

Validation and Recognition of Professional Qualifications and Competencies Acquired Abroad: Criteria-Based Analysis of New and Existing Opportunities in Germany

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Abstract

How can the recognition of foreign professional qualifications be improved and accelerated? This question remains a highly debated topic in German integration policy, especially given the ongoing skilled labor shortage. While the Federal Recognition Act has been the primary focus, two other legally established pathways exist for validating experience-based competencies. However, these methods have received less attention regarding individuals with competencies acquired abroad. This paper compares these three pathways in terms of standards, methods, stakeholders, and outcomes through a criteria-based document and literature review. The central research question asks: What differences exist between the procedures, and what implications do these differences have for utilizing the pathways, particularly for individuals with foreign-acquired competencies? Findings reveal similarities in various criteria but also significant differences, particularly in the entitlements conferred at the end of the process. This highlights the challenge of enhancing transparency and accessibility to promote recognition of informally and non-formally acquired competencies obtained abroad.

Keywords: recognition of foreign qualifications; validation of prior learning; vocational education and training (VET); non-formal and informal learning; labour market integration; skilled migration; Germany

1. Introduction and Research Interest

The labor market integration of immigrants is crucial for their inclusion in the host country's economy. Qualifications and competencies indicate how well they can assimilate into the labor market and society (OECD, 2023). Increasing worker mobility, the internationalization of labor markets, and the expansion of education systems have amplified the demand for widely accepted cross-border recognition procedures (see Annen, 2023). To facilitate access to positions that match foreign-acquired qualifications, many countries have implemented official recognition processes (Damelang, et al., 2020).

Germany, which has experienced significant immigration over the past decade, is enhancing its migration system. A recent migration law aims to simplify the immigration process and improve labor market integration, particularly for non-European immigrants. A key objective of German integration policy is to improve the recognition of foreign professional qualifications, established as a legal right under the Federal Recognition Act of 2012. This recognition involves assessing qualifications acquired abroad against German reference occupations. For regulated professions (e.g., doctors,

nurses, lawyers), recognition is mandatory, while for non-regulated occupations—including the 320 training professions within the German dual training system—recognition is optional but aids employers in understanding foreign qualifications (see Eberhardt & Annen, 2015).

However, Germany's emphasis on formal educational certificates poses challenges for immigrants lacking recognized qualifications, even in non-regulated occupations (see OECD, 2023). Unemployment rates are higher among immigrants with foreign qualifications compared to those with German credentials, as employers often perceive foreign qualifications as less comparable (see Mergener, 2018; Mergener & Maier, 2019). Consequently, a significant portion of immigrant skilled labor remains underutilized, with many overrepresented in low-wage sectors, particularly among new EU members and third countries (see Loschert, et al., 2023).

In the absence of reliable information regarding the equivalence of foreign qualifications and competencies, employers may resort to non-qualification-related characteristics, such as ethnicity or country of origin, as indicators of applicant suitability (see Rohrbach-Schmidt, 2020). Formal recognition of foreign qualifications not only ensures proper hiring and compensation for skilled workers but also positively impacts employment and wages, protecting against underemployment and wage losses (see Brücker et al., 2021; Damelang et al., 2020; Drange & Helland, 2019).

The recognition process under the Federal Recognition Act is only available to individuals who hold a formal qualification from abroad. Those who have gained their professional competencies through work experience cannot benefit from this process. However, there are two alternative procedures, aside from the Federal Recognition Act, that enable the validation of competencies acquired informally (through work experience) or non-formally (through further education): the long-established pathway of External Admission to the Final Examination, available for over 50 years and a newly legalized Assessment Procedure that was introduced in January 2025. While these additional recognition procedures are often overlooked in discussions about integrating skilled workers with foreign qualifications—primarily because they were not specifically designed for this group—they are nonetheless accessible to these individuals. Notably, they require several years of relevant work experience rather than formal qualifications obtained abroad, as mandated by the Federal Recognition Act.

Recognition procedures encompass both process and outcome dimensions (see Annen, 2012). The recognition process consists of multiple steps (see Table 1). Although not all procedures encompass every stage, a comprehensive understanding of the entire process is essential. The outcome is formal recognition, which can be analyzed from both the educational institutional and the societal perspective.

Table 1**Overview and Systematization of the Recognition Process**

(Steps in the) Process of Recognition	Identification	Evaluation/Assessment	Validation	Certification	Formal Recognition
Characteristics	Documentation of competencies	Evaluative documentation of competencies	Checking the validity of documents with regard to a standard	Issue of a guarantee of assessment and validation by an authorized body	Issue of a guarantee of assessment and validation by a state-authorized body
Result	Document	Certificate	Confirmation	Vocational Diploma or Degree	Entitlement

Note: Referring to Annen, 2012, p. 144.

The paper presents a criteria-based analysis of the three recognition procedures, focusing on their similarities, differences, and their practical implications for individuals with foreign-acquired qualifications. It addresses the research question: What are the key differences between the procedures, and how do these differences impact the applicability and accessibility of the pathways for individuals with foreign qualifications? Following an explanation of the underlying theoretical framework, the paper provides a detailed, criteria-based examination of the three procedures. Finally, the discussion addresses the challenges encountered by individuals with foreign qualifications and identifies areas for further research and policy improvement.

