

Recognition of Foreign Qualifications and Migrant Labor Market Integration

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Abstract

Foreign qualifications often lose part of their labor market value when migrants cross national borders. This article examines how recognition systems translate education and occupational experience acquired abroad into decisions that employers and licensing bodies can use. It compares Germany, Canada, and the United States and treats recognition as a sequence of institutional judgments rather than a single administrative act. The study draws on comparative policy analysis, official documents, and prior empirical research available through 10 September 2026. It distinguishes regulated from non-regulated occupations and considers applicants whose records are incomplete because of displacement or institutional breakdown. The findings show that formal recognition improves employment and earnings when it is connected to licensing, targeted education, language support, and employer communication. Delays can produce lasting occupational downgrading because migrants often enter lower-skilled work while waiting and then lose contact with their original profession. National systems distribute authority and uncertainty in different ways, but none removes the need for institutional judgment. Non-state professional identification systems may preserve and organize evidence, yet they cannot confer legal recognition. Their value depends on transparent verification, limited claims, data protection, and effective review. The article proposes a layered approach that connects early guidance, accessible assessment, partial recognition, supervised practice, and portable professional records.

Keywords: foreign qualifications; migrant labor market integration; credential recognition; occupational licensing; professional identification; institutional trust; labor mobility; digital credentials

JEL classification: F22; J24; J61; J68

1 Introduction

International migration transfers people across borders more easily than it transfers the institutional value of their education and experience. A degree, professional certificate, or record of skilled work may be valid in the country where it was issued but difficult to use elsewhere. The receiving country must interpret unfamiliar programs, standards, institutions, and occupational titles. Employers and regulators must also decide whether the available evidence is reliable enough for admission to a profession or for hiring.

This problem affects both migrants and receiving economies. A worker may possess the knowledge needed for a position but remain excluded because the qualification is not recognized, the licensing procedure is slow, or an employer cannot interpret the documents. The result can be unemployment, lower earnings, or employment below the person's level of training. Aggregate integration indicators continue to show substantial gaps between foreign-born and native-born populations in job quality and the use of skills, even where employment rates have improved (OECD and European Commission, 2023).

The recognition of foreign qualifications is often discussed as a technical exercise. In practice, it connects education policy, labor regulation, migration governance, and employer behavior. A positive academic assessment may establish that a foreign degree corresponds to a domestic level. It may still be insufficient for entry into a regulated occupation. A professional license may permit practice but may not remove employer concerns about language, local experience, or references. In a non-regulated occupation, no public recognition decision may be required, leaving the employer to evaluate the qualification directly.

Research shows that the country in which human capital was acquired affects its return after migration. Foreign education and experience are often rewarded less than comparable domestic credentials (Friedberg, 2000). Formal recognition can reduce this loss. Evidence from Germany indicates that recognized occupational qualifications are associated with substantial improvements in employment and wages over the following years (Brücker et al., 2021). Recognition is therefore relevant to economic integration, but its effects depend on the institutional setting in which it occurs.

The issue has become more difficult as mobility has grown more varied. Some migrants move through planned skilled migration programs and can prepare documents before departure. Others move because of war, persecution, family separation, or sudden political change. They may be unable to contact an institution in the country of origin or obtain a complete transcript. Digital records can help, but they can also expose migrants to new risks. At the same time, employers face a growing volume of documents, online profiles, and machine-assisted representations whose quality is uneven.

This article analyzes recognition as a process through which foreign professional evidence acquires usable meaning in a receiving labor market. It compares three national settings: Germany, Canada, and the United States. These cases were selected because they allocate recognition authority differently. Germany relies on a relatively formal statutory structure. Canada combines federal migration policy with provincial regulation and professional self-governance. The United States relies heavily on state licensing bodies, educational institutions, employers, and private evaluation services.

The article also examines professional identification outside state recognition systems. Recent work on RUPASS and Amerpass considers how non-state systems may organize evidence and preserve professional continuity across borders (Leonov, 2026a, 2026b). These systems do not replace public authority. They are relevant because many recognition failures begin before a legal decision is made, when evidence is dispersed, inaccessible, or difficult to interpret.

The argument developed here is that recognition works through a chain of decisions. Document verification, comparison, licensing, employer interpretation, and entry into suitable work are connected but distinct stages. A failure at any stage can reduce the value of the qualification. Policy should therefore be assessed by the occupational outcomes it supports, not only by the number of recognition decisions it produces.

2 Conceptual Framework

2.1 Qualifications credentials and competence

Three concepts require distinction. A qualification is a formal outcome of education, training, or professional preparation. It may be expressed through a degree, diploma, certificate, or occupational title. A credential is the document or digital record used to communicate that outcome. Competence refers to the knowledge and ability a person can apply in practice.

The three may overlap, but they are not interchangeable. A person may hold an authentic credential yet lack current competence because the field has changed or the person has not practiced for many years. Another person may possess strong competence but lack complete documents. This is common among

refugees, workers trained through apprenticeships, and migrants whose professional history includes informal or interrupted employment.

UNESCO defines recognition as a formal acknowledgment by a competent authority of the validity and academic level of a foreign qualification, partial study, or prior learning (UNESCO, 2020). This definition identifies the authority and the object of the decision. It does not imply automatic access to employment. The International Labour Organization similarly treats skills recognition as part of a broader process that connects assessment with employment services and labor market access (ILO, 2020).

2.2 Recognition as institutional conversion

Recognition can be understood as institutional conversion. Education and experience acquired in one system must be translated into categories that another system accepts. This conversion has a documentary dimension, because the evidence must be authenticated. It also has a substantive dimension, because program content and occupational competence must be compared. Finally, it has a legal and practical dimension, because the decision must carry meaning for a licensing body, educational institution, or employer.

