INVENTORY ON THE VALIDATION OF NON-FORMAL AND INFORMAL LEARNING

Country Report 2023: Kyrgyzstan

CONTENTS

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1 Introduction

The validation of non-formal and informal learning (VNFIL) in the Kyrgyz Republic exists in the labour market and is defined as a process of confirmation that an individual has acquired professional competences through non-formal learning and / or in informal setting against a relevant standard for the purpose of obtaining a qualification, which is carried out through an Independent Skills Certification (ISC). The synonyms often used for validation in the labour market are attestation, legalisation and confirmation. Theoretically, VNFIL can be used at all educational levels, i.e. in general education (GE), initial vocational education and training (IVET), continuing vocational education and training (CVET), adult learning (AL), and in higher education (HE), although it is used most frequently in the labour market. Systematic testing of VNFIL procedures and regulations started in the labour market with the support of international funds around 2015 with the significant involvement of the Chamber of Commerce and Industry (CCI). Unfortunately, no relevant national legislation for VNFIL has yet been adopted and the development of ISC in the labour market has practically come to a halt after the ending of foreign support (2021). The industry enterprises and associations together with the educational providers have also started to develop the ISC of their employees, but their activities have been short-lived due to the lack of a national regulatory framework for VNFIL. A positive contribution to testing VNFIL was the approval of the National Qualifications Framework (NQF) in 2021, since it provided for the development of national occupational standards and sectoral qualifications frameworks (SQF) to be used in the ISC system (VNFIL) in the labour market.

The main drivers of VNFIL development in the labour market (i.e. the use of ISC) are the industry enterprises and associations, as the most interested parties. The second interested stakeholder is the Government, as the formalisation of qualifications in the labour market can help greatly in combating the dominance of the informal economy in the country. The third important stakeholder is the population itself, as they need to prove their skills, e.g. to find a better job or for the purpose of labour migration. The obstacles to a significant advancement of VNFIL can be classified into normative, institutional, financial and geographical ones. Moving forward in the development of VNFIL requires mutually agreed (consensus) decisions of the key stakeholders based on the hybrid social business model of independent skills certification, i.e. pursuing a social mission while relying on a commercial business model. Such a hybrid approach can generate income in ways that are more consistent with a for-profit model, but abide by substantial social missions associated with non-profit models.

2 National perspective

2.1 Overarching approach to validation

As already mentioned, VNFIL in the labour market is defined[1] as a process of confirmation that an individual has acquired professional competences through non-formal learning and / or in informal settings against a relevant standard for the purpose of obtaining a qualification, which is carried out through the ISC.

Informal and non-formal types of learning are widespread in the Kyrgyz Republic as a consequence of the extremely high share of the informal economy, with more than 70% of the labour force involved in this sector which is characterised by unregulated relations (President of the Kyrgyz Republic, 2021). The ADB project 38298-023 (Asian Development Bank, 2020) indicated that in 2017 the number of workers with formal VET qualifications was at only around 18%, i.e less than 450 000 people of the employed population.

The *Law of the Kyrgyz Republic on Education* (August 2023) does not explicitly contain rules and regulations for dealing with non-formal and informal learning, although it entitles citizens to undergo validation and to receive a document confirming the qualification. The procedure for validation is prescribed by the authorised state body in the field of education together with the authorised state body in the field of labour, sectoral associations and employers. The individual learning curriculum in Kyrgyzstan usually does not only imply a free choice of a very limited set of elective subjects and modules within some educational programme designed in accordance with the State Educational Standards (SES). The individual learning curriculum is designed to give applicants the freedom to attend / not attend classes and to use other forms of learning - non-formal and informal (work-based) learning - to achieve qualifications in a formal educational organisation. An extreme variant of the individual learning curriculum is possible in the form of an externship, where the applicant does not attend the programme at all. In such a case it is necessary to undergo checkpoints, mid-term and final assessments based on the knowledge and skills acquired in any way outside the formal organisation.

The important document on the issue of current VNFIL development in the country is the *Programme[2] for the Development of Education in the Kyrgyz Republic for 2021-2040* (Government of the Kyrgyz Republic, 2021a) adopted in 2021. It provides official data on the rate of development of the non-formal education sector. A total of 1 443 legal entities have been granted licences to conduct 5 884 non-formal (additional) study programmes between 2014 and 2019 (covering not only VET and AL but also various courses for students outside of GE), when the system of perpetual licensing of educational activities began to operate. This Programme does not directly address VNFIL issues at IVET or HE level, but it can serve as a framework, in particular for describing issues in the fields of AL and CVET such as: insufficient partnership mechanisms between the formal and non-formal educational sectors; limited access to AL and CVET in the regions due to lack of providers offering in-demand programmes; a lack of a culture of 'lifelong learning' (LLL) in the society; a lack of a methodology for analysing the learning needs of the adult population, including those with disabilities; and a lack of statistics on the coverage of citizens in non-formal and informal learning that does not involve the issuing of state-approved documents. In order to overcome the negative trends, the Programme identified the following policies related to the area of non-formal and informal learning for the coming years: establishing links between educational institutions of further education and employers through ISC; building a system of quality assurance (QA) in accordance with the National Qualifications System (NQS) (Government, 2019b). Most importantly, a model system for the formal recognition of qualifications, knowledge and skills

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[1] Chamber of Commerce and Industry of the Kyrgyz Republic, available at https://cci.kg/nezavisimaja-sertifikacija/nspk-v-voprosakh-i-otvetakh.html
[2] The Programme (Government, 2021a) builds on the earlier Programme for the Development of Inclusive Education in the Kyrgyz Republic for 2019-2023 (Government of the Kyrgyz Republic, 2019a), which aimed at raising public awareness of inclusive education and ensuring the rights of learners with special educational needs through 'legal recognition of variable forms of education and technology to support learners with special educational needs' in education, taking into account the need for financial, legal and management support.

acquired non-informally and on the basis of professional experience should be developed within this Programme under the leadership of the Ministry of Education and Science (MES) by 2023 at the latest.

It should be noted that the certification gained through VNFIL is expected to equal the certificate gained through traditional training. The strategic plans of the MES include the development of a system of independent quality assessment of VET, including the certification of graduates based on the NQF and VNFIL, the establishment of a system of official recognition of qualifications, and knowledge and skills acquired informally and on the basis of professional experience in adult education (Government of the Kyrgyz Republic, 2021f) until 2030.

The most important contribution to the launch of VNFIL concept and procedures in Kyrgyzstan came from a decree of the Government (2019b) introducing the *Concept of the National Qualifications System in the Kyrgyz Republic* and later by adopting a 9-level NQF in September 2020. The NQF enshrines directly the possibility of flexible learning and development pathways for qualifications, taking into account all possible forms and types of learning, allowing for a combination of formal, non-formal and informal education in VET, HE, and AL. The NQF, where the learning outcomes of each level of qualification are reflected by descriptors and form the basis for the assessment and recognition of learning outcomes through formal, non-formal and informal learning, is a result of a successful contribution of two main official leaders of the NQS – the MES and the Ministry of Labour, Social Protection and Migration (MLSPM). It was the *Concept of the National Qualifications System* that formally announced in 2019 that it should promote LLL by increasing access and targeted investment and by recognising non-formal and informal (spontaneous) learning.

Although the NQS-related documents do not explicitly introduce the term 'validation', these documents nevertheless provide the basis for skills recognition and certification and other mechanisms that link education and training to the labour market and civil society, regardless of how these skills have been acquired.

Another important actor is the CCI of the Kyrgyz Republic, which did not so much set regulatory policies as it created action plans and introduced validation through the ISC[3]: 'the assessment of the availability of knowledge, skills and abilities, as well as the appropriate behaviour for solving professional tasks of the established level by an independent competent body'. In 2015, the CCI together with GIZ-GOPA began the work on the development of the ISC system in the Kyrgyz Republic for graduates of the VET institutions and other categories of citizens who have completed various forms of learning. The ISC aims at testing practical and theoretical knowledge and skills in accordance with qualification levels and subsequent certification. An important outcome of the joint work was the endorsement by the CCI of two provisions: *Regulation on the Independent Certification of Professional Competences* and *Regulation on the Coordination Council for the Independent Certification of Professional Competences under the CCI of the Kyrgyz Republic* (2015a, 2015b). The rule is that the ISC is a voluntary and inclusive procedure for 1) people who have successfully completed a full course of relevant vocational training, 2) people with disabilities who have no medical impairments and have completed a full course of vocational training, and 3) people who are willing to demonstrate their knowledge, skills and abilities without relevant education but with sufficient practical experience.

