

Extension of Approved Scope of Provision

to include

Blended and / or Fully Online Learning

Process Guide for Providers

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1. Background

Approved scope of provision is a way of describing a provider's range of programmes in terms of sector, award types, programme types, jurisdictional coverage and mode of delivery. The scope of provision is set initially when the provider's institutional capacity and quality assurance are approved by QQI but, for providers already approved, may be extended subsequently through a focused evaluation specific to the type of extension sought.

As set out in <u>QQI's Policy on Provider Approval</u>, a provider whose quality assurance procedures have previously been approved for a specified set of programme types, can apply to extend its approved scope of provision by demonstrating that it has the capacity, resources and quality assurance procedures appropriate to the desired scope.

QQI will evaluate any such application and will decide on approval. If the application is approved and the provider's scope of provision is extended, that will enable the provider to make subsequent applications for validation within the new scope. NB: it is important to understand that extension of scope only has purpose and effect in the context of subsequent programme validation(s).

Quality Assurance (QA) approval for a change in scope confirms reported capacity and capability to manage the proposed change effectively – while the initial test of real capacity is in validation.

Key to any extension of scope is the relevant set of QQI quality assurance guidelines. The provider must show that its quality assurance procedures have regard to the guidelines and that it has the resources required – human, technological and other, to implement those procedures.

QQI's QA Guidelines, <u>for Providers of Blended and Fully Online Programmes</u> was published in 2023. They are intended to enable providers to assure the quality of design, development, delivery and assessment of programmes that learners engage with, partly or fully online.

As will be clear from the guidelines, these types of programmes put demands and expectations on both providers and learners not felt in more traditional modes. It is crucial that the programmes are planned and managed so that the learner experience and integrity of outcomes are maintained to a high standard.

The provider's role is to set out its desired scope of provision and how it has used the QA guidelines to update and extend its already approved quality assurance procedures. QQI's role is to evaluate that proposal using independent expertise and make an approval decision based on that evaluation.

2. Purpose of this Guide

This guide is intended to assist providers in making effective applications to QQI for approval to extend their approved scope of provision to include blended and / or fully online programmes and to allow subsequent applications for validation of programmes using the now approved mode(s) of delivery.

It describes the overall process and also the variations within designed to have evaluations proportionate to the experience and context of the provider.

3. Context: Continuum of Online Provision

A key feature of this process is the continuum of options for approval available to providers which are catered for by these guidelines. QQI has identified a number of distinct staging points along the continuum, and each is a potential extension of scope for a provider. These <u>staging points</u> are:

- 1. Blended Synchronous Only
- 2. Blended Synchronous and Asynchronous
- 3. Fully Online Synchronous Only National
- 4. Fully Online Synchronous and Asynchronous National
- 5. Fully Online Synchronous and Asynchronous National and Transnational

Each staging point has implications for provider resourcing, capacity, infrastructure and quality assurance greater than what applies to the previous points on the continuum. Each is described below together with some of the associated implications.

In all cases however, while all usage of online modes has potential benefits for both provider and learner, the rationale for choosing such a mode(s) should always favour effectiveness over convenience and economy.

3.1. Staging Points on Continuum

I. **Blended – Synchronous Only**: while all programmes designated as 'blended' must include some onsite contact between learner and provider, the online part of the blend for many providers will only include synchronous remote participation by the learner in classes, tutorials, one-to-one sessions etc. This type of contact has become increasingly common and has been found to be both effective and convenient for some learners and providers.

While potentially very effective, synchronous delivery is not the same as onsite (classroom) delivery and teachers / instructors / tutors need to be aware of the differences and what it means for them. Likewise, the learner experience can be quite different if the bulk of contact with the provider and with fellow learners is remote. This too needs to be factored into programme and service planning.

A significant issue for providers here will be training for teaching staff on how to present material synchronously and how to monitor learner engagement and understanding.

Providers will need to ensure that the blend of onsite and synchronous classes is reasonable, and that integrity of assessment is maintained.

Hence, where a provider has not previously been approved for blended learning and wants to continue offering synchronous classes via a platform such as Teams

or Zoom, that provider must seek approval to extend its scope of provision to this staging point.

