

Submission to Quality and Qualifications Ireland

Policy Consultation Process on Green Papers – Phase 1

From



aontas

The Voice of Adult Learning

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AONTAS
The National Adult Learning Organisation
83-87 Main Street
Ranelagh
Dublin 6
Phone 01 4068220
Website www.aontas.com
Email: mail@aontas.com

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Introduction / Background

Quality and Qualifications Ireland (QQI) have commenced an online PDF based consultation process on Green Papers covering a wide range of policy areas. This document collates the responses from AONTAS to four green papers covering

- 1 [Green Paper on the Comprehensive Implementation of the Functions of Quality and Qualifications Ireland](#)
- 2 [Green Paper on Provider Access to Programme Accreditation](#)
- 3.1 [Green Paper on Protection for Enrolled Learners](#)
- 3.2 [Green Paper on Fees for QQI Services](#)

The format of the consultation PDFs involved answering specific questions and those questions have been included here. It is quite difficult to read the responses within the PDF format so they have been cut and pasted into this document. In some cases where options are listed it would be useful to read the Green Papers alongside the responses.

Green Paper on the Comprehensive Implementation of the Functions of Quality and Qualifications Ireland

Q1.a What are your views on the principles contained in the Green Paper?

The mission of AONTAS is to advocate for the right of every adult in Ireland to quality learning.

AONTAS as a membership organisation believes in the right of every adult to continue their learning throughout their lives. We believe that adult and community education are equal and key components of the lifelong learning spectrum and are of vital importance to both the individual and to society as a whole. For the individual, adult learning provides a means of achieving ones full potential through developing confidence and skills essential for employability, nurturing creativity and imagination, enhancing family relationships and enabling civic participation. For society at large adult learning is essential to building a sustainable economy, promoting social change, highlighting structural inequalities and building a healthy democracy.

Overall AONTAS welcomes the publication of this suite of Green Papers and looks forward to being part of the consultative process. The QQI change agenda is ambitious and challenging for all concerned. We welcome the decision to reopen opportunities for new providers to engage with QQI and the continued validation of programmes. This is important to offer a seamless and diverse service to learners.

We welcome the open consultative approach and the commitment to a holistic approach to qualifications and quality assurance. We trust that this will meet the needs of a flexible lifelong learning agenda, and especially of adults who combine learning with employment, family and other responsibilities.

We agree that the NFQ be the central organising feature in the design of QQI policy as it is now well recognised by the public and offers a process for access, transfer and progression.

Learner Focus

We welcome the Learner Centred focus within QQI. AONTAS has a long track record in working with Adult Learners involved in a wide spectrum of educational provision. Previous events include two Lobby for Learning days where learners articulated to policy makers their views on a quality Adult and Community Education Service. Reports of these events can be found via the following links Community Education Strategy for Success and SOLAS Serving Adult Learners. In addition AONTAS produced a comprehensive consultation paper on how best to incorporate the views of adult learners which can be found here Building meaningful representation for adult learners. AONTAS would welcome the opportunity to work with QQI on ways to ensure that the views of adult learners are represented in QQI policies.

The communication of clear information to learners on the new structures in general and how they affect access transfer and progression will be key to the success of the strategy. AONTAS are currently involved in a project to enable learners to access key FET / Information providers via a single web portal. This project is supported by the European Agenda on Lifelong Learning. The

Further Education Section within the Department of Education and Skills is the co-ordinating body, and other organisations involved in developing the project include the IVEA, NALA and the AEGI. Linking with Qualifax, this project may offer opportunities to communicate effectively with current and prospective learners.

QQI, SOLAS, ETBs and INTREO

Throughout the change agenda for FET and HET it will be essential for providers and learners that there are clear communications and timeframes and that reform is introduced in a coherent and consistent way. The new requirements will require extra resources within organisations, and this needs to be clearly recognised by funding bodies. It may be helpful for the White Paper to outline the alignment between the new QQI policies and the other evolving FET structures.

