The Hong Kong Council for Accreditation of Academic and Vocational Qualifications

Authors: Alan WU, Wilbur PANG and Grace WOO

Programme Area Accreditation: Implementation and Challenges

Abstract

The Four-stage Quality Assurance Process was developed by the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) as the Accreditation Authority under the Hong Kong Qualifications Framework. The third stage of the Process is Programme Area Accreditation (PAA). Upon gaining a PAA status, an operator may develop and operate learning programmes within an approved scope of programme area(s) at specified QF Level(s) for an approved period of time. Granting of PAA status would only be considered for operators with sufficient quality assurance competency and maturity at the organisational level and a good track record in delivery of their accredited programme(s). An on-going challenge in the implementation of PAA is the definition of programme area(s). This paper discusses the inherent difficulties of defining programme area(s) and the practical issues encountered in assessing PAA applications. Despite the challenges, it is considered that PAA is an important incentive for operators to build up their track records, and to demonstrate the institutional maturity in assuring the quality of their own programme(s).

Introduction

Programme Area Accreditation (PAA) is the third stage of the Four-stage Quality Assurance (QA) Process developed by the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) under the Hong Kong Qualifications Framework (HKQF). Operators accredited with a PAA status may develop and operate learning programmes within an approved scope of programme area(s) at specified QF Level(s) for an approved period of time, without going through learning programme accreditation or re-accreditation by HKCAAVQ. PAA provides the opportunity for operators to demonstrate the maturity in their mechanisms to assure the quality of their programmes.

A practical challenge in the implementation of PAA is the definition of programme areas. Operators typically want greater flexibility to facilitate programme design and development. The definition of programme area is closely related to the definition of disciplines, and hence study and training areas. Defining disciplinary boundaries is inherently a dynamic task requiring constant review and input from the relevant disciplines. The paper considers some of the underlying issues and practical challenges encountered in describing programme areas.
Development of Disciplines

Classification of disciplines, by its very nature, is highly philosophical. The Latin origin of “discipline” is related to teaching and learning, which still vividly describes the use of the word in present days. The term “academic discipline” is often used to describe an organisation of learning underpinned by systematic development of a body of knowledge. There have been different attempts in classification of disciplines. A key notion developed in such studies is a paradigmatic development based on level of consensus. It was observed that well developed paradigmatic fields have high level of agreements among their practitioners in relation to the acceptable research approaches and topics. A good example is Physics which is characterised by very well established objectives and methodologies of research. On the other hand, less developed paradigmatic fields have lower level of agreement. An example is English Literature which lacks a theoretical paradigm and easily definable research objectives. Nevertheless, English Literature is generally accepted as an academic discipline. It is not difficult to conceive that the level of agreement varies not only across disciplines, but also with time. This is what makes the problem a dynamic one.

In the early days, universities probably organised themselves reflecting the disciplinary nature. However, a university is a complex system with an internal ecosystem, responding to external social-economic developments. In concrete terms, this means that a new faculty within a university may be formed not primarily because of academic considerations, but because of internal and/or social demands. For example, the term “mechatronics” is often used to describe a multidisciplinary field of engineering that includes a combination of mechanical engineering, electrical engineering, telecommunications engineering, control engineering and computer engineering. Given the wide cross-over between disciplines, it is probably debatable whether mechatronic should be called a field of study in its right. Nevertheless, the term has become very fashionable and it is not difficult to find academic departments and programmes adopting this term in their names. Fortunately in the case of mechatronic, there is a high degree of paradigmatic development in its related disciplines, so it is probably not difficult for practitioners in that field to reach consensus on research objectives and methodologies. This may not apply to newer and more fashionable studies such as “sustainable development”. However, this term has become so trendy that it is possible to find Bachelor programmes in sustainable development covering a wide range of topics which share little paradigmatic developments.

As mentioned before, a university is a complex organisation. A university is not unlike a kingdom with different clans competing for influence, protecting their own territories. These competitions are real in terms of resource allocation, staff and branding. Worldwide, there is a general trend that universities are encouraged to become less dependent on recurrent public funding, leading to more universities being operated using a business model. This trend is making the competitions more ferocious. In this climate, academics are working hard to find new niches that may create new opportunities.
In addition, social development has reached a stage that graduates are increasingly mobile across different industries. The old days where people spend most of their life in one industry have gone. Responding to this phenomenon, universities are putting more emphasis on “interdisciplinary” knowledge. Defining discipline is already difficult, defining interdisciplinarity has found to be even more difficult. However, education and training operators have found this a “new gold” to be mined. This encouraged the creation of programmes with very different focuses within the same programme. The differences can be so obvious without even applying the paradigmatic argument explained above.