Conversion is rarely exact. National education systems divide fields differently, assign different lengths to programs, and place practical training at different stages. Occupational titles may appear similar while carrying different legal powers. Recognition bodies therefore assess comparability rather than identity. The key question is often whether the differences are substantial enough to justify denial, partial recognition, or a requirement for additional training.

The Global Convention on the Recognition of Qualifications concerning Higher Education establishes principles of fair, transparent, timely, and non-discriminatory recognition. It also addresses cases in which refugees and displaced persons cannot provide complete documentation (UNESCO, 2019). These principles are important, but their implementation depends on national institutions and does not itself determine access to every occupation.

2.3 Academic recognition and professional recognition

Academic recognition concerns the level and status of education. It is commonly used for admission to further study, transfer of credits, or confirmation that a degree corresponds to a domestic qualification level. Professional recognition concerns access to work, especially where the occupation is regulated.

The distinction explains why one assessment cannot serve every purpose. A university may accept a foreign bachelor's degree for graduate admission while a licensing board requires additional clinical practice. An employer may accept the same degree for an unregulated position without requesting either decision. Migrants need to know which authority can answer the particular question they face.

2.4 Regulated and non-regulated occupations

In a regulated occupation, law reserves practice or use of a professional title for people who meet specified requirements. Recognition may be only one part of the licensing process. Applicants may also need examinations, language tests, supervised practice, background checks, or evidence of professional fitness.

In a non-regulated occupation, the employer usually decides whether the foreign qualification is relevant. Formal assessment may strengthen the application, but it does not compel acceptance. Employer knowledge becomes decisive. A technically accurate recognition statement has little practical effect if recruiters do not understand it or if hiring systems screen out the applicant earlier.

3 Theoretical Approaches

3.1 Human capital transferability

Human capital theory explains education and experience as productive resources. Migration reveals that these resources are partly location-specific. Language, law, workplace routines, professional networks, and knowledge of local institutions affect how easily prior skills can be used. Friedberg (2000) showed that the return to education depends partly on where it was acquired and that post-migration education can raise the value of earlier foreign education.

Recognition may improve transferability by translating a foreign qualification into a familiar domestic category. It cannot transfer every element of professional practice. A physician may understand medicine but still need local knowledge of prescribing rules. An engineer may have strong technical skills but lack familiarity with local codes. Recognition policy must therefore distinguish between real competence gaps and differences that can be addressed through limited adaptation.

3.2 Signaling and information asymmetry

Employers cannot directly observe every applicant's productivity before hiring. Credentials operate as signals that reduce this uncertainty (Spence, 1973). A foreign credential may send a weaker signal when the employer does not know the institution, curriculum, grading system, or occupational context. The problem may persist even when the applicant is highly qualified.

A recognition decision can strengthen the signal by adding an assessment from a familiar institution. Its effect depends on the reputation of the assessing body and the clarity of the result. A statement that only confirms document authenticity answers a different question from an evaluation of academic level or occupational equivalence. If the distinction is unclear, employers may overestimate or underestimate what the assessment proves.

3.3 Social closure and occupational licensing

Professional regulation protects health, safety, and service quality. It also controls entry into occupations. Social closure theory draws attention to the way credentials, licensing, certification, and professional associations restrict access to valued positions (Weeden, 2002). These restrictions may be justified by public interest, but they can also preserve advantages for established groups.

Research on occupational licensing in the United States shows that state-specific requirements can reduce mobility and that reciprocity lowers some of these costs (Johnson and Kleiner, 2020). Licensing can also provide a credible signal while reducing labor supply in the occupation (Blair and Chung, 2018). Foreign-trained applicants face an additional layer because they must first show that their education fits the local licensing structure.

The relevant policy question is not whether standards should exist. It is whether the required evidence is connected to actual occupational risk. Repetition of education already completed abroad may be justified when a material competence gap exists. It is harder to justify when the difference concerns only format, institutional familiarity, or a requirement unrelated to current practice.

3.4 Segmented labor markets

Labor markets do not distribute migrants evenly across occupations. Piore (1979) described how migrants are often drawn into secondary labor markets marked by insecurity, lower pay, and limited progression. Non-recognition can reinforce this pattern. A qualified migrant may enter readily available work outside the original profession and remain there because the recognition process demands time and money that the new job does not provide.

This approach helps explain why early employment is not always evidence of successful integration. A high employment rate can coexist with serious skill underuse. Occupational match, earnings progression, job stability, and access to professional advancement provide a fuller measure.

3.5 Institutional trust and judgment

Recognition depends on trust between institutions that may have no prior relationship. The receiving authority must decide whether it trusts the issuing institution, the documents, the verification channel, and the assessment method. Employers then decide whether they trust the recognition outcome.

These decisions are made with incomplete information. Leonov and Savchuk (2026b) describe institutional judgment as the process through which an institution decides that its limited understanding is sufficient for legitimate action. Applied to qualification recognition, this approach shifts attention from the ideal of complete information to the quality of the decision process. The authority should identify the question, select relevant evidence, explain its interpretation, and allow revision when new information appears.

4 Research Questions

The study addresses four questions.

- RQ1. Through which institutional stages do foreign qualifications acquire labor market value in a receiving country?
- RQ2. Which barriers most often prevent recognition from leading to employment that corresponds to a migrant's education and experience?
- RQ3. How do Germany, Canada, and the United States allocate authority and uncertainty within their recognition systems?
- RQ4. What role can non-state professional identification and digital verification play without replacing licensing authorities or public recognition bodies?

5 Methodology

5.1 Research design

The article uses a qualitative comparative policy design. The unit of analysis is the institutional pathway through which a foreign qualification moves from documentary evidence to a labor market decision. The study does not rank countries or assume that a single national model can be transferred intact to another setting.

Germany, Canada, and the United States were selected because they represent different allocations of authority. Germany provides a relatively formal recognition structure connected to federal and state regulation. Canada combines federal support with provincial and territorial responsibility for many professions. The United States has no single national recognition authority and relies on state licensing bodies, educational institutions, employers, and private credential evaluators.