Community Education

We note in your framework for consultation a specific section dedicated to “the hard to reach”. The AONTAS Community Education Network comprises 140 independently managed community education providers who focus their work on people experiencing disadvantage. AONTAS would welcome an opportunity to work with QQI on a suitable consultative forum to ensure that the views of these learners and providers are included.

Within the “provider type” section of the documents, the responses of private providers are considered together. We recommend that community education and not for profit private providers be distinguished from commercial organisations, as their concerns are quite different.

Lifecycle model of engagement

The clarity of the lifecycle model of engagement with QQI is welcome and also the recognition of this engagement as a long term and sustainable process. It will be important to ensure parity of esteem across the spectrum of the NFQ, noting that a number of private providers including community educators operate on a wide band across the NFQ.

We welcome QQIs commitment to working with a diversity of providers who can meet the needs of a diversity of learners, and that requirements for QA will be proportionate to provision. However, we are concerned at the statement that ‘the close and supportive nature of the relationships between the predecessor bodies and providers will be difficult to sustain due to staff reductions’. Firstly whilst individual supportive relationships have been built over time, there have been consistent difficulties for providers in making contact with FETAC personnel. It is often the experience of providers that had clearer guidelines been available from the offset, some of the difficulties encountered might not have occurred. Secondly, there is some contradiction between this statement and the sentiment of the overall green-paper which endeavours to build relationships, collaborate and pool expertise. Whilst we understand the economic circumstances outlined we would be concerned about a removal of supportive intent (supports which can be mutually beneficial) from the ambitions of the QQI.

The transition to the new arrangements will require change within organisations and we feel that it is important that there be support for both existing and aspirant providers to enable them to meet the new requirements and to ensure the best use of resources in both providers and QQI. We note the City and Guilds model where an advisor/mentor is designated to help providers navigate requirements. We recommend that such a mechanism be made available by QQI. If not it is likely

that a plethora of consultants will emerge with varying levels of expertise, which may slow down the whole process.

AONTAS see adult education and training as multifaceted contributing to social and community learning as well as for labour market requirements. We encourage QQI to have parity of esteem between vocationally oriented education and that for personal development; lifeskills, learning for learning's sake, for active citizenship and the development of critical capacities.

We welcome the decision to reopen opportunities for new providers to engage with QQI and the continued validation of programmes. This is important to offer a seamless and diverse service to learners.

Q1.b What are your views on the two-track approach to policy development?

We welcome the importance of 'drawing upon external knowledge and expertise' (p10) and would hope that adult education providers both statutory and non-statutory and at the range of levels on the NFQ (1-8) would be considered when seeking such expertise.

Also welcome the desire to develop working relationships with representative bodies and would propose AONTAS as one such body.

Q1.c Do you have any other views/comments on the issues raised in this paper?

Section 2.3.3 states that proposed programmes should lead to currently available awards. We hope that this constraint will be lifted quickly as it is likely to restrict provision of innovative programmes in fast evolving areas such as those for the SMART economy.

Green Paper on Provider Access To Programme Accreditation

Q2.a 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

Q2.b 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

A providers' ability to work effectively with a particular target group. The SOLAS action plan states that "a revitalised FET sector must promote access for all learners who wish to avail of programmes – the unemployed and the employed, school leavers as well as early school leavers, those with disabilities, job changers and those who want to pursue particular interests through part-time learning." It is important that providers working with disadvantaged groups have the capacity and experience to do so.

The proportional relationship between the standard required in each of the categories above and the number, level and intensity of programmes being delivered.

We note that in some FET providers are availing of shared programmes. This should not have any adverse affect on their ability to agree QA with QQI

Are there advantages and disadvantages for each option?

We support Option 1 as the policy level option, because it enables quicker access to approval working on an established system. We are aware of aspirant providers who had commenced writing QA systems when the process closed, and they would be able to move rapidly under the proposed scheme. Even if they have to change their procedures to meet the finally agreed QQI protocols, that can be done on a phased basis with the other legacy providers.

