Is the Bologna process a move towards a European HE area?

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Centre de Sociologie des Organisations (Sciences Po and CNRS)

19 rue Amélie, 75007 Paris – France

c.musselin@cso.cnrs.fr

We are today half the way from the deadline which was set by the signers of the Bologna declaration to respect their commitments and implement the measures aiming at constructing a European Higher Education Area and at increasing its attractiveness and its competitiveness. It is therefore too early to draw definitive conclusions, and it will be so for a long time as we all know from political science that the distance between the decision made and the moment when an evaluation of the implementation can be achieved may be long. Morover such an assessment always raises complex issues about what is evaluated and how[1] (Majone and Wildavsky 1984). But it is nevertheless already relevant to begin to understand the meaning and the orientation of what is going on in our countries and to see whether some or all of the objectives of the Bologna process are or not close to be achieved.

My aim in this paper will not be to produce a reduced version of "Trends IV" (Reichert and Tauch 2005) or a summary of the different national reports prepared for the Bergen summit. It is much more to develop a reflection on the (possible) construction of a common higher education area within Europe and to discuss whether the Bologna process, in its nowadays conception and concrete but incomplete implementations is already contributing to this scenario.

In this perspective, it is interesting to observe that since the 80s the European higher education systems experienced in fact two very different processes of reforms that both differently pertain potential move towards more harmonized higher education systems within Europe.

The first one, that will be discussed in the first section of this paper deals with the convergent trends that animated the reforms which were led in the European countries during the last 25 years and aimed at transforming the design of the national higher education systems. As I shall argue, the common orientations of these various public policies in higher education did not lead to more similar higher education systems, although the same conceptions prevailed everywhere.

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[1] For instance, should the distance between the objectives and the achievement be measured, or should the inevitable evolution of the objectives be taken into account? Should the quality of the implementation process itself be evaluated or not?

In the second section I shall turn to the Bologna process and argue that it is completely different from the public policies described in the first part because it is a concerted process and also because it concerns the "products and the production process" of the system rather than their design. I shall also quickly present some of the conclusions that can be drawn from the first years of implementation of the bachelor/master scheme in four countries on which research results have already been published.

The last section will be more reflexive and intends to further identify what makes the emergence of a common area possible and what are the still missing mechanisms within the European countries that signed the successive declarations. To develop this last point, the example of the United States[2] will be mobilised as it constitutes a case where a "common" system developed and within which the university community (administrative staff, students, academics…) feels as being part of this system although the federal state always exercised a weak coordination.

1. Two decades of converging national reforms but a reinforced the disparity among European systems

When reading some of the numerous books, reports and papers which have been produced on the evolution of higher education systems in European countries over the last two decades, one can only be surprised by the convergence of the narratives and argumentations that justify this or this reform to be led. There exist concurrent explanations for such comparable orientations. Most of the time higher education analysts implicitly consider that the similarity in the solutions developed are due to the similarity of the problems to which the different countries were confronted[3]. In a rather functionalist view the converging solutions and orientations are supposed to answer convergent problems. In some other studies, the diffusion of ideas first of all explains the comparativeness of the reforms and, above all, the new public management rhetoric is referred to as a central principle for convergence (for instance Braun D. and Merrien 1999, Pollitt C. and Bouckaert 2000). In this case it is not rare to point at some trans-national institutions, such as the OECD for instance, as producers of the ideas and

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[2]   Canada would be a nice case too, but I had less information about it.
[3]   For instance, Goedegebuure, *et al.* states that « different governments respond in similar ways to the problems of their respective higher education systems (1993: 391) ».

solutions which were promoted. For still others, this is part of a globalisation process through which the North American model is becoming an international pattern which European countries (as others) are trying to imitate. These two last hypothesis (diffusion of ideas or globalisation) can easily be interpreted in neo-institutionalist terms as a form of mimetic and/or normative isomorphism (DiMaggio and Powell 1983) transforming the organisational field of higher education.

But whatever the reason for such a process, it is important to stress that it bears two main features. First, it does not result from a coordinated action among the countries which engaged reforms. Second, it mostly concerned the transformation of the institutional design of each higher education system. I shall briefly recall the main perspectives at stake in these reforms before arguing that despite the convergent orientations which were pushed the different higher education systems remain rather different and keep strong national characteristics.

