



EUROPEAN COMMISSION

*Brussels, 02.05.2017
C(2017) 2409 final*

Dear President,

The Commission would like to thank the Bundesrat for its Opinion on the Commission proposal for a Decision of the European Parliament and of the Council on a common framework for the provision of better services for skills and qualifications (Europass) and repealing Decision No 2241/2004/EC {COM (2016) 625 final}.

The main objective of Europass since it was adopted in 2004 has been to support the transparency of skills and qualifications in Europe. The proposal for the revision of the Decision builds on the achievements and evaluations of Europass to date and seeks to ensure that EU tools and services continue to evolve and be modernised in line with citizens' needs and changes in our education and training systems and labour markets. The proposal seeks to offer a platform for co-operation between the European Union, Member States and stakeholders to deliver the most effective tools and services possible. It forms part of a broader package of measures proposed by the Commission Communication on the New Skills Agenda for Europe {COM(2016) 381 final}.

The Commission is pleased to have this opportunity to provide a number of clarifications regarding the proposal and would like to refer the Bundesrat to the attached annex for more technical comments.

The points made in this reply are based on the initial proposal presented by the Commission which is currently in the legislative process involving both the European Parliament and the Council.

The Commission hopes that the clarifications provided in this reply address the raised by the Bundesrat and looks forward to continuing our political dialogue in the future.

Yours faithfully,

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First Vice-President*

*Marianne Thyssen
Member of the Commission*

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President of the Bundesrat
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ANNEX

The Commission has carefully considered the issues raised by the Bundesrat in its Opinion and would like to offer the following observations.

1. The proposal acknowledges the achievements of Europass to date including the frequent use of the Europass Curriculum Vitae. The proposal seeks to establish the flexibility to amend and change the existing Europass documentation services to ensure they are fit for purpose. The Commission would like to stress that any such changes would be done after full consultation of Member States and stakeholders. Changes to the existing service (such as the development of a cover letter tool and the Europass Skills Passport) were instigated and led by the Member States and the purpose of the proposal is to allow Europass to develop in line with requests from Member States and users.

2. The Commission confirms that the role of Europass as a framework to support the transparency and understanding of skills and qualifications remains unchanged. There is no intention of transforming Europass into a recognition tool. Europass has an established role in supporting the documentation of skills and qualifications (through the Europass Curriculum Vitae); supporting self-assessment (the Language Passport and Digital Competences Self-Assessment Grid); and providing information on qualifications and learning outcomes (the Diploma Supplement and Certificate Supplement). The proposal would allow these existing functions to be modernised and ensure that relevant information can also be accessed through Europass to make it a more comprehensive service. The Commission would also recall that the Europass framework has been the subject of two external evaluations, the most recent in 2013 which have informed the proposal. Furthermore, consultation on the preparation of the New Skills Agenda for Europe included targeted events and consultations on Europass, including inter alia directly with Europass stakeholders: the National Europass Centres, the European Qualifications Framework's National Coordination Points and the Euroguidance network. No new tools and services would be added without a full consultation of Member States including an analysis of the requirements of users and the role of existing services.

3. Regarding the linked information platform, the majority of the information referred to in the proposal is already collected by Member States and provided to EU level platforms (in particular the Learning Opportunities and Qualifications in Europe portal and the EU Skills Panorama). The proposal would ensure that this information is collected through a single framework to preserve its consistency and quality. Any reporting obligations would be discussed with the Member States. There is no intention of web crawling data from the Member States without their consent.

4. The classification of European Skills, Competences, Qualifications and Occupations is included in the proposal as a means to support the effective technical operation of the Europass platform. The Commission confirms that its inclusion in the platform would not create any obligations for the Member States.

The use of the classification in any future portal would be subject to the outcome of the ongoing consultation and testing of the classification system. Providing online services on skills relies on semantic assets (such as classification systems or dictionaries) covering the related terminology. The Commission intends to provide these services in all official EU languages. The classification is currently the most important semantic asset fulfilling these requirements.

The Commission wishes to recall that the use of the classification by Member States is completely voluntary.

