

## **Development of a Differentiated Approach in Accreditation**

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### **Abstract**

Since the launch of the Hong Kong Qualifications Framework (HKQF), over 200 operators have been accredited and offering nearly 8,000 QF-recognised qualifications. Except for the self-accrediting institutions stipulated in the ordinance underpinning the HKQF, the Hong Kong Council for Academic and Vocational Qualifications (HKCAAVQ) is the accreditation authority to safeguard the quality of the qualifications on the Hong Kong Qualifications Register (HKQR). HKCAAVQ performs this function with the Four-stage Quality Assurance Process which is designed to progressively test the maturity and effectiveness of operators. Following the implementation of the Quality Management System (QMS), the IT infrastructure capturing key information from accreditation exercises, HKCAAVQ is moving towards a more data-driven process in determining appropriate approaches in accreditation basing on the track records of the operators in QMS. This paper discusses the analyses of data captured in QMS to support the assessment of operators' maturity for implementation of the differentiated approaches.

### **Keywords**

Differentiation, Data-driven, Track record, Maturity

### **Introduction**

The Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) is an independent statutory body created to conduct accreditation for a wide spectrum of clientele, ranging from private universities to vocational training providers, for recognition under the Hong Kong Qualifications Framework (HKQF). There is a great diversity in terms of the scale of operation, nature of programmes and accreditation experience of these operators. Currently, a form of differentiation in the accreditation approaches has been provided in the facilitation phase incorporated in the accreditation process since 2015.

In 2016, HKCAAVQ implemented the Quality Management System (QMS), an IT infrastructure that captures key information from an accreditation exercise. By retrieving and analysing the data available in QMS, HKCAAVQ can now build up the accreditation profiles of individual operators, and make informed decisions on the appropriate accreditation approaches based on the track records of the operators. In other countries, similar developments are sometimes called a risk-based approach.

### **Differentiation in Facilitation Phase**

HKCAAVQ uses the Four-stage Quality Assurance Process (the Process) to accredit operators and their learning programmes under the HKQF. The four stages are Initial

Evaluation (IE), Learning Programme Accreditation (LPA), Programme Area Accreditation (PAA) and Periodic Review (PR).



**Figure 1** The Four-stage Quality Assurance Process of HKCAAVQ

Accreditation under IE is institutional/organisational and LPA/Re-LPA is programme-based. Operators meeting the eligibility criteria can apply for PAA, as PAA is conferred on operators with sufficient quality assurance competency and maturity at the organisational level and a good track record in delivery of their accredited programme(s). The status of PAA is reviewed periodically through PR.

In 2015, HKCAAVQ incorporated a “facilitation phase” into the Process to (a) help operators who are new to IE/LPA/Re-LPA to be aware of the accreditation requirements; and (b) bring together information about the track records of the accredited operators to assist in HKCAAVQ’s identification of accreditation focus(es) in Re-LPA. Operators that have gained PAA status are not included in the facilitation as they are mature enough to handle the accreditation on their own. To facilitate new and accredited operators who have not yet acquired PAA status to proceed with accreditation, two approaches have been adopted: (a) the “preview approach”; and (b) the “customised approach”.

The “preview approach” is designed to enhance operators’ awareness of the accreditation requirements and facilitate their preparation for the accreditation exercise. Both new and accredited operators can apply for a preview of their accreditation documents. Initial observations on the completeness and relevancy of the submitted draft documents will be provided to operators, but no judgement will be made on whether they can meet the accreditation standards. The initial observations are independent from any judgement made by the accreditation panel in the exercise.

On the other hand, the “customised approach” is designed to provide accredited operators with a customised accreditation scope/process informed by track records against the relevant accreditation standards of their education/training provision that was ascertained through past accreditation exercises. The customised approaches can be a paper-based review accreditation, customised accreditation, variation in validity period or some combination of the different items, depending on the analysis of the track records. The scope of accreditation defined in the facilitation phase does not restrict the accreditation panel from requesting further information and evidence in relation to any of the accreditation standards during the accreditation process.

In the implementation of the “customised approach”, it was noted that there was a need to have a robust and justifiable means of recognising maturity and track records of the operators, and the means to match this recognition with a proportionate approach to quality assurance.