2. Overview of Recognition and Validation Opportunities for Occupational Qualifications in Germany

The German System offers three pathways through which competencies and qualifications acquired abroad can lead or be related to a German vocational qualification. These three pathways are analyzed in the following: The Federal Recognition Act, the External Examination, and the Assessment and Certification of Professional Competencies (hereafter: Assessment Procedure). The latter two pathways apply exclusively to occupations trained within Germany's dual system, which are largely non-regulated. The dual system, the central element of the German VET system, is called "dual" because training takes place at two learning venues: in the company and at the vocational school. Apprentices are employed during the apprenticeship by the company. There are around 320 such occupations, with training typically lasting three years. These include professions such as bakers, office clerks, and electricians.¹ While the Federal Recognition Act covers a broader range of professions (e.g. doctors and nurses), this article focuses solely on the recognition of non-regulated occupations within Germany's dual system across all three procedures for better comparability. The analysis is thus limited to professions governed by the Vocational Training Act (*Berufsbildungsgesetz*, BBiG) and the Crafts and Trade Code (*Handwerksordnung*, [HwO], 1998/2024, Section 1), which together encompass occupations trained within Germany's dual system.

2.1 Federal Recognition Act (*Gesetz zur Verbesserung der Feststellung und Anerkennung im Ausland erworbener Berufsqualifikationen*)

The Federal Recognition Act, enacted in 2012, provides a formal procedure for evaluating and recognizing qualifications obtained abroad. An important part of the

Recognition Act is the Professional Qualifications Assessment Act (Berufsqualifikationsfeststellungsgesetz [BQFG], 2011/2023) ², which regulates the recognition procedure for occupations governed by the Vocational Training Act (BBiG) and the Crafts and Trade Code (HwO). A formal qualification officially recognized in the country of origin is required to initiate a recognition procedure. Based on submitted documents, including the diploma and other materials detailing the content and duration of the foreign training, the relevant recognition authority compares the qualifications to a corresponding German reference profession. If significant differences between the qualifications are identified, documented work experience or further training can also be considered. In cases where applicants cannot provide the necessary documents but can credibly demonstrate that they hold a corresponding qualification, a so-called qualification analysis—a process of competency assessment—can be conducted. This may involve tools such as work samples or technical interviews to assess equivalency.

In addition to full equivalence, partial equivalence can also be a positive outcome of the recognition process. This result provides both applicants and employers with transparency regarding the comparability of foreign professional qualifications with a corresponding German reference profession. Full equivalence carries the same legal consequences as a German qualification.

Information on utilization: There are official statistics on the Recognition Act that provide information on its usage. In 2023, there were around 11,500 applications for recognition of a foreign professional qualification for a non-regulated occupation (see Böse et al., 2024). The qualification analysis option, the process of competency assessment, on the other hand, is rarely used: Only around 120 decisions were decided after participating in a qualification analysis. ³ Of the roughly 10,650 procedures completed in 2023, results were nearly evenly split between “full equivalence” and “partial equivalence.” In two percent of cases, no equivalence could be determined (see Böse et al., 2024).

2.2 External Admission to Final Examination (*Externenzulassung*)

For individuals without formal qualifications but with extensive work experience, the External Admission to the Final Examination (hereafter: External Admission) procedure, established over 50 years ago under the Vocational Training Act and the Crafts and Trade Code, allows candidates to sit for the final vocational exams in recognized training occupations. Typically, eligibility for External Admission is determined based on documentation. Applicants must demonstrate at least one and a half the duration of the standard training period in relevant work experience. This process enables the recognition of competencies gained through informal or non-formal means, such as work experience or further training, rather than formal education (see Heinsberg et al., 2016). The final exam and certification awarded are the same as those received by apprentices who have completed formal training. This procedure enhances the employability of semi-skilled and unskilled workers, providing them an alternative path to formal vocational qualifications. If the final examination is successfully passed, individuals receive the German vocational qualification.

Information on utilization: Although the vocational training statistics provide information on participation in the final examination as an external candidate, they do not provide information on nationality or whether the professional experience was acquired in

Germany or abroad. Thus, it remains unknown how many of the approximately 18,500 people who were admitted to final examinations in 2022 via proof of professional experience acquired their professional qualifications wholly or partly abroad (see Bundesinstitut für Berufsbildung [BIBB], 2024).

2.3 Assessment Procedure

The new Assessment Procedure, which took full effect in January 2025, was introduced under the Vocational Training Act (BBiG) and the Crafts and Trade Code (HwO). This procedure is designed for individuals who possess relevant professional competencies but lack a formal vocational qualification, similar to the criteria used for the External Admission. It facilitates the determination and certification of these competencies based on recognized training occupations.

Similar to the qualification analysis conducted as part of the Recognition Act, this assessment process uses specific tools, such as work samples and technical interviews, to evaluate the comparability of professional competencies to a German vocational qualification.

The outcome can also be full or predominant comparability. The terminology differs slightly from that of the Federal Recognition Act, which is also reflected in the rights that applicants gain at the end of the process. The certificate of full comparability does not constitute legal equivalence to a German qualification; however, it does provide the opportunity to participate in further education.

Information on utilization: The Assessment Procedure has only been possible since January 2025; therefore, there is currently no data on uptake. However, insights can be drawn from the validation procedures implemented as part of the Valikom Transfer project, which ran from November 2018 to April 2023. During this period, 2,012 individuals participated in the validation process. Notably, 43% of these participants did not hold German citizenship, and 54% were born outside Germany (see Wirtherle et al., 2024). This suggests that a significant proportion of participants had acquired work experience abroad and utilized the validation process to formalize their qualifications. The new legal framework, which establishes a statutory right to these procedures, could thus attract this target group effectively.