The comparison focuses on five dimensions: the location of decision-making authority, the distinction between regulated and non-regulated occupations, the treatment of incomplete evidence, the connection between recognition and employment, and the role of non-state or digital verification.

5.2 Sources

The analysis draws on peer-reviewed research, legislation, official program descriptions, policy reports, international conventions, and institutional guidance. Foundational studies were included when they supplied concepts needed to explain human capital transfer, signaling, occupational closure, or segmented labor markets. More recent sources were used to examine recognition outcomes, national arrangements, digital credentials, and non-state professional identification.

Official materials were preferred for the description of legal authority and administrative procedures. Empirical studies were used for claims about employment, earnings, discrimination, and occupational mobility. SSRN working papers were included when they offered a relevant conceptual model or an institutional case not adequately represented in the journal literature. They are treated as working papers, not as substitutes for independent empirical evaluation.

5.3 Temporal scope

The original article was published on 31 December 2023. The present version updates the evidence base through 10 September 2026. Earlier institutional arrangements remain in the analysis where they explain the development or continuing structure of the systems under review. When a source describes a program at a particular date, the article does not assume that every administrative detail remains unchanged.

5.4 Analytical limits

The study does not use individual administrative records and does not estimate a new causal effect. The three national cases contain substantial internal variation by occupation, state, province, and profession. The comparison identifies recurring institutional mechanisms rather than providing a procedural guide for a particular license.

Recognition is also difficult to isolate from language proficiency, immigration status, discrimination, local work experience, and economic conditions. The article therefore distinguishes evidence about recognition from broader explanations of migrant labor market outcomes. Where the analysis extends a theory or case study to a new setting, that extension is identified as an interpretation.

6 Institutional Pathway from Qualification to Employment

6.1 Identifying the relevant authority

The first task is to determine what decision the migrant needs and who can make it. The answer depends on the occupation and purpose. An educational institution may assess a degree for admission. A professional board may decide eligibility for a license. An employer may evaluate a qualification for hiring. An immigration authority may require a separate assessment for a visa or points-based application.

Confusion at this stage creates avoidable cost. Migrants may purchase an academic evaluation that a licensing board does not accept, complete translations in the wrong format, or apply to an authority that has no jurisdiction. Clear pre-arrival information can prevent these errors.

6.2 Collecting and verifying evidence

Applicants are commonly asked for diplomas, transcripts, course descriptions, proof of practical training, licenses, employment records, and certified translations. Verification may require direct contact with the issuing institution. The procedure is relatively straightforward when records are digitized and the institution responds promptly. It becomes difficult when archives are incomplete, institutions have closed, borders have changed, or communication with the country of origin creates risk.

Document verification establishes provenance and integrity. It does not by itself establish equivalence. A verified diploma may represent a program with different content or professional rights. Authorities should state which aspect of the evidence has been confirmed.

6.3 Assessing comparability

The assessing body compares the foreign qualification with a domestic reference point. The comparison may consider level, duration, learning outcomes, practical components, institutional status, and access rights in the issuing country. The result may be full recognition, partial recognition, a statement of comparability, or refusal.

Partial recognition is especially important. A binary decision can force a qualified applicant either into full repetition of training or out of the occupation. A written account of the specific differences makes targeted education possible and allows the applicant to challenge an error.

6.4 Meeting supplementary requirements

In regulated occupations, recognition may be followed by examinations, language requirements, supervised practice, ethics instruction, or proof of good standing. These requirements can protect the public when they address knowledge that is necessary in the receiving system. Their legitimacy is weaker when they duplicate prior training without a documented reason.

6.5 Employer interpretation and occupational entry

The final stage is the use of the qualification in recruitment and employment. Employers need a concise explanation of what the assessment means. A long administrative decision written for legal purposes may be difficult for a recruiter to interpret. Recognition bodies should therefore provide an employer-facing summary without reducing the legal precision of the underlying decision.

The pathway is complete only when the applicant can use the result. OECD guidance stresses the importance of connecting assessment with language learning, bridging programs, work experience, and employment services (OECD, 2017). Treating recognition as an isolated document risks measuring administrative output rather than integration.

7 Major Barriers

7.1 Fragmented responsibility

Recognition systems often divide responsibility among ministries, professional regulators, universities, regional governments, and private evaluators. The division may reflect constitutional or professional autonomy, but it makes the process difficult to navigate. Applicants receive accurate answers to narrow questions without receiving a clear account of the entire pathway.

Fragmentation also creates repeated assessment. The same records may be requested by immigration authorities, educational institutions, licensing bodies, and employers. Each institution may use a different format or verification provider. Repetition increases cost without necessarily improving the quality of the final decision.

7.2 Missing or inaccessible documents

Document requirements place the greatest burden on people who cannot contact the issuing institution. Refugees may have left without transcripts or licenses. Universities may be located in occupied territories or conflict zones. Governments may refuse verification for political reasons. Names, borders, and institutional structures may also have changed.

A procedure that accepts only original documents can exclude applicants whose qualifications are genuine but difficult to document. UNESCO's recognition framework and qualifications passport initiatives show how structured interviews, available records, and expert assessment can support evaluation when conventional evidence is incomplete (UNESCO, 2019, 2020).

7.3 Time and cost

Fees for applications, translations, examinations, travel, and supplementary education can be substantial. The indirect cost may be greater. Applicants must reduce working hours, arrange childcare, or wait without access to their profession. A formally accessible procedure can therefore remain practically inaccessible.

Delay changes behavior. Migrants often accept lower-skilled work to meet immediate needs. Time outside the profession then weakens recent experience and makes later re-entry harder. The recognition process can create part of the disadvantage that it later treats as an individual skills deficit.

7.4 Language and local knowledge

Language proficiency is necessary in many occupations, especially where communication affects safety, informed consent, or legal responsibility. Problems arise when a general language test substitutes for an assessment of occupational communication or when the required level is not connected to actual work.