## **Data-driven Differentiation**

In 2016, HKCAAVQ launched an IT system, the Quality Management System (QMS), funded through the Education Bureau's Quality Enhancement Support Scheme (QESS) to capture information from accreditation exercises, including basic information on the operators and the programmes undertaking accreditation, the nature and outcome of individual exercises, and the key data approved in the accreditation exercises. Other than accreditation, QMS is also the IT platform to store the information on all of the various business<sup>1</sup> lines of HKCAAVQ. Hence, the track record of an operator in all the services under HKCAAVQ can be traced in QMS. On the other hand, with the implementation of QMS, operators' development, including the development of its programmes, over the years can be tracked systematically through the information in QMS. Based on the data and corresponding analysis, judgments can be made about the maturity of an operator, and on the appropriate approaches to be adopted for upcoming accreditation exercises of the relevant operators.

### *An Overview of Accredited Operators*

QMS keeps track of all the accreditation exercises undertaken by operators since 2007, the year before the launch of the HKQF in 2008. To generate an overview of the operators, data is retrieved from QMS for analysis. The dataset is a snapshot of the accreditation profile of the operators, as QMS is a dynamic database being updated regularly as a result of the operation and conduct of the various business lines of HKCAAVQ.

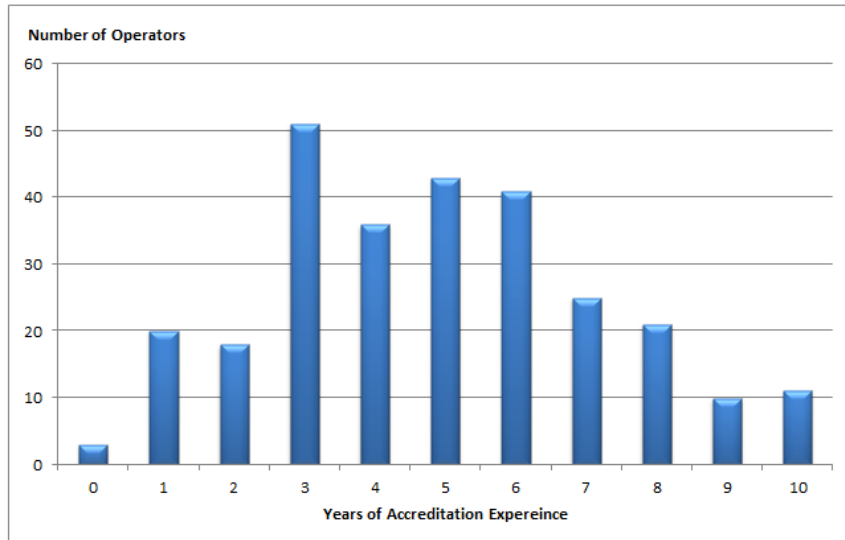
### *Accreditation History of Operators*

Since the HKQF was launched in 2008, more and more operators have had their programmes accredited for recognition under the HKQF and for facilitating movement and progression of their learners. IE and LPA are the starting point of joining the HKQF; subsequently, the programmes will need to undertake Re-LPA for a continuous recognition under the HKQF before expiry of their validity period. Some of the operators may proceed to PAA for more flexible development of their own programmes under a defined scope.

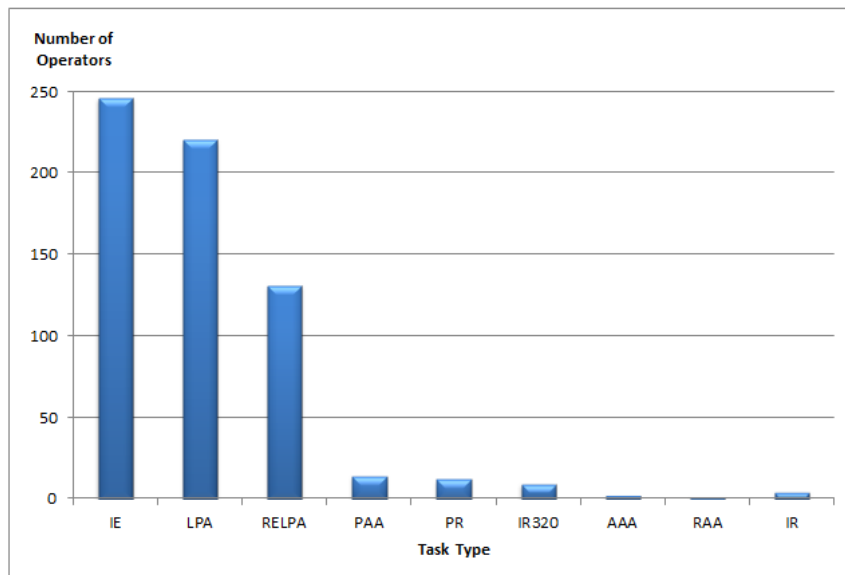
It is expected that the maturity of an operator is achieved through accumulating experience in accreditation and operation. Hence, accreditation experience can be described by the number of years of accreditation experience that an operator accumulates, and the number and nature of the accreditation exercises it has undertaken. In practice, an accreditation exercise can be a combination of different accreditation tasks, such as the combination of IE and LPA which is the standard route for new operators joining the HKQF, and the combination of LPA and Re-LPA of similar programmes (new and existing) for better synergy and logistic arrangements. Hence, other than the number of years, the accreditation experience of an operator is also reflected by the number and nature of the accreditation tasks that it has undertaken.