3. Theoretical Conceptualization, Analytical Perspective, and Methodology

The analysis draws on Annen's (2012) typology of recognition processes, centering on the integrative procedure and applying Annen's criteria grid as the theoretical framework for evaluating recognition procedures.

3.1 Typology of Recognition Procedures

This typology (Annen, 2012, p.280, see Table 2) distinguishes between:

1. procedures that lead to formal (vocational) diplomas or degrees within the education system (integrative type),
2. procedures that result in certificates without formal system equivalence (autonomous type), and
3. procedures that focuses on informal learning and individual development without aiming for certification but documentation of learning results (seconding/supportive type).

This paper focuses solely on the integrative type (see the first column in Table 2), as it provides migrants with the same or comparable formal educational status to that of educational natives. Anchored in the formal education system, it combines summative and formative assessment methods. Competencies are externally evaluated by an institution within the formal education system against formal qualification standards, using interviews, observations, and other assessment methods. The integrative type follows a standard-oriented assessment approach. It modifies existing rights of educational institutions but does not introduce new ones. Recognition standards are set externally, and implementation follows hierarchical legal requirements (see Annen, 2012, pp. 281-284).

Table 2

Typology of Recognition Procedures⁴ - Distinction Between Three Ideal Types

Criterion	Integrative type	Autonomous type	Seconding type
Educational policy objectives	Integration in the formal education system	Positioning in the area of non-formal education	Reference to informal learning dominant
Methodological objective	Summative and formative	Summative	Formative
Methods	External assessment by comparison with qualifications	External assessment through test procedures	Self-assessment through portfolios and/or descriptive methods
Stakeholders	Stakeholders from the formal education system dominate	Private sector stakeholders dominate	Non-profit sector stakeholders dominate
Norms and standards	Process-external standards and standard orientation	Procedure-internal standards and criteria orientation	No standards and individual orientation
Institutional decision-making rights	Expansion of the decision-making rights of the stakeholders in the formal education system through legislation	Granting of decision-making rights through accreditation	Decision-making rights of subordinate importance
Individual entitlements	Entitlements in the formal education system	Entitlements in the employment system	No entitlements

Note: Annen, 2012, p. 285.

3.2 Criteria for the Analysis of Recognition Procedures

The study uses a literature review and document analysis as central qualitative methods, employing the above typology as well as the criteria detailed in the following. The literature review follows Cooper's (1989) five-step model—problem formulation, data collection, data evaluation, analysis, and result presentation. Document analysis, guided by Mayring (2002), examines a range of materials, such as texts and official guidelines, using criteria-like document type, content, and origin. Both methods support the analysis of recognition procedures, where recognition is understood both as a process and as a resulting state or outcome.

A criteria grid is essential for comparing different recognition procedures, as it provides a structured approach to objectively evaluate multiple factors. By detailing the specific criteria below, we aim to enable systematic comparison and evaluation of each procedure. This approach helps identify strengths and weaknesses, guiding

stakeholders in improving these procedures and making the decision process more transparent and informative for potential users.

3.2.1 Context of Origin

Souto-Otero et al. (2008) study conducted as part of the European Union (EU) inventory on national recognition procedures for informal and non-formal learning, identifies key drivers behind their emergence. These include economic, social, educational, demographic, and technological factors, along with EU policy developments, growing validation awareness, and the increasing use of qualification frameworks (see Annen, 2012, pp. 206-209).

3.2.2 Objectives

Recognition procedures pursue various objectives, which can be divided into two areas: educational policy and methodological objectives. Educational policy focuses primarily on the type of certification, while methodological objectives distinguish between summative (requirements-oriented) and formative (individual development-focused) approaches. At the European level, common objectives include comparability and transparency, increased mobility, competitiveness, lifelong learning and employability (see CEDEFOP, 2009). In practice, recognition procedures usually pursue several of these objectives simultaneously (see Annen, 2012, pp. 207-210).

3.2.3 Methods

The methods of these procedures are examined across three key aspects: the role of external and self-assessments, the methodological steps, and the specific methods. The analysis distinguishes between ideal-typical process steps (Annen, 2012, p. 218), as previously described (see Table 1).

Methodologically, there are two main procedural approaches (Annen, 2012, pp. 144-147):

- Performance assessment, in which competencies are evaluated through observed performance and then validated, certified, and formally recognized, using observable behaviors as indicators.
- Document review, in which documented competencies guide the process, with each step building on the previous one.

A third, combined approach integrates both methods, assessing both performance and documented competencies. In performance assessments, the individual must demonstrate competence through performance each time. This is not necessary in the document review, as documents offer a degree of transferability.

3.2.4 Stakeholders

Assuming that the stakeholder constellation (in terms of their relationship and interactions) drives action, rather than the individual actor, this criterion's analysis focuses on both the constellation and the functions of the actors. From a governance perspective, concepts such as 'decision-making rights', 'market', 'hierarchy', 'community' and 'network' are used (see Annen, 2012, pp. 182-185), with coordination mechanisms in particular representing classic analytical categories of institutional analysis (Kussau & Brüsemeister, 2007; Altrichter & Heinrich, 2007).

