

Guidelines for completing the QQI Independent Evaluation Report on an Application for Validation of a Programme of Education and Learning

Overview

The template for the QQI Independent Evaluation Report (IER)¹ forms the basis for the report that details the findings and recommendations of a panel of independent evaluators in respect of a programme submitted to QQI for validation or revalidation.

In conjunction with the QQI *Initial Comments* form, it can also serve as an aid for panel members when structuring their initial impressions of an application.

It can provide a focus for chairpersons when planning and structuring the agenda and questions for the site visit should there be one.

The template is for reports in respect of applications for validation of programmes of higher education and training (HET), apprenticeship and non-CAS further education and training (FET); whether there is a site visit or not².

Purposes of the IER template

The purposes of the IER template are threefold. It is designed to help ensure:

- that reports consistently satisfy the requirements of QQI's validation policy and criteria established under the Qualifications and Quality Assurance (Education and Training) Act 2012;
- that QQI has the evidence it needs before determining an application for validation or revalidation (i.e. determining whether to validate or refuse to validate);
- that the applicant, through evaluation and recommendations, receives feedback that can help improve the proposed programme.

Purpose of the guidelines that accompany the template

The purposes of these guidelines are:

- to assist people to write clear IER reports on applications for validation and
- to support consistency in use of the IER template and the language, style and layout of IERs.

The IER is an **evidence-based** report that will be published by QQI on its website. Therefore, any assertions made, including any recommendations, commendations or proposed special conditions of validation, must be supported by use of evidence gleaned from the application documentation and the site visit. Examples of an evidence-based approach are provided in the appendix.

¹ Independent Evaluation Report on an Application for Validation of a Programme of Education and Learning, version 2.0, 22.03.2018

² In general, submissions for programme validation will normally involve a site visit.

Importance of an evidence based approach

Evaluation panels are engaged by QQI to evaluate programmes on its behalf. The QQI Programme and Awards Executive Committee (PAEC) considers the report of a panel at its meetings and its determination of an application for validation is informed by the IER (see section 7 of *Core Policies and Criteria for the Validation by QQI of Programmes of Education and Training*). To support QQI's determination effectively, the IER must provide a clear, valid and reliable evaluation of the application against each of QQI's validation criteria and it must be consistent with QQI's validation policies.

The IER must clearly set out the reasons for the overall recommendation on whether or not QQI can be satisfied that the application meets its validation criteria. When recommending that a programme be refused validation, it is especially important to indicate all the reasons for this together with the underpinning evidence³ drawn from the submission documents, and where applicable, the site visit. Report writers should note that QQI is required by law⁴ to give reasons for a refusal. They should also note that all QQI validation determinations are subject to appeal and that the report will be fundamental evidence in such an appeal.

For each criterion, the report must succinctly set out the evidence that led the panel to conclude that the criterion in question has (or has not) been met. The supporting evidence may be indicative rather than exhaustive.

Note that QQI may disregard or reject an independent evaluation report at any stage if it is not satisfied that the report is consistent with QQI's validation policy and criteria or if QQI lacks confidence in any aspect of the independent evaluation process. As a general rule, QQI will instigate a new independent evaluation process in these circumstances.

Reporting requirements

Where an application for validation includes embedded programmes, the evaluations of both the principal and embedded programmes/awards should be included in one IER. Nevertheless, a complete evaluation of each programme against the validation criteria is required.

Where an evaluation panel is recommending that QQI refuses validation of an embedded programme, a separate IER is required for that programme. This is for administrative convenience.

Disclaimer

The examples provided in the document are for illustrative purposes only and do not provide the definitive "solution" to drafting an IER.

³ Evidence, in this context can also mean the lack of evidence in the submission or adduced at the meeting in connection with any of the criteria (or sub-criteria) of validation

⁴ Qualifications and Quality Assurance Act 2012

I. Completing the template

Further instructions for preparing the IER are available at page 5 of the IER template.

Note that – where there is consensus among panel members, as there normally will be – the IER will represent the panel’s view. Where consensus cannot be achieved, differing views may be expressed in the IER.