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<sup>1</sup> Other than accreditation, HKCAAVQ also provides different assessment services for the general public, organisations and government bureaux/departments. The accredited operators may also be clients of these assessment services; if so, their performance in these assessments will also be kept in QMS.



**Figure 2** Accreditation experience of operators<sup>2</sup> by years<sup>3</sup>



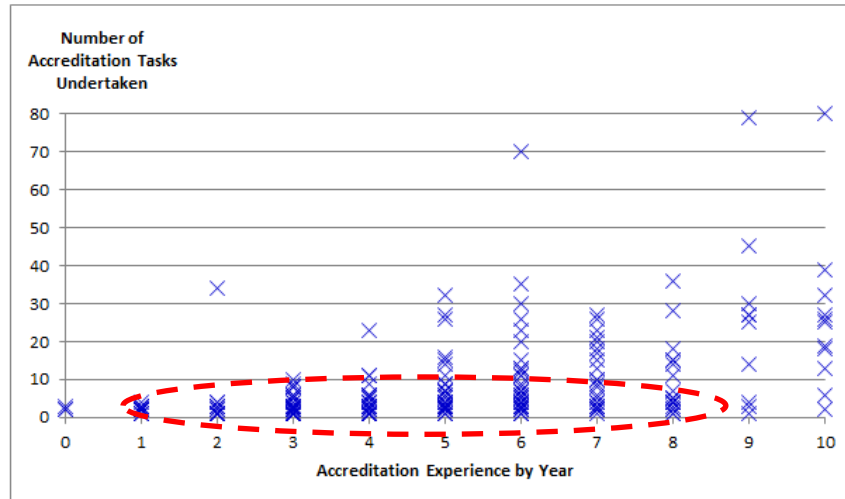
**Figure 3** Accreditation experience of operators<sup>4</sup> by nature of accreditation task<sup>5</sup>

<sup>2</sup> Operators who withdrew from accreditation exercises or undertook accreditation solely for operating programmes for the Employee Retraining Board (ERB) were excluded in all the analysis in this paper. ERB operators had only been accredited under IE and did not accumulate accreditation experience through the Process as expected for other operators.

<sup>3</sup> The years of accreditation experience of an operator is counted from the earliest site visit year of the accreditation exercise undertaken by the operator as recorded in QMS.

<sup>4</sup> In a Non-local Programme (NLP) accreditation exercise, local and non-local partners will be counted as two separate operators in one single accreditation task.

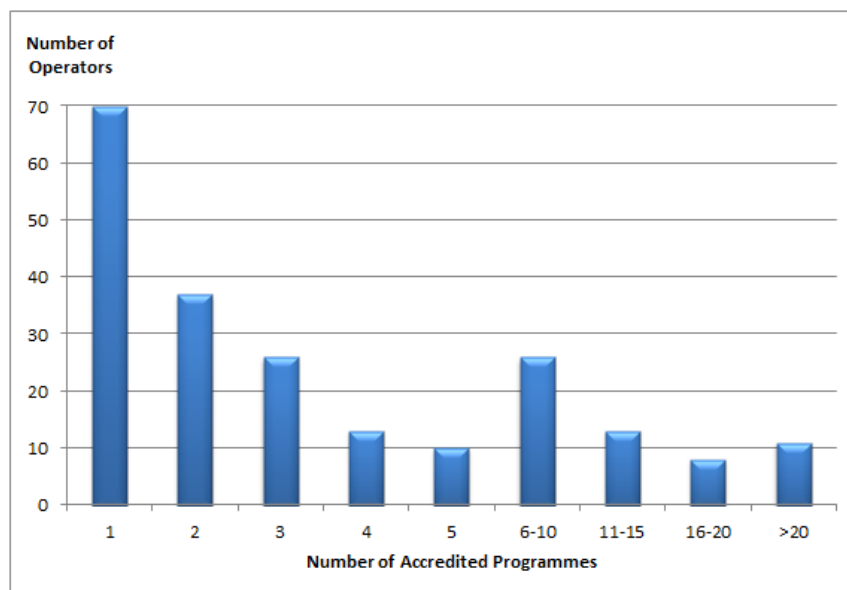
<sup>5</sup> Other than accreditation tasks under the Four-stage QA Process (i.e. IE, LPA, RELPA, PAA and PR), HKCAAVQ also conducts accreditation for recognition of prior learning, which is the Accreditation of Assessment Agencies (AAA) and its re-accreditation (RAAA), and Institutional Review for the Purpose of Seeking Cap. 320 Registration (IR320) or not for Cap. 320 (IR).