Local knowledge presents a similar issue. Some professions require knowledge of national law, codes, or administrative practice. This gap is usually narrower than the entire foreign qualification. Targeted instruction is more proportionate than requiring the applicant to repeat a full domestic program.

7.5 Employer uncertainty and local experience

Employers may treat local experience as evidence that an applicant understands workplace expectations. The requirement can become circular. A migrant cannot obtain relevant local experience without being hired, yet cannot be hired without it. Supervised placements and structured trial employment can reduce this problem.

Evidence from resume experiments shows that employers may respond differently to foreign names, education, and experience even when other qualifications are comparable (Oreopoulos, 2011). Credential recognition can reduce uncertainty, but it does not remove discrimination or every preference for familiar experience.

7.6 Collective reputation

Applicants may be judged through reputations attached to a country, institution, profession, or migrant group. A regulator may increase scrutiny after encountering unreliable records from a particular source. Targeted verification can be justified, but generalized distrust places additional burdens on applicants who had no connection to the original problem.

Leonov (2026c) describes how individual misconduct can spread distrust across professional communities. Applied to qualification recognition, this suggests that institutional memory may turn isolated cases into group-level assumptions. Fair assessment requires reasons tied to the applicant's evidence or to a documented problem with the issuing institution. Nationality alone is not an adequate basis for adverse judgment.

8 Recognition and Occupational Outcomes

8.1 Employment and earnings

Recognition can improve labor market outcomes by removing legal barriers and strengthening the information available to employers. The strongest causal evidence in the literature comes from Germany. Brücker et al. (2021) found that, three years after recognition, immigrants in their study earned 19.8 percent more and were 24.5 percentage points more likely to be employed than comparable applicants in the control group. The authors also reported convergence in earnings with native counterparts.

These results show that recognition can have economic value. They should not be treated as a universal estimate. Effects vary by occupation, applicant characteristics, labor demand, and the connection between the recognition decision and the right to work. A decision that directly opens access to a regulated profession is likely to have a different effect from a general statement of academic comparability.

8.2 Occupational match

Employment alone is an incomplete outcome. A migrant may be employed while working below the level of prior education or outside the original field. Canadian research has documented lower returns to foreign credentials and the devaluation of prior professional experience (Li, 2001; Bauder, 2003; Guo, 2009). These findings point to an institutional problem as well as a labor market problem. Education has value only when an employer or regulator can place it within a recognized occupational structure.

Occupational match should be measured through the relationship between previous training and current work, the level of responsibility, earnings progression, and prospects for advancement. A temporary job outside the profession may be a rational entry strategy. It becomes a sign of failed integration when the worker has no realistic route back to the original field.

8.3 Recognition as a time-sensitive intervention

The timing of recognition affects its value. Early recognition allows migrants to search for work while their skills and professional networks remain current. Late recognition may arrive after several years of occupational separation. Employers may then focus on the applicant's recent lower-skilled employment rather than earlier professional experience.

This process creates path dependence. The first job affects later opportunities, the contacts a person develops, and the training that remains feasible. Recognition policy should therefore consider time to decision as an outcome in its own right. A correct decision delivered too late may not restore the opportunity that was lost.

8.4 Why recognition may not lead to suitable work

Several factors can interrupt the connection between recognition and employment. A licensing authority may require additional steps. Employers may not understand the assessment. The migrant may lack occupational language, local references, transportation, childcare, or the financial ability to complete an unpaid placement. Discrimination may remain after the credential has been recognized.

The problem is cumulative. Each barrier may appear manageable in isolation, but their sequence can make occupational return unrealistic. Effective policy must connect the recognition decision with the support needed to use it.

9 Comparative Analysis of National Models

9.1 Germany

Germany has developed a structured system for assessing foreign professional qualifications. The federal Recognition Act regulates procedures for occupations governed by federal law, while federal state laws apply to other regulated occupations. The official Recognition in Germany portal directs applicants to the relevant authority and reference occupation (Federal Institute for Vocational Education and Training, n.d.).

In the broader European Union framework, Directive 2005/36/EC coordinates recognition of professional qualifications for persons and qualifications within its scope. Germany's national procedures remain central for many qualifications obtained outside that framework (European Parliament and Council, 2005).

The German model relies on comparison with a specific domestic occupation. The competent authority may find full equivalence, identify substantial differences, or specify compensatory measures. This structure gives the applicant a formal decision and, in many cases, a clearer route to remedy identified gaps.

The model's strength is legal visibility. Applicants can identify an authority, a reference occupation, and a decision procedure. Its weakness is the complexity created by different occupations and federal state responsibilities. Documentary demands and supplementary measures may still delay entry. The system works best when counseling, language education, and adaptation training are available alongside assessment.

Germany also provides the empirical example most clearly associated with improved outcomes after recognition (Brücker et al., 2021). This does not mean that every applicant benefits equally. It shows that a formal recognition procedure can have measurable labor market effects when the decision is institutionally connected to occupational access.

9.2 Canada

Canada combines skilled migration selection with a decentralized system of professional regulation. Provinces and territories hold primary responsibility for many regulated occupations and delegate substantial authority to professional regulators. The federal government supports coordination, information, loans, and projects through the Foreign Credential Recognition Program (Employment and Social Development Canada, 2023).

The Pan-Canadian Framework sought to make assessment more timely, consistent, fair, and transparent. It also established a commitment to provide applicants in selected occupations with a recognition decision or an account of additional requirements within a defined period (Forum of Labour Market Ministers, 2009).

The central difficulty is the separation between immigration selection and occupational authorization. Education and experience may help a person qualify for immigration but do not guarantee acceptance by a provincial regulator or employer. Applicants can therefore receive a strong message about the value of their skills before migration and a more restrictive assessment after arrival.