II. Blended – Synchronous and Asynchronous: While still requiring an element of onsite contact between learner and provider, this mode implies that at least some directed learning¹ is conducted via a virtual learning environment (VLE). This is a significant step change for providers previously validated for onsite only or who had only used a synchronous platform.

How the VLE is selected, resourced and managed needs planning and oversight. How material is structured from a pedagogic perspective also needs expertise and potentially significant revision of programmes.

The balance in a programme between onsite, synchronous and asynchronous modes needs consideration from the learner experience perspective.

Fully Online Modes

In addition to the issues mentioned for the previous staging points, the move to fully online is a significant step from a QA perspective. By definition, fully online means there is normally no onsite contact between a learner and the provider during the course of the programme.

Crucially this means

- Significant resourcing and expertise are required for programme design. The skills of an educational technologist would be essential.
- Appropriate hardware and software are required.
- Assessment is remote and assurance of the integrity of assessment outcomes becomes a critical issue.
- Monitoring and supporting learners experience and engagement is essential to ensure positive experiences for learners.

There are different fully online staging points as set out below.

- III. Fully Online Synchronous Only National: this mode, only really viable for short programmes, would involve entirely synchronous teaching and learning and no onsite component to the programme. As with other fully online modes, this requires significant and sophisticated quality assurance. How the provider ensures the integrity of assessment and a supportive environment for the learner will be particularly important.
- IV. Fully Online Synchronous and Asynchronous National: The use of asynchronous technology, software and tools adds additional complexity, resourcing and quality assurance obligations on the provider. Done well, this

¹ More than provision of learning resources / recordings on the VLE.

mode can be very attractive and beneficial for learners for whom onsite provision is not an option e.g. full-time workers who are highly motivated but time poor.

Hence, it is important that the provider carefully selects which programme(s) and for which learner profile(s), the fully online mode is appropriate. This is where a clear organisational policy is critically important.

V. **Fully Online Synchronous and Asynchronous - Transnational:** Where a provider plans to offer its programmes to learners overseas i.e. transnationally, this constitutes the 'rightmost' extreme on the continuum. It incorporates all that went before, but includes the complexities associated with meeting the needs of learners seeking to participate in the programme from another country. Cultural differences, award recognition, language, time zones etc. are some of the obvious issues which need to be factored into programme planning and design.

4. Principles for the Process

For all QQI processes to evaluate and approve extensions of scope requests, the following principles will apply:

Subsidiarity: corporate and academic governance structures already approved will be given significant responsibility to ensure that:

- a. The scope of provision requested is appropriate and supported
- b. A thorough, meaningful and positive self-assessment has been conducted
- c. There are sufficient resources available to deliver on commitments made in the application.

Proportionality: the scale and process of the evaluation required will be in keeping with the scope of provision requested (ref. 2 above) and the context, experience and existing approved scope of provision of the provider.

Independence: as with all QQI evaluation processes, independent expertise will be deployed to assist decision making.

5. Overview of the Process

The purpose of any 'Extension of Scope' process is to ensure that a provider has the capacity, resources and quality assurance procedures appropriate to deliver programmes within the requested scope of provision.

This implies an application by the provider for approval and an evaluation of this application by QQI using independent expertise as required.

6.1. Provider's Role

The provider will:

- Clarify for itself exactly **which of the 'staging points'** along the continuum referenced above it wishes to seek approval for.
- **Inform QQI**² of its intention to apply to extend scope and to which staging point. An outline Action Plan setting out significant work to be done should accompany this communication.
- It should be noted that QQI may require the provider to work towards a different staging point.
- Use QQI's <u>QA Guidelines</u> to inform itself of what is expected of any provider offering programmes of the type it wishes to offer.
- Use <u>Gap Analysis Tool</u> or equivalent to establish in more detail what needs to be done at organisational, programme and learner experience level. This tool will provide an action plan to be followed by the provider.
- Develop a **policy** clearly stating its position on Blended / Fully Online Learning and what that will mean for its programmes and learners. This policy should demonstrate that the provider understands its obligations arising from the QA guidelines and should be approved by academic governance.
- Set out a **strategy** for implementation of this policy. This should address infrastructural and resourcing issues and should have corporate support.
- Develop new / amend existing **QA procedures** which will support development, delivery and assessment of blended / fully online programmes of the type envisaged.
- Develop **learner supports and services** necessary for remote learners, whether on blended / fully online / transnational programmes.
- Conduct / commission and report on a **self-assessment** and make any amendments recommended through that process. A template for reporting on a self-assessment has been provided by QQI.
- Obtain approval from Corporate and Academic Governance

² For providers availing of emergency sanction to offer blended / online programmes expiring on June 30th 2025, this communication to QQI should be before end of 2024.

