



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

QQI RESPONSE TO THE THEMATIC ANALYSIS OF THE REENGAGEMENT PROCESS

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BACKGROUND

One of QQI's functions is to approve a provider's quality assurance procedures and monitor and review the effectiveness of such procedures. Under the Qualifications and Quality Assurance (Education and Training) Act, 2012, QQI was tasked with the development of QA Guidelines for providers. In turn, providers must submit their QA procedures for approval to QQI having had due regard to QQI's QA Guidelines. In 2016, QQI published Statutory Quality Assurance Guidelines. QQI piloted and subsequently established the "reengagement" process for private and independent providers that had previously been approved by the antecedent QA agencies FETAC or HETAC to enable them to fulfil this statutory obligation (have QA procedures established under the 2012 Act).

Through the reengagement process, QQI is working with all our independent and private providers to ensure that their governance, QA and general institutional capacity are sufficient to sustain them and their programmes leading to QQI awards over the next number of years. Reengagement is a once off, forward-looking process which feeds into ongoing monitoring and, ultimately, institutional review.

THEMATIC ANALYSIS OF REENGAGEMENT PROCESS

As set out in the annual workplan for 2020, the QA (QQI Awards) unit commissioned an expert to conduct a thematic analysis of the reengagement process and its findings. The analysis comprised a document review, a survey of providers and panel members and individual interviews with representatives from both of these groups. The analysis was conducted by Dr. Orlaith McCaul, formerly Head of Provider Quality Assurance in HETAC. The analysis covers the period from the commencement of the reengagement process in mid-2018 up to the beginning of February 2020.

During the period covered by the analysis, the reengagement process took applications from 43 voluntary providers of QQI awards (23 HET and 20 FET). Because of the decision to require all HET and the larger FET providers to apply first, this cohort of providers accounts for 9,399 or 82% of the 11,428 QQI major awards at all levels for learners in voluntary providers made in 2019.

While the reengagement process was piloted before formal initiation and has remained largely as designed, it has been modified slightly since then based on learning and experience e.g. the incorporation of the option for a panel to defer a decision on approval. It was considered timely to review and reflect on the process to see what further enhancements could be made to improve its efficiency and effectiveness.

In addition, there is already much to be learned from the experience of providers, panel members and the outcomes as expressed in panel reports and provider responses. This learning relates not just to the process but, more importantly, what quality issues are emanating from the process and how that learning can be fed back into the system to effect positive change.

The thematic analysis was commenced in February 2020 and completed in June 2020. The report of the analysis was published in September 2020 to the QQI website. The analysis consisted of a desk review of process documents and panel reports, as well as a questionnaire and follow up meetings with both providers and panel members. QQI is grateful to the participation of panel members and providers in the analysis process and for the feedback received.

The report found that both providers and panel members found the process to be a positive experience which has led to improvements in institutional QA. Panel members reported that the process was both implemented consistently and is fit-for-purpose. The report additionally made a number of suggestions and recommendations to QQI on how the process might be further enhanced. This document sets out QQI's response to the suggestions and recommendations made in that report.

QQI RESPONSE TO REPORT RECOMMENDATIONS

	Recommendation	QQI Response
1.	<p>The report concludes that providers and panel members would find it helpful if QQI:</p> <p>1. Published a concise “reengagement terminology guide/glossary”</p>	<p>1. QQI has commenced work on producing an FAQ for the reengagement process based on discussions held with providers during peer learning events for applicants in November 2020. It commits to publishing this and a glossary of terms by end of Q1 2021.</p>
	<p>2. Established “A formal and rigorous QQI reengagement training programme for panel members. It is believed that these training programmes and associated learning outcomes could result in:</p> <p>a. A formalised panel of designated QQI reengagement Chairs</p> <p>b. A formalised panel of designated trained QQI reengagement report writers</p> <p>c. A formalised panel of designated QQI reengagement panel members.</p>	<p>2. QQI commenced operating “standing panels” for the reengagement process in May 2020. Applicants are grouped based on commonalities and standing panels appointed to evaluate the applications within that group. Each standing panel has a Chair and report writer and a small number of experienced panel members. This process has been operating well to date and is hoped it will also ensure greater consistency of outcome for providers, a concern which was also noted in the report. A mentoring process for new report writers has also been initiated. In addition, new individual panel members are included on panels with experienced panel members.</p>