Federal initiatives have improved information and supported projects, but evaluations continue to identify fragmented responsibility, cost, local experience requirements, and uneven employer understanding as barriers (Employment and Social Development Canada, 2020). Canada's structure permits occupation-specific innovation, yet it also requires careful coordination across levels of government and professional bodies.

9.3 United States

The United States has no single national authority that recognizes all foreign qualifications. The competent decision-maker depends on the purpose. Educational institutions decide admission and transfer

matters. Employers evaluate qualifications for most jobs. State boards regulate licensed professions. Federal immigration authorities assess qualifications for immigration purposes (U.S. Department of Education, n.d.).

Private credential evaluation services often compare foreign education with U.S. degrees. Their reports can assist employers, universities, and immigration authorities, but acceptance depends on the receiving institution. For licensed occupations, the applicant must follow the rules of the relevant state board. Requirements may differ across states even within the same profession.

This model allows flexibility in non-regulated work. An employer can consider education, experience, portfolios, and practical demonstrations without waiting for a national recognition decision. The same flexibility creates inconsistency. Applicants may receive different answers from different employers or states, and a license obtained in one state may not transfer easily to another. Research on interstate mobility shows the cost of state-specific licensing and the value of reciprocity arrangements (Johnson and Kleiner, 2020).

9.4 Comparison

Table 1. Institutional comparison of qualification-recognition systems

Dimension	Germany	Canada	United States
Primary authority	Federal and state competent authorities; professional regulators	Provincial and territorial regulators, with federal coordination and support	State licensing boards, institutions, employers, and private evaluators
Regulated occupations	Formal comparison with a domestic reference occupation	Profession-specific provincial or territorial licensing	State-specific licensing rules
Non-regulated work	Employer decision; formal assessment may support the application	Employer decision; credential assessment may support the application	Employer decision; private evaluations are common
Main strength	Visible statutory pathway and written remedies	Occupation-specific flexibility with public support programs	Flexible employer-based pathways
Main risk	Delay from documentation and supplementary requirements	Separation between immigration selection and licensing	Fragmentation across states and evaluators
Alternative evidence	Available in some procedures; occupation-dependent	Regulator-specific	Board- or institution-specific

Sources: Federal Institute for Vocational Education and Training (n.d.); Forum of Labour Market Ministers (2009); Employment and Social Development Canada (2020, 2023); U.S. Department of Education (n.d.); OECD (2017).

The three models differ mainly in the location of authority and the visibility of the pathway. Germany places greater emphasis on formal comparison with a domestic reference occupation. Canada combines provincial regulation with federal coordination and immigration selection. The United States leaves more decisions to state boards, educational institutions, employers, and private evaluators.

No model removes discretion. Formal systems locate more of it within administrative and professional bodies. Market-oriented systems leave more of it with employers and private intermediaries. The practical question is whether applicants can identify the decision-maker, understand the evidence standard, and challenge an adverse decision.

10 Unequal Effects on Different Migrant Groups

10.1 Refugees and conflict-displaced migrants

Refugees often face the largest gap between competence and available evidence. They may lack original documents, access to institutional archives, or safe contact with the country of origin. A strict demand for direct verification can exclude them for reasons unrelated to their education.

The UNESCO Qualifications Passport demonstrates an alternative approach. It uses available documentation, structured interviews, and expert assessment to summarize education, work experience, and language proficiency. The passport is not a professional license, but it can make incomplete evidence more usable for education and employment decisions (UNESCO, 2020).

10.2 Country and institution of education

Recognition outcomes may vary according to the receiving institution's familiarity with the country or university that issued the qualification. Programs from well-known institutions are easier to place within existing comparison frameworks. Applicants from less familiar systems may be asked for more evidence even when their education is strong.

This difference can become a form of cumulative disadvantage. Weak institutional familiarity produces additional scrutiny. Additional scrutiny increases delay and cost. Long delay then contributes to occupational separation, which employers may interpret as a decline in competence.

Collective reputation can intensify this effect. When cases of fraud or weak oversight become associated with a country or professional group, authorities may extend distrust to unrelated applicants. Leonov (2026c) argues that collective distrust often grows from institutional memory and risk-reduction practices rather than from formal collective responsibility. Applied here, the argument supports individualized assessment and documented reasons for enhanced verification.

10.3 Gender and family responsibilities

Recognition procedures interact with the unequal distribution of care work. Programs that require full-time attendance, unpaid placements, or travel to distant examination centers may be less accessible to applicants responsible for children or dependent relatives. The formal rule may be identical for everyone while the practical burden is not.

Women are also concentrated in occupations such as health care, education, and social services where licensing and language requirements can be extensive. Flexible scheduling, childcare support, and paid supervised practice can affect whether recognition is actually usable.

10.4 Age and career stage

The expected return from recognition changes across the career. A younger applicant may be able to complete several years of supplementary education, although doing so delays earnings and advancement. An older professional may possess greater experience but have less time to recover the cost of retraining.

Authorities should assess current competence rather than treat the age of a diploma as a direct measure of skill. Recent practice, continuing education, publications, portfolios, and professional responsibility may be more informative than the date of graduation alone.

10.5 Immigration status and financial resources

Temporary status, uncertain work authorization, and limited access to financial aid can restrict the options available to migrants. Recognition may require a long investment before occupational entry.

Applicants who cannot finance that period are more likely to accept lower-skilled work and postpone the process.

Recognition loans and targeted grants can reduce this barrier, but financial support should be connected to realistic occupational pathways. Funding repeated assessments without improving coordination may shift costs rather than solve the underlying problem.

11 From Formal Recognition to Institutional Trust

11.1 A chain of trust

A foreign qualification becomes useful through a chain of trust. The applicant trusts that the process will be fair. The recognition body trusts the issuing institution and verification channel. The regulator trusts the assessment. The employer trusts both the credential and the institutions that interpreted it.