Note that individuals representing either the provider or panel should not normally be named in the body-of the IER, other than in recording who has attended meetings with the panel. Similarly, no personal information relating to the panel or representatives of the provider should be included in the report, other than the name, panel role and principal occupation of the panel members in Part 1 and the roles of provider representatives who met with the panel.

A. General comments with regard to style

- Collective nouns (such as ‘panel’, ‘provider’, and so on) should always take the singular form, e.g. *‘The panel **proposes** as a condition of validation that...’* as opposed to *‘The panel **propose**...’*.
- Only proper nouns, abbreviations, acronyms, titles of policies, documents and standards should be capitalised (e.g. ‘Awards Standards – Science, QQI’).
- The IER should, on the whole, be drafted using the present tense (e.g. *“The panel recommends that...”*).
- Avoid using subjective language, for example, *“the panel is concerned...”*, or *“the panel is impressed...”*.

B. Completing the IER

I. Part 1A

The evaluators’ names, roles (‘chair’, ‘secretary’, ‘industry representative’, ‘subject-matter expert’, ‘QA reviewer’, or – for programmes of higher education and training on the National Framework of Qualifications and above – ‘student’) and principal occupation (in complete form – i.e. no abbreviations or acronyms) should be entered in the table on p. 3 of the IER template.

I. Part 1B

All fields in Part 1B applicable to the programme in question should be completed. Note that this aims to characterise the programme as proposed (or as finally proposed following minor changes). Relevant information is likely be found in the application documentation. The accuracy and viability of the information **must** be confirmed (e.g. the minimum and maximum numbers of learners must be realistic, the number of wholetime equivalent (WTE) academic staff dedicated exclusively to the programme). **Note that minor amendments with respect to the original documentation are often required in this part (e.g. changes to enrolment interval, delivery mode, etc.).**

II. Part 1C – Evaluation of the case for an extension of the approved scope of provision

This section should be completed only in cases where the provider requires an extension of its approved scope of provision. An extension would be required, e.g., if a programme is in a new field of learning, or if it leads to an award at a new NFQ level for the applicant. An extension of scope is also required, for example, in instances where a provider wishes to provide apprenticeship programmes, but has not previously done so.

If the provider does not require an extension of its scope of provision, 'N/A' should be entered in the box in Part 1(a).

QQI will notify the panel in advance of the site visit if an extension of the provider's scope of provision is required.

IV. Part 2A – Evaluation against the validation criteria

1. General information

When completing the parts of the template that deal with the criteria, the report writer must indicate for each criterion whether it has been met comprehensively ('yes'), has not quite been met but where there are only minor deficiencies ('partially'), or has not been met where there are major deficiencies ('no'). Note that '*partially*' means the criterion has not been met, but if the minor deficiencies are corrected, the criterion could be met. If special conditions of validation are proposed these should be set out clearly and it should be clear whether they are proposed as preconditions (to be met before validation).

Yes

Where a criterion has been met, the report writer should specify this underneath the criterion as follows:

The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme meets this criterion.

The best supporting evidence for the positive outcome must be included. Additionally, the panel may include recommendations to the provider for the improvement of the programme.

Partially

Where a criterion has been met partially, the report writer should specify this underneath the criterion as follows:

"The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that programme partially meets this criterion. The minor deficiencies are: "

The best supporting evidence must be included for the positive findings along with all of the reasons why the programme does not (fully) meet the criterion. The panel may recommend special conditions of validation. Additionally, the panel may include recommendations to the provider for the improvement of the programme.

No

"The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI cannot be satisfied that the proposed programme meets this criterion. The major deficiencies are: -"

The best supporting evidence must be included for any positive findings along with all of the reasons why the programme does not meet the criterion. Additionally, the panel may include recommendations to the provider for the improvement of the programme.

Generally

For each criterion give precise reasons for the conclusions organised under each of the 12 criteria (for the programme and each embedded programme and any modules proposed to lead to QQI awards) citing supporting evidence. Although the report must address each of the 12 criteria, it is not required to refer systematically and explicitly to each and every individual sub-criterion in the written report.

Panels are required to comment explicitly against a specific applicable sub-criterion if it has not been met, or if a related aspect of the programme is particularly noteworthy or commendable. Nevertheless, the sub-criteria do need to be systematically *considered* by the panel during the evaluation. Notably, they inform the interpretation of the criterion that they support. Furthermore, providers are required to address them all systematically and explicitly in their self-evaluations.

