NZQA
NEW ZEALAND QUALIFICATIONS AUTHORITY
MANA TOHU MĀTAURANGA O AOTEAROA

Targeted review of the qualifications system: Progressing the changes

September 2010

CONTENTS

INTRODUCTION

In June 2010, the New Zealand Qualifications Authority (NZQA) released a consultation paper *Targeted review of the qualifications system: Progressing the changes*. The paper outlined progress on the development of the qualifications system changes, and sought feedback on proposed qualification design rules and requirements for listing qualifications on the New Zealand Qualifications Framework (NZQF).

Consultation on the proposed qualification design rules and requirements ran for eight weeks, the deadline for submissions being 23 July 2010. In total, 83 formal submissions were received from: tertiary education organisations, industry training organisations, representative bodies and government agencies (see Appendix A for a list of submitters). Four submissions were also received from business units within NZQA.

NZQA also facilitated five regional meetings as part of the consultation activities. These meetings were held in Auckland, Wellington and Christchurch, and over 255 people registered to attend. NZQA's Deputy Chief Executive, Quality Assurance also met with several tertiary institutions and spoke at various sector forums about the proposals. The discussions at these meetings, and others held over the consultation period, were recorded and considered.

Feedback from formal submissions, and those raised in regional meetings and other forums, is outlined in this paper. This feedback will be taken into consideration in further developing the changes, particularly the design rules and requirements for listing qualifications on the NZQF.

SUMMARY OF CONSULTATION FINDINGS

NZQA asked the tertiary education sector to comment on proposed qualification design rules and requirements for listing a qualification on the NZQF. In total, 83 external submissions were received on the consultation to progress changes to the qualifications system. Of these submissions, 67 came from organisations. The remaining 16 submissions were from individuals currently working in education organisations. Most submitters used the questionnaire made available by NZQA (see Appendix B).

Overall, submitters continue to support the intent of the targeted review, and agree that there is an issue with proliferation of qualifications. Most submitters, particularly providers, provided different perspectives of the tertiary education sector. In general, industry groups took a strongly united approach to their submissions, with each often referencing the other.

Much of the content of the submissions reflected the kinds of comments and discussions that took place at the regional meetings.

Overview of feedback received

A key proposal to reduce the number of qualifications and ensure flexibility is to allow for several programmes to lead to a single qualification. The intent of the design rules is to enable flexibility, while still maintaining consistency through a focus on qualification outcomes and a clear qualification prescription.

From the analysis of the consultation submissions received, and input from the regional meetings held, a number of broad themes have emerged:

- Roles and responsibilities.

- Collaborative qualification development.

- The removal of the words 'National' and 'New Zealand' from qualification titles.

- Qualifications in the public domain.

- Moving the problem of proliferation to programmes.

- Managing consistency.

- Funding arrangements.

Specific feedback on the proposals was also received. These focused on the terminology and purpose of the design rules, and the role of stakeholders in qualification development.

DETAILED SUMMARY OF CONSULTATION FINDINGS

Broad themes

Roles and responsibilities

A range of questions on which organisations would be responsible for administering and managing the various facets of the proposals, were raised in the regional meetings and in the consultation submissions. Most topical were questions on what organisations would be responsible for making decisions on how the design rules would be applied, and how much responsibility standard setting bodies (such as industry training organisations) would have to inform and/or manage these decisions. There was also comment from both providers and industry training organisations that the role of 'qualification developer' was unclear in the consultation paper.

The theme of roles and responsibilities was touched upon in the regional meetings and submissions, and will be discussed throughout in this document.

Collaborative qualification development

The proposals require collaboration between education providers and industry training organisations. There are some excellent current examples of collaborative development between industry training organisations and education providers, as well as between education providers.

> Industry is practical and will use common standards where it works but will not where it does not – a balance needs to be struck and this is something ITOs are best placed to do not those with more vested interests such as bodies trying to create monopoly supply or push narrow commercial interests – providers and ITPs to a lesser degree. (Submission 51)

> [The] key stakeholders involvement will be invaluable providing there is a cross section of stakeholders involved e.g. training providers, prospective learners, employers, ITOs and that there is clear, concise guidelines during the consultation process and not just a "talkfest" with differing opinions. (Submission 69)

Most submitters from education providers expressed concern that industry training organisations may veto non-unit-standard qualifications. The concern arises from the proposal to require the industry training organisation to be involved in the development of all qualifications in their area of coverage. A number of education providers believe some industry training organisations will inappropriately protect their ability to arrange training.