In the implementation case we support Option 2, because it will allow for a proportionate assessment of the provider and the level and type of programmes which they wish to offer. It will also shorten the time between provider approval and the commencement of courses leading to QQI

awards. However, we recognise that some aspirant providers may prefer Option 1. If it is logistically possible for QQI we suggest that Options 1 and 2 remain as options and providers can choose which is the better pathway for them.

Do you have comments on the issues raised

The mission of AONTAS is to advocate for the right of every adult in Ireland to quality learning.

AONTAS as a membership organisation believes in the right of every adult to continue their learning throughout their lives. We believe that adult and community education are equal and key components of the lifelong learning spectrum and are of vital importance to both the individual and to society as a whole. For the individual, adult learning provides a means of achieving ones full potential through developing confidence and skills essential for employability, nurturing creativity and imagination, enhancing family relationships and enabling civic participation. For society at large adult learning is essential to building a sustainable economy, promoting social change, highlighting structural inequalities and building a healthy democracy.

Perceptions

We welcome clarification on frequently held perceptions but greet some of these with caution.

The low cost of FETAC engagement has been a core feature of the expansion of educational opportunities to those who might otherwise not have the opportunity to return to education. This is an important equality- based feature of our aforementioned diverse education and training sector. For further details on the AONTAS view on fees, please see our submission to that paper

The naming of FETAC L6 ‘Train the Trainer’ award raises the issues of the requirement for formal teaching qualifications for tutors. We fully support the need for quality standards of teaching and pedagogic practice but have some concerns about either ruling in (or out) specifically named qualifications. In our experience many of the most effective tutors are those with a high skill level in their subject and/or a proven to motivate their particular learner target group. We are aware of many community based adult educators tutoring who have considerable expertise and skills without having degree level education themselves. We recommend that the criteria for tutors be controlled by each provider under their QA and not centrally dictated.

We contend that accreditation is actually a requirement for many state funded programmes at present at Levels 3 and 4, especially for people who are referred via INTREO / FÁS etc. In these cases QQI is the only access to the NFQ framework.

Access to programme accreditation

AONTAS recognises that many aspirant providers have been unable to offer programmes leading to NFQ awards during the transition period and welcomes the opening of the access process. We agree that the criterion for approval should be “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.” This will support the acknowledged diversity of the evolving ET sector. We would ask QQI to note that some independent providers can offer both Further Education and Higher Education opportunities (Respond! College and An Cosan being examples), this can be important to these institutions in promoting access and progression. In these cases, it should be possible to model a single QA system covering both H/FETAC legacy awards.

We also note the challenges involved in bringing together procedures from University level to basic education and that progress will involve change, patience and commitment by all stakeholders. A key priority must be that learners are not inconvenienced during the transition period, and that providers are supported to make the changes required to achieve the standards in as seamless a way as possible.

We understand the concern expressed by QQI that programme providers may apply unprepared and fully support QQI's commitment to comprehensive guidelines. In addition there is a need for support arrangements where a competent individual could advise providers before they submit. Previously some providers found FETAC guidelines unclear and difficult to follow. We welcome the commitment to establish mechanisms to "inform clarify and consult with providers". Support for providers at this stage could be cost effective in the long term due to increased efficiencies in the process. Based on previous experience, we recommend that at least part of that support be personal rather than IT based. We would encourage the continuation of a partnership approach at both a local and sectoral level to support all aspects of the QQI engagement process. The Community Education Network of AONTAS would be willing to facilitate bringing providers in that sector together for such support.

In assessing the capacity of providers we would encourage diversity in thinking as to the required capacities needed at different levels along the NFQ. For example supporting learners at the lower levels is a skilled task and one which might be better measured through learner evaluations and wider outcomes of learning than through the availability of certain library and IT facilities. We would also recommend the inclusion of comparable providers as panel experts e.g. community education provider as expert (with others) to assess other community education applications.