- Complete <u>QQI's Application Form</u> to map application documentation to QQI's Guidelines
- Inform QQI when ready to make application. Details on the online submission process will be provided.
- Submit application form³ to QQI together with supporting documentation including QA procedures.
- Cooperate with the variant of the **evaluation** process set by QQI, as described below. Depending on the level of responsibility devolved by QQI to the provider, this may involve significant organisation and resources.

6.2. QQI's Role

- Take account of the variety of education and training providers and their many operating contexts. The approach of QQI to the evaluation of each application will be proportionate to the provider's operating context.
- Agree with the provider as to the appropriate staging point for that provider based on provider's current approved scope of provision and stated intention. It may be that the provider will be required to apply for a 'lower' staging point than what it intended.
- Give direction as to the process variant to be followed for evaluation of the provider's application see section 6 below .
- Where appropriate, approve the terms of reference for the independent evaluation to be managed by the provider under devolved responsibility.
- Reserve the right to seek additional information from applicants that it considers relevant to an application.
- Use suitably experienced persons to carry out evaluations and produce reports.
- Specify any mandatory changes / conditions resulting from the evaluation process in relation to approved quality assurance procedures with which the provider must comply.
- Be accountable to QQI governance structures and independent appeals body for the conduct of the process.
- Update a provider's approved scope of provision where this is so decided by QQI's Programmes and Awards Executive Committee (PAEC)
- Publish panel reports and provider responses to same.
- Seek feedback from providers and panels on their experience with a view to process improvement.

³ For providers availing of emergency sanction to offer blended / online programmes expiring on June 30th 2025, the application should be made no later than that date. These providers should refer to an email issued by QQI on August 8th 2024

6.3. Common Steps to Process

The following provider obligations are common to all variants of the process, irrespective of the staging point requested by the provider:

- Notify⁴ QQI of intention to extend scope to a specified staging point (One of I to V above). The notification should include confirmation from corporate and academic governance and an Outline Action Plan.
- Use Gap Analysis Tool⁵ to develop more detailed Action Plan. This should include resourcing and continuous professional development (CPD) for staff.
- Update / Develop QA procedures
- Complete self-assessment report this is a more global summation of state of readiness in each of the main areas set out in the QQI QA Guidelines.
- Bring self-assessment report through academic and corporate governance
- Notify QQI of intended date to make application for extension of scope.
- Complete application form and submit to QQI with supporting documents.
- Conduct / cooperate with QQI's independent evaluation.
- Respond to findings of evaluation.
- If application approved, publish updated QA procedures to easily accessible location on website and provide URL to QQI.

6. Variants of the process

QQI has identified a number of variants to the evaluation process reflecting the principle of proportionality set out above. The variants also reflect the staging points of the continuum listed in section 2 above.

The process variants are indicated on the table below.

⁴ For providers availing of emergency approval expiring on June 30th 2025, this notification should be sent before end of December 2024