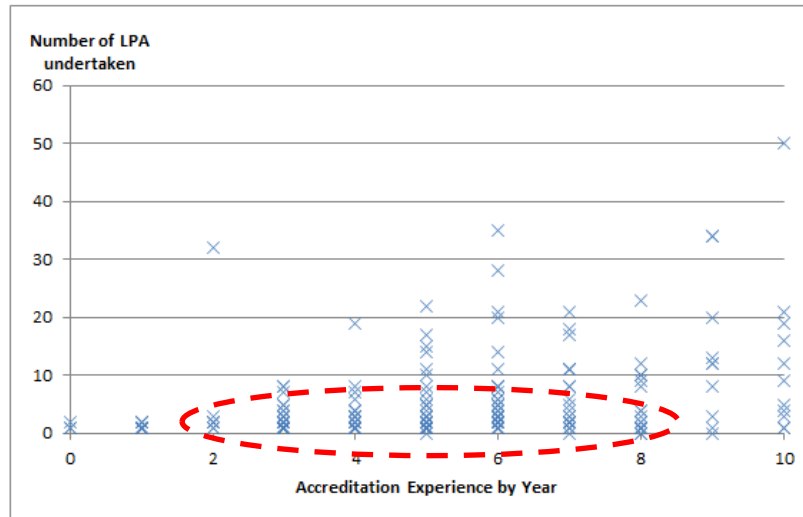
**Figure 4** Relation of number of accreditation tasks undertaken and the years of experience of operators

From the general profile of the accreditation history of the operators, it was noted that most operators have gained more than two years of accreditation experience, but they may not undertake more accreditation tasks after acquiring the accreditation status.

A possible reason for the above phenomenon is that the accredited operators do not undertake more LPA for new programmes, but just keep the accredited programmes undertaking Re-LPA before expiry for recognition under the HKQF.



**Figure 5** Number of programmes that have undertaken LPA by operators

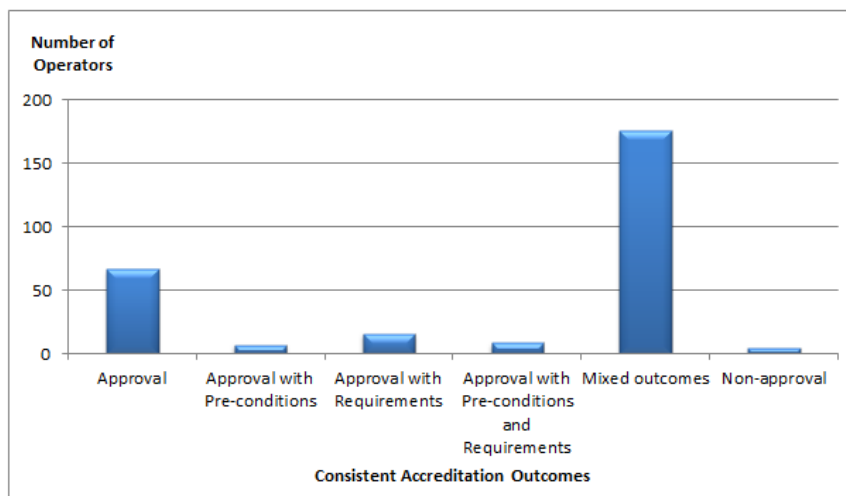


**Figure 6** Relation of the number of LPA undertaken and the years of accreditation experience

From the general profile of LPA undertaken by operators, it was noted that about half of the operators have five or less programmes accredited and recognised under the HKQF. There is no obvious trend that operators continue to develop more programmes and have them accredited after they acquired the accreditation status.

