



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

SECTION 2

Green Paper on Provider Access to 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:

7 JUNE 2013

CLOSING DATE FOR SUBMISSIONS

SECTION 2

Green Paper on Provider Access to Programme Accreditation

2.1 Introduction

The purpose of this Green Paper is to set out the options and issues relating to the requirements and process for applicants seeking access to accreditation for provision of programmes of education and training leading to QQI awards.

For the purposes of these Green Papers, the term ‘accreditation’ is used to refer to a set of engagements between QQI and a provider in order to have its programme lead to a QQI award.

We acknowledge the demand for access to recognition within the National Framework of Qualifications (NFQ), from learners, from providers and other users of the NFQ. As statutory custodian of the NFQ, we recognise and facilitate a variety of routes to recognition within the NFQ which are outlined in Section 1.4. This Green Paper is specifically concerned with the route to the NFQ where QQI makes the award. We have direct responsibility for this route.

The Qualifications and Quality Assurance (Education and Training) Act 2012 (hereafter the 2012 Act) differentiates between statutory providers, who are obliged to engage with QQI and other providers that engage with QQI on a voluntary basis. Statutory providers are automatically ‘relevant providers’. Voluntary education and training providers who have one or more programmes accredited by QQI thereby become ‘relevant providers’ as defined by the 2012 Act.

The process for access to programme accreditation described here only applies to voluntary providers who have no previous access to FETAC or HETAC awards.¹

The programmes offered by English Language Teaching Organisations (ELTOs) do not usually lead to awards. When an International Education Mark (IEM) is introduced these providers will have access to QQI services. QQI inherited administrative responsibility for the

¹ Discussion of the voluntary/obligatory nature of providers is discussed in Section 4.14 Re-engagement of legacy providers.

ACELS (Accreditation and Co-ordination of English Language Services) scheme for ELTOs but the scheme has not been open to new applicants since the 2012 Act was commenced.

2.2 Rationale

The 2012 Act places responsibility on providers to demonstrate sound Quality Assurance (QA) procedures and to meet programme delivery criteria. QQI has a legislative mandate to ensure that providers are compliant with these responsibilities through its validation, review and monitoring functions.

The access to accreditation process should ensure that the applicant provider demonstrates the ability to transform learners through a well-supported learning experience which allows them to achieve the learning outcomes for the level and type of award sought.

Access to the programme accreditation process will establish whether or not the provider has substantive QA procedures which are sufficient for, among other things:

- The delivery of programmes to national standards.
- The protection of learners.
- Meeting requirements for access, transfer and progression of learners.
- Compliance with an agreed Provider Lifecycle of Engagements (as discussed in Section 1.5).

QQI acknowledges the diversity of the existing education and training sector in Ireland. The access to programme accreditation process will be designed to be proportionate to the programme provisions, subject to minimum threshold requirements.

2.2.1 Impact of Closing FET Awards Council and HET Awards Council Provider Registration

The FET and HET Awards Councils each had policies and processes for registration of providers and the validation/accreditation of programmes. When the Bill to establish QQI was published in September 2011, these processes closed to new applicants. Since then, QQI has received approximately 230 queries from providers regarding access to QQI awards. QQI does not refer to providers with access to its awards as 'QQI registered providers' as QQI has such a wide variety of relationships with different providers.

Based on internal QQI discussions, it is clear that a number of those querying access to accreditation have misunderstood the nature of the relationship sought with QQI or the possible benefit QQI could have for them. Some of those who made enquiries are now looking at other routes to NFQ awards or reconsidering their position in the context of the effort and cost involved.

In early March 2013, QQI issued a questionnaire to 105 potential applicants who had been in contact about programme accreditation. QQI continues to issue this questionnaire to potential applicants. The questionnaire gathers information about the potential provider, i.e. their type, the NFQ awards they propose to seek accreditation for, and other awarding bodies they are linked to. To date, we have 82 responses. The majority of the demand for accreditation comes from private FET and commercial training providers. The majority making such enquiries were offering, or hoped to offer, awards at Levels 3 to 5 on the NFQ.