> …there are significant concerns in the PTE sector that the proposal places too much power into the hands of ITOs (particularly if they are also the SSB). The concerns are based around the risk of creating a virtual monopoly and potential conflicts of interest. ITOs would obviously benefit from promoting their own qualifications (particularly if there are licensing fees involved) and this could impact their ability to objectively assess the need for courses which would compete with them. (Submission 26)

> There is variability in the quality of ITOs. There is concern that the quality of some ITOs will impact adversely on the quality of qualifications. Some ITOs are seen as not well

connected or representative of the industry. In some areas there is tension between ITOs and providers and ITOs may have a financial interest in approving or rejecting qualifications and consequently could act as gatekeepers. ITOs should not have the power of veto in either qualification approval or pre-development approval. (Submission 52)

There was a general unease among most submitters about the additional cost of identifying and consulting with stakeholders. Some submitters said that working with stakeholders would also increase the time involved with qualification development.

Depending on final requirements it could add considerable time and expense. Funds and resources devoted to meeting seeking and gaining stakeholder support and input are resources and funds that are not available to actually spend on delivery and students. (Submission 60)

The removal of the words 'National' or 'New Zealand' from qualification titles

There was substantial discussion at the regional meetings on this change. The consultation questionnaire did not explicitly ask submitters to comment on or provide an indication of support for the removal of National and New Zealand nomenclature.

A small number of submitters welcomed this change. They viewed the change as enabling multiple pathways towards a qualification, without associating the context of learning specifically. These submitters viewed the term 'National' as a misnomer that only captured a particular way of learning.

However, a significant proportion of submitters stated their preference for retaining the terms National and New Zealand in the title of nationally recognised qualifications. Some of these submitters argued that employers recognise the quality associated with a National or New Zealand qualification.

'National' qualifications should be the standard for industry qualifications. We have concerns over the removal of the term 'National' in the description of the qualifications. At this stage 'National' qualification is a strong brand recognised by industry. The 'National' brand has credibility. With the number of other qualifications the removal of the term 'National' is likely to be problematic and cause confusion for employers. (Submission 10)

The key issue of these submitters was that they also linked the removal of nomenclature with the removal of all assessment and moderation conditions associated with the nomenclature.

Qualifications in the public domain

The qualification rules propose that each qualification (at levels 1 to 6) will be in the public domain, with programmes owned by individual tertiary education organisations.

About 16 per cent of submitters were concerned that if qualifications are developed without "ownership of the intellectual property" then there will be no clear responsibility for maintaining the qualification. These concerns were related to the

investment made in qualification development and the distinctive nature of these qualifications.

Of particular concern was that there would be no financial incentive for tertiary education organisations to develop a qualification, if another organisation could also develop a programme leading to it. Some education providers want to preserve the distinctive nature of their qualifications. They are concerned that fewer and more generic qualifications will undermine their reputation in the market.

> The major risk is that because the qualification outcome statement will cover a number of programmes of study, it might become either overly generic and therefore of limited value, or it may not capture the full nature or nuances of a particular programme. A number of [our] members are concerned that the Targeted Review process will lead to a dilution or disappearance of their tailored approaches to education, intellectual property and/or unique selling points. (Submission 26)

There was significant discussion on this theme at the regional meetings, and there were a range of perspectives on the potential for a programme of study market.

Two submitters were very supportive of this change. One of these submitters clearly outlined the reasons for this:

- Where alternative qualifications are identified as unnecessary duplication of each other, there is by definition, little if any unique intellectual property (IP) of value within the qualifications themselves

- Where qualifications are sufficiently unique under the new rules to be registered on the New Framework, there is a meaningful trade-off to be made between the national promotion of that qualification and the loss of any IP.

- Most importantly, irrespective of the points mentioned above, we would contend that the overwhelming bulk of any (IP) resides in the programmes leading to a qualification rather than the qualification itself. (Submission 2)

In support of collaborative qualification development, one submitter asked which organisation would have 'qualification ownership' if there were a number of organisations involved in its development (Submission 55).