1.1. A shared framework of orientations and solutions to reform European higher education systems

The European higher education systems were frequently described as composed of three main models. The German one, inherited form the Humboldtian tradition that largely diffused in the North and East of Europe, the Anglo-Saxon model characteristic for the British system and a southern model which includes the mixed situations to be found in South European countries. But, whatever their tradition, all countries in the 80s and 90s came sooner or later to the conclusion that their higher education systems was no more appropriate and should be reformed. When looking at the conceptions and representations which prevailed, it looks like everybody had the same aim and was drawing from the same hat for solutions.

The fact that higher education is central to the development of our societies and their economic growth and, by the end of the 90s, the statement that European countries were becoming knowledge societies in which highly qualified people and research activities are required, played a central role in the argumentations for reform. It also generally justified the intervention of public authorities in this sector and their growing interest for introducing and steering change.

Four issues always at stake in these national reforms. First the transformation of the state-universities relationships. With the exception of the United Kingdom, the usual objective was for the public authorities to abandon their role of rule-production and rules-control to concentrate on regulation and evaluation, i.e. to become what G. Neave and F. van Vught (1991 and 1994) called an "evaluative state". They also spoke in favour of a lighter state in higher education, i.e. a state which defines objectives, sets the frame to reach them but leaves to the universities the freedom to act within this frame. To achieve this mutation, the introduction of new instruments was encouraged. I. Bleiklie (2000: 112) for instance observed "an increasing array of instruments that are applied" and advanced that "whereas policies used to be concentrated on authority and capacity measures, they now encompass all the categories of instruments" and among them: incentive tools, symbolic and hortatory tools and learning tools. The allocation of resources is probably the sector which was the most affected by this shift, with the development of formula based on ex-post evaluation, the introduction of intermediary bodies and agencies responsible for budget decisions or the development of contracts between the state and each institution (Musselin 2004 for France).

A second issue concerned the need for universities to take their stakeholders into account and to banish the ivory tower posture they were accused to have, in order to become more responsive and accountable to the society. Training should therefore prepare the students to their future job outside academia, research should not be led for the sake of the scientists but should solve societal issues and promote technology transfer, while universities should not be run by the sole academic community. The creation of university councils including representatives of the society (economic partners, local authorities, etc.) and being responsible for setting the missions of the concerned institution and approving its budget, occurred in many countries (Germany, the Nederland, Austria etc.). In others, the decision was made to modify the composition of the university deliberative bodies and to introduce representative of stakeholders (Norway). Furthermore, universities were pushed to create technology transfer offices (Krücken 2003), to develop their relationships with technology parks and to foster patenting and licensing.

A third objective consisted in the diversification of funding and in a decreasing part of public resources in the budget of universities. The fiscal and economical crisis experienced by European countries as well as the increasing number of students became crucial arguments to justify the necessity for higher education institutions to look for other sources. They were

encouraged to seek for private funding and to develop their contractual relationships with firms, but also to compete for European programmes or to obtain resources from other public authorities than the state. But, the recent decision in the United Kingdom to increase the level of tuition fees and the demand raised by five German *Länder* to introduce tuitions both reveal a trend towards a higher participation of households in the funding of higher education. This evolution has been encouraged by the European commission in its recent statement (Commission of the European Communities 2005). This indicates a further potential shift in the resource structure, from funding via taxes to direct payment from the "clients".

Developing the autonomy of higher education institutions was a further objective to reach. The numerous and recurrent discourses about the need to strengthen the university executive leadership, and in some countries the changes introduced in the higher education act in order to redesign the university government (in the Nederland, in Italy, in Austria etc.) reflected this orientation. Academic leaders are everywhere expected to become managers and to behave as management professionals rather than as *primus inter pares* (see for instance de Boer and Goedegebuure 2001, de Boer 2002, Fulton 1994, Deem and Reed 2002). The reinforcement of the university administration in numbers but also in qualification (Rhoades and Sporn 2002) has also been a common trend. Last but not least, in many countries, but less broadly than for the orientations described above, universities have become responsible for the management of their faculty positions whereby in many cases this was before the prerogatives of the public authorities. Internal labour markets based on incentive mechanisms have also been developed within higher education institutions[4] (Musselin 2005b).