⁵ Can be updated through the development process

Process Variant	Staging Point(s)	Provider Profile	Provider to conduct	Evaluation Type
1	l Blended - Synchronous Only	All approved providers whose QA has been approved through reengagement or initial access to validation but who have not been approved for blended learning previously.	Gap Analysis and Action Plan Update of QA Manual Self-Assessment Report Application for Approval comprising Application Form + Updated QA Manual / Supporting documents. (to be submitted by Academic Council / Quality Committee)	Desk Review by QQI Executive or Standing Expert Panel
	choice rather than a important that this of The focus for quality catered for. These w The provider needs needs to verify that t	ders experienced in synchronous delivery of classes since the switch to this mode necessitated during the pandemic. Now that it is a a necessity, the provider may deem it appropriate to continue using this mode of delivery when blended with onsite contact also. It is decision be based on experience of effective programmes than for reasons of convenience for provider and / or learners. y assurance should be on ensuring that the differences between the onsite delivery of material and 'on-screen' delivery are recognised and vill be differences for the deliverer ⁶ and for the learners. to reflect this in policy, resourcing, CPD and quality assurance procedures. The Self-Assessment report signed off by academic governance ⁷ the issues have been identified and addressed. hange of scope, the weighting of the evaluation can be proportionately skewed towards the provider's own academic governance.		
2	II Blended - Synchronous and Asynchronous	Providers whose QA has already been approved for blended learning using 2017 guidelines <u>and</u> Providers not approved for blended learning previously but who want	Gap Analysis and Action Plan Update of QA Manual Self-Assessment Report	Desk Review by QQI Executive or Standing Expert Panel Expert panel appointed by QQI <u>Or</u>

⁶ Teacher / Instructor / Lecturer as appropriate

⁷ Academic Council / Quality Committee or whatever term is used for the group providing oversight of programme quality within the provider

Process Variant	Staging Point(s)	Provider Profile	Provider to conduct	Evaluation Type	
		approval to use asynchronous as well as synchronous modes	Application for Approval comprising Application Form + Updated QA Manual / Supporting documents. (to be submitted by Academic Council / Quality Committee)	Expert panel appointed by the provider and approved by QQI	
	This process will be for two different provider profiles as described above. The difference will be in the evaluation i.e. if a provider is not already approved against the 2017 Blended Learning QA Guidelines, then the evaluation will normally be by an independent panel appointed by QQI. Where a provider has already been approved for blended learning and has offered blended validated programmes, the Self-Assessment can benefit from tha experience and identify what needs to be improved to align with the 2023 guidance. The Desk Audit will focus on what changes have been made to resourcin infrastructure, CPD and QA procedures.				
Where a provider is seeking approval for blended learning for the first time, it will be expected to show a thorough Self-Assess for this. In addition to resourcing, infrastructure, CPD and QA procedures, the independent panel will expect clarity of policy a Where so agreed, the independent evaluation may be organised by the provider under QQI oversight. See below for more information of the section of the s			and strategy.		
3	III Fully Online Synchronous Only - National	Providers whose QA has already been approved for blended learning using 2017 guidelines who now want to offer some programmes fully online, but using synchronous platforms only	Gap Analysis and Action Plan Update of QA Manual Self-Assessment Report Application for Approval comprising Application Form + Updated QA Manual / Supporting documents. (to be submitted by Academic Council / Quality Committee)	Expert panel appointed by QQI Or Expert panel appointed by the provider and approved by QQI	
	Fully online programmes should only be used where the provider has clear policy and criteria for identifying the type of programme where it is appropriate to do so. Such criteria should include at a minimum reference to learner profile, programme volume and duration, mix of synchronous and asynchronous content, and assessment techniques.				
	Quality assurance should include specific monitoring of programme elements normally monitored through onsite contact e.g. learner engagement, formative assessment, assessment integrity, admission procedures and criteria etc.				
Fully online synchronous-only may be an effective alternative to onsite attendance for short programmes, identified and any mitigations required put in place.		onsite attendance for short programmes, but the implication	ns arising need to be clearly		
	Because of the innovative nature and potential of fully online delivery and assessment of programmes, it is important that a provider's capacity, resourcing and quality assurance is independently evaluated. Where so agreed, the independent evaluation may be organised by the provider under QQI oversight. See below for more information.				

