Guidance Notes on Substantial Change to Accreditation Status

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Table of Contents

1. Purpose ............................................. p.3
2. The Relationship between Accreditation Status and Substantial Change .......................... p.3
3. Institutional Obligations .................................. p.3
4. Principles for Processing Substantial Change ........................................ p.4
5. Overview of Categories of Change and Handling Procedures ................................ p.5
6. Minor Change ........................................ p.6
7. Substantial Change .................................... p.7
8. Significant Departure .................................. p.9
9. Handling Procedures for Substantial Change ........................................ p.10
10. Possible Outcomes .................................... p.12
11. Fees ................................................. p.12
12. Points to Note ........................................ p.12

Appendix – Flowchart for Handling Substantial Change Application .......................... p.13
1. **Purpose**

1.1 These *Guidance Notes on Substantial Change to Accreditation Status* (Guidance Notes) are intended to serve as general reference for (a) operators who have obtained an accreditation status by successfully completing Initial Evaluation (IE), Institutional Review (IR) or Programme Area Accreditation (PAA), (b) operators offering accredited learning programmes, and (c) accredited assessment agencies who are seeking approval for substantial changes at institutional and/or programme level.

2. **The Relationship between Accreditation Status and Substantial Change**

2.1 The accreditation status of an operator, an assessment agency or a learning programme is granted after a critical evaluation of evidence against the HKCAAVQ standards and criteria for the specific accreditation exercise.

2.2 The provisions of the Accreditation of Academic and Vocational Qualifications Ordinance (Cap. 592) and Hong Kong Council for Accreditation of Academic and Vocational Qualifications Ordinance (Cap. 1150) specify that HKCAAVQ may vary or withdraw an accreditation report if an operator and/or its learning programme, or an assessment agency is no longer competent to meet the standards and/or objectives as claimed.

2.3 The purpose of obtaining approval from HKCAAVQ for any substantial change is to ensure that an operator, an assessment agency or a learning programme can continue to meet the accreditation standards and criteria after implementing the change.

2.4 If HKCAAVQ identifies any unapproved changes that may impact on accreditation status during the course of other accreditation activities involving an operator or assessment agency, HKCAAVQ may initiate a substantial change assessment.

2.5 HKCAAVQ may consider withdrawing the accreditation status at any time during the validity period if there are substantial changes made that have not been approved by HKCAAVQ.

3. **Institutional Obligations**

3.1 An operator or assessment agency is required to ensure that all proposed changes have gone through an internal quality assurance (QA) mechanism before implementation.

3.2 It is the responsibility of an operator or assessment agency to contact HKCAAVQ and seek approval for substantial change and follow the procedures as set out in these Guidance Notes in order to maintain the accreditation status.

3.3 If in doubt as to whether a proposed change is substantial or not, it is advisable for the operator or assessment agency to consult HKCAAVQ before implementation.
4. Principles for Processing Substantial Change

4.1 HKCAAVQ will adhere to the following principles in processing substantial change proposed by an operator or assessment agency.

Continuous improvement and quality enhancement

4.2 An operator or assessment agency granted an accreditation status is expected to be engaged in an ongoing process of self reflection, evaluation and improvement. Such a process will often become a stimulus for change. However, any proposed changes need to be balanced with the requirement to continue to meet the accreditation standards. HKCAAVQ will consider the substantial change applications in light of the expectation of continuous improvement and quality enhancement by an operator or assessment agency.

Meeting accreditation standards and criteria

4.3 An operator, an assessment agency or a learning programme shall continue to meet the accreditation standards and criteria while implementing the proposed substantial change.

Fitness for purpose

4.4 The processing of substantial change applications will adhere to the fitness for purpose principle, with due attention to:

(a) the scope, nature and magnitude of the change;
(b) the capacity of an operator to achieve the objectives as claimed;
(c) the capacity of an assessment agency to assess the skills, knowledge or experience acquired by individuals in relation to the relevant industry or branch of industry; or
(d) the capacity of a learning programme to meet the accreditation standards and/or objectives as claimed.
5. **Overview of Categories of Change and Handling Procedures**

