Instruments without Membership: How Uzbekistan Adapted Four Bologna Tools, 2017–2026

A document-based analysis of credit systems, quali quality assurance and recognition

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This article asks how a national higher education system adopts the instruments of the European Higher Education Area (EHEA) without joining it. Uzbekistan is an instructive case: it is not a signatory of the Bologna Declaration, yet between 2017 and 2026 it introduced a credit-module system modelled on the European Credit Transfer and Accumulation System (ECTS), reorganised its degree architecture, rebuilt its quality assurance arrangements and ratified the UNESCO Global Convention on the Recognition of Qualifications. The study is a desk-based comparative document analysis of fourteen national legal and policy acts, read against the EHEA reference instruments and the secondary literature on post-Soviet higher education. Four dimensions are examined for each instrument: legal entrenchment, technical specification, institutional carrier and evidence of practised use. The analysis finds a consistent pattern of instrument-first adoption: legal texts reproduce the vocabulary and the arithmetic of the Bologna tools with considerable precision, while the infrastructure that gives those tools their function — credit transfer, learning-outcome assessment, self-certification, external review against the Standards and Guidelines for Quality Assurance, and recognition practice — remains thin. Adoption is best described as translation rather than transfer, in which imported instruments are edited to fit an administrative tradition of state attestation. The article argues that the binding constraint is not membership but the recognition hinge that connects credits, qualifications and mobility, and it draws implications for the EHEA's external dimension and for systems that borrow without belonging.

Contents **Page**

1 Introduction **2**

2 Analytical Framework: Transfer, Convergence, Translation **4**

3 The EHEA Toolkit and Its Internal Dependencies **6**

4 Research Design, Corpus and Limits **9**

5 Qualifications: A Hierarchy Reordered, Not Yet Legible **16**

6 Quality Assurance: The Form of Independence, the Logic of Inspection **17**

7 Recognition and Mobility: The Hinge That Does Not Yet Turn **19**

8 Discussion: Three Patterns and One Mechanism **21**

9 Conclusion **24**

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1 Introduction

Expansion on that scale is not a technical adjustment

In 2017, 8.6 per cent of young people of tertiary age in Uzbekistan were enrolled in higher education. In 2024 the figure was 56.5 per cent (World Bank 2026). No European system has expanded participation at that speed in that period, and the expansion has no parallel among Uzbekistan's neighbours: Kazakhstan moved from 50.0 to 53.5 per cent over the same years, Kyrgyzstan from 41.6 to 53.2, and Tajikistan from 30.2 to 35.6. Within seven years the Uzbek system ceased to be an elite system with a small number of specialised institutes and became, at least in enrolment terms, a mass system. Expansion on that scale is not a technical adjustment. It changes who teaches, who is taught, how institutions are financed, what a diploma is worth and what the state must do to keep the value of the diploma credible.

The instruments with which Uzbekistan has managed this change are, in large part, European. A presidential decree of October 2019 approved a Concept for the development of higher education to 2030 that speaks of academic mobility, credit transfer, competence-based curricula, international accreditation and the integration of the national system into the European educational space (Uzbekistan 2019). A new Law on Education followed in September 2020 (Uzbekistan 2020a). In December 2020 the Cabinet of Ministers ordered the phased introduction of a credit-module system from the 2020/21 academic year, defining the academic year as sixty credits, the semester as thirty, and one credit as an average of twenty-five to thirty academic hours of study load (Uzbekistan 2020b). In November 2025 the parliament ratified the UNESCO Global Convention on the Recognition of Qualifications concerning Higher Education (Uzbekistan 2025). A reader of these documents could be forgiven for concluding that Uzbekistan had joined the European Higher Education Area. It has not. It is not a signatory of the Bologna Declaration, it does not report to a ministerial conference, and it does not appear in the Bologna Process Implementation Reports.

It is, in the language of the Process itself, part of the external dimension rather than the Area. This combination — the vocabulary and arithmetic of Bologna

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without the membership, the reporting obligations and the peer review — is the puzzle this article addresses. The literature on the Europeanisation of Central Asian higher education is not large, and what exists concentrates on Kazakhstan, the one state in the region that did join: Kazakhstan signed up in 2010 and has since been the subject of the most detailed single-country study of importation in the region (Tampayeva 2015; Yergebekov and Temirbekova 2012). Uzbekistan, Kyrgyzstan, Tajikistan and Turkmenistan appear in comparative volumes, usually as cases of partial or stalled reform (Huisman, Smolentseva and Froumin 2018; Smolentseva, Huisman and Froumin 2018). The non-member that borrows heavily, and borrows quickly, has not been examined in its own right. That gap matters for two reasons. Empirically, Uzbekistan is now the largest higher education system in Central Asia by enrolment, and what it does with European instruments will shape the regional space in which Kazakh, Kyrgyz and Tajik institutions operate.

Analytically, a non-member is a cleaner test of what the instruments themselves do than a member is: where membership brings monitoring, peer pressure and the reputational cost of non-compliance, a non-member that adopts the same instruments reveals which parts of the Bologna toolkit travel on their own and which depend on the club. The article therefore asks three questions. First, which EHEA instruments has Uzbekistan adopted, and how far has each been carried from legal text into institutional practice? Second, what explains the pattern of adoption — why some elements were reproduced almost verbatim while others were left untouched? Third, what does the case imply for the EHEA's external dimension and for the wider argument that the Bologna Process has become a global template for higher education reform (Vögtle 2014)?