Despite the challenges described above in defining disciplines, there are practical reasons to develop classifications of disciplines. These reasons include, but are not limited to, funding, educational management and manpower planning. For example, the International Standard Classification of Education (ISCED) was developed by UNESCO to facilitate comparisons of education statistics and indicators across countries. Many countries have also developed similar systems for their own contexts.

**Development of Programme Areas in the HKCAAVQ**

The Qualifications Register (QR), launched on 5 May 2008, is the public face of the HKQF. It is an online database of quality assured qualifications and their respective learning programmes accessible by members of the public. Qualifications listed in the QR are classified into 21 areas of study/training. HKCAAVQ has helped develop this classification system for the Education Bureau (EDB) around mid-2000’s in preparation of the implementation of the QF with reference to the then academic and vocational training classification in Hong Kong, such as the University Grants Committee (UGC) and the Joint University Programme Admission System (JUPAS).

The 21 areas of study/training are also referenced by HKCAAVQ for the determination of approved programme area(s) for operators applying for the PAA status. An operator with PAA status is allowed to list their qualifications within the approved PAA scope in the QR without the need of having HKCAAVQ accredit the respective learning programmes individually. An approved PAA scope has two dimensions:

(a) programme area(s): this translates into subject variety of the learning programmes; and;
(b) QF level: this translates into depth of learning programmes.

HKCAAVQ conducted a comprehensive review of its accreditation model during 2011 – 2013, including the scope of programme area(s) for PAA status. Relevant findings of the review are as follows:

(a) There were concerns about potential overlap of some areas of study/training, e.g. “Business & Management, General”, “Business & Management in Specific Industries” and “Business, Global and China”, and unclear correlation of subject matters in some areas of study/training e.g. why “Sports Science” is grouped under
(b) The same area of study/training with “Education” and “Teacher Training”; and

To address the concerns/comments above, it is proposed to introduce the use of sub-areas and illustrative general statements to describe the scope of sub-areas to guide operators and accreditation panels, in line with the following principles agreed by the HKCAAVQ Council in considering recommendations from the Four-stage QA Process Review in March 2013:

(a) sub-areas are set up to host programmes of the same cognate discipline i.e. education and training with closely-related underlying principles, knowledge and technical know-how;
(b) the number of programme areas granted in PAA is kept to a minimum; and
(c) general statements to indicate the potential areas to be covered under each sub-area are provided to guide the operators and panels. The general statements are not meant to be definitive.

Incidentally, a review of the classification of areas of study/training in the QR was conducted by the Liaison Committee on Quality Assurance (LCQA), comprising representatives of the EDB, HKCAAVQ, Joint Quality Review Committee (JQRC) and Quality Assurance Council (QAC) under the UGC. The review resulted in a new classification system of 14 areas of study/training in the QR. As the new classification system will impact on how sub-areas are grouped under the new classification system as well as the scope of programme area(s) in PAA, HKCAAVQ has proposed the creation of sub-areas, with each sub-area described by an illustrative general statement, and the mapping to the new classification system, taking into account International Standard Classification of Education (ISCED) 2013 of UNESCO and the latest Industry Training Advisory Committees on the QF. The proposal is now under consultation with stakeholders before being finalised.

**PAA in the Context of HKCAAVQ’s Four-stage QA Process**

Operators with PAA status can develop and operate their learning programmes within an approved scope of a programme area at specified QF level(s) during a validity period. The qualifications of these learning programmes covered by the PAA status can be entered into the QR for QF recognition without going through prior learning programme accreditation or re-accreditation by HKCAAVQ.

PAA is a comprehensive review of the QA competency of operators. HKCAAVQ must be satisfied that the operator has well-balanced and robust systems implemented for continuous internal quality assurance, review and enhancement of the organisational management and the design and operation of outcome-based learning programmes. The operator must demonstrate with track records how it manages and monitors its operation. It also needs to elaborate its strategic and academic plans to demonstrate its ability to plan and develop. HKCAAVQ therefore will conduct institutional review to examine the
institutional systems and mechanisms, and discipline review to examine the academic development of the programme area concerned. The criteria adopted by HKCAAVQ are as follows:

**Institutional review**
(a) Governance and institutional structure
(b) Overall institutional management
(c) Academic development plan
(d) Financial viability and system
(e) Quality assurance including programme approval, monitoring and review
(f) Staffing policies
(g) Resources and support services

**Discipline review**
(a) Discipline-level management
(b) Strategic plan
(c) Programme development and management
(d) Admission, progression and assessment
(e) Teaching and learning policies
(f) Scope of programme area
(g) Justification of QF level
(h) Discipline-level staffing and staff development
(i) Discipline-level resources and support services