In the documents mentioned above, the notion of validation and the definition of its place in the qualifications and education systems in the country is primarily meant to strengthen upskilling and AL policies. In particular, the aforementioned educational organisations of non-formal learning (1 443 legal entities) are focused on training pre-school and school-age children and upskilling adults with a low level of skills, knowledge and competences, for example, those who have left IVET without completing secondary or post-secondary education or equivalent, to acquire a wider set of skills, knowledge and competences relevant for the labour market and for active participation in the society as indicated in the Upskilling Pathways Recommendation (EU Council Recommendation, 2016). Accordingly, from an economic perspective, the development of VNFIL is beneficial to the state - the recognition of people's knowledge and skills through VNFIL helps them move out of the informal economy.

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[3] CCI. Independent certification of professional competences in questions and answers, available at
https://cci.kg/nezavisimaja-sertifikacija/nspk-v-voprosakh-i-otvetakh.html

2.2 Validation in education and training

Standard-setting initiatives in the field of VNFIL are at an early stage. There are only some references (Government, 2021a) to the possibility of introducing VNFIL into the education system at different levels (IVET, CVET and AL). Moreover, the pressure on society from the informal economy, which is not taxed or controlled by any form of government including the MES, is not yet conducive to the development of VNFIL in the education system. The informal economy includes a wide range of economic activities, from street vending to domestic work to small-scale manufacturing, where formal qualifications and VNIFL may not be relevant or considered. But specific knowledge and skills are very much in demand, which forces people to learn something quickly in order to demonstrate their skills directly in the workplace. As a consequence of this situation, there are many players in the education market providing various non-formal education in the form of courses, workshops, etc., including through formal educational organisations of the mainstream GE, IVET, CVET, AL and HE. However, introducing procedures and systematising validation itself has yet to be fully accomplished. To promote the concept of VNIFL, in August 2023 a Decree No. 431 *'Regulation on the establishment of the "Centre for Independent Certification and Validation" under the Ministry of Education and Science'* (Government, 2023) was issued. This is a subordinate centre of the Ministry of Education and Science of the Kyrgyz Republic that should carry out activities aimed at improving the quality of vocational education through independent assessment of skills/qualifications, as well as recognition of non-formal learning.

The drivers of the introduction of VNFIL into the education system so far are foreign organisations (DVV, 2020; GIZ, 2017, 2021a, 202b; ADB, 2020). What is worth mentioning is the GIZ project 'Promoting employment and vocational qualifications' (2017) which aimed at developing short-term vocational training to give unemployed people skills and qualifications relevant to in-demand areas in the labour market. Another undeniable impact on the education system was seen in the DVV International project, which introduced methodological frameworks, such as the 2022 edition of the manual on basic approaches in AL (Ashimova et al., 2022), including the coverage of VNFIL. These projects all contributed to the introduction of terms such as: validation, non-formal and informal learning, non-formal self-learning, among the employees of ministries, agencies, employment services, enterprises and educational organisations involved in the projects. In addition, ISC centres were established, and validation procedures were tested, which is described in more detail below.

There have been some attempts to introduce the concept of VNFIL into the HE system through training regulations, for example, in the Kyrgyz National University (2022), but no procedures have been created yet. Despite the absence of regulatory rules, VNFIL in the education system is implemented for students of educational organisations by agreement with teachers of a particular discipline or module, without involving the administrations of organisations in these matters.

An interesting limitation is related to the geographical features of the education system: most vocational schools (Level 3-4 of NQF) are located in rural areas (56%), and most colleges (Level 5 of NQF) are located in cities (96%), so there may not be a competent organisation capable of conducting validation in a particular region of residence. In addition, there is a large movement of the labour force, including migration processes, where young people leave the country to work for extended periods, and when they return, the skills acquired abroad differ significantly from those that can be validated through the ISC. On the other hand, it is often migrants who request VNFIL to somehow prove their qualifications before travelling to another country.

In general, there are trends in education towards the development of VNFIL at national level through regulatory mechanisms. The VET system has been piloting for several years an ISC model for graduates (in the post-Soviet era, a VET qualification is an educational qualification and it is not identical to the qualification obtained in the ISC system, based on occupational standards and sectoral requirements), as well as the validation of non-formal learning, supported by the GIZ since 2015. Initiatives to establish regional or sectoral VNFIL systems have arisen so far mainly within the framework of the ISC in the labour market, although of course they rely on and cooperate with the education sector. It is to close these gaps (at least within the educational system) that the above-mentioned Centre for Independent Certification and Validation under the Ministry of Education and Science of the Kyrgyz Republic was

established, whose tasks include defining the framework conditions for the development of an independent certification and validation system, "organising the work on independent certification and validation of professional qualifications"[4], organising the activities of expert groups to develop forms, procedures and materials for independent certification and validation, preparing material and technical support for the development of the independent certification and validation system. Despite significant progress in the system of regulatory documents, this provision does not contain opportunities for validation of informal learning. The regulation does not contain references to occupational standards, the national qualifications framework, and other established elements of the national qualifications system. The requirements/standards against which the assessment should be carried out are also not yet defined (the default seems to be educational standards).

To talk about the possibility of awarding full formal or partial qualifications, credits or modules, in education, relevant changes are needed in the legislation on education. So far, a rapid development of non-formal education can be observed, through the emergence of an increasing number of non-formal educational organisations, which provide various upskilling courses with the issuance of certificates. The high demand for non-formal continuous professional development courses is caused by the greater flexibility and responsiveness of non-formal educational providers to the demand emerging in the education market, whereas formal educational providers are slower and offer traditional courses based on their large, licensed programmes. At the same time, there is competition for the development of not only upskilling courses, but also reskilling by formal educational organisations in a shorter time with the issuance of retraining documents, almost equal to a full formal or partial qualification. And they all have their own market, because education in Kyrgyzstan is still developing and the number of people with qualifications acquired through education is clearly insufficient for the country's economy, and many citizens aim for education that is beneficial to do a certain job.

An important initiative observed in IVET is the approval of the Template of the State Educational Standard for IVET (Government, 2018a), revised in October 2022. The Template has introduced the notion of an integrated curriculum as a programme providing training with recognition of prior learning outcomes at an accelerated pace. This document further stipulates that in order to be admitted to an IVET organisation, applicants must have one of the following documents: a) a secondary general education certificate; b) a certificate of basic general education; and c) another document attesting to the award and recognition of qualifications aligned with the NQF. The latter suggests that a person can provide a certificate of qualifications obtained through the ISC system. In addition, by providing the possibility to create an integrated curriculum for a graduate of an IVET organisation, applicants can both start and continue their career with other integrated IVET programmes (3-4 level of NQF) and even in a Secondary Vocational Education and Training (SVET) organisation (4-5 level of NQF) represented in the country by colleges, often at universities.

Unfortunately, there are no such norms in the Template of the State Educational Standard for SVET (Government, 2018b) revised in 2022. This template is expected to be updated so that the norms regarding the recognition of prior learning and an integrated curriculum are aligned for IVET and SVET.

Although there are no clearly defined norms for validation in education at national level and, as a consequence, there are no such norms in the relevant regulations at the level of educational organisations, this does not mean that validation is not carried out in practice, especially in organisations providing IVET, CVET and HE. The Law on Education speaks of the possibility of forming an individual learning pathway for each learner and introduces the concept of 'externship' as a form of independent study by learners of disciplines according to the main educational programmes with subsequent attestation (current and final) in the relevant educational organisation. There is no formal learning environment for the externship in Kyrgyzstan. In line with these considerations, almost every educational organisation is confronted with special cases in which learners have already had some non-formal or informal learning and there is a requirement for them to individualise their educational pathway within disciplines or practical modules, recognising this prior learning and awarding credits. In some cases, there is a need for individualisation of learning pathways when students undertake parallel learning outside the home institution. This is most common in IT, design, car services, English (students

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[4] Exactly as written in the document (Government, 2023)

demonstrate TOEFL or IELTS certificates), Chinese and other languages. In order to implement VNFIL, the educational institution establishes the relevant committee(s) by internal order, which ensures the impartial validation of the knowledge and skills acquired.

All these different forms of VNFIL take place within the learning process, without awarding full formal or partial qualifications. There is another option of building an individual learning pathway through an externship, making it possible to obtain a full formal qualification through VNFIL up to the final examination. According to current regulations, a student can take an externship and carry out a consistent validation of the knowledge and skills acquired through non-formal and informal learning in agreement with the educational organisation only when authorised by the MES.