The argument, in brief, is this. Uzbekistan has adopted the instruments in the order in which they are easiest to legislate and hardest to use. Credits were adopted first and most completely, because a credit is an arithmetic rule that can be written into a resolution. Qualifications were reorganised next, because degree structures are a matter of state regulation. Quality assurance was rebuilt in form but retained its administrative logic, because the state that licenses institutions is the same state that would have to trust an independent

agency. Recognition, the instrument that gives the other three their purpose, arrived last and remains the weakest link: the country ratified a global convention before it had built the credit transfer and qualification comparability that would make ratification consequential. The result is nominal convergence with procedural decoupling — a pattern familiar from the institutionalist literature on formal structure and ceremonial legitimacy (Meyer and Rowan 1977), and better described as translation than as transfer (Stensaker 2007).

2 Analytical Framework: Transfer, Convergence, Translation

Three bodies of work bear on the question

Three bodies of work bear on the question. The first is the study of policy transfer. Dolowitz and Marsh define transfer as the process by which knowledge about policies, administrative arrangements or institutions in one system is used in the development of policies in another, and they insist on distinguishing what is transferred (goals, instruments, institutions, ideologies) from the degree of transfer, which runs from inspiration through emulation and hybridisation to full copying (Dolowitz and Marsh 2000). Their framework is useful here precisely because it refuses to treat adoption as a binary. A government may copy the arithmetic of a credit system while importing none of the pedagogy that the arithmetic was designed to carry, and the framework gives us the vocabulary to say so: the object transferred is the instrument, not the theory of learning behind it.

The second body of work concerns convergence. Vögtle, Knill and Dobbins show that the Bologna Process produced convergence in degree structures across countries with very different starting points, and that the mechanism was not legal coercion — the Process has no binding law — but transnational communication: shared discourse, common reference points, and the gradual internalisation of external models by domestic actors (Vögtle, Knill and Dobbins 2011). Vögtle's subsequent book extends the argument to the Process as a global template, adopted by states that have no prospect of membership because the template solves a legitimation problem for them (Vögtle 2014). This is

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directly relevant to Uzbekistan. If the Bologna toolkit functions as a template rather than as a club membership benefit, then a non-member should be able to adopt it, and the interesting question becomes why the adoption is uneven.

The third body of work is about translation. Stensaker's study of quality assurance shows that management ideas do not arrive intact: they are edited by the organisations that receive them, and the editing is not a failure of implementation but the normal condition of diffusion (Stensaker 2007). The same argument appears in the literature on borrowing outside Europe. Eta, examining the adoption of the Bologna degree structure in the Central African Economic and Monetary Community, finds that the reform was justified less by its pedagogical content than by the need to display modernity and comparability, and that the borrowed structure was filled with inherited institutional content (Eta 2014). This is the closest analogue to the Uzbek case in the literature, and it suggests a hypothesis: where borrowing is driven by legitimacy rather than by a recognised functional problem, the borrowed instrument will be adopted at the level of form and resisted at the level of procedure.

Meyer and Rowan supply the mechanism that connects the two. Organisations adopt formal structures that are legitimated in their environment, and they decouple those structures from their technical work when the structures do not serve the work's efficiency (Meyer and Rowan 1977). Applied to a national system rather than a firm, the argument predicts that a ministry will legislate a credit system because the credit system signals membership in a modern academic order, while leaving the assessment practices that would make credits meaningful untouched, because changing them would disturb settled interests and settled routines. Decoupling is not hypocrisy; it is the price of legitimacy under conditions where the environment rewards the display of conformity more than the substance of it.

These three literatures are usually applied separately. Combined, they yield the analytical scale used in this article. Adoption is treated as occurring at four levels, each of which can be assessed from documents and each of which can advance independently of the others. The first is rhetorical adoption: the instrument appears

in the vocabulary of policy, in speeches, concept papers and strategy documents. The second is legal adoption: the instrument is written into a binding norm, with definitions, numbers and obligations. The third is organisational adoption: an institution, a unit or a procedure is created and charged with operating the instrument. The fourth is practised adoption: there is evidence, in published material, of the instrument being used for the purpose for which it was designed — credits actually transferred between institutions, learning outcomes actually used to design assessment, external reviews actually changing something.

One further concept is needed, because the four instruments are not independent

One further concept is needed, because the four instruments are not independent. The EHEA treats them as a system in which each instrument supplies the condition for the others: a credit expresses workload and learning outcomes, a qualifications framework locates the credit within a hierarchy of levels, quality assurance certifies that the hierarchy means something, and recognition converts the whole into portable rights for students. Remove any one and the others lose function. A credit that cannot be transferred is a unit of account with no currency; a qualification that cannot be recognised is a certificate of local standing. This interdependence is the article's central analytical claim, and it explains why the order of adoption matters. A system that adopts the instruments in the order of legislative convenience will end with the instruments that are hardest to legislate — recognition and transfer — adopted last, and therefore with a toolkit whose parts do not connect.

3 The EHEA Toolkit and Its Internal Dependencies

The Bologna Declaration of 1999 set six objectives: readable and comparable degrees, a two-cycle structure, a credit system, mobility, European cooperation in quality assurance, and a European dimension in curricula (Bologna Declaration 1999). Two decades later the objectives have been elaborated into a set of technical instruments with their own reference documents, and it is those documents, not the declaration, that a borrowing state actually encounters. The credit system

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is specified in the ECTS Users' Guide. A full-time academic year carries sixty credits, one credit corresponds to twenty-five to thirty hours of student workload, and workload includes independent study, not only contact hours (ECTS Users' Guide 2015). The guide is emphatic that a credit is not a measure of teaching time: it is a measure of the notional learning time that a typical student needs to achieve specified learning outcomes. Credits accumulate towards a qualification and transfer between institutions and countries, and transfer depends on a grade distribution table that allows a receiving institution to interpret a grade awarded elsewhere. The technical apparatus is therefore threefold: a unit of workload, a statement of outcomes, and a translation device for grades.

