

University College Cork

Please see below some collated feedback regarding the *Statutory Topic-Specific QA Guidelines on Flexible and Distance Learning*. I have in many cases just put in various people's comments verbatim, so please be aware the first person singular does not refer to my views personally.

General Commentary:

- On the whole, I think the White Paper is a useful document and I think it could serve as the foundation/backbone of a similar internal document for use when reviewing new and existing programmes/content.
- I read through the QQI document and it is very comprehensive. There is a lot of homework for UCC and a useful rubric for how we score good elearning.
- I wondered how useful it was to separate FDL from other forms of teaching? Many of the points being made seem relevant to face-to-face learning scenarios as well.
- **'FDL is intrinsically learner-centred...'**: This phrasing (in the last line in the first paragraph of section 3.1) is rather problematic in implying that other forms of teaching aren't (and aren't expected to be) learner-centred. Again, probably a larger problem related to other QA guidelines, but worth noting all the same.
- **3.1.1f: 'Learning materials will also need to be quality assured in a different way' AND 3.2.2a: 'All materials and media ... used to deliver FDL are subject to informed peer comment at one or more draft stages...'**: I disagree that materials produced for FDL should be held to a different standard than those produced for other forms of teaching. If they want to introduce peer review of teaching materials, they should do so for all forms of teaching. Singling out FDL effectively raises the bar to entry and engagement and will potentially serve as a disincentive to increased engagement. (Wearing my academic hat, I'd be less inclined to dive into FDL if it meant an increase in admin such as coordinating peer review of teaching materials. (I haven't read the other QA documentation, so perhaps this is officially required for F2F teaching as well — if so, this point is moot). Additionally, what constitutes 'informed peer comment' is unclear — will this be determined by experience with FDL **and** the academic subject? If yes, where are such experts to be found for new programmes? If no, which will be privileged and how will the deficiencies in expertise be balanced? (That said, I agree with the goals of Guideline 7, just not the umbrella rationale/process)
- **3.2: '... that FDL learners should be empowered to track and check their own progress, learning and achievement' (also 3.2.3d, 3.3.1g)**: This phrasing is problematic in that it implies that students in F2F programmes/modules do not have an equal right to track their own progress. I agree that it's vital for FDL, but it's equally important for all teaching. It has a similar problem to my comment above about raising the barrier to entry — the goal should be to make such provisions the default for good teaching and not to set FDL apart with more rigorous standards thereby making people less inclined to embrace it. Are there plans to update other, related QA guidelines to reflect these issues? If not, it should be considered since this document is explicitly framed to only apply to FDL teaching. Ditto for the rest of the line that 'the quality of learning materials plays a distinctive and critical role in FDL' as I'd argue that learning materials play a vital role in all teaching.
- **3.2.1e: 'Each FDL element provides the learner with an interactive learning experience...'**: Need to clarify 'element' as there is a high likelihood that some will interpret this to mean that each and every part of a module must be interactive — so I could see a very literal academic complaining that s/he cannot assign readings because they're not sufficiently 'interactive.' My assumption is that this is referring to either modules or sections

of a module and not the individual constituent parts like readings, videos, discussions, etc. At least, I hope so as that makes more sense than a blanket insistence that each and every part of FDL should be 'interactive' without a clear definition of what is meant by 'interactive'.

- **3.2.3a: '... access learning on a pc or Smart phone'** : 'Smart phone' probably doesn't need to be capitalised, but I believe 'PC' should be
- **3.2.3c: 'The availability and timeliness of feedback to learners is common good practice in all contexts ...'**: adding phrasing like this to 3.2 would address my concerns above and possibly by comments re: 3.1.1f and 3.2.2a
- **3.3.2: '... resources provide learner with an equitable, fair and effective opportunity to achieve the intended learning outcomes'**: again, this should apply to all teaching, not just FDL.

Terminology

- I don't love the term FDL, but have yet to come across a term that accurately fits what we're trying to describe, so for now FDL is as good as anything else.
- Using the term FDL rather than say Technology Enhanced Learning is useful as it is important to view the subject from an audience and delivery perspective rather than medium. This in itself should drive healthy discussion at the early stages of projects.
- Generally, the language in the document is accessible and understandable, but we are a particular community of practice. The Glossary may need to be amended to include definitions and explanations of terms and concepts beyond words; for instance people will generally understand what the word 'enhancement' means but in this context, it probably refers to quite specific and potentially limiting ways of treating content for online delivery.
- **Definition of Instructional Design:** I'd prefer that the definition of ID wasn't limited to FDL — or that this definition made clear that the FDL focus was just for the purposes of this White Paper. All modules/programmes could benefit from thoughtful Instructional Design, but it's often limited to TEL/FDL/online teaching — to the detriment of F2F and more 'traditional' teaching. This is probably a sector wide issue as different institutions employ IDs, Learning Technologists, Educational Technologists, etc and many of them refer to people carrying out the same roles.

Structure

- Breaking things out by organisation, programme, and learner makes sense, but I think a section specifically for academics/teachers might have been useful. I know much of the "programme" stuff is relevant for them, but explicitly engaging the teachers directly (rather than as simply part of a programme) would send a useful message.
- The structure seems logical, but the 'teaching' side seems to be across all sections. It might be helpful to break this out further as specific guidelines for academics developing materials.
- The Learner experience section seems a little light relative to the organization and programme sections. Involving students in constructing learning isn't included — the paper seems to see students as passive customers and learners, which is probably a missed opportunity. FDL gives us the opportunity to guide and nurture learning in ways that might not have been previously available. In this way, institutes have a responsibility now to embrace learning in a global context rather than see it in more traditional local terms.

Fitness for Purpose and User-Friendliness

- The document is short, easy to navigate, well laid out and accessible.

Complementary Resources

- Perhaps a 'Scorecard' or checklist that people could use to benchmark content? Many of these exist online already, but something from the QQI could be a useful and simple tool.
- Examples of best practice from other institutes? This may not be the place for this, but they might help to illustrate some of the concepts under discussion.
- Samples of documents used would be helpful. For example, at lower levels, FETAC used to provide templates for QA Policies and Procedures, which providers were free to use. Similarly, there was a self evaluation checklist and accompanying materials.

I hope you find this feedback helpful and would be delighted to meet with the QQI to discuss any of this if that would be helpful.

Kind regards,
Tom.

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