The chain can fail even when every document is genuine. An employer may not recognize the name of the assessment body. A regulator may accept only reports from designated providers. A private evaluator may confirm academic level without addressing professional competence. Clear boundaries are therefore necessary.

11.2 Institutional judgment under incomplete information

Recognition authorities rarely possess complete knowledge of an applicant. They work with translated records, unfamiliar curricula, interrupted employment histories, and evidence received from institutions that may be difficult to contact. The task is to decide when the available evidence is sufficient for a justified action.

Leonov and Savchuk (2026b) define institutional judgment as a sequence that includes an institutional mandate, a specific question, selection of relevant information, interpretation, a threshold of sufficiency, action, and possible revision. This model is useful for recognition because it makes the reasoning process visible. Applicants should know what the authority is deciding, which evidence matters, and why the information did or did not meet the required threshold.

Generative artificial intelligence adds pressure to this process. Portfolios, translations, recommendation letters, and descriptions of experience can be produced or altered more easily. Institutions should not treat every digital record as suspicious. They should separate the quality of presentation from the verification of the underlying claim and identify which sources can provide independent confirmation.

11.3 Employer interpretation

Employers are part of the recognition system even when they hold no formal regulatory authority. In non-regulated occupations, they often make the final decision. In regulated occupations, they decide whether a licensed applicant fits a particular role.

Recognition statements should therefore be understandable outside the assessing institution. They should identify the domestic level, field, verified elements, limitations, and any remaining requirements. Technical detail can remain in the full decision, while a shorter summary supports recruitment.

11.4 Trust in verification

Verification is credible when the source, method, and scope are clear. A receiving institution should be able to determine who issued the credential, whether the record has been altered, what evidence was checked, and what the verifier did not assess.

European Digital Credentials for Learning illustrate one response. The infrastructure allows institutions to issue digitally signed credentials that can be stored, shared, and checked for authenticity (European Commission, n.d.). Technical integrity does not establish occupational equivalence, but it reduces uncertainty about the record itself.

11.5 Professional continuity and portable records

Migration can fragment a professional history. Education records may remain with a university, employment records with former employers, and publications or work samples across several platforms. A migrant may have to reconstruct the same history for each new application.

A portable professional record can preserve continuity. It should distinguish verified evidence from self-reported information and allow the individual to control access. It should also preserve changes and corrections so that an outdated claim does not become permanent.

11.6 The role of non-state verification

Recent studies of RUPASS and Amerpass clarify the possible contribution of non-state professional identification. RUPASS emerged in response to weaknesses in documenting and verifying migrant competencies in a highly regulated migration environment. It sought to formalize experience and create structured trust among mobile specialists, employers, and authorities without assuming state functions. The case also shows how independent verification systems may encounter resistance when they reduce regulatory ambiguity or limit discretionary control (Leonov, 2026b).

Amerpass develops this logic in a transnational setting. It proposes an evidentiary professional identity that can connect information about education, experience, publications, affiliations, and professional standing across institutional boundaries. The model maintains a strict distinction between professional identification and legally binding recognition. It does not grant a license, determine immigration status, or require an employer to accept a qualification (Leonov, 2026a).

These systems are most useful when they fill information gaps. They can preserve professional evidence and reduce the cost of preliminary verification. Their legitimacy depends on transparent standards, reliable sources, procedural accountability, and accurate limits on what has been verified.

11.7 Risks of digital visibility

Greater visibility is not beneficial in every institutional setting. People who have experienced political pressure, selective enforcement, or misuse of personal information may limit their public communication and manage their professional identity defensively. Leonov and Savchuk (2026a) interpret this behavior as adaptive self-censorship under conditions of institutional vulnerability and persistent observability.

This insight matters for digital credential systems. Migrants may avoid a platform if they do not know who can access the record, how information may be combined, or whether participation could expose them to immigration, political, or employment risks. A trustworthy system needs informed consent, data minimization, purpose limits, correction procedures, and meaningful review. Professional legitimacy should not require universal exposure.

12 Policy Responses and Institutional Reforms

12.1 Information before migration

Applicants should be able to identify recognition and licensing requirements before migration when circumstances permit. Guidance should distinguish immigration assessment from occupational recognition

and explain which documents must come directly from the issuing institution. Early information reduces avoidable applications and allows records to be collected while they remain accessible.

12.2 Coordinated entry points

A single information entry point can guide applicants without centralizing every decision. The entry point should identify the competent authority, explain the sequence, and track referrals. Institutions can preserve their legal independence while sharing verified records and basic case information with the applicant's consent.

12.3 Partial recognition and gap statements

Authorities should explain substantial differences in specific terms. A statement that a qualification is simply not equivalent gives the applicant little basis for action. A gap statement should identify the missing learning outcome, practical component, or local legal knowledge and connect it to an approved remedy.

Partial recognition preserves the value of completed education. It also makes decisions easier to review because the authority must show which parts were accepted and which were not.

12.4 Targeted bridging education

Bridging programs should address documented gaps rather than repeat full qualifications. They may combine occupational language, local law, updated technical content, and supervised practice. Flexible schedules are important for applicants who are already working or providing care.

The program should lead to a recognized outcome. Training that is not accepted by the licensing authority adds another credential without resolving the original barrier.

12.5 Supervised practice and provisional entry

Supervised practice allows applicants to demonstrate competence while learning local procedures. It can be appropriate when the core qualification is comparable but the applicant lacks local experience or a limited practical component.

Provisional entry must protect the public and the worker. Supervision standards, permitted tasks, pay, duration, and the route to full authorization should be stated in advance. Unpaid or indefinite placements can become a new form of exclusion.

12.6 Alternative evidence

Applicants who cannot obtain complete documents should be allowed to present other evidence. This may include structured interviews, examinations, portfolios, verified publications, professional references, prior licenses, and practical demonstrations. The evidentiary standard should remain clear and connected to the decision.

