MEASURES TO MITIGATE IMPACT OF COVID-19 PANDEMIC ON PROGRAMMES LEADING TO QQI AWARDS

VERSION 3 - JUNE 2022





In recognition of the impact on programmes leading to QQI Awards of the Covid-19 pandemic, and the resulting measures taken by Government to enforce social distancing, QQI has proposed mitigatory measures to its governance committees for approval.

QQI's Policies and Standards Committee (PSC) initially approved these measures on 26 March 2020 and extended them until 21 August 2021 on 29 September 2020. At its meeting on 21 March 2022, the PSC reconsidered the temporary measures. The measures are set out in three sections below:

Scope	Mitigation Measure	Expiry Date
All providers of QQI awards	Temporary Extension of Providers' Scope of Provision and Related Amendments to Validated Programmes	30 June 2023
Providers with programmes which require revalidation in order to have an approved intake in September 2020	Extension of Period of Enrolment for Validated Programmes	Expired December 2020
FET providers of CAS Awards	Temporary Modification of Rules for Awarding in Common Awards System	30 June 2023



Temporary Extension of Providers' Scope of Provision and Related Amendments to Validated Programmes

Aim of Paper

This paper is to seek approval from the Committee for the steps taken by the QQI executive to temporarily extend providers' approved scope of provision to accommodate the modifications to programme delivery and assessment necessitated by the social distancing measures mandated by Government to mitigate the effects of the Coronavirus pandemic

Key Points

- QQI specifies an approved scope of provision for any provider seeking QQI validation of its programmes. The scope has a number of parameters, relating to NFQ levels, Award Classes, Fields of Learning, Modes of Delivery etc. and is determined by the provider's resources and quality assurance as evaluated by QQI through its QA Approval and Programme Validation processes.
- Once it is established, a provider should normally only deliver programmes in a manner consistent with its approved scope of provision or apply for validation of a new programme which is within its approved scope of provision. If the provider wishes to extend its scope through validation, then that requires an additional element to the validation process which will focus on the provider's capacity and QA for the proposed new area e.g. if a provider wants to offer a blended programme with a combination of face to face and online delivery / assessment, then its resources and QA procedures for same will be evaluated with reference to the relevant QQI guidelines.
- When the full implications of the Coronavirus pandemic for education and training became clear, it was obvious to all that, for providers, online provision was the only viable alternative to the face to face provision which was no longer permitted.
- Nationally and internationally, primary, secondary and tertiary education
 programmes moved online where possible, so that learners could be maintained
 in the learning process. This required rapid and flexible adjustments for all
 involved, especially providers for whom online provision was not their standard
 mode of provision. A number of providers approached QQI seeking sanction to



provide their programmes and / or assessment online, which was a delivery mode outside their current scope of provision for the programmes involved.

- In recognition of the urgency of the situation, QQI issued guidance on its website mandating providers to move to online programme delivery where possible, but urging them to maintain cognisance of the implications for programme quality and the integrity of the awarding system. Principles for alternative assessment have also been developed and will be published to the QQI website. QQI commits to maintaining and updating its guidance to providers as the situation develops.
- QQI directed providers to establish contingency plans which would be subject to
 their own local academic governance. Once approved internally, the contingency
 plans are to be sent to QQI for noting and published on the provider's website for
 transparency purposes. As with all approved quality assurance procedures, the
 procedures implemented by providers in respect of the extended scope of
 provision are subject to review by QQI.
- As a consequence of the modifications to modes of programme delivery and methods and modes of assessment made by providers to maintain continuity of education and training at this time, validated programmes have changed (albeit temporarily). QQI will address this by granting providers a temporary variation to the conditions of validation. This was noted by the Programme and Awards Executive Committee at its meeting on 8th April 2020.
- This guidance from QQI, in effect, unilaterally extended provider's scope of
 provision at both institutional and programmatic levels. It mandated radical
 alterations to programme delivery, assessment, scheduling etc. This could only be
 acceptable as a force majeure measure and in the exceptional circumstances
 pertaining at the time.
- It is proposed that the dispensation given to providers be maintained for the duration of the crisis period and that when normality, or something close to it, returns then the status quo ante will be reinstated.
- It is very likely that many providers and learners will want the new flexible forms of delivery and assessment to be retained in the future, at least in part.
- However, more detailed consideration by QQI through formal QA approval processes resulting in amended provider policies and procedures will be required before the temporary sanctions introduced in March 2020 become the norm.