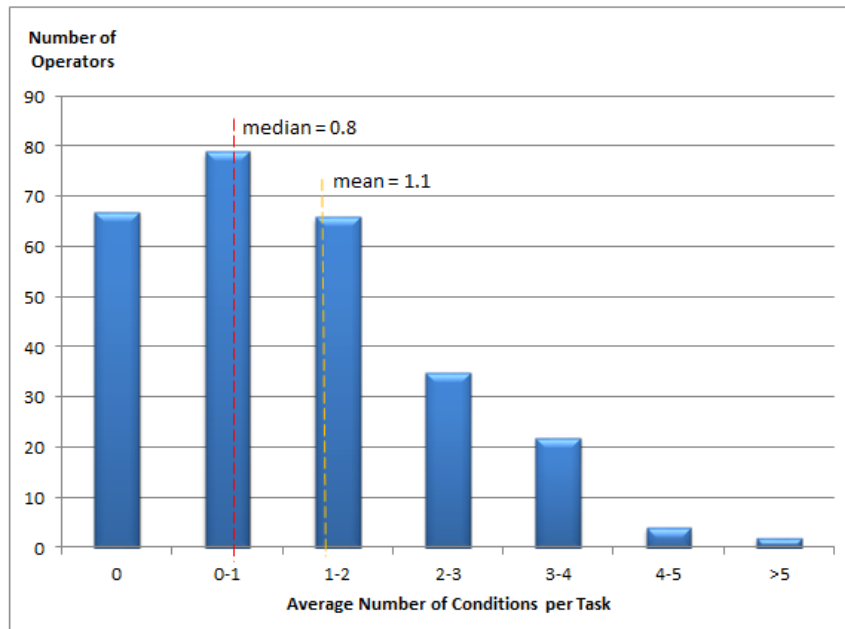
*Track Records of Operators*

An accreditation task may result in any one of three possible outcomes: approval, approval with conditions (i.e. pre-conditions and/or requirements), or non-approval. Conditions will be set if the accreditation panel makes a holistic judgement that the operator has the competence to operate the relevant programme(s), but certain accreditation standard(s) cannot be considered as fully met and the operator is requested to fulfil the conditions by specified deadlines. Pre-conditions and requirements are of equal importance in obtaining and maintaining a valid accreditation status; while a pre-condition is to be fulfilled prior to the commencement of the validity period imposed on an accreditation status, a requirement is to be fulfilled by the stipulated deadline within the validity period. Therefore, an analysis of the pre-conditions and requirements set in an accreditation task can inform the maturity of the operator and its programmes in the accreditation.