Moving the problem of proliferation to programmes

The separation of qualifications from programmes is intended to help reduce the number of qualifications on the NZQF. All qualifications on the NZQF will explain clearly what a graduate in the individual qualification knows and can do. In terms of the separation of the qualification from programmes, the true intellectual property value for providers exists in the programme they offer, not the 'name' of the qualification. The programme is where innovation by a provider will be evident, and that provider's reputation will be based on the credibility and quality of the programme it delivers for learners.

About 30 per cent of submissions expressed that view that there is potential for relocating the problem of proliferation from the qualification to the level of the programme of study.

> This provision [separating programmes from qualifications] is seen as positive and will provide increased learning opportunities. It may lead to a proliferation of programmes particularly if some organisations, that contract delivery to providers, are prescriptive in their programme development and delivery requirements. (Submission 48)

NZQA recognised this potential problem at the outset of the internal discussion on the new design rules. We proposed the establishment of a market for programmes and making programme approval more stringent to address the issue.

Managing consistency

Sector groups raised the importance of the alignment of quality assurance measures to ensure horizontal consistency between programmes leading to the same qualification. This will ensure the qualification is valued. The role of moderation was most commonly raised in relation to ensuring quality and consistency of programmes of study.

> Robust, outcome focussed moderation processes will be required that are capable of being operationalised across different assessment approaches. (Submission 2)

> …learners studying with a training provider are very likely to undertake different assessments to learners whose training is managed through a workplace training programme arranged by an ITO (i.e. assessment against unit standards). There will thus be a need to ensure that whatever assessment methodology is used, it provides an accurate estimate of the how well the required outcomes have been achieved. (Submission 55)

Moderation will be a key method to ensure consistency between pathways to the same qualification, and is likely to be more important than at present. Approaches to moderation will need to be reviewed to ensure they are fit-for-purpose.

Funding arrangements

The importance of the funding system aligning with and supporting the intent of the changes was frequently raised. In relation to the new design rules, qualification developers question the cost of developing and maintaining qualifications, particularly when they will be in the 'public domain', and can be used by others as the developer will not have direct ownership of them.

About 20 per cent of submitters commented on funding arrangements. Some of these submissions reiterated a theme from the previous targeted review consultation that funding is a driver of qualification proliferation. Other submissions stated that some of the proposals, particularly the proposal to clearly separate qualification from the programme, may not suit the current funding arrangements that the Tertiary Education Commission has in place.

Developing the design rules

Overall, submitters were supportive of a single set of design rules.

> These are sensible [the design rules]. They allow for relevance to be maintained whilst ensuring consistency. Many qualification designers already use the NZQA formats. Those who don't like them will scream 'academic freedom' but they do that now. (Submission 11)

The main strengths submitters saw in the design rules were that they enabled and supported a consistent approach to qualification development. One submitter stated that the strength of the NZQF was that all qualifications would be nationally recognised, and acknowledged the role the design rules had in this regard. They also stated that "the standardisation of design [and] increased clarity for intending students" (Submission 3) were strengths of the design rules. Another submitter stated that the rules could be readily adapted to current quality assurance body processes for approval and accreditation.

Some submitters were concerned that a single set of design rules is tantamount to applying 'one-size-fit-all' on all types of qualification development. This is particularly apparent from wānanga, university and the private training establishment sector. The following extract from one submitter reflects this concern:

> [The design rules] do not recognise the unique relationship of marau (curriculum) and delivery that is fundamental to each individual wānanga. (Submission 66)

One submitter viewed the design rules as having too-narrow a focus on meeting employer and industry needs. They stated that "education also has broader social and cultural aims, for example, in the arts and cultural programmes, and design rules need to be able to make these more explicit" (Submission 79).

A number of submitters drew attention to terminology used in the design rules. In general, most were comfortable with some of the key concepts like 'prescription', 'flexibility' and 'relevance'. Some of these submitters suggested minor changes that could affect different parts of the sector. For example, the Industry Training Federation suggested wording changes that were broadly supported by industry training organisations and Business NZ. The wording changes mainly focus on specifying standards listed in the Directory of Assessment Standards.

Level of detail in the qualification prescription

There was wide-ranging debate on the content of the qualification prescription. NZQA proposed sufficient specificity in the description of the qualification to enable tertiary education organisations to develop programmes that are demonstrably equivalent. These programmes also need to lead to the qualification's outcome.