Process Variant	Staging Point(s)	Provider Profile	Provider to conduct	Evaluation Type	
4	IV Fully Online Synchronous and Asynchronous - National	Providers whose QA has already been approved for blended learning using 2017 guidelines who now want to offer programmes fully online but only to learners resident in Ireland. The provider's policy should make clear the programme award type(s), the learner profile(s) and planned mix of synchronous and asynchronous delivery and assessment.	Gap Analysis and Action Plan Update of QA Manual Self-Assessment Report Application for Approval comprising Application Form + Updated QA Manual / Supporting documents. (to be submitted by Academic Council / Quality Committee)	Expert panel appointed by QQI Or Expert panel appointed by the provider and approved by QQI	
	 Fully online programmes should only be used where the provider has clear criteria for identifying the type of programme where it is appropriate to do so. Such criteria should include at a minimum reference to learner profile, programme volume and duration, mix of synchronous and asynchronous content, and assessment techniques. Quality assurance should include specific monitoring of programme elements normally monitored through onsite contact e.g. learner engagement, formative assessment, assessment integrity, admission procedures and criteria etc. Fully online with asynchronous content requires considerable expertise in educational technology and programme design. Because of the innovative nature and potential of fully online delivery and assessment of programmes, it is important that a provider's capacity, resourcing and quality assurance is independently evaluated. Where so agreed, the independent evaluation may be organised by the provider under QQI oversight. See below for more information. 				
5	V Fully Online – National and Transnational	Providers whose QA has already been approved for blended learning against 2017 guidelines who now want to offer programmes fully online to learners resident in Ireland and potentially to learners resident overseas. The provider's policy should make clear the programme award type(s), the learner profile(s) and planned mix of synchronous	Gap Analysis and Action Plan Update of QA Manual Self-Assessment Report Application for Approval comprising Application Form + Updated QA Manual / Supporting documents. (to be submitted by Academic Council / Quality Committee)	Expert panel appointed by QQI Or Expert panel appointed by the provider and approved by QQI	

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Process Variant	Staging Point(s)	Provider Profile	Provider to conduct	Evaluation Type		
		and asynchronous delivery and assessment. The jurisdictions / country profiles envisaged as appropriate for transnational delivery should also be set				
out in the policy. Approval to offer fully online programmes to learners in Ireland but potentially also to learners' resident overseas, is only op QQI against 2017 QA guidelines for blended provision, using synchronous and asynchronous content. All that applies to variant 3 above applies here also, with the additional responsibilities and complexities arising in terms of adequately supported to enable effective participation in the programme. The provider's strategy for fully online learner will academic rationale for transnational provision. The provider's policy will need to set clear criteria for identifying		nsuring overseas learners are				
	 (i) programmes and (ii) learner profiles (including jurisdiction) where fully online transnational mode is appropriate. It should be noted that having overseas learners enrolled onto programmes brings those programmes into the remit of TrustEd Ireland (IEM) requirements. Hence this option is only available to programmes where TrustEd Ireland applies. Currently, for QQI validated programmes this implies higher education programmes only. 					

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6.4. Devolved Responsibility

Where a provider has the experience and capacity to manage the evaluation process assigned to its application, it may be asked by QQI to do so. This is a form of devolved responsibility, specific to this process.

The advantages for the provider in accepting this responsibility are (i) increased control over the timing of the evaluation and (ii) discounted fee.

Just as for the process of programme revalidation, the terms of reference (ToR) under which a provider manages an evaluation need to be agreed at the outset i.e. focus of evaluation, panel composition, panel brief and report.

The draft ToR and proposed panel membership must be submitted to QQI for review and written acceptance 6 weeks prior to the proposed evaluation meeting.

See Appendix 2 for a template Terms of Reference document.

6.5. Independent Experts

A panel of people to be appointed by or approved by QQI to conduct an independent evaluation of a provider's application for extension of scope will typically have the following composition:

Role	Profile
Chair	Current or former practitioner in further and / or higher education familiar with QQI QA Guidelines and validation policy. S/he will have / have had a senior role and will have experience acting in a chair capacity.
Secretary	Will have experience producing evaluation reports, ideally though not necessarily for QQI processes. A secretary who has relevant expertise and experience in blended and online programmes may also contribute to the evaluation as well as reporting the process and findings.
Topic Expert(s)	Will have expertise in design, development and, ideally, management of education programmes with significant online content and assessment.
Learner	As per ENQA requirements, panels evaluating higher education provision must include a learner representative. QQI may choose to have a learner representative on panels for further education providers also.

Desk Audits: where an evaluation is deemed by QQI to be appropriate for a desk audit, the panel size will tend to be smaller. However, all panels will include Chair, Secretary and at least one Topic Expert.

6.6. Panel Report

All evaluations will produce a report of the panel's findings on how the provider's application aligns with the QQI QA Guidelines for Blended and Fully Online Programmes. See Appendix 1 below for a template for the report.