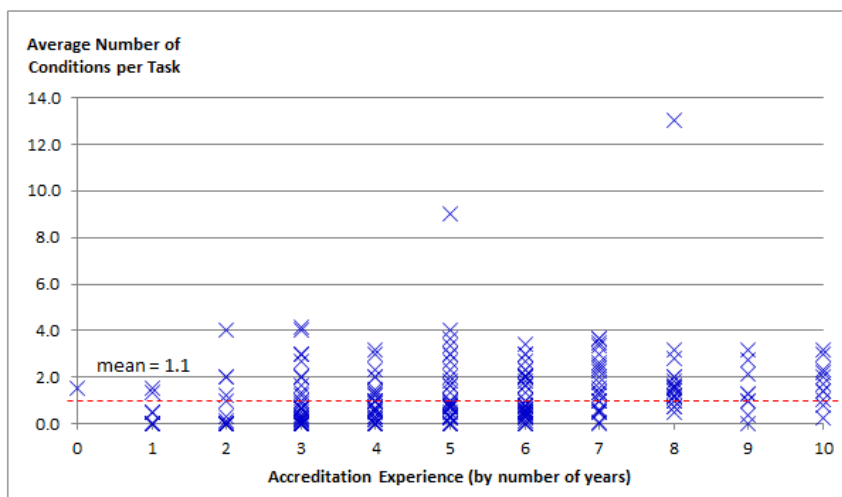


**Figure 7** Analysis of accreditation outcomes of operators – consistency of outcomes

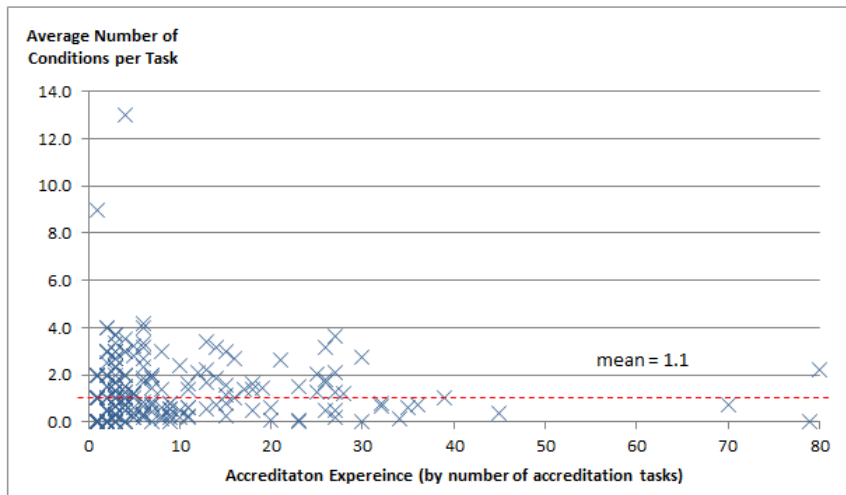
From the profile of the accreditation outcomes of operators, it was noted that most operators do not perform consistently in different accreditation tasks undertaken. The possible reasons may be turnover of responsible staff, programmes newly developed, or first trial of the relevant accreditation task. Hence, to better understand the experience of an operator in accreditation over the years and the various tasks, an average number of conditions per task is worked out.



**Figure 8** Average number of conditions per task of operators

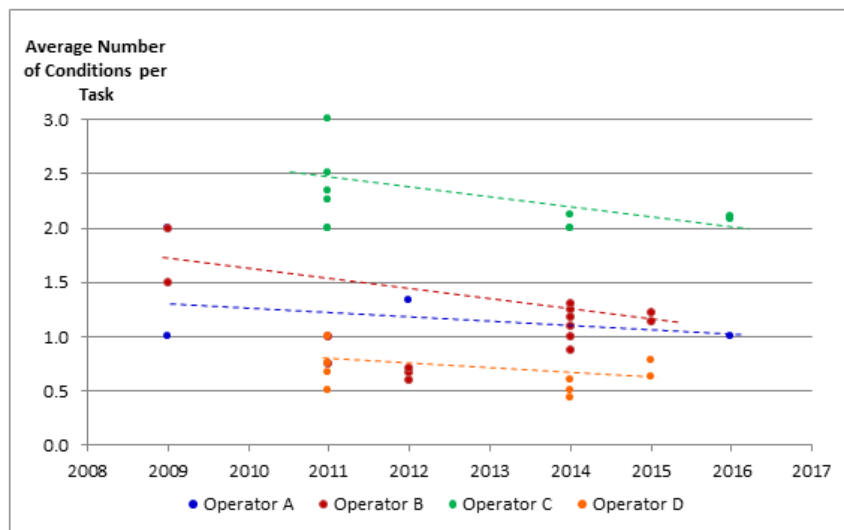


**Figure 9** Average number of conditions per task in relation to accreditation experience by year



**Figure 10** Average number of conditions per task in relation to accreditation experience by tasks undertaken

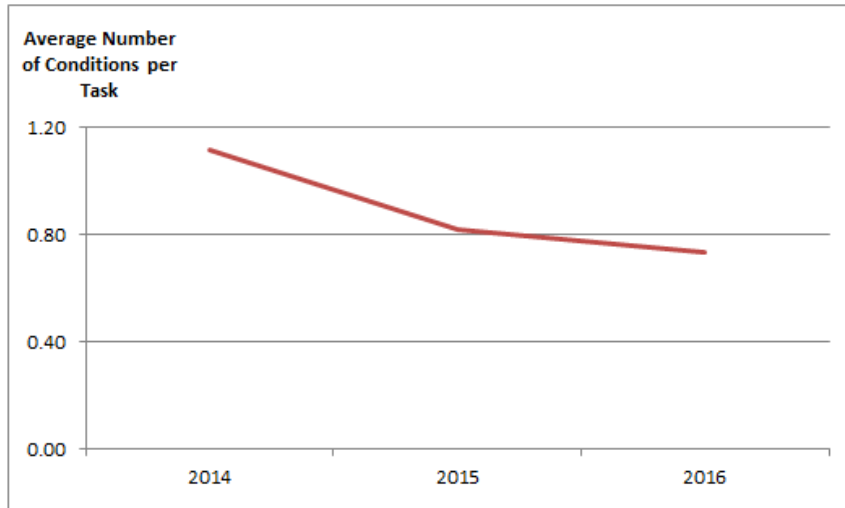
From the profile, it was noted that the mean of the average number of conditions per task per operator is 1.1 and median is 0.8, which does not have an obvious relation with the accreditation experience by year of an operator, but obviously drops when the experience is accumulated through participation in more accreditation tasks. The average number of conditions per task is then a useful guide to the accreditation maturity of an operator.