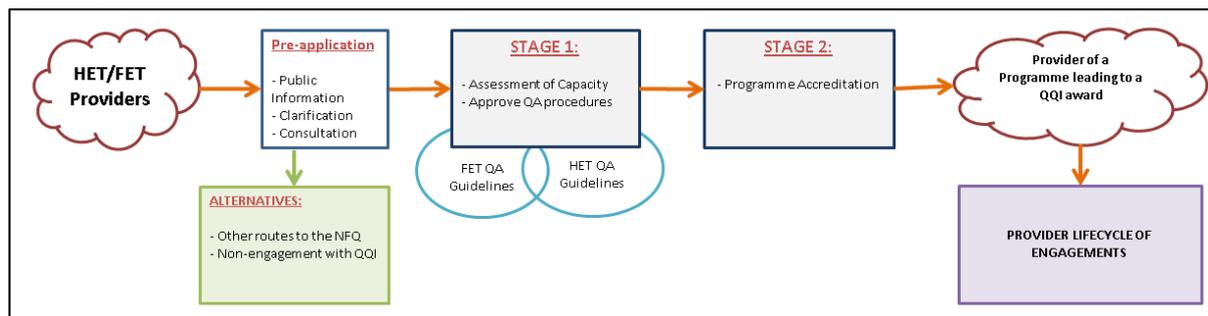
Frequently held perceptions and misconceptions by respondents included:

- That QQI is simply an extension of the FET Awards Council and the former arrangements will be in place to register them as providers.
- That the FET Awards Council policy of not charging fees for agreement of quality assurance or for programme validation would continue.
- That applying to QQI was compulsory, even though the providers in question had programmes from other awarding bodies that were recognised within the NFQ.
- That having completed a Level 6 'Train the Trainer' FETAC award, they were entitled/qualified to offer programmes leading to other FETAC awards.
- That QQI will establish a National Register of Trainers similar to the register that was operated by FÁS in the past.
- That the course they had developed could be accredited by QQI; including courses that were not developed or owned by the organisation, e.g. franchise operators.
- That seeking QQI recognition would be a more cost effective way of training the organisation's own staff rather than using the services of a provider currently offering NFQ awards.
- That all programmes and training provided, must lead to awards on the NFQ. For example manual handling and fire safety training.
- That their learners would not receive funding to undertake programmes unless they lead to QQI awards.

2.3 Access to Programme Accreditation – The Process

Figure 1 describes the proposed process that providers will undertake in order to become providers of programmes leading to QQI awards. It is based on the functions set out in the 2012 Act.

Figure 1: Proposed Provider Access to Accreditation Process



We are proposing a two-stage process for applicants seeking programme accreditation. A pre-engagement of some form may be necessary to clarify and inform prospective applicants about this process and its appropriateness for a given provider.

Stage 1 will include an assessment of provider capacity and the approval of a provider’s QA procedures.

Stage 2 will validate the provider’s programme(s).

Completing Stage 1 does not give any public status to a provider; successful completion of both stages is necessary before a provider may deliver programmes leading to QQI awards.

It is likely that providers will be liable for fees for the complete access to programme accreditation process but how these fees will apply has yet to be decided. Separate fees could be charged for each stage, or a combined fee may be charged.

2.3.1 Pre-engagement

QQI is concerned that providers who wish to access programme accreditation will apply to do so unprepared for what is expected of them or unsure of what value QQI accreditation is to them. If unprepared providers apply, they will be unsuccessful in attaining QQI accreditation and may be restricted from re-applying for a period of time to be determined.

QQI hopes to establish mechanisms to inform, clarify and consult with providers prior to application.

2.3.2 Stage 1

Stage 1 will involve the evaluation of provider capacity and agreement of QA procedures.

Mechanisms for evaluating these elements could include:

- Self-evaluation
- Desk review
- Peer review
- Expert panels
- Site visits
- Cross-consultation with other awarding bodies
- Joint assessment with other agencies.

Q2.a Which mechanism(s) for evaluating provider capacity appropriate? Are different mechanisms required for different types of provision or provider?

[Click here or click on respective bookmark to respond >>](#)

2.3.2.1 Assessment of Capacity

Provider capacity is proposed as a key concept that will underpin a provider's relationship with QQI. The responsibilities of providers, as set out in the 2012 Act, are significant. This would be in keeping with the public sector reform strategy which identified screening of application as a means of increasing efficiency of public services. QQI proposes to assess provider capacity in order to ensure that applicants can meet these responsibilities and to ensure that learners receive education and training from providers that have the resources, capacity and expertise to deliver quality programmes at the standard and level required.

The evaluation of provider capacity may address:

- The legal, financial and structural capacity of an applicant to take responsibility for the proposed provision for which recognition is sought.
- The QA procedures that the provider has in place; that they are sufficiently robust to maintain and enhance the quality of provision.
- Arrangements to protect learners, as required by the 2012 Act, in the event of a programme ceasing (see Section 3.1 – Protection for Enrolled Learners).
- The ability to design, develop and deliver the programme for which accreditation is sought.