1.2. An increased disparity among European countries

Even if curious at first glance, such convergent orientations did not promote more convergent systems of higher education in Europe. When looking at the concrete implementations and at the day-to-day practices of institutions and actors, the convergent ideas and solutions often are more an illusion than a reality. Just taking an example I developed in a previous paper (Musselin 2005a), "evaluation" diffused everywhere (as stated by the book edited by Schwarz and Westerheijden 2004) but it took very different forms, meanings and practices in each country: it can be institutional but also programme or discipline based, it consists in internal

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[4] For a comparative presentation of the situation of twenty different European countries on the management of academic positions and staff, see Enders and de Weert (2004).

and/or external assessment, it is ex post or ex ante, it is tightly or not at all linked to resource allocation. The same could be done with the word "autonomy"! As a whole, if each country seriously evolved, the institutional design of each higher education system remains clearly different from one country to another. As a result, the distance between the French and the British systems increased over the two last decades[5], as well as the distance between the Austrian and the German systems[6], or the distance between the Nederland and the Italian systems[7], etc. The distance even increased within a single country when the higher level of decentralisation on higher education issues allowed the Regions to depart from one another and to experiment by themselves, as it occurred in Germany or Spain for instance.

The fact that the same orientations may lead to different results in different settings is a rather common observation[8]. In this specific case three explanatory factors prevailed. First the "new solutions" nowhere replaced the previous settings: they were aggregated to them and therefore they still entail the previous national characteristics. Second the rhythm (quick or slow), the style (incremental or radical), the timing (at the beginning of the two decades or much later on) and the scope (broad and on every dimension, or rather focused and only on some dimensions) of the reforms have not been the same, thus leading to different paths of change and more or less increasing the distance between the different countries. Third, the reforms engaged encountered more or less resistance in each case and therefore more or less diffused within each country. As shown by Kogan *et a*l. (2000) in their stimulating comparative study of Norway, Sweden and the United Kingdom, public policies at the national level may be more affected by change than the institutions or the academic level (Henkel 2000). We observed the same trend in France with a higher degree of adhesion to the recent French evolutions from the university presidents than from their deans (Mignot-Gérard and Musselin 2002).

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[5]   For instance in terms of the control exercised on academics (stronger in the United Kingdom than in France) and of the assessment of teaching and research activities (light in France compared with the United Kingdom).

[6]   The Austrian system clearly departs from the German one after the Austrian reforms in university government and the introduction of private contracts (that is not civil servants) for the newly recruited academic staff.

[7]   In terms of university governance for instance.

[8]   Cf. for instance the book edited by P. Hall (1989) on the diffusion of Keynesianism. P. Hall in the conclusion identifies three important factors to explain the consistence of these Keynesian ideas (their economic, administrative and political viability) and four elements that more or less facilitated their introduction: the political party in place and its orientations, the structure of the state and the state/society relationships, the structure of the political discourse and the impact of WWII.

Such national reforms aiming at redesigning the institutional design of each higher education system are still going on and the prevailing convergent conceptions on how higher education systems should be organised and structured are still accurate. But parallel to these structural reforms at the system level, the Bologna process and the objective of building a European Higher Education Area emerged and created new but different opportunities for change.

2. Building a common area by reforming the "products": the Bologna process

Even if some of the orientations of the national reforms are restated in the different declarations[9], the process launched by the British, the French, the German and the Italian Ministers of education in May 1998 at the Sorbonne, and which twenty-five other countries joined a year later in Bologna, clearly departs from the reform movement described in the first part of this text. Let us describe these new perspectives and original modes of action before looking at the first conclusions that can be led after a few years of implementation.

2.1. The originality of Bologna process as a leverage for change

The Bologna process primarily intends to coordinate and foster change in the signing countries. It is an original process (Ravinet 2003 and 2005) as it defines common norms and calendars rather than it prescribes rules and as it commits but is not binding. In this perspective, it can be analysed as an intergovernmental form and a kind of precursor of the open-method of coordination[10] which has been defined in the Lisbon conclusions in 2000.

But it also departs from the national reforms discussed above by its targets. It aims at transforming higher education systems by affecting their products and their systems of production rather than by modifying their institutional design. The organisational model for higher education institutions, the state/universities relationships, the diversification of resources and so on, become secondary. The two main issues to achieve in order to reach the objectives of the Bologna declaration (i.e. the readability and comparability of degrees, the

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[9] As shown for instance by the stress put on institutional autonomy in the papers preparing the 2005 Bergen summit.