When assessing a providers understanding and experience of assessment of learners we would encourage diversity in thinking and variance within this rather than an encouragement of standardisation in approach. To this end we are discouraged by emphasis of the current CAS system on extensive summative assessment of learning at the expense of formative approaches. The development of new QA guidelines for providers could be a fruitful place to begin consultation.

Assessment of capacity

AONTAS are concerned that some of the criteria suggested may discourage excellent providers and reduce the options available to learners. These include

Sole purpose or core business of the applicant is the delivery of education and training

Many current providers would not meet these criteria, in particular where it relates to work based learning or community education. We are aware that to fulfil HETAC requirements, some organisations have had to create new companies. This appears to be an unnecessary burden to place on organisations who are already financially stretched. For many community education providers, their location in a multifunctional resource centre type setting is a huge support to learners and enables them to take a holistic approach to working with "hard to reach" groups. We recommend that this criterion is not included.

Applicant is an established Education and Training provider for two years

Without access to accreditation it is difficult to be a provider for two years, especially at the lower levels of the framework. It also may be an anti competitive practice and restrict the establishment of new businesses. We suggest that the criterion be changed to one which looks at the track record of the personnel within the organisation, rather than the organisation itself.

Minimum Number of Learners per year

This may be a valid criterion from the perspective of critical mass, but we suggest that the number be kept low, and coupled to the number of components as well as the number of learners. Given the volatile market, it would be very difficult for new providers to project exact learner numbers.

Applications restricted to providers of programmes of Major Awards only

Within adult education, much provision is part time as learners juggle education with other aspects of their lives. Where individuals are returning to learning after a long absence and are rebuilding their educational confidence with Level 3 or Level 4 programmes, Major Awards which would take more than one year may not always be the optimum path. Learners need to have flexible choices as to when, where and how to study, and to accumulate credits as they go. The model of building component awards over time, is common to other accrediting jurisdictions (e.g. the UK) and we believe it is an important strength to maintain. We believe collaboration across providers toward the gathering of credits for a major award is an important feature of our diverse sector and would wish to retain this option. The large number of FETAC component certificates awarded every year compared to major awards is testament to that fact. All courses offered leading to QQI certification should be linked to a Major Award, however it is unrealistic that only providers offering the full award can apply to QQI.

Green Paper on Protection For Enrolled Learners

Q3.1.a The question arises whether “protection for enrolled learners” is an appropriate label for this function. Does PFEL, as a label, communicate the extent and limitations of the coverage afforded to learners?

AONTAS are committed to the protection of learners, and to ensuring that the learner voice is heard in all aspects of education. We welcome the extension of PFEL as defined in the legislation. We also welcome the option of introducing it in a transitional way so as not to disrupt current provision. AONTAS is committed to the provision of a diversity of programmes in a diversity of settings to meet diverse learner needs. The following issues arise.

Provision for PEFL needs to be proportionate to the programme, level and learner group involved. Adult learners have some different needs to those progressing directly from the second level system to FET or 3rd level. Typically they are juggling learning with jobs, families and other responsibilities. Given that PFEL is a new departure for programmes within much of the FET sector, we suggest that a direct focus group with adult learners to determine their needs would be useful. AONTAS would be willing to host such a group.

- Prevention is better than cure and we suggest that resources be made available to, as far as is practicable, facilitate learners to complete programmes within their current provider and to be able to submit the maximum amount of material for accreditation within their current structure. Even in cases of insolvency, tutors and other personnel may be available to support this process.

Transitional arrangements

- We welcome the proposed transitional arrangement for PFEL, especially for those programmes and providers who did not previously require it. We support the lifecycle approach, which will allow arrangements to develop over time. Within that process, it may be useful to encourage the development of consortia. Within the Community Education sector, AONTAS through its Community Education Network would be well placed to support this process.
- We welcome the requirement for all relevant providers to assist in the placement of learners whose programmes have ceased. However, the extra workload involved in taking on learners who are mid way through a programme requires recognition and resources. There is a need for a fund to support providers in this case, especially if the transfer of fees is not straightforward.