Request to Committee

The Committee is requested to approve the sanction given by QQI to providers to
operate outside their previously approved scope of provision, and to adjust
programmes and assessment from that which was validated, in the knowledge
that the measures taken are temporary and taken only in response to the current
exceptional circumstances.



Extension of Period of Enrolment for Validated Programmes - Expired

Aim of Paper

This paper proposes that QQI extend, by 4 months to 31 December 2020, the last intake date for those validated programmes whose last permitted intake date will have passed by 31 August 2020. This extension would be unilateral i.e. without a requirement for the providers to request it.

It would be granted in recognition of the current difficulties arising from the Coronavirus pandemic, which makes the processes of programme review and revalidation vulnerable, dependent as they are on the availability of external experts, provider QA personnel and QQI executive staff.

Key Points

- There are approximately 75 programmes due to be revalidated for a September 2020 intake – 72 higher education programmes from 10providers and 3 further education apprenticeships from 2 providers.
- The providers involved are currently at various stages of preparation for making applications for revalidation. The initial review phase is a particularly labour-intensive process, involving as it does data analysis and consultation with a wide range of stakeholders, both internal and external. It also necessitates the development of a revised programme by internal subject matter experts. The process is coordinated by the provider's QA staff.
- For those providers who have completed the programme review and initial
 programme development stage, the next phase involves the evaluation of the
 review and revised programme by an independent panel of experts, which
 includes a site visit to the provider.
- Even in normal circumstances, it is a regular occurrence that providers do not manage to complete the whole review and revalidation process in time to be able to enrol students on the revalidated programme at the start of the next academic year. There are a variety of reasons for such occurrences, with volume of work being the most common. In such cases the provider seeks an extension to their enrolment period, generally for one year, to allow for a further intake while completing the review / programme development and evaluation process.



- There is a fee for such an application (€3,000 per programme per year). QQI
 needs to accept that there is a valid rationale in order to approve the extension
 request. In 2019 the PAEC approved 49 requests for extensions, wholly
 comprising higher education programmes.
- Since the beginning of March 2020, a number of providers have already indicated their intention to seek extensions for particular programmes due to a possible inability to proceed as scheduled with their review and revalidation activities due to the decreased availability of internal and / or external persons necessary for the process. These providers have also queried the fee for extension requests in the current circumstances, especially since many are unsure as to the future viability of the programmes given their dependence on international students.
- Many of the providers involved have expressed their intention to complete their programme reviews and revalidations in time for September 2020. They have queried the extension facility in case completion of review and revalidation is not feasible under the current circumstances.
- An extension of four months would give the sector some breathing space and an
 opportunity to evaluate the new reality in Autumn 2020 when, one hopes, the
 crisis has receded, and a level of normality and predictability has returned.
- For those programmes with a single intake per annum, the duration of the
 extension is immaterial, so long as it facilitates another intake. However, many
 programmes have multiple intakes generally Autumn and Spring, and in the
 interests of equality, a four-month extension would ensure that one extra intake is
 approved for all providers. Given point 6 above, QQI does not anticipate that all
 providers will avail of the extra intake, if it is approved.
- While QQI will forego some income if this proposal is accepted, this is seen by the executive as reasonable and proportionate. These programmes, if continuing, will generate the income for QQI in 2021.

Request to Committee

The Committee is requested to approve the proposal and to direct the executive to notify the providers concerned of the extension of their enrolment periods.



Temporary Modification of Rules for Awarding in Common Awards System until 30 June 2023

Aim of Paper

This paper is to seek approval from the Committee to allow the executive to modify the rules for any specified major award in the Common Awards System (CAS). Any such modifications would be to cater for situations where a learner is unable, for valid reasons arising from the Coronavirus pandemic, to meet the certificate requirements for the major award (e.g. to complete a 15 credit work experience module) but can meet the overall outcomes by alternative means.