Many educational organisations are constantly confronted with proactive students and forced to consider their needs outside the framework of formal education and the desire for flexible trajectories. As Kyrgyzstan is a country with flexible informal economic relationships in society, a similar flexibility is also visible in VNFIL, which is provided by agreement between a student and a teacher at the request of the student. For example, a student is enrolled in an IT programme and already has experience in C++ programming. Such a student can apply to the teacher of C++ programming for a credit without attending a class, by completing either an appropriate test or individual work to prove the skills. Educational institutions are not always receptive to these initiatives, as the cost of tuition is linked to academic hours of study, and the granting of credits through VNFIL reduces the cost of tuition for the educational institutions.

2.3 Validation in the labour market

Labour market initiatives play a crucial role in the development of VNFIL at national level, mainly by involving foreign partners. A major contribution to the involvement of the Public Employment Service (PES), through cooperation with enterprises and the CCI in the processes of upskilling citizens for employment, followed by validation, was made through the project 'Promoting employment and vocational qualifications in Kyrgyzstan' launched in 2017 and continued in 2021 (GIZ, 2021a). This project is extremely significant as the percentage of youth unemployment in Kyrgyzstan reached almost 16% in 2019 (according to the National Statistical Committee of the Kyrgyz Republic)[5]. The project provided vocational training courses in cooperation with the regional PES at vocational lycées targeting also unqualified youth and youth unemployment in 2021-2023. Training is offered in the following areas: electric and gas welding, for plasterers with insulation skills (energy-efficient construction and renovation), plumbers, vegetable growers (greenhouse), seamstresses, and cooks. In the new project phase, the focus is on introducing and implementing a partnership model for vocational guidance and counselling, as well as developing and disseminating new short-term vocational training courses that are in demand. Additionally, independent skills' certification and validation procedures in the selected pilot regions have been tested with the ISC approach developed by CCI in the framework of the same GIZ project[6], i.e. the confirmation by a competent body authorised by a sectoral organisation that the demonstrated skills of an employee meet the requirements of an established standard (draft standards were used in the testing). It can be an occupational standard or sectoral requirements which have not yet reached the level and approval in the form of an occupational standard.

The aim of the ISC is set to 'identify what the individual knows, understands and is able to do, assess these results, relate them to the NQF and occupational standards in the given field of work and ultimately decide on the award of a vocational qualification'. According to the rules, the ISC is open to both employed and unemployed citizens – those who have completed a vocational training course, those who have health limitations but are still able and willing to learn and work, and those who are willing to demonstrate their knowledge and skills acquired without special education but with sufficient practical experience.

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[5] MLSSM, German Society for International Cooperation (GIZ), available at https://mlsp.gov.kg/giz/
[6] CCI, available at https://cci.kg/news/1/1400.html

The Coordination Council for ISC under the CCI (CCI, 2015b) was created specifically for this work. It should develop and coordinate the system of ISC in the Kyrgyz labour market. It consists of representatives of MLSPM, sectoral councils (at least Agriculture, Catering and Food Processing, Beauty Industry, Machines and Mechanical Engineering, and other), and enterprises. The adopted rule is that the content of the ISC should be determined by the occupational standard or occupational requirements of the relevant qualification level. If persons with disabilities are certified, their special situation is taken into account during the competence certification process. The existence of a disability or impairment should be documented or visually assessed at the time of registration for the ISC. However, despite the rather clear rules developed for the establishment and operation of the sectoral ISC centres, their operation has not been widespread. Virtually all of the centres established in 2017-2020 ceased to operate after the end of funding from foreign partners. A successful example of implementation of ISC (validation in the labour market) relates to the sector of catering and food processing (see Example 1), which is still in operation.

Example 1. Independent Skills Certification in catering and food processing

Sectoral Centre for Independent Skills Certification (SCISC) in food processing/catering

ISC services can be provided by the Sectoral Centre for Independent Skills Certification (SCISC) in food processing/catering, which received an impetus for its development as part of the GIZ project. The SCISC works in conjunction with the National Catering Association and vocational schools, in particular, Vocational Lyceum No.18, which provides the premises, equipment, helps with the preparation of test items and provides the staff to organise trial testing. The aim of the SCISC is to ensure that the results of the ISC provide the recognition of learning outcomes regardless of how they were obtained and thus increase the employability of citizens. From the Centre's point of view, the certification does not replace or challenge vocational education but confirms the skills of an applicant against the current requirements of employers and regulations.

Their website continues to operate and contains basic information for potential clients: explanation of what ISC is, how and where to take the ISC exam, the steps to pass the exam, instructions on how to pass the ISC exam, required documents from the applicant, the appeals (complaints) procedure, the certification application form, assessment procedures, ISC Questions and Answers, and other services.

Source: https://nspk-povar.kg/ and https://cci.kg/news/1/1400.html

Another less successful example (since it is not operational anymore) can be drawn from the beauty industry in Kyrgyzstan. The ISC was conducted by the CCI together with the MLSPM, MES, Ministry of Economy and Commerce (MEC), business associations with the support of GIZ, in particular with the participation of the Association of Beauty and SPA Industries[7].

The ISC procedures (as described on the websites of CCI and SCISC) include all four validation stages: identification, documentation, assessment and certification (Cedefop, 2015). If applicants fail to pass the qualification examination, they receive advice on how to prepare for examination next time. The rules of procedures are communicated to the applicants at least two weeks before the qualifying examination.

The ISC initiative launched by the CCI is not aimed solely at labour market purposes as cooperation with the educational organisations is welcomed by the CCI, especially with vocational schools (lyceums). When organising ISC centres, the sectoral associations rely on the resources of their cooperating training organisations, as at minimum methodologists are needed to draw up occupational standards, sectoral requirements and assessment standards. An organised test space is also required, which is

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[7] Association of Beauty and SPA Industries, available at https://www.instagram.com/apix.kg/

very similar to the learning environment available in the educational organisations. The educational institutions, for their part, are beginning to adapt their educational process to the articulated requirements of employers, which are beginning to clearly manifest themselves in the examination programme. It should be noted that the rules and mechanisms described here are just beginning to take shape in the country, with varying degrees of success. What usually happens is the following: an initiative emerges, followed by establishing the rules to govern the associated processes, however, when leadership changes occur, often everything stops. Subsequently, under market pressure and with the emergence of new initiative actors, development resumes only to repeat the cycle once again. Unfortunately, the CCI's initiative to keep statistics on the ISC and a register of certified nationals did not survive beyond 2015-2016. Similarly, the experiments in the beauty industry, the catering industry and in another six sectors are currently in a 'dormant state', since no nationally standardised rules, tools and templates for VNFIL/ISC have yet been created in the country.

The fact that informal relationships to a large extent still define business relationships in the country, not only creates difficulties for formalising and establishing VNFIL arrangements but also in for moving the entire economy away from informal relationships[8]. Therefore, there are only a few employers which have the resources and expertise to contribute to VNFIL initiatives.

2.4 Validation in the third sector

In recent years, there has been an increase in the number of organisations, including private companies, non-governmental organisations (NGOs) and youth and voluntary organisations, which offer training, often in 'soft skills' such as team building, leadership, guerrilla marketing, sales training, which are rarely provided by the formal system. The third sector traditionally provides opportunities for non-formal and informal learning, with certificates at the end of the training, but it does not offer formalised verification and certification of this learning, and therefore, is not part of the formal education system or the ISC system developed in the labour market.

It should be stressed that only formal education providers or organisations registered within the ISC system can issue a certificate/diploma or award a qualification through the ISC system. The third sector organisations provide their own certificates and the skills acquired can meet national qualification requirements, and formal education providers through their procedures may validate these.

As an example, the Kyrgyz Adult Education Association[9] provides training to an average of 5 000 citizens annually. This organisation has also been developed through the sponsorship of DVV International, GIZ, USAID and other organisations. The Association formulates its mission as promoting the welfare of the population of the Kyrgyz Republic through the development of non-formal learning. Courses are offered in various areas: English, sewing, welding, accounting, tourism, hospitality and many others.

The certificates obtained in this way can often be seen with students of educational organisations (especially part-time students) presenting them to teachers when studying similar disciplines. VNFIL is not yet seen in the third sector, but non-formal learning certificates are used by students in formal training organisations to validate their skills acquired outside the home organisations.