About 15 per cent of submitters wanted to preserve the role of unit standards in the qualification prescription. Most of these submitters represented industry training organisations. They argued that setting unit standards at qualification level confirms and maintains the importance of National qualifications, and the standard setting role of their organisations. Some of these submitters also stated that unit standards provide information about the context of a qualification. In this regard, there is also the issue of identifying where there is a valid need for commercial experience to be incorporated into the qualification. Commercial experience is often seen as a 'gate' that industry training organisations use to prevent education providers from providing a specific qualification, and retain it for workplace delivery only.

NZQA ran workshops with education providers to define a common qualification outcome statement. On each occasion, the similarities between qualifications have been greater than the differences and a common outcome statement has been able to

be developed. Further work is being done with a sector group to identify the requirements of the prescription.

Design rule 1

> 1. The qualification descriptors and requirements for award are compatible with the information required for registration on the New Zealand Qualifications Framework.

The main source of comment about design rule 1 was the proposal to include credit values, credit ranges and entry requirements in the qualification prescription. Most of the comments suggested that credit value, credit range and entry requirements should be stipulated at programme of study level, rather than at qualification level.

> 'Entry Requirements' are currently set to ensure student ability to manage the technical level of the study/work, and workload in a programme of study. The entry requirements will be different for different programmes of study, leading to the same qualification. (Submission 15)

There was an underlying anxiety that consistency and flexibility were at opposite ends of a spectrum. Submission 54 stated that there was a "[r]equirement for too much information" while Submission 27 stated that "in introducing flexibility of delivery, we must not overcorrect to a point that we end up with a system of solely 'empty shell' qualifications that deliver little or no information about the detailed learning outcomes within them".

Design rule 2

> 2. The qualification specifies clear information about its outcomes.

Design rule 2 requires that qualifications specify clear information about its outcomes. A number of submitters expressed unease with the proposal that outcome statements should enable comparisons between qualifications, and form the basis for credit transfer. The main source of this unease was that the outcome statements could not provide the depth of information required to recognise learning.

> The majority of credit transfer activities relate to components of programmes of study not the total qualification. Qualification outcome statements would have to be too long and too detailed if they were to have this function. (Submission 55)

> We think it is beyond the scope of the course outcome statement to be making comparisons between qualifications on the NZQF and providing a basis for transfer of credit across qualifications. The latter has more to do with the specific learning outcomes of individual course components. (Submission 78)

One submitter considered that if the three different parts of design rule 2 were not followed as a whole, this could lead to "a narrow technicist approach that doesn't acknowledge wider capabilities" (Submission 34).

Design rule 3

> 3. The qualification is useful and relevant to learners, industry and other key stakeholders.

Comments about design rule 3 were focused mostly on the inclusion of qualification review dates. A number of submitters asked for more information on what the processes for these qualification reviews will be. One submitter did not agree with the inclusion of a review date (Submission 54).

Mandatory qualification reviews were one of the changes proposed in the targeted review. The qualification reviews are currently being developed and NZQA intends to consult on the proposals later in the year.

Most submissions from institutes of technology and polytechnics asked how self-assessment and external evaluation and review would relate to the requirements of design rule 3. One of these submitters stated that the reviews would enhance and support the self-assessment focus of tertiary education organisations:

> These are all critical to ensuring relevance, further, SAEER should ensure that there are systems in place to maintain this standard, given that relevance needs constant attention not just a multi year review. (Submission 34)

Further comments on design rule 3 focused on phrasing and intended meaning. Specifically, the phrase "useful and relevant to learners, industry and other key stakeholders" attracted attention. One submitter considered that usefulness to industry and multiple pathways towards achievement were not complementary notions (Submission 56).

Design rule 4

> 4. The qualification is substantially different from those already registered.

Most submitters were comfortable with this change but asked for a definition for "substantially different". Some submitters also asked what organisation would be responsible for making decisions on substantial difference, and on what criteria these decisions would be made. An additional suggestion was that there should be a context placed on considerations of "substantially different".

Design rule 5

> 5. The qualification is flexible and achievable in different contexts.

This rule proposes that "the qualification prescriptions are sufficiently flexible to be achieved in different learning contexts, including work and study. Accredited bodies are not excluded by qualification size, specified learning processes or assessment conditions".