3.2.5 Norms und Standards

Standardization serves different objectives and varies in levels of detail. Standards can pertain to the concept of competence, qualification, or learning outcomes (Annen, 2012, pp. 233-236). According to CEDEFOP (2009) the following types of standards can be differentiated (Annen, 2012, p.11):

- Occupational standards, which specify essential activities and competencies required for occupational tasks.
- Educational standards, which define the expected outcome of a learning process and the educational program, including content, learning outcomes, timetable, teaching methods and learning environments.
- Assessment standards, that specify the object of assessment, procedures, performance criteria, assessment methods and the design of the assessment body authorized to award a qualification.

3.2.6 Decision-Making Rights and Individual Entitlements

The concept of decision-making authority from a governance perspective is used to examine the decision-making rights of the institutional actors involved. Unlike the economic concept of disposal rights, which describes control over (economic) resources, this perspective focuses on the decision-making authority of organizations. These powers determine the authorizations associated with the recognition procedures. The entitlements that individuals gain from these recognition procedures are also analyzed, considering the concept of certification (see Annen, 2012, p. 239).

4. Criteria-Based Analysis of Procedures for Formalizing Professional Qualifications and Competencies Acquired Abroad

The following analysis examines the three procedures for recognizing or validating professional qualifications and competencies, based on the criteria outlined in the previous section.

4.1 Recognition Act

Since 2012, the Recognition Act has granted individuals who acquired professional qualifications and competencies abroad a legal right to have their qualifications assessed for equivalence with German standards —regardless of nationality, place of residence or residence status.

Context of Origin and Objectives

Before the Act, there was no legal right to an individual assessment of foreign professional qualifications. Existing regulations, such as Directive 2005/36/EC (European Union, 2005), were extended to include individuals from third countries or with qualifications acquired there (see BMBF, 2014). For the first time, individuals seeking recognition in one of Germany's dual training occupations (currently about 320) are entitled to an equivalence determination.

- Educational Policy Objective

The Act aims to enhance the economic and labor market integration of skilled workers with foreign qualifications (Bundestag, 2011), while also creating pathways for further qualification within the education system through targeted continuing education.

- Methodological Objective

The primary goal is summative, focusing on determining equivalence based on specific requirements. The procedure allows for the inclusion and comparison of individually acquired competencies with formal qualifications. Formative elements are included through post-qualification options. After a partial equivalence decision, individuals can acquire additional qualifications through work experience or further training. In a new procedure, these newly acquired competencies may lead to full equivalence.

Methods

The competent authority assesses whether a foreign vocational qualification is equivalent to a German one by reviewing documents such as diplomas and training regulations. This external evaluation follows defined criteria, including training content and duration (cf. BMBF, 2014; Böse et al., 2014). As shown in Table 3 (Standard Case), the standard case typically involves document review and a comparison with a German reference occupation. If significant gaps are identified, they may be compensated for through documented work experience or further training (see Böse et al., 2014). In addition to the document review, “other suitable procedures” (Berufsqualifikationsfeststellungsgesetz [BQFG], 2011/2023; Section 14) allow for the recognition of qualifications and competencies that cannot be substantiated with documents. As shown in Table 3 (Exception), this is where the “qualification analysis” (see Oehme, 2012) comes into play. Developed through a Ministry of Education-funded project, this procedure includes tools such as work samples, technical interviews, or trial work to assess professional competencies. As part of the recognition procedure, the qualification analysis requires a formal qualification for admission. If certificates are unavailable, applicants must credibly demonstrate that they obtained the qualification. The qualification analysis is conducted in German, though linguistic aids may be used for support.

The recognition procedure thus integrates formal, non-formal, and informal learning outcomes, with performance assessments complementing document review to provide a comprehensive validation of competencies (see Böse et al., 2014).

Figure 3

Overview of the Recognition Process - Recognition Act

Process of recognition	Identification	Evaluation/ assessment	Validation	Certification	Formal recognition
Standard case	Identification usually not needed, as these formal learning outcomes are clear from diplomas/vocational degrees issued abroad. Only the identification of whether the application requirements are met is necessary.		In general document review: Comparison of foreign qualifications (including informally or non-formally acquired competencies if applicable) with a German reference occupation (criteria: content and duration)	Appealable decision from the competent recognition authority on partial equivalence	Appealable decision from the competent recognition authority on full equivalence
Result	Determination that the professional qualification is fundamentally eligible for recognition and that the requirements for the recognition procedure are met.	-		Partial equivalence	Legal equivalence with the German vocational Diploma or Degree
		-			
Exception ("qualification analysis" - when documents cannot be provided)	Identification required (Credible demonstration of which qualifications were obtained, and how and where they were acquired.)	At this stage, it is assessed whether a successful validation outcome can be expected based on the identified competencies and qualifications.	Performance assessment (methods include work samples, expert interviews, practical and theoretical exams, and expert opinions.)		
Result	-	Admission to the "qualification analysis"		Partial equivalence	Legal equivalence with the German vocational Diploma or Degree

Note: Author illustration, based on Annen, 2012, p. 144. See Table 1 for comparison.