[10] For an analysis of this method, see for instance Dehousse (2002), Gornitzka (2005), Heritier (2002), Radaelli (2004).

mobility of students and academic staff, the European dimension of universities and an increased attractiveness and competitiveness) are: the reshaping of the study structure into the bachelor/master scheme and the emergence of European cooperation in quality assurance. Both of them directly concerns one of the main product of higher education systems: teaching. The first one transforms the formal organisation of the training structure and the second affects its contents.

The first underlying idea is thus to create a common area by offering a space within which the students can be mobile and circulate thanks to a common currency (the ECTS) and a similar structure of studies (bachelor in three years, master in two and doctorate, all organised in semesters and modules) guaranteed by a recognised quality assurance system available on this specific space. The second underlying idea is to bring the different higher education systems closer, on the one hand, by introducing the same study structure but also, on the other hand, through an increased student mobility and/or through the necessity to attract more students. The third underlying idea is finally to increase the overall quality of the European systems by developing quality assurance processes in all countries and by defining minimum standards achieving a high level of quality.

This focus on the product, the production process and the "clients" therefore reveals a strategy of reform (be it conscious or not) that departs from the usual transformation of the institutional settings.

2.2. A two steps process

For the signing countries, the first step into this process consists in introducing the bachelor/master scheme and, for some of them, to create an accreditation system. The scope of change depends on the previous existing situation.

In a country like Germany (but it is also the case for Norway, Italy, Austria, etc.) where no intermediary diplomas existed, universities (and the German polytechnics, the *Fachhochschulen*) have to create a new diploma (and to have it recognized by the job market,

which is not the easiest issue[11]). Bologna further implies rethinking the whole German training conceptions: the ECTS and the potential mobility for the students after each semester oblige to organise exams for each course, where more integrated modes of assessment prevailed before. Finally, the introduction of the new scheme has been an opportunity to create accreditation agencies that deliver an advice about each curricula leading to a Bachelor or to a Master and re-examine their decision after a time-limited period while up to now, the conformity with the general study regulation was enough to open a new curriculum, this was assessed by the ministry of the Land and was not re-examined until a new federal study regulation was implemented[12]. A similar evolution can be observed in Norway which also faces the introduction of a new diploma and introduced an evaluation agency (the NOKUT).

In a country like France, even if the introduction of the bachelor/master scheme led to a massive mobilisation of French academics and was seen as an opportunity to rethink the existing curricula, the task was facilitated by the fact that there already existed diplomas at the bachelor and master levels. The issue was therefore not to create these grades but to succeed in rending obsolete the other intermediary diplomas that previously existed: the DEUG (two years after the *baccalauréat*) and the *maîtrise* (*baccalauréat + 4*). It should be added that no crucial change was introduces about accreditation. As there already existed a four-year regular assessment led by the central administration for each curricula leading to a national diploma, it has been an argument for the French government not to change its "quality assurance" process or to create a new one (see for instance the national report on France for the Bergen summit).

The first step in the process hence had rather different implications for each of the country, not to speak of the case of the United Kingdom where a consensus prevails to say that the British system already has a bachelor/master scheme (even if the master mostly last a one-year period of time) and an efficient quality assurance system (Duclaud-Williams 2004, Mangset 2005): therefore most British academics and institutions do not feel concerned by the process yet.

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[11] The German academics decided to introduce selection processes for the access to the Master degrees as it is considered that the value of the Bachelor can only be recognized by the students and the employers if it becomes a final diploma for a significant proportion of students.

[12] Which was not so frequent.

Without underscoring the implications of this first step and the huge amount of energy it needs, it first concerns formal transformation rather than contents, or to put it more clearly, this harmonisation phase only points at the formal structure, that is the two cycles scheme of the study structure and the organisation of each cycle in semesters, declined in modules. The change in contents that occurred by the same token have been independently by each country with no coordination with the others). Following the neo-institutionalist perspectives (Meyer and Rowan 1977), this formal change is a kind of appearing conformity with what the institutional environment (here the agreements among the Education Ministers of forty European countries) imposes as rational, but it may at the same time be decoupled from concrete practices, which can remained unchanged. Further studies, such as the doctoral research engaged by M. Mangset shall allow to look at the effectiveness of change in the day-to-day teaching practices and to test the neo-institutionalist hypothesis. Moreover, the Trends IV report (Reichert and Tauch 2005) already stresses the different interpretations which are existing on the definitions and uses adopted by the countries and institutions about the modules (page 15), the ECTS (page 5), or the contents and objectives of the bachelor degree (pages 12 and 13). The same formal structure may thus experience different concrete implementation.