A system that adopts only the first has adopted a calendar, not a credit system.

The qualifications framework is specified in the Framework for Qualifications of the European Higher Education Area, adopted at Bergen in 2005. It defines three cycles, each described by generic outcomes — the Dublin descriptors — covering knowledge, application, judgement, communication and learning skills, and it provides for a short cycle within or linked to the first cycle (QF-EHEA 2005). The framework is not self-executing: each country is expected to produce a national framework and to self-certify its compatibility with the overarching framework, a procedure that requires an independent evaluation and a public report. Self-certification is the point at which a national hierarchy of qualifications becomes legible to other systems, and it is also the point at which a state must expose its own qualifications to external examination.

Quality assurance is specified in the Standards and Guidelines for Quality Assurance in the European Higher Education Area, revised in 2015. The ESG are organised in three parts: internal quality assurance within institutions, external quality assurance of institutions and programmes, and the quality assurance of agencies themselves (ESG 2015). The standards are deliberately generic, but they carry a distinctive logic. Quality is defined as a matter of institutional responsibility rather than state inspection; external review is expected to be cyclical, to be conducted by independent experts, to include students, and to produce a public

report; and agencies are expected to be evaluated against the same standards they apply. The ESG do not prescribe a national model, but they do rule out one: a system in which the state licenses programmes and treats the licence as the whole of quality assurance has not adopted the ESG, whatever vocabulary it uses.

Recognition is specified in the Lisbon Recognition Convention of 1997, joint instrument of the Council of Europe and UNESCO. The convention establishes a right to have qualifications assessed, a presumption of recognition unless a substantial difference can be demonstrated, and a set of procedures designed to make the assessment transparent and time-bound (Council of Europe and UNESCO 1997; Uvalić-Trumbić and Bergan 1996). Its operational devices are the Diploma Supplement, which describes a qualification in a standard format, and the network of national information centres. The convention has since been complemented by the UNESCO Global Convention of 2019, which extends the same principles beyond the European region and which Uzbekistan ratified in 2025 (UNESCO 2019; Uzbekistan 2025).

The ministerial communiqués tie the four together

The ministerial communiqués tie the four together. The Rome Communiqué of 2020 committed members to full and automatic recognition, to the implementation of national qualifications frameworks compatible with the overarching framework, and to the use of the ESG as the reference for quality assurance, and it set a deadline of 2025 for automatic recognition (Rome Communiqué 2020). The Tirana Communiqué of 2024 reviewed progress and shifted emphasis toward implementation gaps, noting that commitments adopted at ministerial level had not been matched by practice in national systems. This is a significant admission for present purposes. The club itself has found that legal commitment and practised use diverge among members, which suggests that the divergence observed in a non-member is not simply a deficit of membership but a general property of the instruments.

Mobility is the test. The EHEA's stated purpose is that students and graduates should be able to move between systems without losing time or status, and each instrument exists to make that possible: credits make study periods countable, the framework makes qualifications comparable, quality assurance makes

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them trustworthy, and recognition makes them usable. Teichler's assessment of two decades of mobility data is sobering in this respect: the Process improved the formal conditions for mobility more than it changed the actual flows, which remained shaped by language, cost, labour markets and prior ties (Teichler 2012). The lesson for a borrowing state is that instruments create the possibility of mobility, not the demand for it, and that a system which adopts the instruments without the flows will experience them as administrative overhead.

4 Research Design, Corpus and Limits

The study is a single-country, theory-guided document analysis. The choice of method follows from the question. The question is not how much reform occurred — enrolment data answer that — but how the reform was assembled from borrowed parts, and that is a question about texts, their provenance and their silences. Documents are the appropriate unit because in a system where the ministry is the principal author of change, the legal act is where the instrument first exists. The corpus has three layers. The first layer is the national layer: the presidential decree of 2019 approving the Concept to 2030, the Law on Education of 2020, the Cabinet resolution of December 2020 on the organisation of the educational process and the credit-module system, the 2025 law ratifying the Global Convention, and the strategy documents that frame them. The second layer is the European reference layer: the Bologna Declaration, the QF-EHEA, the ESG, the ECTS Users' Guide, the Lisbon Convention and the Rome and Tirana communiqués. The third layer is the scholarly literature on post-Soviet and Central Asian higher education, which supplies the institutional history that the legal texts assume but do not state.

The comparison proceeds instrument by instrument. For each of the four instruments, the national texts are read against the European reference document to establish four things: whether the instrument is legally entrenched (a binding norm with definitions and obligations); how far its technical specification goes (does the text define the unit, the workload, the outcomes, the procedure?); whether an institutional carrier exists (an agency, a unit, a procedure with a named owner);

and whether there is published evidence of practised use. The four levels correspond to the rhetorical, legal, organisational and practised levels set out in Section 2. The assessment is qualitative and interpretive; where a judgement is made, the text on which it rests is cited.