The Diploma Supplement template is promoted through the Europass Framework. Individual higher education institutions adapt the template to their local systems and populate it with information before issuing to graduates. The proposal does not require higher education institutions to use the European Skills, Competences, Qualifications and Occupations classification or any other classification system when issuing the Diploma Supplement. The proposal fully respects the shared ownership of the Diploma Supplement with the United Nations Educational, Scientific and Cultural Organization (UNESCO) and the Council of Europe.

5. The proposal on the establishment of National Skills Coordination Points and the operation of related national services does not stipulate the combining, merging or any other form of restructuring of the relevant national centres. Neither does the proposal state how national services should be organised. The only requirement is that Member States designate a single point within each Member State as a co-ordinating point for the activities associated with these centres: a reduction in the administrative burden for both Member States and the European Union institutions. The Coordination Point would be the recipient of funding for the activities of the national centres and the central point for submitting the application for funding and final report on activities, and for audit purposes. Beyond this, the extent of any co-operation and how the centres operate is entirely for Member States to determine.

Evaluations of the Europass framework have found that in many countries the impact, awareness and efficiency of the centres is unclear and a lack of strategic approach often dilutes the impact of their work. There is also significant underspending and under-utilisation of the co-financing provided by the Commission for the activities of the centres (EUR 8 million underspent since 2011); allocating a single grant to each Member State would allow more flexible use of these funds in line with national resources and priorities.

The proposal would not put an end to any existing functions; instead it would establish the activities carried out by Euroguidance centres in a legal text for the first time, as well as reiterating the importance of the activities carried out by the National Europass Centres and European Qualifications Framework's National Coordination Points.

6. The proposal confirms that the Europass Qualification Supplement template includes the Diploma Supplement and Certificate Supplement (see: footnote 32 in the proposal). The definitions of these documents remain unchanged from the current Decision (see

p.20 of the proposal) which provides that they are 'attached to a qualification' to give context and information so they are not considered recognition documents or a replacement for certification. The feedback received during the consultation on the Europass proposal welcomed a reflection on the relevance and usage of both existing documents. The proposal only provides the possibility for amending and adding supplement templates if a clear need is identified. There are no new supplements identified through the proposal and no new administrative burden created. The proposal states that the Supplement templates shall be made available electronically through Europass but does not stipulate how the completed supplements are issued – this is for the responsible body to determine.

7. Europass has an established self-assessment function with two tools available for the self-assessment of digital and language competence. This provision allows for the development of self-assessment tools based on users' needs. There are no specific provisions for new self-assessment tools but in case a clear need emerges based on feedback from Member States and stakeholders, the proposal provides for the possibility to add these. The Commission confirms that, where necessary, it would develop such tools in consultation with the Member States. Development would be based on an evidence based evaluation of needs and existing services and a fully-tested product developed based on proven methodologies. This has been the practice for the existing self-assessment tools. In that regard, the reference to other EU and third-party tools simply means that individuals would be able to store the outcomes of these self-assessments in their Europass documents such as the Curriculum Vitae.

8. The Commission notes the position of the Bundesrat that the proposed mutual learning and support activity should be in the form of 'peer learning' rather than 'peer review'.

9. The Commission confirms that there is no change in the legal basis of the proposal in comparison the current Europass Decision. Both the proposal for a new European Qualifications Framework Recommendation¹ and the proposal for a new Europass Decision were developed within the context of the New Skills Agenda for Europe. The proposed revision of the Regulation² establishing a European Centre for the Development of Vocational Training (CEDEFOP) allows for a role in implementing the Europass Decision. Cedefop has an established role in the 2004 Decision of providing expertise to the Commission and Member States on the implementation of Europass (and currently hosts the existing Europass portal). This role of providing expertise is reiterated in recital 24 of the proposal.

The proposals for the European Qualifications Framework, Europass and Cedefop are not interrelated in a way that prevents them from being discussed, negotiated and implemented separately.

¹ COM(2016) 383 final.

² COM(2016) 532 final.

10. The European Qualifications Framework is referred to in the proposal as a supporting framework to bring consistency to the information included in the new Europass service. It should be noted that the European Qualifications Framework is already referred to in all information on learning opportunities and qualifications currently provided by Member States to the Learning Opportunities and Qualifications in Europe portal. The inclusion of the European Qualifications Framework in the current proposal would not create any new obligations for Member States or change the voluntary nature of engagement with the Framework.