Alternative evidence does not mean unverified acceptance. It means that the institution evaluates competence through more than one documentary route. This is particularly important for refugees and applicants from disrupted systems.

12.7 Employer engagement

Employers need guidance on the meaning and limits of recognition decisions. Sector bodies and large employers can help recognition agencies develop readable summaries and identify the information used in hiring. Employer participation should improve communication without transferring public licensing powers to private firms.

Recruitment practices also require review. If automated screening removes applicants because a foreign institution is not listed, a later recognition decision cannot correct the exclusion. Employers should allow recognized qualifications and verified equivalents to pass initial screening.

12.8 Portability and interoperability

Applicants should not have to rebuild the same evidence file for every institution. With consent, verified records should be reusable across education, licensing, and employment processes. Interoperability should preserve the source and scope of each verification rather than merge different decisions into a single unexplained score.

Digital signatures and credential wallets can support portability. Their governance is as important as their technical design. The holder needs access, correction rights, and control over disclosure.

12.9 Monitoring outcomes

Recognition policy should be evaluated through more than application counts. Relevant measures include processing time, total applicant cost, reasons for refusal, appeal outcomes, completion of supplementary measures, entry into the corresponding occupation, and earnings progression.

Results should be reported separately for major applicant groups where privacy permits. Average processing time may conceal serious delays for refugees, certain occupations, or qualifications from less familiar systems. Monitoring should identify where applicants leave the pathway and why.

12.10 Digital records and independent verification

Digital records and independent verification platforms should complement public recognition and occupational licensing. RUPASS illustrates how a non-state system may document competencies and support trust in a national setting with fragmented qualification information. Amerpass extends this approach by considering how professional evidence can remain portable during migration, institutional rupture, or prolonged separation from the country in which it was acquired (Leonov, 2026a, 2026b).

Such systems cannot compel employer acceptance, replace examinations, or remove licensing requirements. Their contribution lies in organizing evidence before and during formal assessment. Public authorities may support interoperability while retaining their own decision powers and requiring transparent verification methods.

The European Commission's recommendation on qualifications of third-country nationals supports faster assessment, improved information, recognition of partial qualifications, and cooperation with employers and recognition networks (European Commission, 2023). These reforms are most effective when they connect administrative recognition with practical occupational entry.

13 Discussion

13.1 Recognition as institutional conversion

The comparison supports an understanding of recognition as institutional conversion rather than document comparison alone. A foreign qualification acquires labor market value when evidence from one system is translated into categories that another system can use. The translation includes several separate judgments: whether the evidence is authentic, whether the program is comparable, whether the applicant meets occupational requirements, and whether an employer regards the result as sufficient for hiring.

This finding answers the first research question. Foreign qualifications acquire value through a sequence of connected institutions, not through a single recognition event. The sequence may begin with an educational institution, a public agency, a professional regulator, or a private evaluator. It ends only when the

qualification can be used for further study, licensing, recruitment, or occupational advancement. A favorable decision at one stage does not automatically bind the next institution.

The distinction between qualification, credential, and competence is therefore central. Authorities need credible credentials to evaluate a qualification, while employers and regulators ultimately need confidence in competence. Problems arise when an institution makes claims beyond the question it has assessed. Confirmation that a document is authentic does not prove occupational readiness. Academic comparability does not grant a license. A professional identifier does not create a legal right to practice.

13.2 Different systems allocate uncertainty differently

The three national cases do not represent a simple continuum from effective to ineffective recognition. They allocate uncertainty to different actors. Germany places much of the initial uncertainty within a formal comparison between the foreign qualification and a domestic reference occupation. Canada distributes it among immigration authorities, provinces and territories, professional regulators, employers, and supporting programs. The United States leaves more decisions to state boards, educational institutions, private evaluators, and employers.

This answers the third research question. Greater formalization can make authority and remedies more visible, but it may also create detailed documentary and supplementary requirements. Greater decentralization can allow flexible decisions, especially in non-regulated work, but it can make outcomes less predictable and reduce portability. Neither structure removes institutional judgment. It determines who exercises judgment, what evidence is considered, and how easily the decision can be reviewed.

The comparison also cautions against borrowing a single procedure without its surrounding institutions. A centralized information portal is useful only if it accurately directs applicants to competent authorities. A credential evaluation is useful only if the intended recipient accepts it. A bridging program is useful only if it satisfies a regulator or improves access to appropriate work. Reform should therefore connect institutional functions rather than reproduce an isolated administrative instrument.

13.3 Recognition is necessary but insufficient

The evidence reviewed here explains why recognition often improves labor market outcomes but does not eliminate occupational disadvantage. It can remove a legal barrier, clarify academic level, and strengthen the signal sent to employers. It cannot by itself supply occupational language, local legal knowledge, professional networks, childcare, or the resources needed to complete supplementary training. It also cannot eliminate discrimination.

This conclusion answers the second research question. The main barriers are cumulative. Fragmented authority can send an applicant to the wrong procedure. Missing documents can prevent a substantive assessment. Cost and delay can force the applicant into unrelated work. Language or local knowledge requirements may then be added to employer demands for recent local experience. Even after recognition, recruiters may not understand the decision or may rely on familiar institutions and names.

These barriers interact with time. A delay is not merely an administrative inconvenience. It can alter the applicant's career. Time outside the profession weakens recent experience, reduces earnings, and makes additional education harder to finance. For this reason, processing time and occupational re-entry should be evaluated together. A system can produce legally correct decisions while still contributing to long-term skill underuse.

13.4 Equal procedures can impose unequal burdens

A uniform documentary rule may appear neutral while imposing very different burdens. An applicant from a stable institution with responsive digital archives can satisfy a direct-verification requirement quickly. A refugee from a disrupted system may be unable to satisfy the same rule at any cost. The relevant equality question is not only whether the written requirement is identical. It is whether applicants have a fair opportunity to demonstrate the fact that the requirement is intended to establish.