The report will include the panel's recommendation to QQI on approval of the application. The recommendations open to a panel are:

- Approve
- Approve with Conditions
- Refuse to Approve pending Mandatory Changes
- Refuse to Approve

Where the panel has recommended either approval or approval with conditions, it will also state the Staging Point that it is recommending approval for and any limits on the approval based on National Framework of Qualifications (NFQ) level(s), award class(es) and discipline areas.

A panel's report will be shared with the provider for a factual accuracy check and a response to findings / recommendation.

The finalised report and provider's response will be brought to QQI's Programmes and Awards Executive Committee (PAEC) for decision and subsequently published on QQI's website.

7. Decision on Application for Approval

The PAEC will consider the panel report and provider response and make its decision. QQI will notify the provider and the panel of the PAEC's decision and will publish the decision and panel report.

The possible decisions and implications of each are set out below.

7.1. Approve

Approval means the provider's approved scope of provision is extended to a particular staging point along the continuum. This may be the staging point by the provider on application or the staging point recommended by the panel.

Following approval, the provider may submit programmes for validation within this new scope of provision.

7.2. Approve with Conditions

Approval with Conditions is Approval with the proviso that there are one or more conditions to be fulfilled within a specified time period, post PAEC decision. This outcome is restricted to minor amendments which have a concrete and verifiable outcome – i.e. staff role being filled, or a specific piece of equipment being purchased.

Maintenance of approval is contingent on the conditions being met satisfactorily within the specified time period. Failure to do so could result of withdrawal of the approval. All conditions must go to the PAEC for formal closure.

With any approval, the panel may have some suggestions for how a provider might further enhance its capacity and / or QA infrastructure. Such suggestions will be set out as "Specific Advices"

In addition, a recommendation to approve may be set within limits based on the following programme parameters: NFQ Level, NFQ Award Class, Discipline Areas.

7.3. Refuse to Approve pending Mandatory Changes

With this decision, the provider will have up to six months from the date of notification of the PAEC's decision in which to make changes specified in the panel report and submit revised documentation to QQI for verification by the panel.

Depending on the nature of the changes required, a further meeting between the panel and the provider may be required.

At that point, the panel will reach a final recommendation which will be either to Approve, Approve with Conditions or Refuse to Approve. The panel report will be updated to reflect the final recommendation.

The updated panel report will follow the same route to PAEC at which a final decision on approval will be made.

7.4. Refuse to Approve

A decision by PAEC to Refuse Approval means the provider's scope of provision remains as it was. No programmes can be submitted for validation which fall outside that scope.

The provider may choose to <u>Appeal</u> the decision to refuse validation on the basis of not meeting the requirement to have approved quality assurance procedures.

8. Support documentation available to providers:

<u>QA Guidelines</u>

Process Guide (this document)

Terms of Reference template for Evaluation under Devolved Responsibility

Gap Analysis / Action Plan Tool

Self-Assessment Tool

Application Form

Panel Report template

9. Fees

An application for extension of scope will be 50% of the fee paid by that provider under Reengagement, or Initial Access subject to a minimum fee of €2,000.

Providers who manage the evaluation under devolved responsibility will have a further discount of 50%, again subject to a minimum fee of €2,000.

As extension of scope is intrinsically part of the validation process, the fee paid for the extension will be deducted from a subsequent application for validation which is within the newly approved scope.