V. Criterion 6 – *There are sufficient qualified and capable programme staff available to implement the programme as planned*

Providers are required to indicate the overall WTE (whole-time equivalent) staff (dedicated exclusively to this programme)/learner ratio in their programme document. Panels should comment on the appropriateness of this under criterion 6.

VI. Part 2B

Recommendation to QQI

1. Overall recommendation to QQI

Indicate whether the programme is ‘satisfactory’, ‘satisfactory subject to proposed special conditions’, or ‘not satisfactory’. See section 6 of *Core Policies and Criteria for the Validation by QQI of Programmes of Education and Training*.

When drafting the IER, any **recommendations to the provider** and **proposed special conditions of validation** should be inserted under the relevant criterion within the body of the IER in **bold text**. They must then be replicated respectively under the headings ‘*summary of recommendations to the provider*’ and ‘*summary of proposed special conditions of validation*’.

2. Proposed special conditions of validation

Keep in mind that proposed special conditions of validation are proposals made by the panel to the QQI Programme and Awards Executive Committee and must be phrased as such.

Note the distinction between conditions and recommendations (next section). Recommendations are generally drafted for the provider’s benefit (programme improvement).

The report writer must stipulate that, “*The panel proposes as a special condition of validation that...*”.

It is incorrect to state, “*The panel requires that...*”, or “*It shall be a condition of validation that...*”.

There must be rationale for each proposed condition. This may be implicit but must never be obscure. Conditions should be clear and as succinct as possible to facilitate efficient follow-up. An overarching condition may, for example, seek a satisfactory response to a set of more detailed recommendations. Generally, proposed conditions set out what needs to be addressed rather than how. Recommendations are more flexible in that regard.

In general, if the overall recommendation to QQI is satisfactory subject to proposed special conditions, these should be specified with proposed timescales for compliance for each condition. Special conditions may include proposed pre-validation conditions i.e. proposed (minor) things to be done to a programme that almost fully meets the validation criteria before QQI makes a determination. See section 6 of *Core Policies and Criteria for the Validation by QQI of Programmes of Education and Training*.

Frequently, if a panel recommends that a programme be validated subject to proposed special conditions, the provider must meet the conditions before the programme can be validated by QQI. Note that, in some cases, special conditions may not have to be met before validation, but by a specific future date.

It needs to be remembered that proposed special conditions of validation **are for minor matters**. If there are major deficiencies, then a “Not Satisfactory” recommendation is warranted.

3. Recommendations

Generally, validation reports include recommendations to the provider. These are intended to help providers enhance their programmes. Providers do not have to implement these to ensure validation (although they are expected to consider them and address them in their responses to IERs). Recommendations cannot, therefore, be used in lieu of conditions.

Even where the IER recommends that the programme is ‘Not Satisfactory’, the inclusion of recommendations can help the provider who may wish to modify the proposed programme and make a new application for validation.

Recommendations should be stated as follows: *“It is recommended that...”*.

4. Commendations

A panel may include commendations in the IER **but** these should be reserved for exemplary practice only. A programme that simply meets the criteria is not commendable.

5. Declarations of Evaluators’ Interests

Any interests declared by evaluators on QQI’s *Considerations for independent evaluators in QQI Validation Processes (including conflicts of interest matters)* form, or any that emerge at another point during the validation process, must be included in this section. The report writer should provide sufficient context so that the reason why the interest is being noted in the IER is clear to the reader.

VII. Part 3: Programme schedule(s)

If the panel recommends the programme as ‘satisfactory’, the finalised proposed programme schedule should be included. **QQI will insert the programme schedule(s) here.** If the programme is being provided on both a full and part-time basis, programme schedules for both modes will be inserted.

If the first draft of the report recommends 'satisfactory subject to proposed special conditions' QQI may invite the provider to address the proposed conditions and submit revised documentation, this will generally be referred back to the panel for desk review. Changes to the original programme schedule may be required.