Table 1 sets out the corpus of national documents with the instrument each principally addresses. Table 2 presents the assessment matrix that organises Sections 6 to 9. Table 3 and Figure 1 place the legal changes against the enrolment trend they were meant to govern, using World Bank indicators retrieved in 2026. The indicators are used descriptively, to establish scale, not causally: the article does not claim that the credit-module system produced the expansion, and the timing alone would not support such a claim.

Document	Date	Instrument(s) principally addressed	Level of adoption
Presidential Decree No. UP-5847, Concept for the Development of Higher Education to 2030	8 Oct 2019	All four (framework document)	Rhetorical and legal (framework)
Law on Education No. ZRU-637	23 Sep 2020	Qualifications; quality assurance (state functions)	Legal
Cabinet of Ministers Resolution No. 824, On Measures to Improve the Organisation of the Educational Process	31 Dec 2020	Credit system	Legal and technical
Law No. ZRU-1094, ratification of the UNESCO Global Convention	11 Nov 2025	Recognition	Legal (international obligation)

Table 1

Four limits should be stated plainly

Table 1. National documents in the corpus and the instruments they principally address Source: author’s compilation from the documents listed in the References. Table 2. Adoption of four EHEA instruments on four levels Note: ratings are the author’s assessment,

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based on the documents in Table 1 read against the EHEA reference instruments. 'Full' indicates a binding norm with complete technical specification; 'Substantial', 'Partial' and 'Limited' indicate declining specification; 'Absent' indicates no provision in the documents reviewed. Four limits should be stated plainly. First, the study has no interview data. It cannot say how credits are actually awarded in a given department, whether learning outcomes are used in assessment design, or whether an external review changed a programme. It can say what the rules require and what published accounts report, and it must mark the difference. Second, legal texts are statements of intent. A resolution that defines a credit does not prove that credits are used as designed, and the analysis therefore treats legal adoption as one level among four rather than as the conclusion.

Third, the secondary literature on Uzbekistan is thinner than on Kazakhstan and is uneven in quality; where it is used, it is used for institutional history rather than for evaluative claims. Fourth, official statistics on Uzbek higher education are incomplete in exactly the areas that matter most for this argument — credit transfer, recognition decisions, graduate employment — and the analysis treats the absence of data as itself a finding rather than as a gap to be filled by inference.

The second instrument is the qualifications framework, and here the documentary record is thinner than for credits: the national documents establish the levels of education and the state’s authority over qualifications, but they do not set out a framework with level descriptors. To understand what Uzbekistan did with the instruments, one has to understand what it inherited. The Soviet model bequeathed a system organised around specialised institutes, a curriculum fixed in Moscow-approved hours, a split between teaching and research, and a state that both financed and certified. The institutional landscape was narrow and hierarchical: a small number of universities and a larger number of branch institutes, each tied to a ministry or an industry, each delivering a curriculum defined by contact hours and assessed by state examination commissions. Johnson’s account of the Soviet legacy emphasises how deeply the administrative logic was embedded: institutions were units of a planning system, and their legit-

imacy derived from conformity to plan rather than from competition or reputation (Johnson 2008).

Smolentseva, Huisman and Froumin show that the post-Soviet transformation did not dissolve that logic so much as diversify its owners, producing systems that combined market expansion with persistent state control over credentials (Smolentseva, Huisman and Froumin 2018).

The turning point is the presidential decree of October 2019. The Concept it approves is a broad document, but its higher education provisions are specific: expansion of access, diversification of providers, introduction of credit-based organisation of the educational process, development of academic mobility, alignment of curricula with labour market needs, and integration into the international educational space (Uzbekistan 2019). The decree is significant less for any single measure than for the sequence it authorises. It treats expansion as the primary goal and the European instruments as the means, which is the reverse of the order in which the EHEA instruments were developed. In the European case, credits and quality assurance were devised to manage mobility within a system that already had mass participation; in the Uzbek case, they were introduced to manage expansion in a system that did not. That inversion is the origin of most of the difficulties examined below.

The Law on Education of September 2020 restated the architecture: a system of continuous education, with higher education organised in levels, and with the state retaining the functions of licensing, attestation and the approval of curricula (Uzbekistan 2020a). The Cabinet resolution of December 2020 then supplied the operational detail. From the 2020/21 academic year the educational process was to move to a credit-module system in stages. The academic year was set at sixty credits and the semester at thirty; one credit was defined as an average of twenty-five to thirty academic hours of study load; each element of the curriculum was to be described by learning outcomes, with not fewer than six indicators per element; and the structure of the programme was to be built from these elements (Uzbekistan 2020b).

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The expansion that followed was rapid and is visible in the aggregate data

The expansion that followed was rapid and is visible in the aggregate data. Between 2020 and 2024 the gross enrolment ratio rose from 16.0 to 56.5 per cent (World Bank 2026). Public expenditure on education rose from 4.4 to 5.5 per cent of GDP between 2020 and 2023, a substantial commitment but not one proportionate to a tripling of enrolment, which implies that a large part of the expansion was carried by non-state provision and by fees. The enrolment growth is the background against which the instruments must be judged: a credit system introduced into a stable system is an administrative reform, while a credit system introduced into a system that is tripling in size is a device for managing a transformation whose scale the device was never designed for.