Requirements for matching

- We agree that the requirement for submission for validation of awards simultaneously with academic matching providers is very problematic especially for small providers in the not for profit sector. Practically, it will rarely be possible for learners to transfer seamlessly to a programme in a different provider with both programmes being at the same stage of learning and assessment. Thus we suggest that a reciprocal arrangement with other providers who have access to a validated programme leading to the same award should be adequate. QQI should consider the possibility of relaxing academic matching requirements for providers in rural areas or niche sectors, and replacing it with a fee refund option.
- For some niche providers and programmes, it may be difficult to find matching providers. Notwithstanding concerns re intellectual property, it would be helpful if QQI could facilitate

an exchange of information between providers to enable matching partnerships to be easily established.

- It is important that providers are not discouraged from innovating and developing new programmes by PFEL requirements.
- Overall the ETBs could have supportive role in co-ordinating locally based PFEL arrangements.

Transfer to other centres / fee refund

- There needs to be clarity in the refund of fees, especially where there is insolvency and learners are unlikely to be preferential creditors. We suggest the development of a fund to ensure that learners are not disadvantaged and refunds delayed during lengthy liquidation or other procedures. This fund could be underwritten by the Department in the first instance.
- The White Paper could clarify the position where fees are paid “on behalf of a learner” as to how those fees are refunded. Is it to the learner or to the funder who may be the State, or an employer, a combination of the above etc?
- Where programmes are wholly funded by the State i.e. contracted training or BTEI, it is important that policies are developed by those funders for the return of that “learning credit” to the enrolled learner. In such cases there may be a role for the funding body as well as the provider in PFEL.
- Adult learners balance their education with family, jobs and other responsibilities and are constrained in terms of time and travel to an alternative provider. In some cases it may not be feasible for learners to transfer to another provider, or they may choose not to. Learners should have an entitlement to a refund of fees if a replacement programme does not meet their needs.

Duration of programmes

- The issues of programmes of 3 months in duration is problematic. In this case a full time programme could involve up to 400 contact hours while a part time course meeting one evening per week could be 30 hours. We suggest that the approximate number of contact hours in a programme be included in the criteria for PFEL. We share your concern that providers may shoehorn programmes into a short time frame, or offer them on a module by module basis. These approaches may not be in the interests of learners, especially those seeking full awards, and would reduce opportunities for integrated assessment. It is therefore important that the PFEL requirements can be readily achieved thus obviating any incentive for providers to design their programmes around 3 month timeframes.

Communication with learners

- Within PFEL communication with learners is essential and must be clear. It is important that learners are aware of arrangements before a crisis occurs.

Q3.1.d Do you have any preferences among the options?

Without knowing the full details of the proposed PFEL requirements it is difficult to assess the options, both of which have advantages and disadvantages. Overall Option 2 seems to be the one which will minimise disruption to programmes and enable the development of matching arrangements over time. We suggest that it should be made clear to providers that the “life cycle basis” should be considered as a maximum and that it would be good practice to put PFEL arrangements in place as soon as possible for all programmes.

Green Paper on Fees for QQI Services

Q3.2.p Do you have any comments on the issues raised in the Green Paper?

The mission of AONTAS is to advocate for the right of every adult in Ireland to quality learning. AONTAS as a membership organisation believes in the right of every adult to continue their learning throughout their lives. We believe that adult and community education are equal and key components of the lifelong learning spectrum and are of vital importance to both the individual and to society as a whole. For the individual, adult learning provides a means of achieving ones full potential through developing confidence and skills essential for employability, nurturing creativity and imagination, enhancing family relationships and enabling civic participation. For society at large adult learning is essential to building a sustainable economy, promoting social change, highlighting structural inequalities and building a healthy democracy.