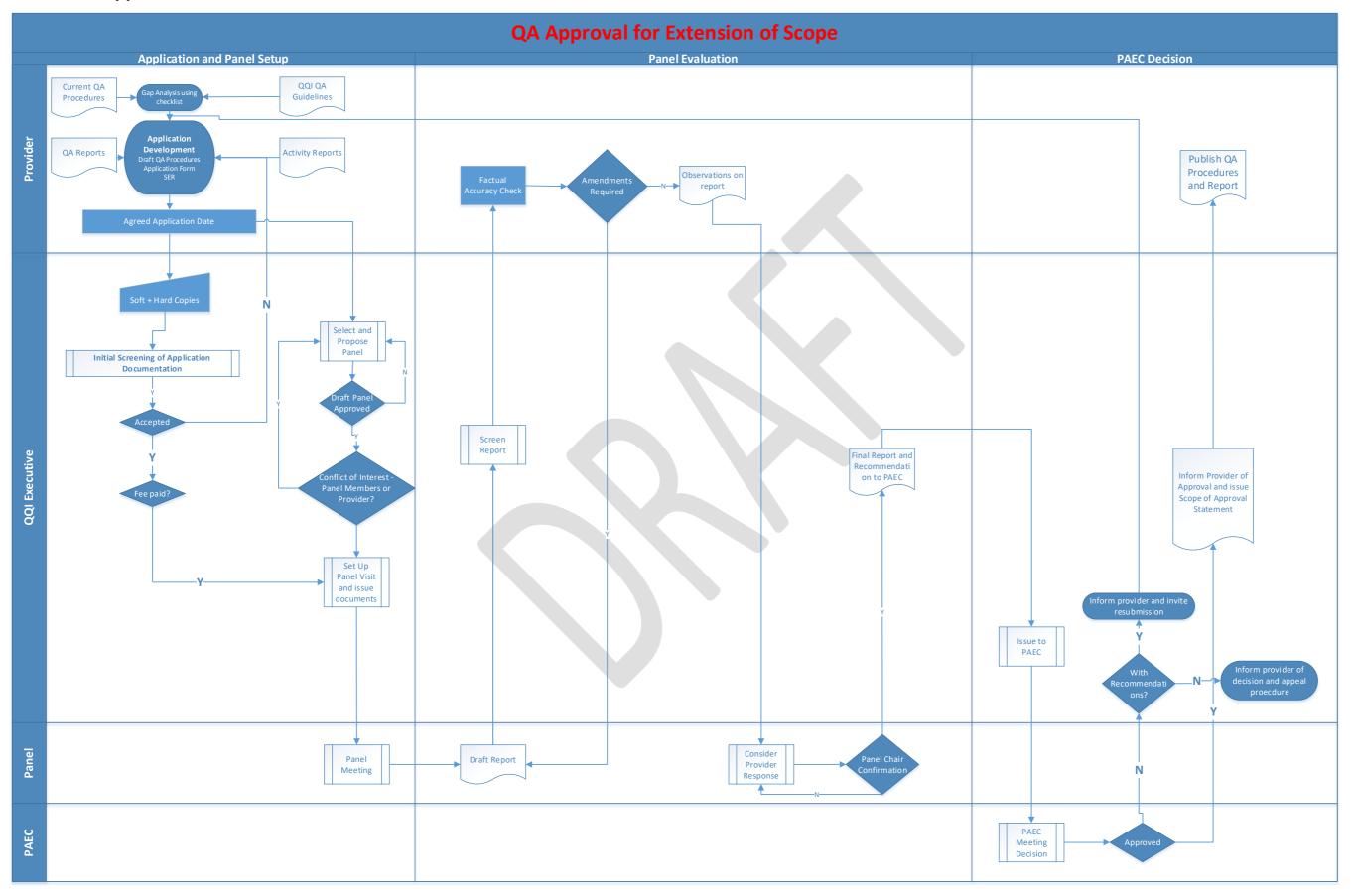
10. Actions and Timelines

For providers availing of QQI's emergency approval, expiring on June 30th 2025, to offer programmes online outside their approved scope of provision, there is a specific timeline which applies if they want to continue offering such programmes beyond that date:

- By **end December 2024**, the provider must notify QQI of its intention to seek extension and specify the expected staging point for that extension and have an outline action plan setting out when they plan to apply for extension of scope and what steps must be taken beforehand.
- These providers should make their application to QQI by end June 2025. This will allow them to continue to use blended / online modes while their applications are being processed.
- Those providers who have not confirmed their intentions by end December 2024 must revert to approved scope of provision and deliver the programme as originally validated i.e. onsite only or blended only from July 2025.

In the period after emergency approval applies i.e. from July 2025 on, providers may apply to extend their approved scope of provision. QQI will determine the process of evaluation as necessary after the emergency approval of scope.

11. Appendix 1 - Process Flowchart





12. Appendix 2 – Template for Terms of Reference for Evaluation under Devolved Responsibility