- A provider's understanding and experience of assessment of learners.
- The ability to comply with access, transfer and progression requirements.

Q2.b Are any of the proposed factors not relevant to evaluating provider capacity? Are there other factors that should be considered?

[Click here or click on respective bookmark to respond >>](#)

2.3.2.2 Approval of QA Procedures

As part of Stage 1, providers will be required to comply with the requirements of the 2012 Act which states that providers:

shall establish procedures in writing for the purposes of establishing, ascertaining, maintaining and improving the quality of education, training, research and related services which the provider provides.

Providers' procedures need to reflect guidelines issued by QQI. QQI proposes to publish criteria and develop a process for approving the provider's QA procedures. As part of this process, providers will be required to demonstrate that their procedures meet those criteria.

2.3.2.3 QA Guidelines

While QQI will in due course develop new QA guidelines for all providers, in the short term it is proposed to adopt interim measures to facilitate the opening of access to the programme accreditation process. QQI proposes to adopt the guidelines issued by the former FET and HET Awards Councils with modifications to reflect additional requirements of the 2012 Act. These guidelines will set out our expectations of providers but they are not a 'how to' manual for providers.

2.3.2.4 Approval of Procedures for Access, Transfer and Progression

The 2012 Act places the requirement on providers to facilitate access to, and movement between, programmes leading to awards recognised within the NFQ. They are required to have policies and procedures in place for informing learners and the public about this. For the purposes of opening the process for access to programme accreditation, the savings provisions in the 2012 Act will allow QQI to maintain the 2003 policy determinations of the NQAI, and the FET and HET Award Councils as the relevant policies and criteria. In due course QQI will be reviewing the 2003 policies and developing new policies and criteria.

Providers will need to document the procedures that they put in place and QQI proposes to consider these for approval as part of the same Stage 1 process that approves the provider's QA procedures.

2.3.3 Stage 2

2.3.3.1 Programme Validation

In order to provide access to programme accreditation QQI will validate the proposed programme(s) of education and training to be offered by the provider. Validation is the process by which QQI satisfies itself that a learner has the opportunity to attain knowledge, skill or competence to meet the standards of an award made by QQI. Variant forms of programme validation cover collaborative provision, transnational provision, joint awarding and research degrees.

Proposed programmes by education and training providers seeking access to accreditation should relate to awards that are available.

Pending development of a new QQI awards policy, QQI proposes to use awards policies developed by the former FET and HET Awards Councils, subject to any modification required to meet the requirements of the 2012 Act and the imperative for consistency of approach. This will cover CAS awards, Craft awards, and HETAC awards.

2.3.3.2 Programme validation criteria and process

To facilitate the opening of the access to accreditation process, QQI proposes to use the materials issued by the former FET and HET Awards Councils on validation. QQI will develop new policy on programme accreditation that will apply in the future.

2.4 Provider access to accreditation - Options for consideration

In developing and implementing a policy on access to programme accreditation, QQI has considered:

- The current demand from education and training providers to apply for access to programme accreditation.
- The Comprehensive Policy Development Programme being undertaken by QQI.

This section seeks your views on options at a policy level and at an implementation level.

2.4.1 Policy-level Options

OPTION 1 Assessment of capacity and approval of QA procedures against QQI criteria based on modified legacy FET and HET Awards Council guidelines.

Programme Validation for specific programmes leading to awards on the NFQ using enhanced legacy FET and HET Awards Council processes.

Advantages

- Quickly meets the demand to open access to accreditation for education and training providers that have expressed an interest.
- By enhancing the criteria for new applicants, standards across the further and higher education sectors are raised.

Disadvantages

- The criteria and guidelines may not reflect the new direction to be taken by QQI QA criteria which have yet to be developed.
- Applicants who succeed under these criteria may have to be re-evaluated under new criteria in the medium term.

OPTION 2 Assessment of capacity and approval of QA procedures with additional conditions/criteria for (a) the applicant provider and/or (b) the programme.

Examples of additional conditions/criteria that could apply:

Applicant Conditions

- Sole purpose/core business of the applicant is the delivery of education and training.
- The applicant is an established education and training provider for a specific period of time e.g. two years.
- A minimum number of learners will achieve awards annually.
- Providers that are located in areas with limited current available provision of NFQ awards.

Programme Conditions

- Applications restricted to providers of programmes of Major awards only.

- Applications for programmes in specific fields of learning identified in the National Skills Strategy.

Advantages

- Meets the demand to allow access to accreditation to the applicants who have expressed their interest.
- Some of the proposed conditions will benefit learners.
- Some of the conditions will benefit providers who have been in business for some time.