The literature on Central Asian higher education adds a political dimension that the legal texts suppress. Azimbayeva's comparison of Kazakhstan, Russia and Uzbekistan finds that governance reform in all three moved toward a mixture of state control and market mechanisms, with the state retaining the decisive levers of appointment, licensing and finance (Azimbayeva 2017). Knox, Kurmanov and Yesdauletov show that academic freedom in the region remains constrained by political and administrative red lines, and that formal convergence with European norms has not altered the underlying distribution of authority (Knox, Kurmanov and Yesdauletov 2025). These findings matter for the interpretation of adoption: an instrument that presupposes institutional autonomy — as the ESG do — will be translated differently in a system where autonomy is conditional. That is not a cultural observation but an institutional one, and it predicts where decoupling will occur.

Table 3. Enrolment and public spending indicators, selected Central Asian systems Source: World Bank (2026), World Development Indicators, indicators SE.TER.ENRR and SE.XPD.TOTL.GD.ZS, retrieved 2026. GER: gross enrolment ratio, tertiary education, both sexes (%). Spending: government expenditure on education as a share of GDP.

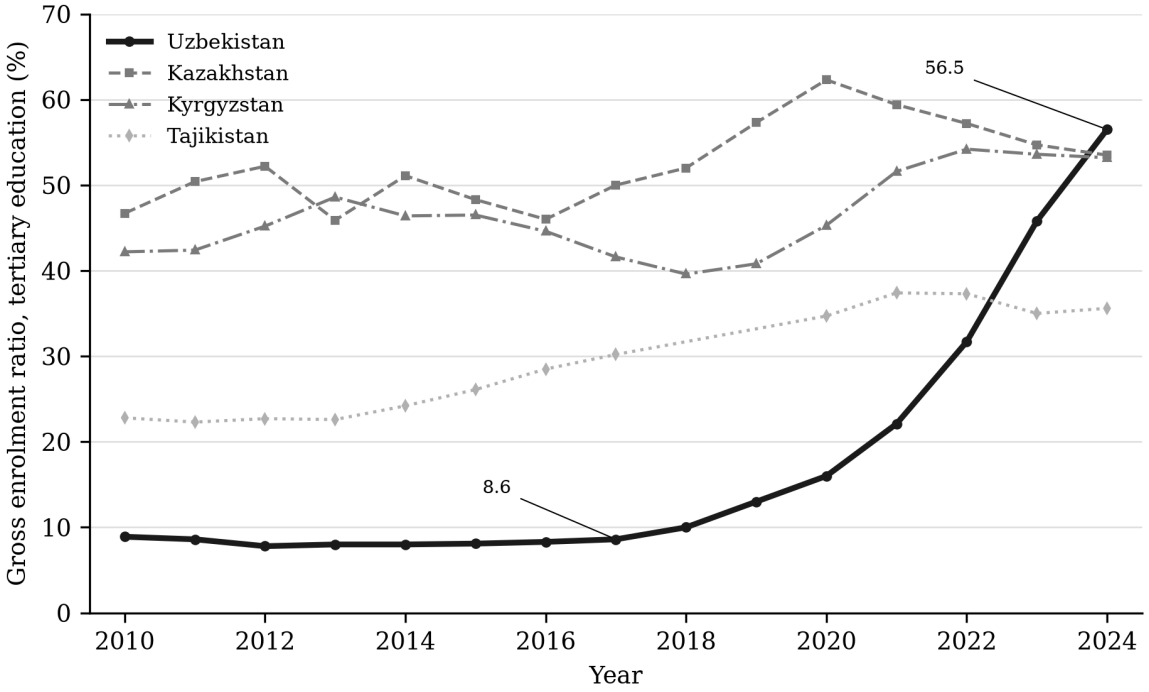

Figure 1 Gross enrolment ratio in tertiary education, Uzbekistan, Kazakhstan, Kyrgyzstan and Tajikistan, 2010-2024 (%).. Source: World Bank (2026), World Development Indicators, indicator SE.TER.ENRR, retrieved 2026. Values for Tajikistan for 2018 and 2019 are not reported.

The credit-module system is the most fully specified of the four instruments and the clearest illustration of the pattern. The December 2020 resolution defines the unit, the conversion, the annual and semester norms, the outcomes requirement and the modular structure, and it does so in language that a European reader would recognise as ECTS-compatible (Uzbekistan 2020b). The ECTS Guide defines a full-time year as sixty credits and one credit as twenty-five to thirty hours of student workload (ECTS Users' Guide 2015). The Uzbek resolution defines a year as sixty credits and one credit as twenty-five to thirty academic hours of study load. On the arithmetic, the two documents are almost identical.

The difference is in the word that carries the concept. ECTS credits measure workload, which includes lectures, seminars, laboratory work, independent study, placement and assessment, and the measure is validated by asking students how long tasks actually take.

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The Uzbek text measures “academic hours of study load”, a phrase from the planning tradition in which the hour is a unit of teacher-delivered instruction and the curriculum is a schedule of such hours. The phrase does not exclude independent study, but it does not require its inclusion, and in a system where the academic hour has long been the currency of planning, the path of least resistance is to convert the existing hour load into credits at the stated ratio. That operation preserves the old curriculum and relabels it. It is precisely the kind of translation that Stensaker describes: the imported idea is edited to fit the receiving organisation’s existing repertoire, and the edit is invisible in the final document because the vocabulary is the imported vocabulary (Stensaker 2007).

The outcomes requirement sharpens the point. The resolution requires each element of the curriculum to be described by learning outcomes, with not fewer than six indicators per element. This is a genuine departure from the Soviet curriculum, which specified content rather than outcomes, and it is the element of the reform with the greatest potential to change teaching. But an outcomes statement is a text, and the requirement that it exist is not the requirement that it be used. The EHEA’s own experience is instructive: the shift from content to outcomes took more than a decade in most member states and required changes in assessment, staff development and external review before it became more than a documentary practice. A resolution can require the statement; only assessment practice can make it operative. On the evidence available, Uzbekistan has completed the first step and has not yet been shown to have completed the second.