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[8] Interview with Munara Kozhomkulova, Secretary of the National Qualification Council (Bishkek), 22/02/2023.
[9] Kyrgyz Adult Education Association, available at https://kaea.kg/

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3 Links to the national qualifications framework (NQF)

The country adopted a decree on a 9-level NQF in September 2020, updating the concept adopted in 2016 (Government, 2020) as indicated in the ETF report 'National Qualification Framework. Kyrgyzstan' (2021). The framework[10] includes qualifications from GE, VET, HE, and AL. The Government of the Kyrgyz Republic went further and in 2021 introduced additional provisions on the *Methodology for Developing a Sectoral Qualifications Framework* (SQF) (Government, 2021b), which defines the rules for the establishment of SQFs, with only one SQF 'Education' being approved so far. The country has developed several methodological tools, and piloted occupational standards, curricula, and validation of non-formal learning. 'However, stakeholder engagement is for the time being limited to a narrow set of actors and institutional arrangements are not yet settled.' (ETF, 2021)

In general, the MES and MLSPM lead the development of the NQF and the wider NQS strategy, but the National Qualifications Council (NQC) was formed in 2021 (Government, 2022a) to directly manage the development of NQS, to ensure interaction between all stakeholders (government agencies, labour market representatives, education providers, international organisations, etc.) for the comprehensive development of elements of the NQS, to ensure consistency and transparency of procedures, their comparability with international methodologies and recognition of qualifications through the ISC in the labour market and VNFIL in education.

The register of sectoral qualifications frameworks available on the website of the MLSPM contains so far only one sectoral framework in the field of 'Education'. In addition, there are thirty approved occupational standards from various industries. At least twenty standards are pending approval[11]. Based on these and other standards, VNIFL could potentially be deployed if the necessary regulatory framework is adopted.

Kyrgyzstan's NQF is defined as a very flexible framework (Government, 2020). The main elements of the NQF are qualification levels, qualification level descriptors, varied pathways to qualification levels, and assessments from formal learning to determine the academic workload of achieving a qualification level. The NQF descriptors are defined as being general enough 'to cover all types of education, including non-formal and informal, to reflect contemporary types of qualifications'.

The NQF levels are described in learning outcomes.[12] Importantly, the NQF Regulation introduces the concept of a 'unit of qualification' as one of the elements (modules) within a course or programme of study, the acquisition of which leads to an approved document (certificate). This means that it is possible to validate some skills as part of a unit of the whole qualification. However, this concept is not further developed, i.e. a partial qualification still cannot be awarded. The expert community and Government representatives are discussing how to improve the NQF by introducing partial qualifications and micro-credentials.

Qualifications in the Kyrgyz Republic are linked to credits. The workload to achieve a qualification level in formal learning is defined within SQFs and occupational standards. For qualification levels 1-4, the workload is measured in hours. For qualification levels 5-8, the workload is measured in credits. The number of credits of SVET and HE levels corresponds to the SES, according to which 1 credit is equal to 30 academic hours. The workload of qualification level 9 is not formally fixed.

Learning outcomes acquired through non-formal learning and confirmed by certificates require validation when presented in a formal training organisation. Similarly, in the case of the ISC in the labour market,

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[10] The approved NQF is based on the adopted Concept of the National Qualification System (NQS) in the Kyrgyz Republic (Government, 2019b) and the subsequent development of the NQS Action Plan.
[11] https://mlsp.g.kg/ru/reestr-professionalnyh-standartov-2/
[12] In accordance with the NQF Regulation, each NQF descriptor offers a general statement of expectations regarding the educational achievements and abilities typical of a qualification, indicating the completion of learning or a particular stage of learning. In turn, the descriptors provide information on what is appropriate for the learner at each level of education and describe the learning outcomes.

while these certificates are taken into account in the admission to the qualification exam, the exam still has to be taken.

4 Standards and reference points

Kyrgyzstan manages its education through the SES for all main levels of education GE, IVET[13], SVET[14], and HE. Accordingly, if there is a need for VNFIL through the education system, the requirements of the SES are used. These standards are constantly undergoing changes and many of them were last updated in 2022. A list of educational standards can be found on the website of the Ministry of Justice[15] of the Kyrgyz Republic: IVET (Government, 2018c), SVET (MES, 2019), HE (MES, 2021). The educational standards are created based on general methodologies set out in Templates (Government, 2011, 2018b, 2022b), which define various learning parameters, in particular the use of learning outcomes, general and professional competences. The list of vocational competences for IVET and SVET is drawn up on the basis of the NQF in the respective vocational field. The HE (Government, 2011) operates with a more complex classification of competences, highlighting general scientific competences, instrumental competences, professional competences, socio-personal competences and general cultural competences.

Despite the presence of employers' representatives in the education and training process, there is a lack of clarity about the requirements which employers place on the graduates of IVET and SVET providers entering the labour market, also due to the lack of approved and registered occupational standards in the Kyrgyz Republic (Government, 2021c). To alleviate these difficulties, in 2021, the Government established a general *Methodology for the development of occupational standards* (Government, 2021d) based on a functional analysis of work functions. Occupational standards have been developed by working groups including representatives of business and education, in terms of work functions with a necessary list of knowledge, skills and competences for a particular occupation. The total number of SQF and occupational standards that were approved and registered by the MLSPM are one SQF (Education)[16] and thirty occupational standards[17]. About 20 occupational standards are at the approval stage.

The ISC recommends using occupational standards as reference points and to create verifiable learning outcomes based on the requirements of the occupational standards. Since so far only three occupational standards have been developed, the labour market certification (ISC) may have some flexibility depending on the competences of the training staff / certification organisations and, in particular, their understanding of the content of the professions and the employers' requirements. The choice of the reference points for validation should be done in theory in accordance with the occupational standards. But as there are still very few of them, the ISC centres have tried to launch certification by using the sectoral requirements formulated by the key stakeholders in the industry through sectoral associations and educational organisations engaged to develop test procedures (as described in Example 1, where the requirements for certification are defined by the Catering Association in agreement with IVET organisations).

Competence frameworks in the Kyrgyz Republic are still rare, and only the framework developed worldwide in the project Curriculum globALE (UNESCO, 2021), launched by the DVV in 2019 in particular also for Kyrgyzstan and Central Asia, and which sets out a basic qualification framework for adult educators can be discussed now. How this framework will be used in the work of the Kyrgyz Adult Education Association and its 15 AL centres remains to be seen.

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[13] IVET is generally provided by vocational lyceums where qualifications at NQF levels 2-3-4 can be obtained.
[14] SVET is provided by colleges at NQF level 5, where in some cases it is possible to study at post-secondary level approximately equal to the first and second year of a Bachelor's degree.
[15] The Ministry of Justice is responsible for registering and officially publishing educational standards as all other legislative documents issued by government bodies.
[16] Register of sectoral qualifications frameworks, available at https://mlsp.gov.kg/reestr-otraslevyh-ramok-kvalifikaczij
[17] Register of occupational standards, available at https://mlsp.gov.kg/reestr-professionalnyh-standartov/

5 Organisations and institutions involved in the validation arrangements and their coordination

The development of VNFIL systems in the country is at an initial stage. The main players in this field are government organisations (the MES, MLSPM, MEC), labour market stakeholders (e.g. the CCI, sectoral councils and unions such as the Public Association of Kyrgyz Evaluators, the National Catering Association, the Mining and Metallurgy Union of Kyrgyzstan, the Association of Builders 'Kyrgyz Imarat', etc.) and international organisations, whose influence has played an important role in the development of VNFIL-related terminology and organising experimental trials.

The distribution of roles can be described more specifically by an example of establishing the system of ISC in the field of real estate valuation activities (see Example 2).

Example 2. ISC for valuation market professionals

Validation arrangements and their coordination of ISC for valuation market professionals

The main actors involved are as follows:

(1) independent valuation specialists and companies whose services are needed in various transactions of movable and immovable property, cadastral valuations, insurance valuations, forensic expertise, etc. As the valuation market develops, it became clear that there was a need for associations of evaluators and relevant laws regulating their activities. This is how the **(2)** the Public Association of Kyrgyz valuators and the Association of Legal Entities 'Kyrgyz Association of valuators' emerged. This important commercial activity cannot be without the supervision of the Kyrgyz Republic, whose **(3)** Parliament in 2021 adopted the Law on Valuation Activities (2021). For historical reference, we will point out that all these processes began back in 2003 with the approval of the provisional rules for the activities of evaluators and valuation organisations defined by the **(4)** Government of the Kyrgyz Republic. The new law introduces the concept of 'certification' as a mandatory procedure to confirm the appropriate level of qualifications and professional knowledge of the valuator to carry out valuation activities, and the 'qualification certificate' as a document issued in the prescribed manner and confirming that the valuator has the qualification and professional knowledge necessary to carry out valuation activities.