5.1 There are three categories of change with different handling procedures:

<table>
<thead>
<tr>
<th>Categories of Change</th>
<th>Handling Procedures</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Minor change</strong></td>
<td>Nil</td>
</tr>
<tr>
<td>Change that is minor revision to an operator, an assessment agency or a learning programme.</td>
<td>(Informing HKCAAVQ is not required, but if in doubt, please contact HKCAAVQ.)</td>
</tr>
<tr>
<td><strong>Substantial change</strong></td>
<td>Assessment or notification</td>
</tr>
<tr>
<td>Change that is significant modification to an operator, an assessment agency or a learning programme.</td>
<td></td>
</tr>
<tr>
<td><strong>Significant departure</strong></td>
<td>New accreditation exercise</td>
</tr>
<tr>
<td>Change that represents significant departure from the approved scope and nature of an operator, an assessment agency or a learning programme.</td>
<td></td>
</tr>
</tbody>
</table>

5.2 Some examples of minor change, substantial change and significant departure are provided in Sections 6-8 for reference only. They are by no means exhaustive.
6. Minor Change

6.1 Minor change refers to minor revision to an operator, an assessment agency or a learning programme. Such change is not considered as substantial change.

6.2 The following are examples of minor change:

- a module title or re-coding of a module without affecting the programme aims or objectives, the Programme Intended Learning Outcomes (PILOs) and Module Intended Learning Outcomes (MILOs)
- sequence of modules of the same subject which does not affect the PILOs, progression within the learning programme and the credit points in a semester
- change/addition/reduction of prescribed textbooks and recommended reading list of a module without affecting the programme aims or objectives, PILOs and MILOs
- learning and teaching activities of a module without affecting the programme aims or objectives, PILOs and MILOs
- External Advisors/Examiners without affecting the appointment criteria
- addition of staff development schemes and activities
- addition of student support services
- student record management system without affecting integrity, security, accuracy and currency of the records
- company director without impact on the ownership and governance of the operator

6.3 An operator or assessment agency can implement minor change without informing HKCAAVQ. However, the operator or assessment agency is required to retain documentary evidence that such change has gone through the internal quality assurance processes. The documentary records of minor change should be included in the submission for re-accreditation.
7. **Substantial Change**

7.1 Substantial change refers to significant modification to an operator, an assessment agency or a learning programme.

7.2 The following are examples of substantial change:

**(a) Change of an operator**

- mission / purpose of an operator
- governance structure and/or key personnel responsible for the governance, management, operation and sustainability of an operator
- organisational structure and/or academic or training plans / strategic goals which has impact on the institutional philosophy or mission of an operator
- scope of training services, e.g. from provision of in-house training to public training (for vocational operators)
- academic / training model, such as a change which leads to significant revisions in an operator’s orientation and its ability to offer learning programmes at the approved QF Level or leading to a different mode of operation, e.g. from a predominately face-to-face delivery to a blended learning mode
- previously approved campus development plans
- campus site / training venue where a learning programme is delivered
- funding model or resource distribution policy
- policy and/or mechanism of quality assurance
- School(s) / Department(s) / Unit(s) responsible for delivering the learning programme(s)

**(b) Change of an assessment agency**

- status, direction and/or mission of an assessment agency
- core leadership or senior management resulting in changes in strategic plans or organisational structures for decision making
- funding model, financial plan or resource distribution policy
- principles and criteria for the conduct of assessment tests
- management of the assessment process
- Units of Competency (UoC) clusters under which the assessment tests are conducted
- assessment centres at which the assessment is conducted
(c) **Change of a learning programme**

- title of a learning programme
- qualification to which a learning programme leads, e.g. change from an associate degree to a higher diploma; or change from a professional diploma to an advanced diploma
- aims or objectives of a learning programme and/or the PILOs
- MILOs which have an impact on the programme aims or objectives and the PILOs
- programme structure and/or content, for example,
  - addition / deletion of practicum, internship or modules
  - QF Level of individual module(s) where changes result in the learning programme not having the majority of credits at its approved QF Level
  - combining existing modules to form new module(s)
  - number of modules required for the qualification
  - addition of a new major / stream
  - addition / deletion / re-organisation of subject area /domain
  - conversion to a Specification of Competency Standards (SCS) programme
  - change in programme / module content leading to variation of 10% or more of the total QF credits of the learning programme within the validity period (for vocational programmes)
- classification of sub-area under the same Area of Study and Training
- delivery mode of the learning programme, e.g. addition of a part-time mode or an online mode
- QF credit(s) of individual modules where changes lead to a variation of 10% or more of the total QF credits of the learning programme within the validity period
- requirements on admission, graduation, exemption or advanced standing
- number of enrolments, more than 10% increase in actual number of students/learners admitted as compared to the approved maximum number of new students/learners per year; and/or maximum number of students/learners per class for vocational programmes
- assessment strategy at programme level, e.g. assessment scheme, weighting on written and/or practical assessments, continuous and/or final assessments for vocational programmes
- appointment criteria of teaching staff
- staff deployment plan of a learning programme, e.g. shift to predominant use of part-time teaching staff
- teaching / training venue at which a learning programme is delivered and/or assessed
- learning and teaching support of a learning programme, e.g. reduction in specialist teaching facilities and out-sourced teaching facilities