Most feedback on this rule has come from the industry training sector. In general, this group does not support the notion that industry training organisations cannot specify assessment conditions. Some took a view that a focus on flexibility would subsequently lead to removal of any sort of quality assurance or moderation. They also commented that standard setting bodies should be able to specify how a qualification should be achieved, rather than at programme of study or training level.

> We believe that if Standard Setting Bodies such as ITOs are to correctly carry out their role they must be able to put in place appropriate conditions that will maintain standards. This will mean that not all providers will have the capacity to deliver some qualifications. (Submission 10)

The feedback from providers for this change was predominately positive. Most of these submitters viewed this as an encouraging shift that would prevent qualification proliferation. In agreeing with the intent of the design rule, one submitter noted that:

> The distinction between qualification outcomes and the learning pathways to achieve these outcomes acknowledges a variety of methods and contexts, which must be allowed to remain irrespective of pressure put by any significant body for a preferred means of achieving the qualification outcomes. Rather this should be based on sound educational and pedagogical principles. (Submission 50)

Listing a qualification on the New Zealand Qualifications Framework

The next part of the consultation paper focused on proposals for the pre-development assessment of a qualification, including outcome statement and qualification prescription requirements. The role of stakeholders throughout the qualification development process was also discussed.

Overall, submitters were supportive of the proposals for stakeholder involvement in pre-development qualification assessment and qualification approval. The existing relationships between industry training organisations and providers were also highlighted in submissions. A number emphasised the positive collaborative working relationships they have with their stakeholders. Others took issue with how other organisations functioned in relation to managing stakeholder relationships.

Some submitters noted some potential problems gaining consensus at various different stages of qualification 'lifecycle'. There were concerns raised by a few

submitters that extending the qualification development mandate beyond local stakeholder need would increase the costs and time involved with consultation.

> There will be resource implications for the ITOs concerned and these additional costs need to be taken into account in investment plans and the funding model. (Submission 9)

Pre-development assessment

The questionnaire asked submitters to consider what other information could be included in the pre-development assessment to make it more effective.

Most submitters viewed the proposals for pre-development assessment positively. In general, they were interested in ensuring the process did not add to qualification development timeframes. Some were concerned that too much information would be required at this stage, and would add to the expense and time involved. One submitter suggested that high performing industry training organisations should be eligible for a more 'streamlined' qualification approval process (Submission 19).

Suggestions to assist with the pre-development assessment process included provision by NZQA of: checklist or template materials detailing requirements for pre-development approval, examples of good practice, and workshops. Two submitters also suggested an accessible register or list of qualifications in pre-development should be available.

Outcome statements

About 43 per cent of submitters answered the question on how much an outcome statement should change between pre-development assessment and final qualification approval for listing. The majority of these submitters did not think there should be substantial changes made to an outcome statement between the pre-development stage and final qualification approval. Any changes made to an outcome statement would be refinements to ensure coherency and specificity. Some respondents noted that a substantial change could result in qualification outcomes being dissimilar to those presented at the pre-development approval stage.

> It [the outcome statement] should be elaborated on with additional depth added but is expected that it would not be significantly changed. If the outcome statement was significantly changed then the qualification finally approved could be different to that for which approval was given to develop. (Submission 52)

One submitter noted that if adequate stakeholder engagement occurs prior to pre-development, the outcome statement after qualification approval would be subject to minor amendments only (Submission 77). On the other hand, this submitter also went on to say that if there should be more opportunities for stakeholder involvement throughout qualification development, this may lead to substantial changes to the outcome statement. In relation to this, two submitters stated that substantial changes could occur as a result of extensive stakeholder feedback.

> There can be significant changes to the outcome statement. The detailed analysis and consultation of subject matter experts and providers in the development of a qualification leads to greater clarity of the outcomes required from a qualification for the workplace. (Submission 11)

Mandated stakeholder involvement

Submitters were asked to comment on the strengths and weaknesses of stakeholder involvement in the various stages of qualification development. Most agreed that it was essential for stakeholders to be involved in pre-development of qualifications and in the final approval of qualifications.

> Absolutely essential. It is too easy for organisations or units within organisations to develop weakly referenced constructs of "industry" need and drift well away from serving stakeholders well. (Submissions 33 and 34)

In addition to the overall agreement with the proposal for mandated stakeholder involvement in qualification development, four ideas were apparent from the submissions in response to the proposal.

Providers emphasised that industry training organisations are not the only stakeholder they consider important for qualification development. One of these submitters suggested that another provider may also be a stakeholder particularly where staircasing arrangements are concerned.