From this point of view, the next step to come is of a different kind. The development of coordinated quality assurance systems should much more impact on the contents and on the pedagogical practices and push towards reduced discrepancies between the existing contents and practices. Even if the idea of a European agency for quality assurance now seems completely unlikely, and even if the documents recently published stress (as the ENQA report 2005) that the diversity and variety of European higher education systems is "generally acknowledged as being one of the glories of Europe" (page 10), making "single monolithic approach to quality, standards and quality assurance in higher education inappropriate" (page 10), the second step of the Bologna process should reduce this diversity: the standards and guidelines proposed in this text are potential factors for an increased harmonisation. If they were to be adopted and respected by the Bologna signing countries, it would define a space within which quality assurance would follow comparable principles in order to guarantee and display an equivalent level of quality everywhere. But the reports to be produced by these internal and external evaluations should lead to more transparency, more comparability, more benchmarking too, on the contents and on the pedagogical practices. This would definitively go a step further than the "formal isomorphism" required by the two cycles scheme itself.

2.3. First observations on the first results achieved by the implementation of the first step: is the Bologna process Europe-oriented ?

The implementation of such standards and guidelines is still to come and can only allow for conjunctures today. But, on the contrary, the first step is already going on, therefore opening possibilities for some first observations. Reading the national reports for the Bergen summit (even with a critical eye as we all know that many – if not all – countries tried to appear as the best students of the class) and the "Trends IV" report (Reichert and Tauch 2005) shows that even if not binding the successive declarations are taken seriously by most countries and that the first step of the process is widely implemented. But with what effects ? It is still too early to draw definitive conclusions but intermediary observations can be proposed as some research have already been produced in some countries. Among the many issues that can be raised from those first studies, I shall concentrate on the contribution of the Bologna process to the construction of a European Area and argue that empirical evidences mostly indicate that it first of all serves national if not local purposes. The implementation of the Bologna declaration, up to now, is not a "European process" from two points of view.

On the one hand, many countries took the opportunity of the Bologna process to treat some of their national problems and therefore "nationalised" the bachelor/master reform. It is at least obvious for the three following countries.

In Norway, as shown by Å Gorniztka (forthcoming), the European ideas "were moulded and shaped by the local policy process, and […] were converted into tangible policy measures" (page 3). She argues that the *Quality Reform* which was introduced after different white papers goes far beyond the Bologna process and concerns issues such as university governance or funding devices. But Bologna had an important role as "menu of solutions" (page 11) and as choice facilitator for the reformers. For instance the bachelor/master scheme allowed to finally launch the reform of the study structure which Norwegian governments were pushing for years, not in order to have a readable system but to reduce the length of the study. Bologna avoided discussion about the structure to adopt as it proposes the 3+2+3 model.

In France, similar processes can also be observed. Even if a French minister (Claude Allègre) gave the first impulse to the Bologna process in 1998 (when he organized the Sorbonne Conference), this reform is mostly presented as a European non-escapable shift. But it is at the same time used to support the national reform agenda. The suppression of the national guidelines (*maquettes*) which broadly defined for each degree and each speciality the minimum contents of the curricula that should be offered in every universities delivering this degree all over France was for instance discretely achieved at the favour of the introduction of the Bachelor/master scheme. It also served the objective to reduce the distance between the French universities and the French *Grandes Ecoles* and to push the latter to come closer to the international university norms.

In Germany, as clearly documented in the study led by G. Krücken and his students (2005) on the implementation of the Bologna process in German universities, issues which were discussed for a long time could also be addressed through the Bologna process. As in Norway, the length of the study was for many years a discussed issue, which could suddenly be solved thanks to the Bologna process. It also gave a chance to the introduction of accreditation agencies and quality assurance processes.