What is missing is best seen by listing what the ECTS Guide treats as constitutive

What is missing is best seen by listing what the ECTS Guide treats as constitutive. The guide requires a course catalogue with learning outcomes and credit values, a grade distribution table to translate grades between institutions, a transcript of records recording credits and grades, a procedure for recognising prior learning, and a learning agreement for mobile students (ECTS Users' Guide 2015). The Uzbek resolution provides for the first of these, in the form of programme structure and outcomes. It is silent on the other four. That silence is consequential: without a grade distribution table, a receiving institution cannot interpret a grade; without a learning agreement, a mobility

period cannot be planned in advance; without prior learning recognition, a student who changes programme loses time; without a transcript convention, credits exist inside an institution but not between institutions.

The consequence is that the credit in Uzbekistan currently functions as a unit of account rather than as a currency. It measures progress through a programme, it disciplines the semester, and it allows the ministry to compare programme loads across institutions. These are real administrative gains, and it would be wrong to describe the reform as cosmetic: a system that knows what a semester contains is easier to plan and to audit than one that does not. But the purpose for which ECTS was designed — making study portable — requires the four missing devices, and their absence means that a student who moves between two Uzbek institutions, or between an Uzbek and a Kazakh one, has a credit record that the receiving institution must interpret without the instruments that were designed to make interpretation unnecessary.

5 Qualifications: A Hierarchy Reordered, Not Yet Legible

The second instrument is the qualifications framework, and here the documentary record is thinner. The Law on Education of 2020 establishes the levels of the education system and the state's authority over the definition of qualifications; the Concept to 2030 commits the system to comparability with international standards (Uzbekistan 2019; 2020a). Neither document, in the versions examined, sets out a national qualifications framework with level descriptors, nor does either refer to self-certification against the Framework for Qualifications of the European Higher Education Area. The absence is significant because of what a framework does. The QF-EHEA is not a list of degrees; it is a set of level descriptors that state what a holder of a qualification at a given level should know and be able to do, and it is the reference against which national frameworks are certified as compatible (QF-EHEA 2005). Self-certification is the procedure that produces legibility: a country publishes a report, verified by international experts,

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explaining how its national qualifications map onto the overarching framework, including where its qualifications differ.

Without that step, a national hierarchy remains a domestic classification, and a foreign institution assessing an Uzbek diploma has no authoritative statement of what the diploma represents beyond the length of study.

Uzbekistan's degree architecture has nonetheless been reorganised in ways that move toward the Bologna model. The two principal cycles, bakalavriat and magistratura, correspond in length and sequence to the first and second cycles of the QF-EHEA, and the reform documents present them as the core of the system. The correspondence is real but incomplete. The Bologna model's first cycle is defined by outcomes, not by duration, and the four-year bachelor's degree is compatible with the framework only if its outcomes match the first-cycle descriptors. Duration is a proxy for level, not a definition of it, and a system that reforms duration without reforming outcomes has reformed the calendar.

6 Quality Assurance: The Form of Independence, the Logic of Inspection

Quality assurance is where the tension between imported form and inherited logic is most visible, and where the documentary record is richest. The pre-reform system was a system of state control: institutions were licensed, programmes were approved, and graduates were certified by state examination commissions. Quality was a matter of conformity to the approved curriculum, and the state was both the author of the standard and the judge of compliance. Krouglov's account of the transformation describes a system in transition from this model toward one organised around internal quality culture and external review, with international accreditation as a new element (Krouglov 2017; 2022).

A quality assurance function has been created inside the ministerial structure, and the difficulty lies in its relationship with the ministry. In the ESG model, the value of external review depends on the reviewer's independence from the authority that funds and appoints. Where the agency is constituted within the ministry, or where its leadership is appointed by the minister, the review is structurally an extension of inspection, however expert its methods. This is not a criticism of individuals; it is a property of organisational design, and it is the reason the ESG treat agency independence as a standard rather than an aspiration. The documents examined establish the function without establishing the independence, and the distinction is the difference between quality assurance as a system of peer judgement and quality assurance as a system of administrative verification.

The second difficulty concerns the public report

The second difficulty concerns the public report. The ESG's external review is designed to produce a published judgement that institutions, students and employers can use. A review whose findings are confidential to the ministry informs the state but not the market, and in a system expanding through non-state provision, the market is where quality information is most needed. The documents do not, in the versions examined, provide for publication of review outcomes in a form comparable to the ESG's expectations. The consequence is that the information asymmetry that quality assurance is meant to correct persists: the state knows more than it discloses, and students choose between institutions on the basis of reputation and price rather than assessed quality.

The third difficulty is the student. The ESG require student participation in quality assurance, both in internal processes and in external review panels. Student participation is not a decorative commitment: it is the mechanism by which the institution learns what its own processes feel like from the receiving end, and it is the element of the ESG most resistant to translation into an administrative system, because it requires a recognised student voice with the standing to dissent. The documents examined do not establish such a mechanism. Where student evaluation exists, it tends to be a survey administered by the administration rather than a participation in governance, and the difference matters for the same reason that the difference between

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workload and contact hours matters: the form is present, the function is not.

