the MQF and dissemination
- Group of activities 2.5: Capacity building of various actors according to their role in the qualifications system
- Group of activities 2.6: Agreement for the use of a protocol setting out roles and responsibilities of various actors and how they interact.

**WP 3: Learning outcomes implementation**

- Group of activities 3.1: Analysis of learning outcomes implementation
- Group of activities 3.2: Development of guidelines on learning outcomes and dissemination
- Group of activities 3.3: Capacity building of various actors according to their role
- Group of activities 3.4: Implementation of learning outcomes (OS, QS, curricula, etc.), including credit systems.

**WP 4: Development and implementation of validation of NF and IF learning**

- Group of activities 4.1: Design of the validation of the NF and IF learning (VNFIL) system and procedures
- Group of activities 4.2: Development of guidelines on VNFIL and dissemination
- Group of activities 4.3: Capacity building of various actors according to their role
- Group of activities 4.4: Implementation of VNFIL.



#### **WP 5: Inclusion of qualifications into the MQF**

- Group of activities 5.1: Description of the system for inclusion of qualifications in the MQF
- Group of activities 5.2: Development of the MQF register (standards, IT infrastructure)
- Group of activities 5.3: Development of guidelines on inclusion of qualifications and dissemination
- Group of activities 5.4: Capacity building of various actors according to their role
- Group of activities 5.5: Development of new qualifications
- Group of activities 5.6: Revision of existing qualifications
- Group of activities 5.7: Inclusion of qualifications into the MQF on the basis of standards.

#### **WP 6: Quality assurance**

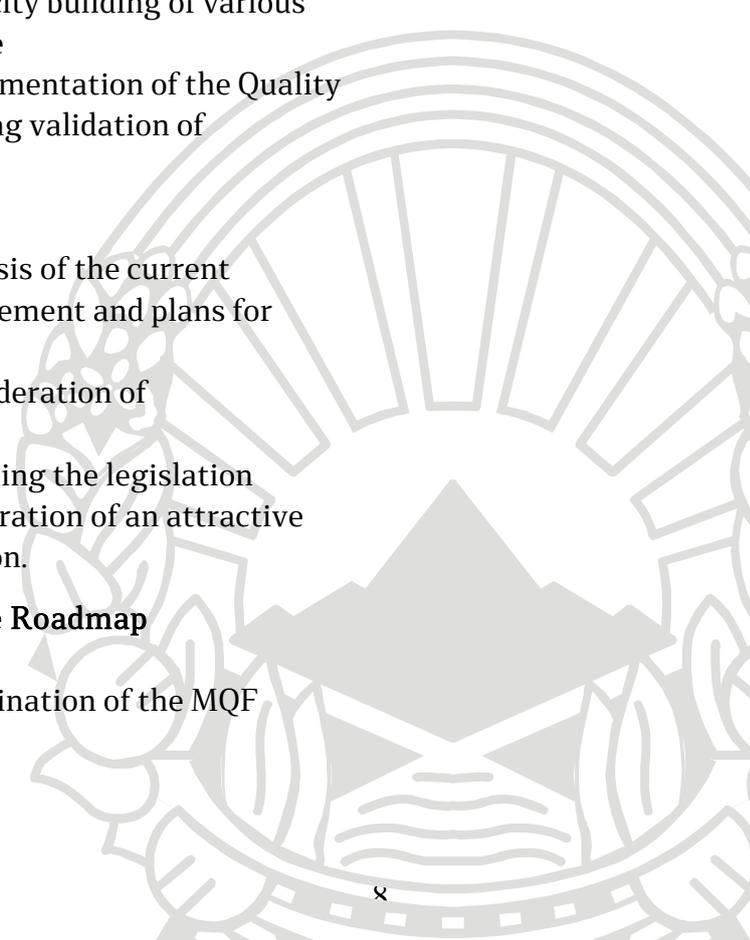
- Group of activities 6.1: Analysis of the QA system(s) in MK and plans for improvements
- Group of activities 6.2: Alignment of QA with EQAVET and ESG
- Group of activities 6.3: Development of guidelines on QA and dissemination
- Group of activities 6.4: Capacity building of various actors according to their role
- Group of activities 6.5: Implementation of the Quality assurance system(s), including validation of qualifications.

#### **WP 7: Legislation**

- Group of activities 7.1: Analysis of the current legislation, needs for improvement and plans for harmonisation
- Group of activities 7.2: Consideration of recommendations
- Group of activities 7.3: Updating the legislation
- Group of activities 7.4: Preparation of an attractive publication and dissemination.

#### **WP 8: Quality assurance of the Roadmap implementation**

- Group of activities 8.1: Coordination of the MQF implementation





- Group of activities 8.2: Communication to relevant actors, dissemination and promotion of the MQF
- Group of activities 8.3: Monitoring of the implementation of the Roadmap
- Group of activities 8.4: Analysis of the implementation of the Roadmap and updates when justified.
- Group of activities 8.5: Transfer of all relevant results to the legislation (WP-6).

The Roadmap is provided on the web site :

[http://mrk.mk/wp-content/uploads/2015/05/MQF\\_Roadmap.pdf](http://mrk.mk/wp-content/uploads/2015/05/MQF_Roadmap.pdf)

The Ministry of Education and Science as coordinator of the NQF expresses gratitude for the valuable comments and suggestions of the EQF AG.

Kind regards,

**Minister  
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