On the other hand, the national implementation processes of Bologna can also be qualified as "non-European" because the actors who are directly responsible for them in each country are surprisingly not looking at what is happening in the neighbour countries and develop rather "local" version of the bachelor/master scheme. The study recently published by G. Krücken (2005) closely converges with the study I am leading in France with S. Mignot-Gérard and P. Barraud de Lagerie (2005): both stress the absence of a European perspective in the on-going transformations and in the actors' representations at the institutional level. In the third chapter of the third part of the Krücken's study, the analysis led by Johanna Bunzmann (2005) on the perceived competitive environment to which universities are referring, reveals that it consists in the close neighbour institutions which are all the time presented as competitors and cooperation partners as well. But neither are universities in other European countries quoted nor are they perceived as places at which to look at (and maybe to imitate) before defining one's own new curricula. The same holds true for the French universities. They are conscious that the new structure may increase the competition for students (and one of them is all the more aware that it is a well-reputed institution looking for international best students entering its masters and doctoral programmes, while the others pay attention to this issue because they

fear not to remain attractive at the master level) but none of them looked at its European counterparts to redesign its curricula. For some of them[13] they often even did not look at the other institutions in their neighbourhood. In the French case, we also observed that student mobility is not taken seriously by the interviewed academics. They do not believe that, on the short term at least, their students will be wanting to leave and do not expect a significant increase in the number of European students they will receive.

The implementation of the Bologna process as it appears today (May 2005) thus presents three characteristics. It is first perceived as a European movement that can not be avoided but which at the same time is accepted and often welcome. Only a few countries are still not engaged in it and among them the United Kingdom is probably the only one where the resistance is as strong at the national, institutional and individual levels. Second, the bachelor/master scheme is everywhere becoming a common study structure and a lot of countries would achieve this shift before 2010. From this point of view a European area with a common formal organisation of the curricula is emerging. But at the same time, the institutions and the actors directly involve in the process, and in fact often actively mobilised by it, still do not perceive this area (at least in the countries on which I concentrate in this paper) and develop their local understanding of this European process. The still very limited number of joint diplomas also reveals a low level of coordination and a low consciousness of the fact that the area defined by the countries adopting the bachelor/master scheme, the semesters, the modules and the ECTS is supposed to become the place within which they should primarily develop their relationships and the space designing their relevant coordination and competition-set.

A step further is therefore still needed for the Bologna process to build more than a formal European Higher Education area.

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[13]   None of the two French provincial universities under study are located in a big city counting three or four universities. As shown by the report to be published by the IGAENR (a French administrative evaluation body) universities in cities like Grenoble, Marseille or Bordeaux, took the opportunity of the Bologna process to develop a more rationalised training offering and to foster what is called in French a *logique de site* (a territorial logic) among higher education institutions that often perceived themselves as competitors in the past.

3. What is necessary for a common area to exist ?

In the two previous sections, I examined two different processes that through different ways had/have the potential to lead to the creation of a European Higher Education Area: the first one, by the uncoordinated emergence of converging conceptions and solutions to steer and manage each system; and the second by the harmonization of the products and systems of production within the European area. I then discussed the limits of the first process and its final incapacity to overcome the national specificities and then exposed the doubts that one may have, at least today, about the first concrete implementation of the Bologna process and its potential to create a shared area.

To go a step further in our reflection and in analysing the conditions to meet for a European Higher Education Area to exist, I shall now develop two complementary questionings: what creates borders to an area (that is: what defines what/who is in/out and thus allows to differentiate the European area from another one); what contributes to the emergence of a feeling of belonging to the same area; and what leads each person to perceive oneself as part of it.

Such questions are difficult to answer in general. They are even more complex when one considers supra-national entities. Moreover, there exists no example of a common area for higher education in the world which is not integrated within a nation-state. Nevertheless countries like the United States provide interesting cases for reflection because the role of the federal level in the organisation of the higher education system has been rather weak and each state has its own university system with its specific institutional design.

The European higher education area already shares (and sometimes for years) some common figures with the US higher education area. The first to mention is the existence of "area-wide" institutions' representatives, such as the Association of American Universities for the US or the European University Association in Europe.

After the implementation of the bachelor/master scheme, the European Higher Education Area shall share a supplementary common point with the US area: the existence of an area-wide similar study structure. Within each US state exists a transfer system (which can rely on different principles from one state to another) allowing the resident students to move from one

institution to another within the state, but each student can move from one (public state) to another or from one private institution to another (if s/he passes the selection process). The harmonised study structure (but also the language uniformity) facilitates such processes, even if the perception of a large space for study does not concern every US student and every US institution: two years colleges are mostly attended by students living within the local area and compete for students within this area, while research universities will receive and try to attract applications from the whole American territory and even abroad.