Strategic management of valuation activities under the law is transferred to the Government of the Kyrgyz Republic with the authority to adopt regulations in the field of valuation activities, determining the procedure for certification of valuators and others, as well as the approval of valuation standards in respect of which the valuation is carried out. To implement this law, valuation standards have already been developed and approved by the Government of the Kyrgyz Republic, in respect of which the valuation is carried out: business, real estate, machinery and equipment, etc. The national valuation standards are based on the concepts and provisions of the International Valuation Standards (IVS)[18]. Standards of this type do not belong to occupational standards and are developed to establish procedures and rules for conducting property valuation. Sectoral qualification requirements for valuators, developed by 2 Associations of valuators together with the Institute of Innovative Professions (IIP), are based on these standards and are created to assess the knowledge and ability of candidates to correctly apply established procedures and rules of valuation.

In 2022, the Government of the Kyrgyz Republic adopted the *Decree on the Procedure for Certification of valuators* (Government, 2022c), which defines the following concepts: a qualification examination – the procedure for assessing the knowledge, skills and abilities of applicants; a qualification examination programme – a set of topics grouped into sections of examination questions required to confirm the qualifications of applicants for a qualification certificate; **(5)** an examination committee – established by the

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[18] International Valuation Standards Council, available at https://www.ivsc.org/

authorised body to carry out the qualification examination. In this case (**6**), the MEC is defined as the authorised body. Prospective candidates eligible for the ISC procedure shall have a university degree in valuation (i.e. formal education in this field), or other HE degree if they have completed non-formal learning (retraining or advanced training) in valuation. In addition, higher categories of appraisers require 2 to 5 years of work experience in valuation (i.e. require informal learning in a work-based learning mode).

Once all the ISC entitlements in the area have been completed, the question arises as to who will do the certification. Section 2.3 briefly describes the certification system in the catering market and the establishment of the SCISC with the participation and training provided by GIZ. In this case, there was no foreign funding and the MEC had to find an acceptable format to organise the certification process and the qualification examination. This was undertaken by the (**7**) private Institute of Innovative Professions (IIP), which was the first HEI in Kyrgyzstan to issue awards in 'Property valuation and Management' and 'Real Estate Expertise and Management'. The collaboration of the Associations of valuators with MEC and IIP has been fruitful, as many of IIP's graduates work both as valuators and in public bodies, including the MEC, and conversely, graduates who have gained experience in the valuation market now work as guest lecturers at IIP, teaching new students. The collaboration resulted in the creation of a syllabus for the qualification exam and tests developed by IIP lecturers, coordinated with the Associations of valuators and the MEC, supervisor of ISC in this field. The resulting knowledge base is presented in the form of computer-based tests with a total number of about 600 tasks, graded for different categories and levels of valuators. When taking the qualification examination, the computer system randomly generates a certain number of questions and tasks that applicants must solve and upload back into the computer system. Neither the IIP teachers nor anyone else knows what set of questions any applicant receives. The next step in the development of this system will be the creation of a modern proctoring management system.

Occupational standards in the field of valuation are still in the process of being developed.

If we consider the VNIFL model according to the European Guidelines (Cedefop, 2015), then in this case the MEC acts as a body that conducts identification, documentation and certification. The assessment is outsourced to the IIP in the form of a qualification exam for evaluators of the 2nd, 1st and highest categories (the exam has a gradation in complexity). The certificate is issued by the MEC, while the accreditation process is not discussed yet.

Source: Interviews with valuation market actors

The Cabinet of Ministers has not yet decided who will be the main operator for the development of ISC and VNFIL. During the implementation of the above-mentioned GIZ project, three main proposals were considered to define the responsibility for managing the validation and ISC system in the country: the MES, MLSPM or CCI. A leader in the development of VNFIL could be the NQC, where representatives of all stakeholders in the development of the NSC are present. In line with the NSC's regulatory documents, it should develop proposals for defining the main areas of training that are priorities for the economy, as well as develop elements of the NQS (sectoral frameworks, occupational standards, assessment tools, etc.) for comparability of outcomes. As shown earlier, a certain number of national regulations already provide the basis for the development of VNFIL systems in the country. Unfortunately, apart from the experiments carried out by the CCI since 2015 together with GIZ, no-one has yet taken responsibility for the practical systematisation in this field. The role of the PES in the dissemination of VNFIL is small, their actions so far have focused on building correct records and dealing with the unemployed as well as assisting in upskilling and reskilling.

These examples with the introduction of ISC in the field of valuation and catering are not the only ones, sectoral organisations and their associations in other fields are also active and are gradually promoting their objectives and obtaining approvals of the responsible Ministries to adopt ISC regulations: in the transport (Ministry of Transport, 2021), and construction (Government, 2021e) sectors. Participants in the ISC processes would prefer to make this system mandatory, but this is unlikely in a country with a predominantly informal economy.

Social impact enterprises and NGOs such as the Association for the Education Development, the Skills Development Fund and Sectoral Associations could play an important role in the development of VNFIL

as they bring together the most advanced employers (VNFIL is a response to their requests), teachers and experts. The result of their collaboration may be the most advanced training (which does not yet exist in formal curricula), requiring recognition in terms of qualifications.

6 VNFIL service providers

As already described earlier, we can only speak of forerunners of VNFIL arrangements in the labour market, where some regulations of the processes of ISC of occupational competences are observed.

The following distinction can be made in the approach between the VNFIL providers in the education sector and the labour market. In terms of background, VNFIL in the education sector has been around for a long time and has emerged as a particular case of validation in the need to build an individual learning pathway. The involvement of VET/HE in more systemic forms of VNFIL observed in the labour market has largely taken place under the influence of foreign partners (see Example 1 (Catering)), or in collaboration of various institutions as in Example 2 (Valuation). The earlier parts of the report reveal that the most advanced VNFIL practices within the emerging ISC system are shown by the independent VNFIL providers in the labour market with the patronage of the relevant industry associations. Even Example 2 (Valuation), which gives an example of direct interaction with an educational organisation (IIP), shows that HEIs are involved as outsourcing organisations for the development of examination programmes and tests. Education is involved in the processes of developing the VNFIL system and trying to build its own VNFIL models (MES, 2022).

The organisational capacities of the VNFIL providers (ISC centres in the national context) cannot yet be accurately assessed, as the dissemination of VNFIL is in test mode. The project with DVV (2021a) was able to involve a large number of participants and certify more than 1 500 people in a short period of time, in eight sectors of the country's economy. At the end of this project, it has not yet been possible to create a cost-effective model for all participants. The available budgets for VNFIL cannot be assessed at present because the economic and regulatory models for implementing VNFIL are not finalised. Shifting the responsibility for financing VNFIL to applicants and interested employers has not yet been possible, nor have the sources of funding been identified.

If we look at the officially adopted documents on offering complementary courses, e.g. for gaining a full vocational qualification, the regulations already approved in various sectors, following the general rules (CCI, 2015a), state that if a person fails the exam, the relevant ISC (VNFIL) provider in the labour market may recommend additional training at an external organisation, as VNFIL providers do not have the training facilities. Of course, this does not apply to the valuation example, where in the case of failure, the HEI (IIP) offers its services to train the unsuccessful applicant, e.g. through a refresher course.

For the established centres of ISC, offering ISC (VNFIL) is naturally a strategic priority. In Example 2, implementing VNFIL together with associations of valuators is an additional task for the engaged HEI (IIP). The most difficult thing at the moment is to find the business concept for VNFIL providers, as there is not much demand from applicants for validation. That is the problem where players interested in the development of VNFIL fail - potential candidates are not informed, do not understand the value of validation, and do not see the possible application of certificates in the future. Businesses, which are the most interested consumers of validation, are waiting for the state to help them with qualification issues in the labour market, to allocate funds, to create national tools. The state is looking at the VNFIL development initiative as another tool for streamlining the labour market through NQS, for which the state does not yet have the financial resources. Education is ready to be involved in these processes, but has its own interests to have the validation market go through educational organisations, which is not at all suitable for businesses which prefer the ISC to do it. In general, businesses would like to see the management of certification processes go through their associations and industry unions. Trust in the education system is too limited to entrust certification to educational institutions. There are fears that the education system will automatically pass all its graduates through the certification system, thereby diminishing the value of the certificate. Educational providers are seen as more useful for retraining candidates when needed and it is possible to outsource the qualification exam as demonstrated in Example 2. As a result of these disagreements and misunderstandings, previously established VNFIL providers have suspended their work or closed down, which can now be classified as a test run to establish a validation system in the country.