**PAA as a Necessary Step to Promote Quality**

HKCAAVQ applies threshold standards to determine the accreditation outcome while it also emphasises enhancement of programme quality and student learning experience in programme re-accreditation. Operators with years of external accreditation experience have established their quality assurance mechanisms. It is common to see that they can demonstrate the improvements made to their own operation and their programmes; and meeting threshold standards no longer being a challenge for these operators. It is a natural step for these operators to seek more autonomy from HKCAAVQ, and it is reasonable for HKCAAVQ to empower operators with good track records to assure the quality of their own programmes. HKCAAVQ can, in turn, deploy its resources more effectively to handle the increasing accreditation requests. Currently, HKCAAVQ has granted five operators a PAA status. HKCAAVQ will continue to monitor the performance of these operators through Periodic Review, the fourth stage of the of the Four-stage QA Process.

The clientele of HKCAAVQ includes operators offering academic programmes and vocational training. Five operators have been accredited with PAA status. Four of them are academic institutions, two of which were accredited in 2014. A possible reason is the planning of the academic institutions to pursue a university title. As of a government policy, operators which wish to apply for a university title must first obtain PAA status in three programme areas at QF level 5. While the Government has other requirements, the
PAA status is the pre-requisite for the operators to initiate the process of seeking a university title.

**Practical Considerations in Granting Programme Areas**

Different from accrediting a programme which has a well-defined scope including the intended learning outcomes and curriculum, PAA is an accreditation of a programme area which may be open to broader interpretation. A clearly defined scope of programme area is therefore a key to make the accreditation feasible and ensure that the approved programme area can be consistently implemented. The HKCAAVQ adopts the following standard to elaborate the criterion of scope of programme area:

*The operator must have a demonstrable sound track record in planning and delivering learning programmes of the programme area under consideration. Its learning programmes must have a clearly defined scope which is relevant to its mission and within its capability and financial means for further development.*

There are three inter-related concerns about defining the scope of a programme area:

(a) common understanding on the definition of a programme area;
(b) track record of relevant programmes offered under the proposed programme area; and
(c) room for further development of new programmes under the proposed programme area.

Based on the choice of words, the boundary of a programme area may become too wide, such as Global Studies. Similarly, Chinese Studies may include Chinese language, literature, history and philosophy in the Chinese culture. There may be a need to restrict the scope of a programme area so it is commensurate with the areas of competence and experience of the operators.

In practice, the operator will propose a definition of a pre-defined programme area befitting its needs. Based on the evidence-based principle, the operator is required to demonstrate on the one hand that it has the institutional capacity to be granted PAA and on the other hand that the core area of the existing programmes can sufficiently support the programme area that it defines. As a norm, major studies normally take up 50% of the full curriculum, minor studies is normally between 20% and 50% of the full curriculum while streams of study or concentration are normally not more than 20%. Minor studies and streams or concentration cannot be used to support the whole area. For example, for a Chinese language programme with Chinese literature as minor, the Chinese literature minor cannot be used to apply for PAA in Chinese literature.

The requirement on track record seems to be a chicken-and-egg problem. If an operator already offers four degree programmes in Chinese language, literature, history and philosophy, the operator can provide sufficient track records to claim a programme area of Chinese Studies. After obtaining the PAA status in Chinese Studies, it seems that the
room for this operator to offer new programmes under this programme area is limited. The situation is particularly challenging for those programme areas with clear boundaries, such as accounting and nursing.

PAA is important for the development of the operators. As a quality assurance agency, HKCAAVQ respects the autonomy of the operators to have their own plans. Yet, the operators have to justify with evidence how and why they are capable to manage and assure the quality of the programmes under a specified scope of a programme area. The experience shows that there is no general rule to handle the definition of the scope of a programme area, but direct and sufficient communication with the operator helps manage the expectation of the operators and shape the scope of programme area before the accreditation starts. To better handle this continuous challenge, the EDB has set up a Working Group on Review of Programme Areas in January 2014. HKCAAVQ also established a Standing Panel on Programme Area Accreditation Scope in March 2014. It is expected that through the concerted effort of different stakeholders, the challenges arising from the implementation of PAA can be addressed.

**Conclusion**

PAA is an important stage for operators to prove their quality assurance capabilities. By requiring the operators to provide evidence of robust and effective implementation of their internal quality assurance mechanisms, a certain degree of “autonomy” within a defined scope can be, in return, granted to the appropriate operators. This aligns with the concept of “earned autonomy”. This is a prudent approach because a track record of learning programme accreditation and re-accreditation is a pre-requisite for applying PAA status, and each PAA granted is subject to Periodic Review.

The challenges discussed in this paper are not only for HKCAAVQ. An operator applying for a PAA also have to demonstrate that the challenges have been fully considered, in justifying the applied scope. In fact, considerations applied to those challenges would be a good indication of the readiness for granting a PAA.