**Figure 11** Average number of conditions per task of four selected operators across the years

From the profile of four selected operators having more than six years of accreditation experience, the move of the average number of conditions per task indicates an improvement in the track records when the experience accumulates through undertaking more accreditation tasks.





**Figure 12** Average number of conditions per task of the whole clientele in recent years

A decreasing trend in the average number of conditions per task by year of the whole clientele is observed. This signifies the accumulation of experience through accreditation activities and operation of recognised programmes in the whole sector.

### *Accreditation Profile of an Operator*

The general overview of the whole clientele lays a background for interpreting the accreditation history and track records of individual operators, and provides a platform to adjust the expectation on an operator. To construct the accreditation profile of an operator, QMS is the most important and convenient source of information, but other sources are also valuable for consideration.

The information that contributes to the accreditation profile of an operator includes:

Source	Information Item
QMS	<i>Accreditation History</i>
	- Experience by years
	- Experience by tasks undertaken
	- Number and nature of programmes accredited
	<i>Track Record</i>
	- Average number of conditions per task
	- Number and nature of conditions
	- Validity period granted in past exercises
	<i>Performance in Assessments</i>
	- Performance in other assessment services, if any
External Party (provided by operator)	<i>External Recognition</i>
	- Self-accreditation status, if any
	- Third-party endorsement from relevant authority/ professional body
HKCAAVQ Internal Record / Relevant Authorities/ Public Domain	<i>Compliance to Regulations</i>
	- Complaints, if any
	- Record of breaching relevant rules or regulations, if any

**Table 1** Possible sources and information items of the accreditation profile of an operator

### ***Proportionate Differentiated Approaches***

With the information collected and compiled from various sources on the track record in accreditation and effectiveness in operation, the accreditation profile of an operator forms the basis for considering appropriate and proportionate differentiated approaches for the upcoming accreditation exercise(s). The responsible case officer is able to compare the accreditation profile of the operator with the whole clientele, and use the profile as a reference in considering the various possible approaches.

(a) *Customised Accreditation*

Based on the profile of the operator, the accreditation document or site visit could be streamlined for accreditation and re-accreditation of learning programmes offered by mature operators, with a focus on the standards directly related to issues of concern. As a result, the accreditation document could be lightened, size of the panel reduced and the duration of the accreditation process shortened.

(b) *Paper-based Review*

Based on the track record at programme level, if no pre-condition is stipulated in the previous accreditation report(s), re-accreditation of the programme or programmes in the same subject area or industry could be paper-based.

(c) *Variation in Validity Period*

For programmes with solid track record, longer validity period could be considered as recognition of the maturity of the operators. This could be supported by some form of regular reporting, e.g. annual or bi-annual reports.

### **Conclusion**

Differentiated approaches in accreditation or more tailored quality assurance processes are a growing demand from institutions and organisations as they undertook successive rounds of accreditation activity. Mature institutions and organisations are expecting to have more flexibility in their preparation of the documentation as well as the arrangements of the process. With the launch of the HKQF in 2008, operators in Hong Kong are gaining more and more experience in accreditation as well as in operating programmes recognised under the HKQF. The maturity of their internal quality assurance system and effectiveness of their operation are being reflected in the decreasing number of conditions set in accreditation exercises or tasks.

Development of the operators and their programmes are tracked in QMS, an important IT infrastructure in HKCAAVQ. By compiling the accreditation profile of the operators, maturity of an operator can be assessed for an appropriate approach of accreditation. Supported by the data in QMS, HKCAAVQ is developing a strong evidence-based culture to support the implementation of a differentiated approach for accreditation.