> The question here is who leads future relevance? This must be a collaborative and transparent process. In some cases education providers are ahead of industry with this. [Organisation name] already has strong links with industry and other stakeholders throughout the development of qualifications and continuous improvement cycles so this would be business as usual for us. (Submission 12)

There was concern from providers that industry training organisations would be afforded an advantage, as both a qualification developer and stakeholder for qualifications developed by other organisations. There is a view that industry training organisations will have "multiple roles" (Submission 9) in the qualification development, pre-approval and approval processes.

> We believe that the changes will put [industry training organisations] in a situation where it will be very difficult to maintain their integrity. They will be in a far stronger position to promote their 'industry endorsed' qualifications and yet they will also be responsible for assessing the 'need' of new qualifications proposed by other providers in the pre-development assessment phase. (Submission 45)

Some industry training organisations view this change as something that NZQA should be enforcing anyway, and as such, consider that industry training organisations should be mandated stakeholders in pre-development, qualification development and review stages. In a related context, some submissions from industry groups expressed concern that their standard setting role will be undermined if there is not a requirement to use National qualifications.

> There is no recognition for the need for workplace experience or the legislated role of ITOs. (Submission 22)

Finally, industry training organisations did not consider providers to be stakeholders when they develop qualifications. In connection to this, two industry training

organisations considered questions on the impact of stakeholder involvement not relevant for them to answer.

CONCLUSION

The consultation paper sought the views of New Zealand's tertiary education sector on proposals to progress the changes to the qualification system. In general, submissions were supportive of the direction NZQA is taking to strengthen the quality assurance of New Zealand's qualifications system. In addition, submitters supported NZQA's vision for a unified and simplified NZQF.

The role of standard setting bodies, providers, qualification developers and education agencies was commented on throughout. This was particularly apparent in discussions on collaborative qualification development and mandated stakeholder involvement. The potential costs of reviewing current qualifications, the pre-development assessment and mandated stakeholder involvement were also a concern for submitters.

The removal of the words 'National' and 'New Zealand' from qualification titles attracted a lot of discussion, particularly from industry training organisations. The main argument was that National and New Zealand qualifications were better suited to being nationally recognised than provider-developed qualifications. The presence of moderation and assessment were raised as an example of this.

There was some apprehension from submitters for the proposal that qualifications on the NZQF would be in the public domain. This apprehension related to the intellectual property in a qualification. There was also concern that some providers would be driven away from developing qualifications, and into developing programmes. Most submitters viewed the separation of qualification from programmes leading to it as a positive change. However, there was some concern that a focus on qualifications would lead to a proliferation in programmes.

This information, gathered from the consultation process, will contribute towards recommendations made to the NZQA Board.

APPENDIX A: CONSULTATION SUBMITTERS

Agricultural ITO
Ako Aotearoa
Avatar Institute of Learning
Alastair Melvin, Director, Avonmore Tertiary Institute
Bay of Plenty Polytechnic
Larissa Macleman, Blue Cactus Hairdressing Ltd
Building and Construction ITO
Business New Zealand
Careerforce
City and Guilds
Communications and Media ITO
Competency International Ltd
Graham Muir, CPIT
Creative Trades ITO
Department of Labour
Eastern Institute of Technology
Mark Shotbolt, Elim College
English Language Partners
Kari Miller, Manager, Enterprise Development Solutions Ltd
ETITO
Fire and Rescue Services ITO
Hair to Train
Hairdressing ITO
Mandy Harrington, Director, Headquarters Hairdressing Academy Ltd
House of Montrose Limited
Steve Dakin, Director, Human Resource Systems Design
Independent Training Institutes
Industry Training Federation
Infratrain
ITP Quality
Joinery ITO
Learning State
Mark Paterson, Director, Mainland Air Services Limited
Manukau Institute of Technology (submitted two organisation responses)
Massey University
Metro ITP Group
Motor Trade Association (Inc.)
Dr. Ray Meldrum
Natcoll Design Technology
National Advisory Committee for Business Studies
National Engineering Education Plan Project
Nelson Marlborough Institute of Technology
New Zealand Institute of Education
New Zealand Institute of Management
Diana Garrett, New Zealand Institute of Management
New Zealand Management Academies and Pacific International Hotel Management
School
New Zealand Tertiary College
New Zealand Union of Students' Associations