VIII. Appendices

Appendices should be added to the IER to provide details of provider representatives (limiting detail to roles e.g. 10 members of staff that would be teaching on the programme) at the site visit, the site visit agenda, the documentation considered by the panel and, where applicable, to note any supplementary statements by the panel in respect of the provider's response and any minor revisions made on the foot of the first draft of the IER.

Appendix

Examples of good practice and an evidence-based approach.

Please note that the examples provided below are a guide only and are based on fictitious scenarios.

If a panel is satisfied that a criterion or sub-criterion has been met, the report writer should not simply copy and paste the sub-criteria, confirming that they have been complied with. The report template contains the criteria and sub criteria and therefore copying or paraphrasing them adds no useful information.

For example, in reference to sub-criterion 3 (a), it is not sufficient to restate:

"The development of the programme and the intended programme learning outcomes has sought out and taken into account the views of stakeholders such as learners, graduates, teachers, lecturers, education and training institutions, employers, statutory bodies, regulatory bodies, the international scientific and academic communities, professional bodies and equivalent associations, trades unions, and social and community representatives..."

Rather, in relation to this sub-criterion, the report writer should provide compelling evidence of what caused the panel to reach its decision. In this case, the report writer should set out examples of the evidence presented in respect of stakeholder consultation. Note that this evidence does not need to be exhaustive.

In order to assist report writers, a number of examples are set out below. As they are not based on a specific programme document, they are, by necessity, somewhat vaguer than the commentary in a 'real' IER would need to be.

Example: Highlighting commendable aspects of a programme

A panel may include commendations in the IER but these should be reserved for exemplary practice only. Normal practice that would be expected in any validation submission is not grounds for commendation.

In the following example a panel reports positively on industry consultation during the development of the programme. It supported its assertion by referring to the fact that the provider had

- identified stakeholders,
- consulted stakeholders,
- taken stakeholder views into account,

and provide examples of each of these elements.

“The panel notes the comprehensive engagement of employer and professional body stakeholders throughout the development of this programme. A core group of representatives from across the sector, which included leading employers and professional bodies in the field (e.g. ABC Ltd., XYZ Professional Organisation), was identified during the initial stages of the programme’s development and asked to outline deficits and gaps in the skill-sets of current graduates in this discipline. They were also requested to identify attributes that they would expect graduates to have. This comprehensive feedback was instrumental in compiling an occupational profile, which has clearly informed the design and the learning outcomes of the programme.

Based on the evidence supplied in the programme documentation and discussions at the site visit, the panel is satisfied that the programme learning outcomes will provide learners with the knowledge, skill and competence required to gain employment in the relevant sector”.

This level of consultation would be expected of providers when developing a programme. This is an example of good practice, but is not worthy of commendation.

Similarly, engagement between a provider’s staff and students is expected in higher education institutions. Therefore, it should not be subject of commendation, unless it provides a good example of innovative practice that would have relevance beyond this programme, this institution and other institutions. If a practice is deemed to be commendable, then evidence should be provided that underlines, for example, its transferability, comprehensiveness, effectiveness, innovativeness and inclusiveness etc.

Example: Highlighting deficiencies in a programme that a criterion has not been met that might lead to a recommendation to refuse validation.

In the following example, the report writer referred to what the panel viewed as insufficient industry consultation during the development of the programme and supports this assertion by referring to specific evidence. They state that the provider had:

- neither identified nor consulted a suitable number of stakeholders,
- in some cases, consulted with representatives selected from areas with little relevance to the programme.

The report writer then provides concrete examples to illustrate their point and makes recommendations as to how the provider should rectify the deficiencies.

“The panel considers that the level of engagement with industry stakeholders during the programme’s development was insufficient to ensure that representative prospective employers

and practitioners were systematically involved in the programme design. It considers that the provider should have consulted with a greater number of industry stakeholders. Furthermore, upon closer examination of those industry representatives consulted, it has emerged that these were drawn from a very small pool of stakeholders, most of whom the provider has worked closely with in the past.

In addition, the panel noted of those stakeholders consulted, some were not active in a sector of industry relevant to the programme – for example, Industry Representative A, while well-known and respected in its field, would be highly unlikely to employ graduates of this programme. Such employers are not well placed to identify the relevant knowledge, skill and competence required by target learners to gain employment in the relevant sector.