<p>3. Embed a “A formalised, experiential learning programme (shadowing opportunities) ... into the existing process. This would enable interested parties to observe the reengagement process and improve capacity across the sector.</p>	<p>3. QQI is open to this possibility, assuming that both the provider being evaluated and the panel doing the evaluation are both equally comfortable with the option. QQI, for example, will not mandate that providers must allow other providers observe their panel meeting. Requests to observe the process have been accommodated on an ad hoc basis to date. Further consideration will be given to this proposal and will include discussions with applicant providers and panel members to gauge their views.</p>
<p>4. Publish “Sample approved QA policies and procedures ... representing best practice. While QQI do require providers to publish approved QA documentation some consideration should be given to producing a proforma which providers might use to structure their documentation.”</p>	<p>4. QQI will not be advancing this suggestion. QQI has been clear in its QA policy and in the Statutory QA Guidelines that a ‘one size fits all’ model is to be avoided. The Guidelines apply to providers in a proportionate way so as to reflect the individual circumstances of each applicant. A significant risk with publishing exemplar QA procedures is that they will be assumed to represent ‘the right model’ or approach as endorsed by QQI and may be adopted by providers in circumstances where they are inadequate or inappropriate to the individual context. Conversely, providers are required to publish their approved QA procedures and a listing of all providers whose QA procedures have been approved is available on the QQI website. Applicants may, therefore, easily find and review the range of procedures published to date and determine which if any of these may have applicability in or inspiration for their own context.</p>

<p>2.</p>	<p>5. Formalise “the expected inputs and outcomes of the initial panel planning meeting.”</p> <p>It was proposed that the reengagement process be revised to:</p> <p>a. Re-focus the process to concentrate largely on a desk review as the core exercise to determine eligibility for approval.</p> <ul style="list-style-type: none"> » Recommendations for reengagement (approval) to be a possible outcome of the desk review and follow up responses where needed. » Training and appointing a team of core members of QQI staff to initially carry out this exercise is an option to be considered. » QQI to require a site visit only in exceptional circumstances. » Remote communications in lieu of a site visit. » Where site visits are required, the agenda to be limited to exceptions identified in the desk review (AND not subsequently adequately addressed) with a more limited panel membership. 	<p>5. QQI has a formal agenda for the panel planning meeting, which is shared with panel members in advance.</p> <p>QQI will not be advancing the proposal to refocus the process to largely rely on a desk-review exercise. QQI is strongly of the view that the site visit (currently being conducted online in response to the Covid-19 related public health restrictions) is an essential element of the process; it helps ensure that the documented procedures submitted reflect practice and are known and understood by all relevant staff. Many providers have benefited from the site visit process in that it evidenced to the expert panel that appropriate procedures exist and are implemented but are not formally documented. A requirement to formally document these procedures thus became a mandatory change to be addressed, rather than the provider receiving an outright ‘refusal to approve’ recommendation, as would have been the outcome of a desk review exercise.</p> <p>It is also an opportunity for providers to ‘showcase’ their approach and engage in constructive and supportive dialogue with the appointed panel of experts. Both providers and panel members were very positive about the site visit element of the process as noted throughout the report. The basis for this recommendation or how it would enhance the process is not clear.</p>
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<p>b. Increased use of technology to support communication between the applicant and the review panel and limiting the need for panel member travel.</p> <p>c. “Bulk” commission and contract experienced report writers and chairs for the revised reengagement process.</p>	<p>Since May 2020, in response to the Covid-19 pandemic, QQI has moved all of its QA approval processes online, including the ‘site visit’ meeting between the panel and the provider. A survey on this move online, conducted in October and November 2020, strongly indicates that this move has worked well. QQI will consider, in consultation with applicant providers and panel members, whether this approach or element thereof should be retained when the current public health restrictions are relaxed.</p> <p>As noted under point 1 above, QQI commenced the appointment of standing panels for the reengagement process in May 2020. This approach has worked well to date.</p>
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3. It was proposed that “consideration should be given to streamlining the details of the report to comment on whether the standards have been met (or not) and matters considered valuable for sector wide learning to be gathered and disseminated in a different manner and fora.”

QQI will reflect on this suggestion, as it appreciates the considerable effort required from report writers in producing reengagement reports. However, feedback received by QQI from providers who have been through the reengagement process is that the detail contained in the reports is crucial to their ability to adequately understand and address any issues identified by the Panel for further action. In the event of a negative recommendation, full evidence of how this recommendation arose is also crucial.

Applicant providers have consistently reported that the detail contained in the reports is extremely helpful to their understanding of how providers comparable to themselves have addressed similar challenges and has positively impacted their preparation for the reengagement process.

Finally, the reports contain an important insight into how individual providers operate and form the basis of an ongoing QA dialogue between QQI and the provider which is taken up through annual monitoring, validation actively, and ultimately, cyclical review.



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