North Tec
NZ Welding School
NZAPEP
NZITO
NZITP
Barry Madgwick, Team Leader, Tertiary Records, NZQA
NZVCC (Universities New Zealand)
Open Polytechnic
Plumbing, Gasfitting, Drainlaying and Roofing
PORSE ECE Training (Ltd) NZ
Premier Hairdressing College
QED Associates Limited
Greg Holmes, Director Academic, Regent International Education Group
REINZ ITO
Seaford ITO
Service Industries Training Alliance
Glynn Lorrigan, South Pacific College of Natural Therapies
Tai Poutini Polytechnic
Te Wānanga o Aotearoa
Te Wānanga o Raukawa
Paul Kayes, Academic Registrar, Te Whare Wānanga o Awanuiārangi
Team 7 Hairdressing
Tertiary Education Commission
The Hairdressing College
The Learning Connexion
Jonathon Hendry, Toi Whakaari: NZ Drama
Tranzqual ITO
UCOL
Unitec
Wellington Institute of Technology
Wellpark College of Natural Therapies
Whitireia Polytechnic
Wintec
Lyn Morris, Young Enterprise Trust

Four submissions were also received from the Tertiary Assessment & Moderation, National Qualifications Services, Qualifications Recognition Services, and Framework Registration business units within NZQA.

APPENDIX B: CONSULTATION QUESTIONNAIRE

Targeted Review of the Qualifications System: Progressing the Changes
The following questionnaire contains questions regarding the proposals for implementation of changes developed out of the Targeted Review of the Qualifications System. We value your feedback on the proposals.

Each question is directed at different parts of the proposals, including proposed new design rules and outcome statements, and development requirements for listing a new qualification on the New Zealand Qualifications Framework (NZQF)

You may provide feedback on the proposals as a whole and complete the entire questionnaire, or you can fill out just the sections that are of interest to you. Please ensure that you have read the consultation document before answering this questionnaire. Electronic responses are preferred, but hard-copy responses are also welcome. The due date for responses is **23 July 2010**.

Please fill out the form and send it via email to:

qualificationsreview@nzqa.govt.nz

Alternatively, you can post it to:

Consultation: Progressing the changes
Quality Assurance Division Policy
NZQA
PO Box 160
WELLINGTON 6140

Before starting the questionnaire, please provide the following information:

Your name, role and organisation

| |
| |

Is your response a personal view or the view of your organisation?

| |
| |

Is there any other information by which you would like your organisation to be identified? Please specify

| |
| |

Thank you for taking the time to respond to this consultation.

1. What are the major strengths and weaknesses of:
- the shift to describing qualifications in terms of an outcome statement?

- separating the qualification from the programme of study or training pathway?

2. What, if any issues, do you see in the shift to a single set of design rules for all qualification developers?

3. What are the main strengths and weaknesses of the proposed set of design rules for qualifications at levels 1 to 6?

4. Design rule 1b states requirements for the qualification prescription to achieve a balance between consistency and flexibility. Is any other information needed in the prescription to ensure flexibility and consistency of outcomes between programmes of study and training pathways leading to a qualification?

Which of the following two options will best achieve the balance between flexibility and consistency?

  i) subject areas and number of credits required at each level in each subject (e.g. NZSCED fields and sub-fields)
  ii) detailed learning outcomes (e.g. unit standards, course component outcomes

Are there any other options?

5. What impact will design rule 4, which requires qualifications to be substantially different from those already registered, have on your organisation?

6. How will design rule 5a, which requires qualification prescriptions to be sufficiently flexible to be achieved in different learning contexts (including study and work), affect your organisation?

Listing a qualification on the NZQF (p. 11-13)

7. What suggestions do you have on how to make the proposals for pre-development assessment more effective?

8. What level of detail do you think is reasonable to require in a provisional outcome statement?

9. How would you expect the outcome of the statement to change between the pre-development stage and final qualification approval for listing?

10. What are the strengths or weaknesses of the proposals for stakeholder involvement in the confirmation of need and pre-development of a qualification?

11. What are the strengths and weaknesses of the proposals for stakeholder involvement in the final development, approval and listing of a qualification?

12. How will the formalised requirements for involvement of industry training organisations, other standard setting bodies or regulatory bodies (where one exists) affect your development of qualifications?