



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

SECTION 4.13

Green Paper on Programme Accreditation

FOR CONSULTATION

QQI welcomes your views.

If you have suggestions regarding any aspect of the content of this proposed Policy Document please use the *Questions and Comments* area which appears immediately after it.

PLEASE NOTE:

13 SEPTEMBER 2013

CLOSING DATE FOR SUBMISSIONS

SECTION 4.13

Green Paper on Programme Accreditation

4.13.1 Introduction

Programme accreditation is an overarching term which incorporates the process of programme validation and subsequent delivery of such programmes in the FET and HET sectors. For the purposes of this paper the term programme validation is used as the principal function from which other QQI and provider activities may flow. Such activities as currently operated include collaborative provision, transnational provision and joint awarding, and research degree programme approval and accreditation.

In the FET sector programme validation operates in relation to provision of programmes leading to Common Awards System (CAS) awards only. In the HET sector it comprises initial programme validation subsequent programmatic review leading to programme revalidation. Based on the principle of a provider having a validated programme, current HET providers may engage in collaborative provision, transnational provision and joint award activity.

In the future, programme accreditation as a QQI function may also include English Language Teaching (ELT) programme approval (which is not subject to statutory validation as it does not necessarily lead to an NFQ award) and programme accreditation related to the International Education Mark (IEM).

Achievement of programme accreditation for new applicant providers will signal completion of stage 2 of the provider access to accreditation process (see Section 2 Green Paper on Provider Access to Programme Accreditation).

4.13.2 Rationale

4.13.2.1 Legislative and organisational context

The Qualifications and Quality Assurance (Education and Training) Act 2012 (the 2012 Act) sets out the following relevant definitions:

Programme:

A programme of education and training means a process by which a learner acquires knowledge, skill or competence and includes a course of study, a course of instruction and an apprenticeship (S2)

Validation:

A programme of education and training is validated where the Authority confirms under section 45 that the provider of the programme has satisfied the Authority that an enrolled learner of that provider who completes that programme will acquire, and where appropriate, be able to demonstrate, the necessary knowledge, skill or competence to justify an award of the Authority being offered in respect of that programme (S2)

The Act also determines that QQI:

- Shall establish and publish policies and criteria for validation (as soon as practicable), review these at least once every 5 years and may determine a fee for validation (S44).
- Shall reach a determination on applications for validation of programmes of education and training (S45) including those programmes related to joint award arrangements (S51).
- May review a programme of education and training which it has validated (S46) and may subsequently withdraw validation (S47).

Elsewhere in the 2012 Act validation is also referred to or it impacts on specific areas such as applying for an award (S50); joint awarding arrangements (S51); and Protection for Enrolled Learners (S65).

4.13.2.2 Public Policy Context

Programme accreditation is intended to provide a measure of oversight and assurance that programmes leading to awards within the National Framework of Qualifications (NFQ) enable learners to meet the standards of the award.

Public policy can influence the demand for programme accreditation as the following illustrate:

- The 'National Strategy for Higher Education to 2030'.
- The national economic recovery and employment strategy including labour market activation initiatives. E.g. Springboard.

- Forfás/Expert Group on Future Skills Needs National Skills Bulletins, Labour Market Reports, Trends in Education and Training Outputs, Sectorial Skills supply and demand research.
- National strategy on international education.
- The impact on the FET sector of the roll out of the Common Awards System (CAS) and subsequent demand for programme validation
- The impact on the FET sector of the establishment of Solas as the Further Education and Training Authority and the establishment of Local Education and Training Boards and their relationship with QQI

4.13.3 Current Transitional Arrangements

There are two existing policies for programme validation currently operated by QQI: the FET Awards Council validation policy established in 2006 and the HET Awards Council Core Validation Policy and Criteria revised in 2010. These policies are saved under the 2012 Act and QQI proposes to continue to operate them for existing and new providers, subject to any modifications required to meet the 2012 Act, until new policies and criteria are determined. Programme validations, and revalidations where appropriate, are continuing.

4.13.3.1 FET sector

Programme validation in this sector has been implemented as a formal, criteria-based, decision making process with the roll out of the CAS since 2007. With the introduction of the CAS, detailed award specifications with extensive structural requirements and statements of learning outcomes and assessments were made available to the FET sector. These serve as the basis against which programmes are validated. The number of programmes validated has increased substantially year on year. This is expected to peak in 2012 and may fall from 2014 onwards, subject to the policies on new award development and on access to accreditation for new providers.

Table 1: FET programmes validated 2007-2012

CAS rollout	Year	No. Programme Validated
Levels 1 and 2	2007	9
Levels 1 and 2	2008	21
Level 1,2,3	2009	50
Levels 1,2,3,4,5	2010	60
Levels 1,2,3,4,5 and 6	2011	413
Levels 1,2,3,4,5 and 6	2012	1273

Programme validation as operated under the FET awards council policy is managed via an online application system and is currently available for programmes leading to all award types. The evaluation that underpins programme validation has been devolved in some cases through the use of Programme Approval Agreements (PAA). A PAA is a high level QA agreement based on the principle of subsidiarity. It recognises the experience and capacity of providers and other organisations in programme evaluation and approval. The subsequent decision to validate programmes stays with QQI. Currently there are 20 PAAs in place including with FÁS, Teagasc, an Institute of Technology and all Vocational Education Committees.

The volume of programmes validated for major awards tends to reflect provision made by the public providers who are obliged under legislation to ensure that their qualifications lead to awards in the NFQ. A small number of voluntary providers (e.g. non-statutory FET provider) have programmes validated leading to major awards.

Currently no fees are payable for validation for FETAC awards. If QQI introduces a fee for programme validation this will likely influence provider behaviour.