The cost of the ISC in the labour market varies from EUR 30 to EUR 180 depending on consumables and equipment used for holding the exam; it is higher in food processing, for instance.

The accreditation of ISC centres (VNFIL providers) is currently not seen as a national priority in the country.

7 Information and guidance

7.1 Information, outreach and promotion

There is public information on the internet only about the possibility to certify professional competences, regardless of the form of learning, at the SCISC in food processing/catering. In addition, a description of the principles, terms and general algorithm of the ISC is available on the CCI website. Several news reports can also be found in the media on the launch of validation and ISC processes in collaboration with foreign partners.

It is too early to say that all potential VNFIL providers have been informed about VNFIL, but the main economic sectors, their associations and sectoral councils: finance, real estate, catering and food processing, construction, agriculture, energy, machinery and equipment have participated in international pilot projects developing ISC (validation) schemes and models. All information about the ISC system has been available for quite some time on the CCI website, so one can assume that the public and economic agents are informed about the benefits of the approach.

The key stakeholders such as the MES, MEC, NQC are well-informed about potential VNFIL arrangements as they have made certain steps to launch VNFIL in the country. Potential VNFIL users and citizens are informed to a much lesser extent as these processes are outside their attention and no promotional campaign has been implemented, except for the publication of a few news items in the media. Outreach activities about VNFIL arrangements to potential beneficiaries of VNFIL are not organised.

A good example can be given of the information and promotion made to reach out to potential ISC customers in the sector of catering and food processing (see Example 1). After the end of the respective GIZ project, completed in 2020, only the SCISC in food processing/catering remained afloat even though the ISC had been piloted also in other sectors. The SCISC did not dissolve but continued its ISC-related activities as a result of the perseverance of the centre's leadership.

In the second (valuation) example, the ISC for valuators does not have its own website, but the ISC system of valuators' qualifications (note that there are a limited number of such specialists) has been built with the full participation of sectoral associations, under the supervision of the MEC. Availing of word-of-mouth and the close contacts of a small country, virtually all valuators in the country are aware of the prospect of having their competences certified. The example of dissemination of information from the catering sector is more complicated, as there are many more participants (potential validation users) who usually have a lower level of qualification, and whose understanding of the need for validation is lower due to family-business nature of the work. Consequently, the importance and benefits of VNFIL are more difficult to communicate to potential users.

As we can see from the examples, digital technologies are used to promote information on the internet as well as to test applicants via a computer-based testing system. However, the validation and ISC market has not yet fully embraced digital technology, and this will require the involvement of the Ministry of Digital Development of the Kyrgyz Republic, High Technology Park and other members of the IT community to develop advanced digital ISC platforms based on CRM-technologies. There is an ongoing discussion among IT professionals and employers in the field of digital technologies about whether the need for professional qualifications can be dispensed with in relation to non-formal training[19].

7.2 Advice and guidance

In the current ISC system for catering (Example 1), an individual beneficiary can receive advice and guidance about the VNFIL services, process, costs, duration, outcomes, further learning or career paths

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[19] Radio Azattyk (blocked in Kyrgyzstan, VPN is needed).IT diploma or IT certificate – which is better? https://rus.azattyk.org/a/30671504.html

via telephone, internet and by contacting the service in person. Advice and guidance are provided as an integral part of the VNFIL arrangements before application and in case an applicant has failed to pass the qualification examination. Advice and guidance about identification and documentation of existing competencies and other validation procedures are offered free of charge. Additionally, applicants receive advice on linking their skills and competencies with the reference points – assessment standards (which can be considered versions of the occupational standards in the catering sector and are only approved at sector level) for a particular activity in order to understand what level of qualification the applicant may qualify for. Support for preparation to the VNFIL process is provided verbally, and no special training is provided.

In the ISC valuation system (Example 2) being developed, the rules are similar to those described above.

The examples of ISC (VNFIL) cases in the labour market are under development or in idle-time mode.

In education, to receive VNFIL services for continuing education or recognising a qualification, personal contact with the educational organisation is required, and prior information on the availability of the service can be obtained by telephone. Advice and guidance are provided as an integral part of the VNFIL arrangements in education if an applicant and an educational organisation have come to agreement. There may be a fee for taking examinations and re-credits, depending on the arrangement. The most open-ended form of VNFIL to obtain a full qualification through an externship requires the approval of the MES for the applicant to take the externship. Training under this form is extremely rare and there is a fee. It should be emphasised that when a student requests an externship, the institution forms a committee of teachers and managers to conduct the intermediate and final attestations. The knowledge and skills of such a student are acquired independently through self-study, non-formal and informal learning, and it becomes the task of the institution to develop an individual curriculum with milestones, the completion of which is required for the student to undergo the VNFIL process.

8 Validation practitioners

8.1 Profile of validation practitioners

Since the VNFIL processes in the country are at an initial stage, the existing VNFIL arrangements in the labour market essentially singles out two basic roles – managers and experts.

The managers are usually the owners of the certification centres. In the current ISC system for catering (Example 1), it is the owner and manager of the SCISC in food processing/catering and at the same time the President of the National Catering Association.

The experts are invited specialists from the production and training area, who draw up the examination programmes, tests and practical assignments. They are also involved in the qualification examinations.

There is a practice of inviting catering managers to the qualification examinations to ensure the transparency and credibility of the examinations and to enable them to select their staff from among those who have successfully passed the certification.

The work related to the validation stages (identifying the documents and qualifications of applicants, preparing and administering tests, counselling and issuing certificates) is done by workers who are able to do clerical work. Managers of the processes described in the examples are not directly involved in the development of testing programmes and carrying out the tests themselves, but they are involved in promoting the benefits of ISC in the labour market, advertising campaigns, and reaching out to potential participants and their managers, consultations, etc.

The profile of validation practitioners has not been defined in the education sector. They must implement the internal regulations and procedures adopted in the educational institutions.

8.2 Qualification requirements

In the ISC system, experts (whose function is described in section 8.1) are recruited usually from the education sector or the labour market, but in general all experts have some teaching experience in one way or another, perhaps not in formal education.

8.3 Provision of training and support for validation practitioners

In the ISC system, training in the VNFIL processes takes the form of on-the-job training for all those involved in the processes.

9 Quality assurance

There are no external audits focusing solely on VNFIL management and procedures in Kyrgyzstan; they are performed only if the entire management system of an organisation is subject to the audit.

The elements which will possibly be used in validation in the future and which may play a role as QA components are SES that are developed in cooperation with experts from relevant sectors and education. These requirements determine the learning outcomes, along with the assessment criteria and learning environment. Moreover, all modern SES contain requirements of alignment with relevant occupational standards.

When considering QA issues in relation to the labour market validation within the ISC, for the time being, it can be stated that this is a matter for the future, when the ISC system is restored to working capacity and regulation at the level of national legislation is adopted.

10 Inputs, outputs and outcomes

10.1 Funding

There is currently no specific national funding framework for validation. The development of assessment tools in the ISC system is organised by the sectoral associations and international grants.

Currently, in accordance with the Action Plan (Government, 2021g) there are plans to develop a draft legal act providing for the establishment of ISC centres (public or private) in Q4 2025, with the responsible agency – the MLSPM, funded from the national budget. The government is also tasked with introducing ISC based on training results as a mandatory tool for testing the level of knowledge and skills of vocational school graduates, showing the quality of staff training and their compliance with labour market requirements during Q1 2022–Q4 2026, with the responsible agency – the MES, funded from the national budget. These plans indicate the intention of providing additional ISC of vocational school graduates in relation to occupational standards at ISC centres. Naturally, educational and occupational standards differ in terms of the content of learning outcomes and other components. Consequently, the question arises as to where these students can complete their studies in order to meet the requirements of the occupational standards or sectoral requirements and in order to take examinations at the ISC centres in addition to the qualification exams when they leave the school. On the other hand, many modern SES contain a requirement that the curricula should take into account the requirements of occupational standards, and the qualification examinations in the educational organisation should also take these requirements into account. It is important to consider that the units of learning outcomes related to vocational skills and competences may ultimately become the same/similar in VET and in occupational standards. However, the challenge lies in ensuring the confidence in the credibility of the assessments of these competencies in vocational schools, as the industry often prefers to seek external independent validation.

Successful experiments in the ISC development and certification procedures were mainly covered by donor funding (DVV, 2020; GIZ, 2017, 2021a, 202b; ADB, 2020). In accordance with the ISC rules, the financial costs of ISC are borne by the 'initiator of the certification' (jobseeker, employer, employment service, migration service, or educational institution).