Stakeholders

Chambers responsible for each occupation manage recognition procedures. In the German Vocational Educational and Training (VET) system, “chambers” (competent bodies) are self-governed professional organizations—such as Chambers of Commerce and Industry (responsible for most commercial and industrial occupations) or Chambers of Crafts (responsible for traditional skilled trades, e.g., carpenters, bakers, electricians)—that oversee vocational training and examinations in the dual system and hold legal authority for implementing recognition procedures. To support the implementation of the Recognition Act, advisory structures and central bodies were established and funded. One example is IHK-FOSA ⁵, which centrally handles recognition procedures for almost all chambers of commerce and industry. The Chambers of Crafts have established the so-called lead chamber system. Certain chambers specialize in qualifications from specific countries of origin and produce assessments to support the relevant local chambers.

There is a range of information services and advice centers, each targeting specific groups (e.g. skilled workers abroad) or occupational fields (see BMBF, 2024, p. 4).

Norms and Standards

The equivalence assessment requires proof of a foreign professional qualification recognized by the issuing state. The recognition procedure follows the Recognition Act, which defines required documentation and typically sets a three-month processing deadline. Foreign qualifications are compared to German reference occupations governed by regulated training frameworks, ensuring a standardized basis for comparison.

If significant differences are identified, partial equivalence is granted, although the law does not explicitly define ‘significant differences.’ A consistent interpretation is assumed, given the central role of IHK FOSA and the lead chambers in the process.

In cases where documentation is lacking, competencies can be demonstrated through a ‘qualification analysis,’ for which standards were developed on a funded project. These standards include specific tools for the practical demonstration of existing professional competencies.

Decision-Making Rights and Individual Entitlements

The expansion of decision-making rights for the chambers within the formal education system is established and mandated through legislation. Consequently, the authorities responsible for each profession are also tasked with implementing the recognition procedure.

The outcome of the recognition procedure is communicated through an official decision. When a foreign professional qualification is deemed fully equivalent to the German reference qualification, it grants the same legal entitlements as a German qualification. Partial equivalence may also be awarded; while it does not confer any legal rights, it increases transparency on the labor and training market. Since the occupations considered here are non-regulated and do not require formal licensure, they may be practiced even with partial equivalence (see Tablee 3, “Results”).

4.2 External Admission

External Admission allows individuals with relevant work experience to take the regular final examination for state-recognized vocational training.

Context of Origin and Objectives

Since 1969, the Vocational Training Act (BBiG) and Crafts and Trade Code (HwO) have permitted external candidates without formal vocational training but with relevant work experience to take the final exam, validating their non-formal and informal competencies.

- Educational Policy Objectives

This provision aims to improve the labor market prospects of semi-skilled and unskilled workers by enabling them to obtain vocational qualifications. It also enhances the flexibility of the German education system by providing alternative routes to vocational and trade qualifications.

- Methodological Objective

The admission procedure is summative, evaluating existing competencies against training requirements. Many candidates take preparatory courses before the exam, which include formative elements to support effective exam preparation (see Gutschow & Schreiber, 2013).

Methods

Competencies acquired informally or non-formally are recognized for admission to the final examination - which is normally taken by apprentices after completing their training period - typically through a document review (see Schreiber & Weber-Höller, 2011). Required documents—such as employment references, CVs, and records of further training—must demonstrate substantial, relevant professional experience and align with the occupation's training requirements (see Heinsberg et al., 2016). The validation, as shown in Table 4, is based on the occupational training profile, ensuring that the duration of the candidate's professional experience - which must be at least one and a half times the standard training period - and its content align with the requirements of a corresponding German apprenticeship program (see Annen & Schreiber, 2011, p. 151).

Table 4*Overview of the Recognition Process - External Admission*

Process of recognition	Identification	Evaluation/ assessment	Validation	Certification	Formal recognition
Characteristics	Compilation of all required documents for final exam admission - especially evidence of prior work experience	-	Document review: Comparison of the applicant's documented work experience competencies with the German reference occupation and evaluation of their likelihood of passing the exam (Criterion: Professional experience of at least 1.5 times the duration of the German reference training.)	-	Exam: External participation in the final exam based on competencies gained through work experience.
Result			Admission to the final examination		<i>Entitlement</i> German vocational qualification

Note: Own presentation, based on Annen, 2012, p. 144. See Table 1 for comparison.

However, External Admission is not a validation procedure as defined by European Union guidelines (Heinsberg et al., 2016; CEDEFOP, 2009), since learning outcomes are only confirmed and certified upon passing the regular final examination.

Stakeholders

The governance of External Admission involves multiple stakeholders, each with distinct roles. Chambers play a central role by overseeing procedures, assessing competencies, and ensuring alignment with vocational standards. They also advise candidates on eligibility and may suggest alternative pathways, such as retraining. Public and private education institutions further support the process by offering preparatory courses.

Norms and Standards

Occupational standards define the essential competencies required for a qualification. In the context of External Admission, chambers assess applicants' work experience to ensure it meets these standards. Candidates must have work experience equivalent to at least one and a half times the duration of the relevant training program. These criteria guide the evaluation process to determine whether candidates possess the necessary competencies. The final examination follows standardized regulations, ensuring consistency and comparability across Germany.

Decision-Making Rights and Individual Entitlements

The chambers' authority to decide on the admission of external candidates to final examinations is established by law. They determine eligibility based on predefined evaluation standards.

Once admitted as an external candidate and upon passing the final examination, individuals obtain a full German vocational qualification with all associated rights, including eligibility for further training (see Table 4, "Results").

4.3 Assessment Procedure

Anchored in the Vocational Training Act (BBiG) and the Crafts and Trade Code (HwO), the new Assessment Procedure, which enables the validation of informally and non-formally acquired competencies, came fully into force in January 2025.