Alternative evidence is appropriate when it remains connected to that fact. Interviews, examinations, portfolios, verified employment records, prior licenses, and practical demonstrations can support a reasoned decision when conventional documentation is incomplete. They should not lower occupational standards. They should provide another way to establish competence or prior learning.

Unequal burdens also arise from financial resources, gendered care responsibilities, age, immigration status, and the reputation assigned to a country or institution. Disaggregated monitoring is needed because average processing times and recognition rates can conceal these differences. Authorities should also distinguish documented institutional risk from general assumptions about nationality or professional community.

13.5 Non-state identification and its boundaries

The fourth research question concerns the role of non-state professional identification. RUPASS and Amerpass show how an independent system might organize dispersed evidence, distinguish verified from self-reported information, and maintain a professional history across borders. This function can be valuable before formal recognition, during an assessment, and later when the individual applies to employers or professional bodies (Leonov, 2026a, 2026b).

The boundary is equally important. A non-state system cannot confer a public license, determine academic equivalence for every institution, or guarantee employer acceptance. Its record should identify the source, date, method, and scope of each verification. It should not collapse different judgments into a single score that hides uncertainty.

The institutional value of such a system depends on governance. Verification standards must be public enough to assess. Individuals need correction and review procedures. Data collection should be limited to the stated purpose, and disclosure should remain under meaningful user control. These safeguards matter because professional visibility can create risk for migrants who have experienced political pressure, selective enforcement, or insecure status (Leonov and Savchuk, 2026a).

Artificial intelligence adds another reason for careful design. It can assist with translation, document classification, comparison, and the detection of inconsistent records. It can also create plausible but false information or obscure the reasons for a decision. Institutional judgment cannot be reduced to accepting an automated output. The responsible institution must define the question, examine relevant evidence, record uncertainty, and retain the capacity to revise the result (Leonov and Savchuk, 2026b).

13.6 Implications for policy and practice

Recognition systems should be designed around the applicant's pathway rather than the administrative boundaries of each institution. This does not require a single authority to make every decision. It requires institutions to explain their role, accept reusable evidence where lawful, and communicate how one decision relates to the next.

Three practical priorities follow. First, applicants need reliable information early enough to collect records and plan costs. Second, authorities need proportionate ways to identify specific gaps and allow them

to be remedied through targeted education, supervised practice, or alternative evidence. Third, employers need concise information about what a recognition result establishes and what it does not establish.

Success should be measured through outcomes. Application volume and decision speed are useful administrative indicators, but they do not show whether the applicant entered suitable work. Monitoring should include total cost, supplementary requirements, abandonment, appeals, occupational match, time to entry, and earnings progression. The measures should be disaggregated where sample size and privacy protections permit.

13.7 Limitations and future research

This article compares institutional mechanisms across three countries and does not provide a complete account of every occupation or jurisdiction. Regulation varies within each country. Procedures also change over time, and official descriptions do not always reveal how applicants experience them in practice.

The evidence base combines causal research, observational studies, policy documents, and conceptual working papers. These sources answer different questions and should not be treated as equivalent. The German evidence on employment and earnings is particularly informative, but its estimated effects cannot be transferred directly to Canada, the United States, or every occupational group.

Future research should follow applicants across the full pathway from first inquiry to occupational entry. It should compare people who receive full recognition, partial recognition, alternative assessment, and refusal. Research should also examine the accuracy, acceptance, privacy effects, and distributional consequences of digital and non-state verification systems. These questions require independent evaluation and data that permit institutional claims to be tested against labor market outcomes.

14 Conclusion

Foreign qualifications do not lose their substantive content when a person crosses a border, but they can lose institutional legibility. Recognition restores part of that legibility by translating education and experience into categories used by receiving institutions. Its effectiveness depends on more than the accuracy of a single comparison. Verification, assessment, licensing, employer interpretation, and occupational entry must function as a connected pathway.

Germany, Canada, and the United States allocate responsibility differently. Germany provides a more formal route organized around a domestic reference occupation. Canada combines federal migration and support policies with provincial, territorial, and professional authority. The United States relies on state licensing, institutional autonomy, employer judgment, and private evaluation. Each model has strengths, and each can produce delay, repetition, or uncertainty.

The labor market consequences are substantial. Recognition can improve employment and earnings when it removes a binding barrier and is connected to appropriate work. Its value declines when applicants wait for years, repeat unnecessary education, or receive decisions that employers cannot interpret. Refugees, people with incomplete documents, caregivers, older professionals, and applicants from unfamiliar institutions may face particularly high burdens.

A more effective approach combines early guidance, accessible assessment, specific gap statements, partial recognition, targeted education, supervised practice, and alternative evidence. It also gives employers clear information and measures success through occupational outcomes. Portable digital records can reduce repeated verification if they preserve source information, limit claims, protect personal data, and permit correction.

Non-state professional identification can support this structure by organizing evidence and preserving professional continuity. It should remain complementary to public recognition and occupational licensing. Its legitimacy depends on transparent methods and on a clear account of what it cannot decide.

Recognition policy is ultimately a policy of institutional trust. The objective is not to eliminate uncertainty, which no system can do. It is to make uncertainty visible, assign decisions to competent bodies, and give applicants a fair opportunity to demonstrate what they know and can do. When these conditions are met, recognition becomes more than an administrative result. It becomes a practical route from migration to professional participation.

Declarations

Declaration of interest

Igor Leonov is the developer of the Amerpass concept and is affiliated with Amerpass Foundation. This relationship is disclosed because the article discusses Amerpass. The analysis treats Amerpass as a conceptual non-state model and does not present it as an authorized recognition body. The authors declare no other known competing interests.

Research ethics

The study is based on publicly available documents and published research. It did not involve human participants, personal data, or original experiments.

Data availability

No original dataset was generated or analyzed for this study. The documents and publications used in the analysis are identified in the reference list.

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