It is not just that a lack of financial support prevents certain groups from entering validation procedures. The situation is much more complicated even if certification centres are set up, financed, consulted and the qualification examinations are completely free of charge, and funded by donors, the state or other sources. The labour market should express a clear need for confirmed (not only declared) qualifications. Due to the underdevelopment of the general economy of the state, the availability of confirmed qualifications is not an essential need for, nor an articulated need by employees and employers.

Significant barriers to developing funding mechanisms for validation are the general underfunding of the national budget, the underdeveloped economy of the country, the delayed development of NQS and occupational standards which lead to a lack of public and governmental attention to the VNFIL issue and a lack of articulation of consumer demand for the service in the labour market.

10.2 Distribution of costs

The examination and certification-related expenses in validation processes undertaken at ISC should be paid by the job seeker, employer, public employment service, migration service, educational institution depending on the agreement with the ISC service. The lump sum approach is implemented according to the prices of passing the qualification examination in the ISC system.

The level of certificates applied for can be from 2 to 6 in accordance with the NQF levels.

At present, enterprises do not 'buy' validation services for their employees, although this was implicit in the design of the ISC system. PES can buy VNFIL services from VNFIL providers as indicated in ISC rules, but this has not been observed in our case.

10.3 Evidence of benefits to individuals

The ISC system promotes[20] the benefits of validation in the society to draw attention to the need for independent assessment and opportunities for applicants. The importance and benefits of an independent assessment is usually articulated for all market participants: employees, employers and consumers.

The benefits of conducting an independent qualification assessment

for an employer:

- professional assistance in assessing the qualification of an employee;

- no need for independent development of assessment systems and certification;

- no need to check the knowledge and skills of citizens applying for work, if they have an independent assessment conclusion.

for an employee:

- documentary evidence of qualifications and compliance with the respective occupational standard;

- expanding employment opportunities and increasing demand in the labour market;

- providing psychological comfort and self-confidence;

- determination of further professional development and career growth;

- the opportunity to confirm the qualifications without having a relevant formal education, but having work experience.

The ISC centres should be monitored by relevant ministries, agencies as well as employers' associations. Generally, the oversight of the overall operation of the system has not yet been determined, with the closest candidate being the NQC.

10.4 Beneficiaries and users of validation processes

10.4.1 Validation trends

Statistics on the numbers of VNFIL providers, number of qualifications offered and individuals who have participated in VNFIL are not publicly available as data is not collected. Since the ETF report on NQF Kyrgyzstan (ETF, 2021) which mentioned that about 1 500 graduates of vocational schools underwent a test-run of ISC in 8 sectors with the support from GIZ, nothing has changed, as this project and others have not led to the elaboration of a business model for ISC in the labour market. Furthermore, there is evidence of tests being arranged to validate several occupations in personal care and food processing/catering sectors.

The CCI has made an effort to maintain a register[21] of independently certified persons and to process statistical data, however the register worked for one year only – from 2015 to 2016.

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[20] Chamber of Commerce and Industry, available at https://cci.kg/nezavisimaja-sertifikacija/nezavisimaja-sertifikacija-professionalnykh-kompetencijj.html
[21] CCI, Statistics on ISC results, available at https://cci.kg/nezavisimaja-sertifikacija/statistika-po-rezultatam-nspk.html

10.4.2 Validation users

Data on the distribution by target groups, gender, age, employment status, previous qualifications is not publicly available.

10.4.3 Validation and disadvantaged groups

Experiments conducted with VNFIL in the country have necessarily included disadvantaged groups such as the long-term unemployed, migrants, refugees, and people with low qualifications. In order to develop validation and certification mechanisms, the test centres at VET schools carried out competency assessments and issued certificates to VET students who were in the formal training programme (but had not completed it). Independent test centres of ISC attracted from the labour market all those who wanted to certify their competencies at NQF level 2-4, and who mainly included disadvantaged groups. VNFIL and the subsequent certification was of great importance for the participants in these experiments, as many had had little or no formal vocational training before.

Statistics for this target group were not collected.

A deliberate deployment of VNFIL in Kyrgyzstan's labour market could have a cumulative effect in bringing the economy out of the shadows, as workers can obtain at least some official documents that certify their real job skills, but the resumption of work must start with the creation of a sustainable business model for the promotion and deployment of VNFIL.

11 Validation methods

This section will be based on the two examples (catering and valuation) already described which were piloted (in the idle-mode at present) with the possibility to resume their activities at almost any moment if there are relevant legal documents and a request from potential validation candidates.

Each candidate in the catering example (2-4 level of NQF) had to pass a pre-test consisting of approximately 100 questions, which were in the form of a self-assessment, before being invited to the qualification exam. The staff of the ISC centre clarified together with the applicant his/her intention, readiness to take the qualifying examination, the level of competence for which the applicant is eligible, etc.

The qualification exam consisted of two blocks.

- Theoretical block – a practice-oriented test (multiple-choice and open questions) of knowledge in the profession is certified.

- Practical block – assessment of the level of mastery of labour functions within the vocation to be certified. The practical assignment used the equipment of the testing centre and was based on a method of controlled job practice. Potential employers were also invited to observe the practical exercises and had the right to give their assessment to the test-takers, which was considered in the certification process.

The total score for the two blocks was calculated according to the formula: $0.3 \times C1 + 0.7 \times C2$, where C1 is the score for the theoretical block (%), and C2 is the score for the practical block (%). The qualification examination was concluded when the total score of the theoretical and practical units was at least 75% and a certificate of the relevant type was issued. If the applicant failed the exam, he/she could continue training on his/her own and study informally. Neither the SCISC nor CCI rules provide for the referral of a failed applicant to an affiliated training provider, which reduces corruption and increases the credibility of informally trained applicants. Those who fail the exam may appeal to the certification centre according to a specified procedure. If this is also rejected, candidates may go to a suitable institution or workplace to complete their studies.

Each candidate in the second (valuation) example (6 level of NQF) did not need to undergo a pre-test since the applicant must have been referred to a qualifying examination by the Valuation associations and approved by the MEC based on the previously sent necessary documentation indicating earlier experience in valuation. The examination took the form of a randomised computer-based test. The tests had both multiple-choice questions and quite complex simulation tasks with calculations on the computer.

As can be seen from these two examples, VNFIL practitioners are trying to adapt the methods for different contexts, target groups, verification purposes, skill levels and their own capabilities.

12 Use of ICT in validation

Standard digital tools such as MS Word, Excel, Google are used for documenting certification processes, drawing certificates, conducting tests in ISC centres. All ISC centres that conducted testing in 2015-2022 used the standard digital tools to record and track the learning achievements of individuals.

The CCI attempted to maintain an open online database of certified professionals on its website, but this has been halted (see p. 10.4). The occupational standards database on the MLSPM website suffered the same fate.

There is a nationally standardised Learning Management System (LMS) developed by AVN[22] from Kyrgyzstan, which is used by most educational institutions; it contains a testing module similar in functionality to TestPad, which is used to test knowledge during VNFIL at the request of a student.[23]

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[22] AVN, Implementation and maintenance of information systems for comprehensive automation of business processes in educational institutions, available at https://avn.kg/
[23] Online Test Pad, available at https://onlinetestpad.com/

ETF Working together Learning for life
European Training Foundation

13 The position of validation in society

The labour market and the world of education have not yet understood the value of VNFIL. The experiments with VNFIL and certification of competences have shown that residents (nationals and foreigners who are registered in Kyrgyzstan) can take advantage VNFIL, and that it is possible to find quite competent managers and assessors to carry out validation and ISC. It is not possible to assess the extent to which the results of VNFIL are trusted by all and whether there are doubts, i.e. further research is needed on this issue.

The level of involvement of the key stakeholders in VNFIL can be described as follows:

- Governmental organisations and agencies have a good understanding of VNFIL and give lip service to the idea. The development of legislation is stalled at the stage of reaching consensus among all players.

- The CCI has been fully involved in the ISC processes since 2015, and now it is one of the most qualified players in this area However, after so many attempts to introduce ISC, there is a certain weariness with the subject because regulatory documents at the state level have not yet been adopted, and many initiatives in several sectors have been suspended.

- Education institutions are also quite well informed about validation, but the availability of real individual trajectories with recognition of prior learning, credit accumulation (regardless of the form of obtaining knowledge and skills), transfer, possibility of leaving school and returning, obtaining partial qualifications are not regulated at the legislative level. To launch these processes, it will be necessary, among other things, to recognise VNFIL as the most important tool for reforming education in accordance with the needs of the labour market.