Context of Origin and Objectives

In 2015, the Federal Ministry of Education and Research (BMBF) launched the project "Degree-Related Validation of Non-Formally and Informally Acquired Competencies" (ValiKom, 2015–2018), followed by the ValiKom Transfer project (2018–2024) (Bundesministerium für Bildung und Forschung [BMBF], 2014; Böse et al., 2024).

The validation procedures developed within these projects align with qualification analysis principles (see 4.1). Experts from industry, trades, and agriculture evaluated non-formally and informally acquired competencies against recognized training qualifications.

With the new legally established Assessment Procedure, the Federal Government has implemented the EU Council's 2012 recommendation, which mandates all member states to adopt regulations for validating non-formal and informal learning.

- Educational Policy Objectives

This procedure aims to identify and certify vocational competencies that have been acquired informally or non-formally but are comparable to those obtained through vocational training. It ensures these competencies are recognized within the vocational training system.

Such validation is particularly valuable for individuals with lower formal qualifications, as this group often struggles to demonstrate their competencies in a formal examination setting (see Bundestag, 2024).

- Methodological Objective

The Assessment Procedure evaluates existing competencies against the requirements of a specific German occupation, making it primarily summative. However, it also includes formative elements, as the "predominant comparability" result identifies competencies that still need to be acquired for full equivalence. The legal framework allows for a supplementary procedure following further qualification.

Methods

As part of the projects, the application for participation in the validation process initially includes documentation of acquired competencies, including self-assessment (using a dedicated self-assessment sheet). The chamber reviews this to determine which areas require external assessment, which is then conducted by professional experts from the

chambers using practical methods such as work samples, technical interviews, or trial work (as in qualification analysis, see 4.1). Written tests should be avoided whenever possible, a principle that is already legally established in current legislation. According to Section 50c of German Vocational Training Act (BBiG), written tasks should be omitted when other instruments can assess an individual's qualifications with reasonable effort. This is because this approach is particularly relevant for procedures aimed at individuals with professional experience, where the focus is on evaluating practical, work-related competencies rather than theoretical knowledge.

Figure 5

Overview of the Process of Recognition – Assessment Procedure

Process of recognition	Identification	Evaluation/ assessment	Validation	Certification	Formal recognition
Characteristics	Professional competencies gained from prior work experience should be identified for the application (e.g., through a self-assessment questionnaire)	Evaluate whether there is a positive outlook that the result of the Assessment Procedure will be at least 'predominantly comparable'. (Criterion: Professional experience of at least 1.5 times the duration of the German reference training.)	Performance assessment (methods include work samples, expert interviews, practical and theoretical exams, and expert opinions.)		
Result		Admission to the Assessment Procedure	<i>Until 2024:</i> Certificate without legal consequences: Full equivalence or Partial equivalence	<i>Since 01/2015 (as part of the statutory regulation):</i> Predominant comparability With further qualification through a supplementary procedure, candidates can achieve full comparability with a formal vocational qualification.	<i>Since 01/2015 (as part of the statutory regulation):</i> Full comparability -Certification of individual occupational competence comparable to formal vocational training -Specific entitlements within the education system, such as qualification for vocational trainer certification, serving as the admission procedure for the external examination, and eligibility for advanced vocational training

Note: Author presentation, based on Annen 2012, p. 144. See Figure 1 for comparison.

The law stipulates that an Assessment Procedure is conducted only if at least "predominant comparability" can be expected as a result. It can be assumed that the competent authorities (Chambers of Commerce and Industry or Chambers of Crafts) will largely rely on the established assessment instruments from the predecessor projects.

Upon application, the responsible chamber (competent body) will assess and certify an applicant's professional competence if it is predominantly or fully comparable to the reference occupation. Individuals who have received a certificate of "predominant comparability" may undergo a supplementary procedure to achieve full comparability, provided they have acquired the missing competencies.

Stakeholders

When the Valikom project was launched, the competent bodies — chambers of industry and commerce, chambers of crafts and trades, and chambers of agriculture — were selected to introduce and design the validation procedures (see Oehme, Witt & Tews, 2017). These authorities are now also responsible for the newly established Assessment Procedures under the recent legal framework. What is still missing for a successful implementation is funding mechanisms for the assessment procedures and advisory structures.

To support the implementation of the Assessment Procedure, the Federal Ministry of Education and Research (BMBF) has been funding a 'Validation Service Center' since November 2024. The core task of this service center is to build expertise among the implementing bodies and to establish structures that ensure a uniform implementation of the procedure (e.g., defining assessment instruments, quality assurance, and network development).

Norms und Standards

The implementation of the Assessment Procedure will be legally regulated, with the competent chamber responsible for evaluating each applicant's professional competence based on a recognized training occupation. Participants must be at least 25 years old.

To qualify for admission, candidates must provide evidence of work experience equivalent to one and a half times the training period of the reference occupation, along with credible proof of competencies comparable to those required for the corresponding German occupation. While the ValiKom Transfer project initially made no distinction regarding the origin of work experience, current legal requirements mandate that at least half of this experience be acquired in Germany.

The specific requirements and standards for the procedure, including potential assessment instruments, have been defined in a statutory order, developed with stakeholder involvement to ensure a uniform implementation.