Changes in QQI must lead to a better learning environment for the learner and enable people to engage in clear pathways of lifelong learning which actively encourage participation and minimise barriers. It is therefore essential that any fees structure which is brought in must not impact negatively on current learners moving through the NFQ and on the diversity of programmes and providers available to them.

From a diversity perspective there is a concern and a risk that smaller not for profit providers who are allocated funding on a programme by programme or year by year basis would not have the resources to pay significant fees up front. This could result in the loss of such providers from the system for cash flow reasons. This would not serve the interests of quality for learners. Ideally we recommend that such providers and programmes be exempted from fees. However, if fees are to be charged, it is essential that funding bodies are aware of the increased cost of QQI certification for programmes and agree to increase their budget to providers accordingly.

Fees should not be used to “incentivise or dis incentivise” engagement with QQI. The standard should be the ability to deliver a quality programme which meets learner needs and national certification standards.

It is well known that when fees are charged for a service which was formerly free, there is a resistance to change. However, this can best be countered by an enhanced service which demonstrates value for money. Feedback from providers on FETAC services identified difficulties with communication, feedback and timelines for QA approval, programme validation and reviews. It will be essential that the new QQI service will address those issues and offer a high quality, transparent and timely service, with redress for providers if those targets are not met.

Q3.2.a Should a range of fees be established for each service, i.e. should fees vary across classes of providers? (Section 3.2.7.1)

To meet National priorities, it is essential that learners can avail of a wide diversity of programmes and providers which meet their diverse needs, for economic, social and community learning. Fees charged need to relate to both the service being provided and the capacity of the organisation to pay. Factors such as the number and level of programmes being offered by a provider as well as their legal status i.e. Statutory or non statutory, for profit or not for profit, community and voluntary vs private for profit etc must be taken into consideration.

Q3.2.b Should flat fees be considered for each service, i.e. should there be a single fee for each service, irrespective of the nature of the provider or NFQ level of the provision? (Section 3.2.7.1)

No

Q3.2.c Should the level of fee for any service relate to the NFQ level of the awards which a provider offers? (Section 3.2.7.1)

YES

Q3.2.d Should fees be used as a mechanism to incentivise or dis-incentivise engagement with QQI? (Section 3.2.7.1)

NO

Q3.2.e Should the fee policy provide for a partial refund where a provider is fully prepared for their interaction with QQI and the service can be delivered with maximum efficiency? (Section 3.2.7.1)

YES

Q3.2.f Should fees reflect in some measure the cost of the resources required to provide an effective service? (Section 3.2.7.1)

YES

Q3.2.g Should a composite fee be charged when QQI conducts one or more reviews at the same time? (Section 3.2.7.2)

YES

What factors should QQI consider when determining the composite fee?

Every effort needs to be made to minimise costs to providers and to offer best value for the investment in review. In all cases fees need to relate to the service provided. Especially in the FET sector, where fees are new, it will be essential to have absolute clarity with regard to the services being provided, the expected timelines involved and the fees being charged.

It makes sense from many perspectives to co-ordinate reviews as much information will be common to all programmes in a centre. The monitoring and review structures need to maximise opportunities for simultaneous reviews of different aspects of providers and thus minimise costs to both providers and QQI. In principle, a composite fee should reflect the amount of work carried out by the review panel.

With regard to a “relationship fee” it is difficult to assess how this would work for providers at this stage, when the degree of engagement is unclear. Also, given the diversity of resource bases and funding streams of providers, one size will not fit all. We would suggest that at this stage QQI give providers options to pay a relationship fee or to “pay as you go” for services, and that as the overall service matures, providers will be able to pick the option that best meets their needs and their financial and educational models.

Q3.2.h Would it be preferable to have a relationship fee/annual subscription which would remain relatively static over a defined period of time, i.e. a 5 year period? (Section 3.2.7.2)

(not answered) note comments above

Q3.2.i In what circumstances should exemptions from fees for QQI services or waivers apply? (Section 3.2.7.3)

The White Paper on Adult Education “Learning for Life”, notes the importance of access to learning opportunities and recommended that people doing “second chance” education, should be exempted from fees. In our view this should continue, and in addition, people in receipt of, or dependent on a person in receipt of a medical card and/or a welfare payment including FIS should also be exempt to incentivise participation in lifelong learning.