13.3.2 HET Sector

Core Validation Policy and Criteria 2010 applies to provision of programmes by providers leading to HETAC awards within the NFQ and to providers with DA to make awards. It is also applicable to the validation of joint awards and research degrees. These include public institutions providing HET and up to 41 voluntary HET providers. A small number of providers have taken devolved responsibility for validation sub-process under Section 5 of the Core Validation Policy. The approach to programme validation for programmes in HET in the main reflects a peer review approach as well as a focus generally on the large volume of learning associated with programmes leading to major awards which typically are of longer duration. The national standards for HETAC awards are largely set at a broad disciplinary level and detailed standards for individual named awards are established as part of the

validation process. Minor awards are based on validated programmes leading to major awards.

The validation process comprises: internal assessment by the provider of the proposed programme, external assessment including onsite evaluation of the programme by a panel of experts, preparation of a report from the expert panel, the provider's response to the report and decision by QQI. The majority of programmes validated in HET lead to major awards. Validation is for a specified period, normally five years, following which a programmatic review is required if validation is to continue. The programmatic review cycle is well established as a process in the HET sector and is managed by the provider with approval from QQI. It includes agreement by QQI of the Terms of Reference of the review and the expert panel membership. The outcome of the review and recommendation of the panel is considered by QQI and approved as appropriate.

4.13.4 Towards Coherence in Policy on Programme Accreditation

The 2012 Act allows QQI to establish different policies and criteria for validation of different programmes or classes of programmes. An overarching QQI programme accreditation policy may be considered to bring a coherent structure to programme accreditation that reflects the Provider Lifecycle of Engagements (See Section 1.5) and the relevant award systems. This would, over time, improve and extend the range of practices in programme accreditation over the short, medium and long term. If this approach were adopted it would enable QQI to:

- Determine new criteria for programme validation in line with the development of the awards policy.
- Establish the balance of responsibilities in programme accreditation between the provider, QQI and external experts.
- Manage external expectations and tensions between the level of continuity and the level of change.
- Address the external influences on demand for accreditation from QQI including those outlined above relating to various public policy initiatives.
- Address the resource implications for QQI of operating the programme accreditation function into the future.

4.13.5 Programme Accreditation - Issues for Consideration

It is premature to present a definitive set of considered options here. Further exploration of validation policy and practice in other jurisdictions is required to inform policy options. More pointedly the practices of other awarding bodies in validating programmes that will lead to awards recognised in the NFQ will need to be further investigated to compare rigour, criteria, cost, degree of externality etc. (See Green Paper 4.3 on Recognition of Qualifications within the NFQ).

It should be noted that the validation policies of the former awarding bodies are dependent on the awards policies of the FET and HET Awards Councils. If QQI develops and implements a new awards policy the new validation policy will also be considered. The fundamental issues relating to the awards policy are discussed in Green Paper 4.1 Awards and Standards.

Issue 1 Scope and interpretation of validation concept

The FET and HET Awards Councils took radically different approaches in fulfilling their statutory function to validate programmes leading to awards. They used different language, sometimes to describe similar concepts. Validation has different criteria and scope in the two sectors. These differences in policy and implementation require further interrogation in the process of developing new validation policy for QQI.

Issue 2 Programme duration

The average duration of a programme in FET leading to a major award at levels 1 to 6 is significantly shorter than the average duration of a programme in HET leading to a major award at levels 6 to 10. Whilst duration is only one aspect of the programme to be considered at the point of validation, it does impact on the volume and learner assessment associated with the programme. These elements need to be evaluated and therefore impact upon the potential approaches to validation. There are many other features of programmes across levels 1 to 10 of the framework that would suggest that a single approach to validation would not be feasible.

Issue 3 Number and range of programmes requiring validation

The number and range of programmes requiring validation (and potentially revalidation) particularly in the further education and training sector provides a challenge to QQI in a time of diminishing resources. QQI must find ways to validate these programmes efficiently. The

concepts explored in Section 4.11 Green Paper on Provider Risk and Proportionality may be of assistance in this regard.

The current HET validation process which establishes a programme specific panel for each programme to be validated is resource intensive for QQI. In a relatively small higher education and training sector it places strain on the pool of experts who act as panel members. The inclusion of international experts is costly.

Issue 4 Validation of programmes leading to component rather than major awards

Current FET validation data shows that a practice has emerged in the sector of submitting programmes for validation that meet the requirements of a single or range of minor (component) awards without reference to the major award to which these minor awards are associated. This is not good practice and it leads to a piecemeal approach to programme development and a fragmented learner experience as it does not support or promote the achievement of major or special-purpose awards.

Issue 5 Responsiveness of validation policy

Changing labour market requirements and associated national funding and regulatory policy responses stimulate demand for validation of new programmes. QQI is often expected to expedite validation, without compromising programme quality. The extent to which responsiveness, maintenance of quality and cost can be balanced will need to be explored in developing validation policy.

Issue 6 Validation fees

QQI currently charges fees for validation of programmes leading to HETAC awards but not for validation of programmes leading to FETAC awards. Any new validation policy will have to consider the costs associated with different approaches and the extent to which these costs are met by fees charged to providers. These issues are discussed further in Green Paper 3.2 on Fees.

Questions and Comments

SPECIFIC CONSULTATION QUESTIONS

Q4.13.A Do you agree that a new overarching approach to programme accreditation is preferable to continuing sectoral approaches?

Q4.13.B Do you have any comments on the issues raised in this Green Paper?

Q4.13.c Are there other issues relating to programme accreditation that have not been raised in this Green Paper?

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If you are satisfied with your comments please send them to us now by clicking the *Submit* button below.

You can also give feedback to QQI at: consultation@qqi.ie

Thank you for your time!