Decision-Making Rights and Individual Entitlements

With the legal regulation, the chambers have been granted authority over the implementation of the new statutory Assessment Procedure.

In addition to full equivalence, the projects also allowed partial equivalence; the legal regulation now uses the term "predominant comparability" for this (see Table 5, "Results"). Certificates detail competencies relative to the reference occupation,

improving job market opportunities and enabling further competence development through post-qualification.

Full comparability grants authorization to train apprentices, eligibility for advanced training, and replaces the admission process for external candidates taking the regular final examination (see 4.2). However, it does not confer a formal vocational qualification or legal equivalence.

5. Discussion and Conclusion

Similarities and Differences Between the Procedures

The criteria-based analysis of recognition and validation procedures clearly highlights both similarities and differences (for a comprehensive illustration, see Table 6).

The three analyzed procedures share notable similarities in their objectives: improving employability and creating pathways within the formal education system by obtaining certificates from this system or comparable qualifications. Although primarily summative, they incorporate formative elements by providing guidance on which competencies still need to be acquired to achieve full equivalence (Recognition Act), full comparability (Admission Procedure), or a vocational qualification (External Admission).

The formal education system serves as the common frame of reference for all three procedures, with the chambers as the primary bodies responsible for recognition and validation.

Figure 6

Comparative Synopsis of the Analyzed Recognition and Validation Procedures

		Recognition procedure		
		Recognition Act	External Admission	Assessment Procedure
Analysis Criteria	Educational policy objectives	Obtaining certificates of the formal education system (or at least comparable to these)		
		Focus on labor market integration of foreign-trained professionals; while also creating pathways for further qualification within the education system.	Increase flexibility in the German education system. Enhance professional development and job opportunities for semi-skilled and unskilled workers with relevant work experience.	The aim is to determine and certify the professional competence, which is comparable to a vocational training, and to make it possible to integrate it into the vocational training system.
	Methodological objective	Primarily summative : Existing qualifications and competencies are assessed in comparison to the German reference occupation.		
		Incorporating also formative elements:		
		If the result is "partial equivalence", a subsequent qualification is possible.	Candidates often take preparatory courses before the exam.	If the result is "predominantly comparability", a subsequent qualification is possible.
	Methods	External assessment		
		Document review	Document review	Performance assessment (validation or determination procedure)
		In certain cases: Performance assessment (so-called "qualification analysis")	Admission to and participation in examination	In advance: document review + self-assessment
		All phases	Identification, assessment, validation, certification / formal recognition only after passing the final examination.	All phases
	Stakeholders	For the implementation of the procedures (incl. counseling): Actors in the formal education system Responsible chambers for the occupations (chambers of industry and commerce, chambers of crafts, chambers of agriculture)		
		Wide range of information and advice services, some of which are publicly funded; also specifically for people who are still abroad.	Various providers of preparatory courses.	Validation service center in the planning stage, to support the chambers in implementing the procedures.
	Norms und standards	All procedures rely on regulated occupational standards, focusing on either work experience or foreign qualifications in comparison to German reference occupations. Reference: Current training regulations The procedures follow educational and assessment standards as defined by legal regulations and additional ordinances. The assessment standard differs across the procedures (see 'Methods')		
		Prerequisite is a training recognized in the country of training.	Prerequisite is proof of work experience equivalent to 1.5 times the training period of the reference occupation. Participants must be at least 25 years old.	
	Decision-making rights	Expansion of the decision-making rights of the actors in the formal education system (chambers) through legislation Validation and certification are carried out by institutions responsible for quality assurance and control of (formal) qualifications		
		Notification of (partial or full) equivalence	Vocational qualification (thus entitlements in the formal education and employment system)	Certificate of full comparability or notification of predominant comparability
	Individual entitlements	Authorizations associated with the certificate of full equivalence: Legal equivalence with vocational qualification (thus authorizations in the education and employment system)		Authorizations associated with the certificate of full comparability: Specific authorizations within the education system, such as subject-specific trainer qualification, External Admission to the final examination, and admission to further vocational training.

Note: Author representation according to Typology of the recognition of competencies - distinction between three ideal types (Annen, 2012, p.285)

Despite their similarities and their classification as integrative recognition processes (see Annen 2012), the three procedures differ in key aspects. These differences are most evident in admission requirements, such as vocational diplomas or work experience, as well as in the specific entitlements granted to applicants. While qualifications are issued by the same authorities (chambers), the associated rights at the end of the process vary significantly.

The new legal framework provides the basis for an Assessment Procedure that evaluates informally and non-formally acquired competencies. However, the granted rights are significantly lower than those conferred by a formal vocational diploma. Even when full comparability with a German diploma is achieved, it does not imply legal equivalence, unlike the Recognition Act.

Many other actors—many of them publicly funded—contribute to the implementation of the Recognition Act, particularly by establishing a broad network of information and counseling services for individuals with foreign vocational qualifications. However, no such comprehensive network currently exists for the External Admission or the new Assessment Procedure, nor is one planned.

Limitations

This paper is based on a criteria-driven document analysis, focusing on individuals who have acquired their professional qualifications abroad, in which the three procedures for the recognition and validation of professional qualifications in Germany were examined and compared. The aim was to systematically compare and analyze these procedures, including the methods of validation and recognition used, the entitlements they grant, and to identify their similarities and differences in detail.