- Employers and their associations are far from aware of VNFIL, and how it can help them, except in isolated cases. Example 2 describes an industry market for property valuation with a reasonably high level of income for its participants. With regulations in place, industry employers and their employees will themselves facilitate the rapid launch of VNFIL in the form of ISC in their business, as there is already national expertise, experts for certification, developed examination and test programmes. Most importantly, there is a clear demand from potential buyers of valuation services. The quality of a valuation service begins with the trust in the evaluator as a service provider with high professional expertise, which can be confirmed by a valuable certificate obtained through the ISC, and which consequently makes the valuation service more prestigious and expensive. In contrast, Example 1 looks at the mass food and catering market, where sustainability has not been achieved due to a lack of information in society about the value of qualifications obtained through ISC. There is no clear demand from the market for VNFIL services for workers and new recruits. The owner of a restaurant, café, fast-food outlet is confident that he or she can conduct this 'exam' at the time of recruitment by asking the job applicant to simply show his or her skills on the job. Publicity and advertising campaigns explaining the benefits of validation should be carried out. The best publicity would be to showcase the success of companies with certified employees.

- VNFIL procedures are most needed by nationals who, for one reason or another, would be interested in validation and in having their qualifications documented. Often the requests come from people intending to migrate for work reasons in order to somehow prove their skills in the new place. There are limitations because national employers do not ask for certificates and that certification requires a financial investment.

- Trade unions are aware of the problem but their level of intervention is limited. Although they are ready to support validation in every possible way, the weakness of the economy and their historical Soviet past undermines their ability to advocate for workers' rights.

- Important players are NGOs active in education support and private PES which are the most flexible and advanced institutions in understanding of the issue. But they lack understanding of the business model of using VNFIL in their work and sources of funding.

14 Recommendations

The development of the VNFIL system in the country is at an initial stage due to the existing institutional, financial, and normative barriers:

- Institutional constraints stem from the underdeveloped economy, as the pervasive informal labour relations are not conducive to people seeking formal recognition of non-formally or informally acquired skills and formalising them with a qualification. Accordingly, the state is more concerned about bringing workers out of the shadows, so that the latter are at least registered and pay taxes. It is safe to say that the weak social policy, including in education, is a consequence of low tax collection in Kyrgyzstan. The education system in the country and the modern labour market are the main agents of the NQS development policy. Institutional constraints are also linked to the specifics of Kyrgyzstan's economic development, i.e. the traditions of a family-oriented society expressed in the fact that it is customary to work in families and family groups – this explains why the qualification of an employee is based on simple trust or the recommendations of friends, and no documentary evidence is required. A certain limitation is related to the geographical features of the education system: most vocational schools (Level 3-4 of NQF) are located in rural areas and most colleges (Level 5 of NQF) are located in cities, so there may not be a competent organisation capable of conducting validation in a particular region of residence. In addition, there is a significant feature of the labour force, through migration processes, where young people leave the country to work for extended periods, and when they return, they often do not fall into the skills that can be validated through the education system or the ISC. On the other hand, it is often migrants who request VNFIL to somehow prove their qualifications before travelling to another country.

- Financial barriers also stem from the country's informal economy, where people have very low incomes, and they look for quick jobs and quick earnings, as opposed to investing in their qualifications. The same barrier did not generate enough income for the established ISC centres when, after the end of foreign partner funding, the activities of the centres virtually ceased as there was no obvious influx of candidates for VNFIL.

- All of the above-mentioned limitations are piled on top of each other due to the main obstacle – the lack of a coherent legal and regulatory framework so far on VNFIL in the labour market and in education. Numerous experiments with foreign support have created methodologies and successful precedents in the field of VNFIL, in which the participants are already numbered in the thousands. Unfortunately, projects with foreign participation in this area have not achieved sustainability.

We can see that the potential market for validation candidates is huge due to the prevailing informal economy in the country, i.e. a very large number of workers with skills acquired through non-formal and informal learning who would be willing to validate their qualifications under certain conditions. In addition, there are already well-established VNFIL procedures in the form of ISC in the labour market, which have shown their effectiveness. This means that there are tested tools for VNFIL in the labour market (procedures, qualified staff, websites, experience, counselling) and there is a large number of potential candidates for involvement in VNFIL – but it is not working.

This situation can be shifted and set in motion by triggering four main drivers for development: establishing a regulatory mechanism, correct adjustment, budget support, and instrumental innovation. The drivers can be launched separately, but their combined use can have a synergetic effect.

- The regulatory mechanism is almost obvious. It is necessary to continue and accelerate the work initiated to create comprehensive legislation in VNFIL, NQF and occupational standards and to identify a responsible body to manage these processes. The closest candidate for governance of the regulatory framework by the state is the NQC, while the operator of the system could well be the CCI of the Kyrgyz Republic, which has by now been positioned as the most advanced managing body in promoting ISC. One of the significant challenges is the fact that in the new Law on Education, and due to the liberalisation of the legislation, the process of awarding qualifications in further education (in the absence of occupational standards and VNFIL procedures) is practically left without quality

assurance tools. VNFIL can therefore be an important driver for non-formal education providers to improve the quality of their educational services.

- Correct adjustment of VNFIL refers to the positioning of VNFIL in the qualifications market (formal and informal). It should be recognised that VNFIL, promoted in the form of ISC, is quite a commercial product in the labour market with a social mission. The Hybrid Social Business Model has already been created for this kind of product in the 21st century, which can be used as a basis for the reconstruction of the existing ISC centres and the creation of new ones, if we look at the current situation from a business perspective. The ISC centres need to be reoriented towards a hybrid organisation model – a social mission and a commercial business model – to pave the way for a new approach to achieving social impact. It should be foreseen that social enterprises are also fragile organisations, having to balance a fine line between achieving the social mission and meeting market demands. But with such an approach, social enterprises can leverage investment, marketing, including social media marketing, PR and advertising mechanisms to achieve their objectives. The extent of the needs of validation providers and potential customers must be clarified in a special study. Now validation providers have no access to financial incentives enabling them to offer validation services to citizens and specific target groups. There is a prospect for VNFIL to move into the category of social projects of business and business associations, starting with successful examples as shown earlier with the Kyrgyz associations of evaluators.

- In order for a hybrid social model to work, initial and supporting funding from the dedicated budget lines is essential. Therefore, regulation by the state cannot end with the creation of regulations alone. Attention must be paid to the social nature of the activity, i.e. to the contribution that competent workers with proven qualifications can potentially make to the economy of the country. This means that qualifications and procedures for awarding qualifications through VNIFL should be mutually reinforcing and complementary on the labour market and in the education system. The latter is the primary concern of the state, and budget allocation can significantly accelerate these processes as well as ensure control by the state authorities.

- The fourth driver is instrumental innovation in education. Above, the focus of the recommendations was mainly on two players – government and business. However, the third pillar of the VNFIL development in the country – educational providers – cannot be left out. Non-formal learning and AL will adjust very quickly to formal education if a vector for VNFIL and the possibility of partial qualifications can be launched there. The development of innovative ways of introducing micro-credentials in educational processes, with the development of appropriate legislation, could significantly increase the pressure by potential candidates among students and all those who wish to apply, if the validation and certification of specific skills through the micro-credentials mechanism can be done directly in education. This would be a complex restructuring of the educational process, but it would lead to an improvement in the overall quality of education, when it is clear to the society that a certified specific skill represents a formal qualification.

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Sources

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* Interviewees agree/disagree for their name, organisation and/or position to be referenced in this country report.

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16 ACRONYMS

AL	Adult Learning
CCI	Chamber of Commerce and Industry
CVET	Continuing Vocational Education and Training
ETF	European Training Foundation.
GE	General Education
HE	Higher Education
HEI	Higher Education Institution
ISC	Independent Skills Certification
IIP	Institute of Innovative Professions
IVET	Initial Vocational Education and Training
LLL	Lifelong Learning
LMS	Learning Management System
MEC	Ministry of Economy and Commerce
MES	Ministry of Education and Science
MLSPM	Ministry of Labour, Social Protection and Migration
NQC	National Qualifications Council
NQF	National Qualifications Framework
NQS	National Qualifications System
PES	Public Employment Service
RPL	Recognition of Prior Learning
SES	State Educational Standards

SQF	Sectoral Qualifications Framework
SCISC	Sectoral Centre for Independent Skills Certification
SME	Small and Medium Enterprise
SVET	Secondary Vocational Education and Training
VET	Vocational Education and Training
VNIFL	Validation of Non-Formal and Informal Learning