These three difficulties share a structure. Each is a case of an instrument adopted at the organisational level and not carried into the practised level, and each is explained by the same cause: the state that would have to cede authority to make the instrument work is the state that authored the instrument. That is the decoupling mechanism in its purest form. The ministry adopts the ESG vocabulary because it signals modernity and because international accreditation requires it; it retains the inspection logic because that logic is the basis of its authority. Meyer and Rowan's argument predicts exactly this outcome, and the prediction is confirmed not by the ministry's intentions but by the design of the bodies it created (Meyer and Rowan 1977).

There is a fair counter-argument. A state that has just tripled enrolment has a legitimate interest in rapid verification of provision, and a fully independent, cyclical, public-review system is slow and expensive. Inspection is a reasonable instrument for a system in the middle of a capacity emergency. The counter-argument has force, but it cuts against the claim that the ESG have been adopted: it supports the different claim that a transitional system may rationally choose inspection over peer review, and that the choice should be described as such rather than as the implementation of a European standard. The distinction matters for policy because it determines what kind of assistance a system needs. A system implementing the ESG needs help with agency independence and review methodology; a system choosing inspection needs help with inspection capacity and publication. Confusing the two wastes both.

7 Recognition and Mobility: The Hinge That Does Not Yet Turn

Recognition is the instrument that converts the other three into rights, and it is the one where the gap between adoption and function is widest. The Lisbon Convention establishes a presumption of recognition, a

right to a reasoned decision, and a procedure for assessing qualifications against substantial differences (Council of Europe and UNESCO 1997). Its logic is that a qualification awarded by a competent authority should be recognised unless the receiving system can demonstrate that it is substantially different from the qualification for which recognition is sought, and the burden of proof lies with the refuser (Uvalić-Trumbić and Bergan 1996).

Uzbekistan is not a party to the Lisbon Convention, which is a European regional instrument, and its recognition obligations have instead been framed through the UNESCO Global Convention of 2019, ratified in November 2025 (UNESCO 2019; Uzbekistan 2025). The Global Convention extends the Lisbon principles globally: a right to assessment, a presumption of recognition unless substantial differences are demonstrated, transparent and time-bound procedures, and cooperation between national authorities. Ratification is a genuine commitment, and it places Uzbekistan within a global recognition regime that includes most of the EHEA states. The consequence for the other instruments is direct. A credit system without transfer and a qualification hierarchy without certification are, in themselves, domestic administrative improvements. They become instruments of mobility only when a receiving institution can rely on them, and reliance requires a recognition infrastructure: a statement of what the qualification means, a procedure for comparing it, and an authority whose decisions are accepted. The absence of that infrastructure is why the Uzbek reform, despite its technical precision, has not yet produced a visible increase in academic mobility.

Teichler's finding that formal instruments create the conditions for mobility but not the demand applies with double force here, because the demand side — the agreements, the language capacity, the funding — is also thin (Teichler 2012).

Mobility in the region has been shaped by other forces

Mobility in the region has been shaped by other forces. The literature on Central Asian student mobility documents flows toward Russia, Turkey, Korea, China and, increasingly, Europe, with the direction determined by language, cost, visa regimes and historical ties rather than by credit compatibility, and with English-medium provision becoming an important channel of outward

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orientation (Rahmanova and Ekşi 2023). The OSCE Academy in Bishkek is an instructive case of intra-regional mobility organised outside the national credit systems, through an international institution with its own arrangements. Anafinova's study of the Tuning initiative in Central Asia shows that subject-level cooperation can build comparability from the ground up, through shared learning outcomes and discipline-based networks, without waiting for national frameworks (Anafinova 2022). These examples suggest an alternative route: comparability built by academics and disciplines rather than by ministries, which is closer to how the EHEA itself developed in its early years.

The recognition hinge, then, has three parts, and none of them is fully in place. The first is a competent authority with published procedures. The second is a description of national qualifications in a form that foreign authorities can read, which is the Diploma Supplement and, behind it, the qualifications framework. The third is a set of transfer agreements and credit recognition practices that allow study periods to count. Ratification supplies the first in principle; the framework and the supplement supply the second only when they exist in the form the conventions presuppose; the agreements supply the third, and they are absent. The result is a system that has signed the right to recognition and has not yet built the machinery that makes the right usable, which is the precise form that decoupling takes at the level of international law.

8 Discussion: Three Patterns and One Mechanism

The first is a legislative gradient. The depth of adoption declines as the functional importance of the instrument rises. Credits, the least consequential of the four instruments when taken alone, are specified in the greatest detail: a unit, a conversion ratio, a semester norm, an annual norm, an outcomes requirement and a modular structure, all fixed in a binding resolution within a year of the enabling decree. Qualifications, which determine whether a credit means anything across institutions, are addressed at the level of degree structure and not at the level of descriptors and certi-

fication. Quality assurance, which determines whether a qualification is trustworthy, is addressed through the creation of a body and the encouragement of international accreditation, without the independence and publication that give external review its meaning. Recognition, which determines whether any of it travels, is addressed through ratification of a convention whose implementing apparatus is not yet in place. The gradient runs from the instrument that can be written as a formula to the instrument that requires an institution to surrender discretion.

The second is translation into the administrative register. Each instrument has been rendered in the vocabulary of the system it entered. The credit became an academic hour at a fixed ratio; the module became a unit of curriculum planning; the quality agency became a unit of ministerial administration; recognition became a treaty obligation. In each case the translation is intelligible and internally coherent, and in each case it preserves the older logic inside the newer form. This is not a failure of understanding. The officials who wrote the resolution knew what ECTS was; the text they produced is technically competent. It is a failure of fit between an instrument designed to distribute authority and an administrative system designed to concentrate it, and the translation is the compromise that the fit permits.