Re fee levels it is important that no adult learner is disadvantaged because of the route to certification they take. Thus it should not cost more for a learner who accumulates credits towards a full award over a three year period than for one who can take on a faster pace of learning.

Q3.2.j Should certain categories of providers be exempt from paying fees?(Section 3.2.7.3)

The overarching policy is to support learners in general, and specifically those with low current educational levels, to gain accreditation and move through the NFQ. Thus we recommend that not for profit providers working specifically with those “hard to reach” target groups, and offering programmes at Levels 3-5 be exempt from fees.

We note the requirement from a public policy context (3.2.3) for cost recovery from public services. However we also note that the majority of programmes in the FE sector are funded from the public purse either directly or indirectly. Thus charging of fees is likely to be financially neutral to the state. Especially in the FE sector where there is no history of fees, it is essential that any fees introduction is done in a way which does not negatively impact on the diversity of providers or programmes available to learners.

We note that QQI hope to begin charging fees to FE providers from Sept 2013. There needs to be a reasonable programme of transition for existing providers to any new system, which will allow for effective planning and development. Within this context, it is essential that clear budgetary lines are established with and between QQI, the DES, SOLAS and the ETBs with regard to the payment of fees. Detail of such joined up thinking must be included in the forthcoming White paper. As the ETBs will not be fully established and the funding mechanisms may not be clear by September, we suggest that charging fees at this juncture would put small not for profit community education providers at a serious disadvantage as they plan their programmes for the coming academic year. Indeed, learners are currently enrolling for September courses, and it would not be appropriate for extra costs to be added at this point.

We infer from attendance at briefings and the consultation documents that QQI would like to deal with fewer providers and would support the development of consortia or clusters. This may indeed be the route to go for some smaller providers, for many reasons including the cost of QQI fees. However, it is important that a clear process be outlined and adequate time given for such new structures to be established. It would not serve the needs of the most disadvantaged learners within the community, if community education providers were discouraged from engaging with QQI and thus their expertise and capacity lost to the learners. The AONTAS Community Education Network would be open to discussing facilitating such a process leading to the development of consortia or clusters amongst its members.

Q3.2.k Should exemptions apply to services which relate to the provision of awards up to and including level 4 on the NFQ? (Section 3.2.7.3)

YES

Q3.2.l Should the cost of certification to the learner/provider be the same irrespective of the level of the award in question? (Section 3.2.7.4)

NO

Q3.2.m Are there other options that have not been considered in this Green Paper?

The Green paper does not outline the services to providers and timelines for those services which will be offered for the fees to be charged. Within the FE sector, providers have reported difficulties of communication with FETAC and a lack of clarity around timelines and requirements for QA agreements, and validation of programmes.

Q3.2.o Do you have any preferences among the options?

Every effort needs to be made to minimise costs to providers and to offer best value for the investment in review. In all cases fees need to relate to the service provided. Especially in the FET sector, where fees are new, it will be essential to have absolute clarity with regard to the services being provided, the expected timelines involved and the fees being charged.

It makes sense from many perspectives to co-ordinate reviews as much information will be common to all programmes in a centre. The monitoring and review structures need to maximise opportunities for simultaneous reviews of different aspects of providers and thus minimise costs to both providers and QQI. In principle, a composite fee should reflect the amount of work carried out by the review panel.

With regard to a “relationship fee” it is difficult to assess how this would work for providers at this stage, when the degree of engagement is unclear. Also, given the diversity of resource bases and funding streams of providers, one size will not fit all. We would suggest that at this stage QQI give providers options to pay a relationship fee or to “pay as you go” for services, and that as the overall service matures, providers will be able to pick the option that best meets their needs and their financial and educational models.