No empirical data were collected on the actual use or effectiveness of these procedures, such as through surveys or interviews with relevant authorities or affected individuals; therefore, no conclusions can be drawn about how the three procedures, or the certificates associated with them, impact employment opportunities and the usability of professional qualifications in the labor market, or conduct a comparison to one another.

Official recognition statistics offer insights into the number of recognition procedures completed. Data regarding the procedures carried out under the new Assessment Procedure, introduced in January 2025, will first be available in the vocational training statistics by late summer 2026. However, it will not be possible to determine how many of those undergoing this procedure have gained professional experience abroad. A similar situation exists regarding the use of the option for admission to external examinations. While figures are available, there is no information on how many individuals actually possess professional experience abroad.

Research Implications

The above limitations give rise to several research needs:

Empirical studies on the use of procedures: Further empirical research is needed to investigate the actual use of the procedures. In particular, data should be collected on the groups that select different procedures and their success rates in terms of recognition and professional integration.

Decision-making criteria of applicants: Research should focus on the factors influencing applicants' choice of procedure, such as language skills, willingness to take exams, financial resources, and the need for a visa.

Effectiveness, efficiency, and company perception of the procedures: Future studies should assess the effectiveness of these procedures in terms of professional integration and their recognition by employers. Comparative studies on the impact of different procedures on employability, as well as on how companies perceive and evaluate the certificates issued through these procedures, would be valuable. This is crucial for understanding how these factors affect the employment opportunities of individuals with foreign qualifications.

New assessment procedures: The new assessment procedure introduced in 2025 should be subject to empirical research, particularly regarding its impact on the recognition of informally and non-formally acquired skills. Monitoring the implementation of this procedure and, if necessary, making timely adjustments is important. An evaluation is legally scheduled to take place ten years after its implementation. However, even in preparation for this evaluation, gathering early information on the implementation and any associated challenges would be valuable.

Political implications

The analysis shows that the various recognition and validation procedures use different methods of assessing professional skills. They also entail different rights and thus potentially different opportunities on the labor market, which, depending on the individual circumstances of those with foreign-acquired professional qualifications, may bring both advantages and disadvantages.

Policy measures should aim to provide sufficient information and counseling opportunities that offer comprehensive guidance on all three procedures, outlining the advantages and disadvantages for interested parties and their individual situations. An established information and counseling system already exists under the Recognition Act; however, the other two procedures should also be considered within this system, as they may be equally relevant for specific target groups, particularly those without formal qualifications. This should increase the accessibility and transparency of all three procedures to promote the integration of qualified professionals from abroad. This also includes ensuring that the procedures are affordable or that funding options are available. For individuals already employed and not receiving state support, subsidies could play a crucial role in enabling participation in recognition or validation processes.

To further facilitate access to the labor market and address the skilled labor shortage in many sectors, the new assessment procedure should be better known, particularly to those who could benefit from recognizing informally acquired qualifications and obtaining the corresponding rights.

Currently, the established full comparability of proven skills does not equate to legal equivalence with German qualifications. Given the increasing importance of migration for the skilled labor market, how political measures could incorporate the new validation procedure into skilled labor immigration policies should be explored. Individuals without formal qualifications but with relevant professional experience could greatly benefit from this option.

Practical Implications

The analysis shows that choosing the right procedure for applicants is not always straightforward. It depends on various factors that vary greatly from person to person. Sound advice is essential to support applicants in their decision-making process. In addition to language skills, relevant factors include the ability to acquire theoretical knowledge, financial resources, and the availability of support services.

The choice of procedure should be made carefully, considering individual circumstances. Advisory centers need to expand their competencies to provide comprehensive guidance on all recognized procedures. Advisory institutions that primarily work with the Recognition Act should also offer information on other procedures, as these may be equally important for certain target groups.

Companies should be aware of the positive effects that validation procedures can have on employee motivation and retention. These procedures can strengthen employees' self-confidence and expand their career opportunities, as evidenced by the findings from the ValiKom Transfer Project, which preceded the legal establishment of the Assessment Procedure (see Wirtherle et al., 2021)). For companies to be aware of the opportunities these procedures offer is also important and to support their employees in participating, helping them to formalize their professional qualifications that are not formally recognized in Germany—either because they were obtained abroad and have not yet been recognized, or because they involve competencies acquired informally or non-formally.

In summary, both the external examination and the new assessment procedure offer important ways of recognizing and validating qualifications and skills acquired abroad, alongside the Recognition Act, even though neither procedure was developed specifically for this target group.

If the accessibility and transparency of these procedures are increased, this could improve the qualification-appropriate employment of people with foreign qualifications and facilitate their integration into the German labor market. In the long term, this could lead to an increase in the number of skilled workers settling in Germany and counteract emigration, which would have a positive impact on population development and the economy (see Maier et al., 2021; Maier et al., 2022). Current legal reforms on skilled worker immigration, which in certain cases also allow skilled workers without formal recognition to immigrate (see Bushanska et al., 2023), could further increase the relevance of these procedures.

¹ For more information on the dual system, see: <https://www.bibb.de/en/77203.php>

² For more information, including the structure of the act, see Bundesministerium für Bildung und Forschung (BMBF). (2024).

³ Source: Own evaluations of official statistics according to §17 BQFG.

⁴ The complete typology contains further criteria that were not used here for the comparison of the three integrative types of procedures (see Annen, 2012, p. 285).

⁵ IHK Foreign Skills Approval (<https://www.ihk-fosa.de>)

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