Key Points

- The Common Awards System (CAS) is a set of standards at levels 1 to 6 of the NFQ. Each major award requires the achievement of a set of minor awards a.k.a. components, which if passed in a QQI specified permutation, allows a learner to achieve the major award.
- The 'certificate requirements' comprise individual mandatory components and groups or 'pools' of elective components within which there is an element of choice e.g. one of these two, two from the following five etc.
- All the CAS major awards at levels 4, 5 and 6 have an elective pool comprising two components relating to work placement. Therefore, to achieve the major award, a learner has to have passed a Work Experience or Work Practice component typically amounting to 1/8 of the total credit requirement for the major award. Both require the learner to have spent a period on placement with an employer. The standards broadly relate to preparation and performance in a work situation.
- Because of the sudden and enforced shutdown of the economy, many learners have been rendered unable to commence or complete their placement. As it stands, without some form of accommodation, these learners will not be able to achieve their major award this summer. For those seeking progression to higher education through CAO, this is a very pressing issue. Likewise, for those seeking a major award for employment purposes.
- As part of the contingency planning they are required to carry out, FET providers
 are examining a variety of ways to accommodate these learners who cannot fully
 complete a Work Experience or Work Practice component at this time. The



principles for accommodating such learners will be agreed with QQI. Modifications will have to comply with those principles, be approved through their academic governance and be published. They are examining alternative assessments to fill the gap for learners who have partially completed their placements.

- For learners who have too large a gap to fill (under the preceding provision) or
 who had not commenced their placement, another solution is required. This
 would be for QQI, where practicable, to add another elective to the work
 placement pool in certain awards, effectively making a placement elective rather
 than mandatory for those awards. It may not be possible to facilitate this in all
 cases.
- Work Practice and Work Experience are not the only components which address work-based learning. Most awards which are strongly vocational in nature e.g. Healthcare Support, Early Childhood Care and Education have separate, individually mandatory components which require learners to be in an award relevant workplace where skills and attitudes appropriate to that workplace are attained and assessed. Normally programmes leading to such awards cannot be completed without suitable practice placement.
- The Work Experience component is very generic and addresses general work readiness for younger learners who have not had any work experience previously. Those learners who are in workplaces for the vocationally specific components can generally integrate the requirements for Work Experience into their vocationally specific learning and assessment.

Proposal

TEMPORARY ALTERNATIVES TO WORK EXPERIENCE AND WORK PRACTICE

The executive proposes the following methodology and criteria for adjusting award requirements for specific CAS major awards to extend the work placement pool of components to include approved alternatives to Work Experience and Work Practice. If no alternative of the same credit value exists a temporary new component (minor award) may be created by the executive by extending the expected learning outcomes of the closest matching one.

METHODOLOGY

- A provider, or preferably a group of providers working as a collective for this purpose, propose an adjustment to the award requirements indicating
 - a. A justification for a change to the rule i.e. why is this necessary.
 - b. The major award to be amended



- c. The proposed alternative component
- d. A justification for the suggested component's inclusion. This should show the relevance of this component to enhancing a learner's readiness for a generic workplace setting.
- Designated QQI executive staff review the provider proposal and make a recommendation on acceptance based on criteria set out below. The recommendation would need approval by a designated senior manager.
- If approved, the change to the award rules for the specified award would be made on QBS. This would then apply to all learners seeking this award and would not be confined to the learners of the proposing provider. This is an important point of equity.
- When the current crisis over, the award rules can be reverted to the status quo ante.

CRITERIA

When considering a proposed change to the award rule, the QQI executive should refer to the following criteria:

- The proposal must be from a provider or, preferably from a group of providers
 working collaboratively, which has / have identified a suitable alternative
 component following consideration of learning outcomes. The proposal must
 demonstrate prior approval by provider level governance.
- The justification given by the provider(s) is well founded and an award change is an appropriate response to the situation.
- The rationale given by the provider(s) for the alterative elective component is
 persuasive. It should show how the learning outcomes are relevant to enhancing
 a learner's readiness for employment.

TEMPORARY ALTERNATIVES TO PLACEMENT FOR STRONGLY VOCATIONAL AWARDS In the context of strongly vocational awards such as those referred to in (7) where practice placements are not feasible on account of the impact of the COVID-19 pandemic, and where practicable alternative arrangements for meeting the learning outcomes as outlined in the standards can be established by providers, these may be considered for approval by the QQI executive in consultation with key stakeholders and any regulators.

METHODOLOGY AND CRITERIA FOR APPROVING ALTERNATIVES TO MANDATORY WORK PLACEMENT

The same methodology and criteria as for C1 will apply mutatis mutandis with the added criterion that essential learning outcomes must be demonstrated.