In the United Stats this student mobility is further supported by some mechanisms which do not exist in Europe yet. Many instruments and devices allow the US students (and their parents), the US institutions, and the US employers to get an idea about the quality of the curricula and the value of the diplomas. An interesting point to mention is that there exists no coherent and US wide recognised quality assurance processes but rather a huge diversity of information providers. Just to mention some of them, one finds the different rankings published by the press (and among them the influential[14] ranking from US news), the official typology produced by the Carnegie foundation, the quality assurance processes at the institutional level, a range of independent accreditation agencies, some more or less developed accreditation processes controlled by each state public system in order to regulate their own study offering (Brisset-Sillion 1997), etc. Rather than the use of shared common guidelines, the common point among those instruments and devices is to concern institutions and programmes located within the same competition-set[15], the American higher education area.

A further important condition for the perception of a common area in the United States is the existence of an area-wide academic labour market (a condition which for the moment does not really exist in Europe). If the Bologna declaration and its followers put emphasis on academic mobility, and in the more recent documents on long-term mobility, none of them inscribed on the agenda the construction of a European academic labour market (or the harmonisation of the architecture of the academic labour markets). It seems nevertheless indispensable to go in this direction, if one wants , institutions as well as , individual academics to go over the local/national representation they have of the relevant area in which

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[14] Influential on the institutions too as shown by Espeland and Stevens (2002).
[15] Some of them nevertheless propose their services worldwide and deliver an American label to non American institutions or programmes. This is the case for the independent accreditation agencies.

they are included. In the US on the contrary there exists a large congruence between the space defined as the American higher education area and the space for academic careers. The latter does not only correspond to the area an American academic will "naturally" consider when sending applications, but also to an area within which recruitment and career processes are highly comparable. Although there exists no federal regulation, although each state public system is very differently structured and steered and although there are differences between the private and the public higher education sectors, the processes and the requirements to become an assistant professor are everywhere about the same. This is supported by, and justifies by the same token, the existence of US-wide discipline-based professional associations which provide their members with information about the US academic labour market and which diffuse advices about how to prepare a dossier of application or to pass a job-talk. This area-wide academic labour market is, of course, not closed on itself: it is open to non-American, while some American teachers leave it for some other higher education systems as well. But, anyway, it corresponds to the primarily coherent and relevant space for US academics. This certainly favours the feeling of belonging not only to an institution or to a state system, but also to a larger area whose borders are relevant for the study structure, the competition-set, the student mobility and the academic careers.

A last point to mention when comparing the European and the US areas finally concerns the research funding system and the territory covered by the most prestigious funding councils or foundations. In the US, the latter clearly cover the whole area. This is still not the case in Europe. Despite the success of the 6th framework, the national and regional funding bodies or mechanisms remain the main resource providers for European institutions and academics. Moreover some of the constraints imposed by the European calls[16] and the type of projects it favours limit the scope of the research programme it can address. Furthermore, there exist few (no?) other European funding alternatives.

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[16]   US colleagues are for instance not obliged to cooperate with at least two other US states when they apply for funding at the NSF….

Conclusion

While the construction of a European Higher Education Area is explicitly on the agenda for less than ten years, the existence of converging forces within European countries can already be traced back to the beginning of the 80s with the emergence and the diffusion in most countries of the same conceptions, orientations and solutions to transform their higher education system and reshape their institutional settings. We saw in the first part of this paper that such forces poorly favoured convergences among the different higher education systems and even increased disparity among them. Since the Sorbonne declaration in 1998 and its initialisation and expansion in Bologna in 1999, a new process affects European universities and clearly aims at building a European Higher Education Area through the harmonisation of the study structures and the promotion of common quality assurance guidelines and standards. In the second part I stressed the originality of this approach which focuses on the product and on the productive system rather than on the institutional design but also observed that the implementation of the first step of the process – the introduction and generalisation of the bachelor/master scheme – succeeds in harmonizing the formal study structure but is at the same time "nationalised" by each country in order to push its own reform agenda. Furthermore, the process is not led within a European perspective by most institutions and individual actors.

Looking at what makes the US system a coherent and relevant higher education area, I finally identified some of the conditions that today impede the emergence of a European Higher Education Area. It shows that an harmonised study structure will not be sufficient for institutions and individual actors to develop a feeling of belonging to a supra-national territory and to envisage their actions within the European Higher Education Area rather than within their local and national settings. Therefore, if one thinks that a European higher education area is wishful, the Bologna process should be considered the very first step of a long evolution during which further challenges will be in front of the European countries: among these challenges the harmonisation of their academic labour markets is probably not the easiest one!

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