The third is that expansion outran infrastructure, and that the instruments were used to manage the consequences. The enrolment ratio rose from 8.6 to 56.5 per cent in seven years, and public expenditure rose from 4.4 to 5.5 per cent of GDP over a slightly shorter period. A system that multiplies its student body by six while increasing its unit funding by a quarter is a system under acute capacity stress, and in that condition the instruments that are most useful are the ones that standardise and count: credits, modules, programme templates, licensing. The instruments that require deliberation — external peer review, outcomes-based assessment, recognition procedures — are precisely the ones that a stressed system postpones. The order of adoption is therefore not only a matter of legislative convenience; it is also a rational response to an emergency, and any judgement of the reform must hold both facts at once.

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The environment in this case is not vague

The mechanism that connects the three patterns is the one identified in Section 2: decoupling of formal structure from technical work, undertaken to secure legitimacy under conditions where the environment rewards conformity of form. The environment in this case is not vague. It consists of international accreditation bodies whose standards presume the ESG, of partner universities whose agreements presume ECTS, of rankings and reputation systems that reward the vocabulary of the European model, and of a domestic political project that presents integration into the world educational space as an achievement. Each of these rewards the display of the instrument, and none of them, in the absence of membership and peer review, examines whether the instrument is used. Decoupling is the predictable result, and its location is predictable too: it occurs wherever the instrument would require the state to give up a discretion that the state retains.

What follows is a question of sequence: the connective devices would deliver more function per unit of effort than further elaboration of the instruments themselves. Four are specified in documents the system has already endorsed. The first is a grade distribution table and a transcript convention, adopted nationally and published. These are technical documents of a few pages, and they convert credits from an internal unit of account into a transferable record. The second is a credit transfer agreement among a group of Uzbek universities, piloted in one or two disciplines, with a learning agreement template and a recognition procedure. The third is a Diploma Supplement issued automatically with every qualification, in the format the conventions presuppose, which requires no new law and makes every Uzbek graduate legible to a foreign admissions office. The fourth is the publication of external review outcomes, in a form that allows comparison, which costs a website and a decision.

For the EHEA's external dimension, the case carries a clear implication. The Process has spent two decades extending its instruments beyond its membership through dialogue, projects and the Bologna Policy Forum, and the Tirana Communiqué reaffirms the commitment to engagement with partner regions. The Uzbek case shows that the instruments travel readily and that their connective infrastructure does not travel with them. A policy of external engagement that consists of

conferences, declarations and technical assistance in drafting resolutions will produce nominal convergence; a policy that consists of help with recognition practice, credit transfer pilots, agency independence and data publication will produce practised convergence, which is slower and less photogenic. If the EHEA's goal is that a qualification awarded in Samarkand should be usable in Salamanca, the second kind of assistance is the one that matters, and it is also the kind that the EHEA's own members have found difficult.

For the theory of policy borrowing, the case supports three refinements. First, the four-level scale introduced in Section 2 is more informative than a binary measure of adoption, because it locates the break in the chain and the break is where the explanation lies. Second, decoupling should be treated as a variable rather than a diagnosis: it occurs at predictable points, defined by the discretion that an instrument would remove, and those points can be identified before adoption. Third, the direction of borrowing matters less than the presence of an external examiner. Kazakhstan's membership gave it an examiner, in the form of implementation reports and peer review, and its implementation of the connective devices was correspondingly deeper; Uzbekistan's non-membership gives it none, and its implementation stopped where the examiner would have looked. That is a hypothesis rather than a finding, and it is testable by comparing the two systems on the same four levels, which is the natural next step for this research.

9 Conclusion

Uzbekistan has done something that the literature on the Bologna Process has not much examined: it has adopted the instruments of the European Higher Education Area without joining the Area, and it has done so at speed, in the middle of an expansion of participation without precedent in its region. The result is a system that speaks the European vocabulary with unusual technical fluency and that has not yet built the machinery that makes the vocabulary mean anything across a border. The article's contribution is to specify that outcome rather than to lament it. Adoption was assessed at four levels — rhetorical, legal, organisational

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and practised — and for each of the four instruments the chain was found to break at the same place: between the creation of a body or a rule and the demonstration that the rule is used for its designed purpose. The credit system has the arithmetic of ECTS and not its transfer devices; the qualifications architecture has the degree lengths of the Bologna model and not its descriptors or certification; quality assurance has the form of an agency and the logic of inspection; recognition has a ratified convention and not an implementing practice.

The instruments were adopted in inverse order to their functional importance, because the ones that matter most are the ones that require the state to give up discretion.

Three conclusions follow. The first is analytical: the four instruments are a system, and the system's performance is set by its weakest connective device, which in this case is recognition. Judging a reform by the sophistication of its credit rules is like judging a currency by the quality of its printing. The second is practical: the highest-return interventions available to Uzbekistan are not new instruments but the small devices that make existing ones operative — a grade distribution table, a transfer pilot, an automatic Diploma Supplement, published review outcomes. Each is compatible with the legal framework already in place, and each would convert a formal instrument into a working one. The third is comparative: the case suggests that what membership supplies is not the instruments, which anyone may copy, but the examiner who asks whether they are used. That is a fragile and unglamorous benefit, and it appears to be the one that matters.

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