Disadvantages

- Some of the conditions may be considered anti-competitive.
- Some of the conditions could distort providers' intended programme provision.
- Judging the sole purpose/core business of a provider could be problematic, particularly in the area of work-based learning provision.

2.4.2 Implementation-level Options

Applying to seek access to accreditation will not be taken lightly by applicants as it demands significant resources on the part of the provider to make such an application. There are options on how the process could be implemented.

OPTION 1 Sequence the process in two separate stages with the applicant having to succeed in stage 1 before progressing to stage 2.

Advantages

- Reduces applicants' commitment of resources at an early stage.
- Follows the sequence outlined in the 2012 Act.
- Providers have a full QA agreement in place for programme development.

Disadvantages

- Defers development work on programmes.
- Applicants may succeed at stage 1 and never proceed to stage 2 wasting their resources and QQI's corresponding effort.
- More time may elapse before gaining access to QQI awards.

OPTION 2 Applicants submit all the requirements for Stage 1 and 2 and QQI will manage the stages in parallel.

Advantages

- Applicants engage fully with QQI with a focus on the programme they propose to offer.
- Possibly a quicker overall process.

Disadvantages

- Greater investment of resources by the provider upfront.
- Risk of overload on provider's developmental capacity.
- Confusion between programme and provider level considerations and criteria.

2.5 Access to programme accreditation for ELTOs

ELTOs not currently recognised by ACELS may have to be considered for September opening for new providers as they will be the only group of interested applicants without access to an engagement with QQI.

OPTION 1 Postpone any new access for ELTOs until an IEM policy is developed.

Advantages

- ELTOs can plan for the introduction of an IEM.

Disadvantages

- No interim engagement for new ELTOs.
- ELTOs without alternative routes to the Internationalisation Register will be disadvantaged in that regard.

OPTION 2 Submit for a Stage 1 assessment of capacity and agree QA procedures as are available to new providers seeking access to accreditation and subsequently ACELS inspection.

Advantages

- Meets same criteria as all other new providers regarding QA and capacity.

- Anticipates statutory requirements to be introduced with IEM.
- Access to familiar ACELS scheme and brand.

Disadvantages

- This is not statutorily provided for.
- May be overly expensive/disproportionate.
- ACELS criteria may require revision.

OPTION 3 Re-open the ACELS process subject to a condition that as soon as the IEM is available, the ELTO must apply for it.

Advantages

- Access to familiar ACELS scheme and brand.
- Parity with existing ACELS providers.

Disadvantages

- This is not statutorily provided for.
- Providers may need completely fresh engagement with QQI when the IEM is introduced.
- Inconsistent with treatment of other providers engaging with QQI for the first time.
- The continuing operation of a legacy process places a burden on QQI.

Questions and Comments

SPECIFIC QUESTIONS FOR THIS GREEN PAPER

SECTION 2.3.2

Q2A. Which mechanism(s) for evaluation is appropriate?

Self-evaluation

Desk review

Peer review

Expert panels

Site visits

Cross-consultation with other awarding bodies

Joint assessment with other agencies

Are different mechanisms required for different types of provision or provider?

Questions and Comments

SPECIFIC QUESTIONS FOR THIS GREEN PAPER

SECTION 2.3.2.1

Q2B. Are any of these factors not relevant?

The legal, financial and structural capacity of an applicant to take responsibility for the proposed provision for which recognition is sought.

The QA procedures that the provider has in place. That they are sufficiently robust to maintain and enhance the quality of provision.

Arrangements to protect learners, as required by the 2012 Act, in the event of a programme ceasing (see Section 3.1 – Protection for Enrolled Learners).

The ability to design, develop and deliver the programme for which accreditation is sought.

A provider's understanding and experience of assessment of learners.

Ability to comply with requirement on access, transfer and progression.

Are there other factors that should be considered?

Questions and Comments

GENERAL CONSULTATION QUESTIONS

Are there other options that have not been considered in this Green Paper?

Are there advantages and disadvantages that have not been identified for each option?

Do you have any preferences among the options?

2.4.1 Policy-level Options

option 1

option 2

2.4.2 Implementation-level Options

option 1

option 2

2.5 Access to programme accreditation for ELTOs

option 1

option 2

option 3

Do you have any comments on the issues raised in the Green Paper?

- » You can choose to save this document and return to add further comments.
- » When you have finished commenting please submit your comments by going to the last page and clicking the *Submit* button. Thank you.

Are you finished commenting?

Please provide the following details.

Which sector do you work in?

If other please describe here

Contact email address

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!