7.3 An operator or assessment agency is required to seek approval from HKCAAVQ prior to implementation of substantial change.
8. Significant Departure

8.1 Significant departure refers to change that departs from the approved scope and nature of an operator, an assessment agency or a learning programme.

8.2 The following are examples of significant departure:

(a) Change of an operator / assessment agency

- legal status, form of control or ownership
- IE status, for example, an operator with IE status at QF Level 3 will need to undergo another IE exercise if it intends to operate learning programmes at a higher QF Level
- partnership or collaboration arrangements for a non-local programme
- an operator with PAA status that wishes to extend the scope of approval to other programme areas or higher QF Levels
- extension of the PAA status to another operator or subsidiary
- an assessment agency that wants to extend the scope of accreditation status to cover other industries or branches of an industry or QF Levels

(b) Change of a learning programme

- Area of Study and Training
- addition of a new qualification title
- QF Level of a learning programme
- addition of an intermediate exit award
- QF credit(s) of core modules leading to a variation of 20% or more of the total QF credits of a learning programme within the validity period
- programme content leading to a variation of 20% or more of the total QF credits of a learning programme within the validity period (for vocational programmes)
- collaboration arrangements affecting major aspects of programme development and delivery

8.3 These changes are to be processed through standard accreditation exercises as appropriate and the relevant accreditation guidance notes and accreditation fee will apply.
9. Handling Procedures for Substantial Change

9.1 There are two procedures for handling substantial change: assessment and notification. **HKCAAVQ will determine the procedures to be adopted with consideration to the nature, scale and scope of the change.** The notification procedure may apply to an operator with a good track record in accreditation who is eligible for a differentiation approach to accreditation, e.g. no site visit will be conducted in the accreditation process. More details are provided in the flowchart in the Appendix.

9.2 All operators should submit an Application Form for Substantial Change with relevant and sufficient supporting documents to HKCAAVQ via the e-portal **at least three months prior to the implementation date of the proposed substantial change.** Under special circumstances (e.g. change in student/learner number), this required timeframe may be shortened and each special case is considered on a case-by-case basis.

9.3 Upon receipt of the Application Form for Substantial Change and the required supporting documents, HKCAAVQ will determine whether the proposed change is substantial or not.

9.4 HKCAAVQ will confirm the handling procedures within 5 working days, including the timeframe for completing the process and the necessary fee in the Service Agreement to be signed between HKCAAVQ and the operator. The operator may be required to provide additional information, if needed.

**Assessment Procedure**

9.5 The assessment procedure is applicable to all operators. HKCAAVQ will decide whether the substantial change will be assessed by means of paper-based review, a meeting or site visit.

9.6 HKCAAVQ may engage specialist(s) who have the expertise and experience in the discipline / industry / quality assurance to review the substantial change.

9.7 It normally takes about 6-8 weeks to complete the assessment procedure after the operator has returned the signed Service Agreement and the fee. The actual processing time may vary with the scope of the proposed change.

**Notification Procedure**

9.8 For an operator who is eligible for a differentiation approach to accreditation, HKCAAVQ will consider the nature, scale and scope of the proposed change. Based on the information provided, HKCAAVQ will determine if the notification procedure is applicable.

9.9 It normally takes about 3-4 weeks to complete the notification procedure after the operator has returned the signed Service Agreement and the fee. The actual processing time may vary with the scope of the proposed change.
9.10 The notification procedure will not be applicable for some changes. For example:

<table>
<thead>
<tr>
<th>Institutional level</th>
<th>Substantial change to governance and management of the operator or new teaching venue(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Programme level</td>
<td>Substantial change to programme title, aims, objectives learning outcomes or qualification title</td>
</tr>
</tbody>
</table>
10. Possible Outcomes

10.1 The possible outcomes are approval or non-approval. Where deemed necessary, HKCAAVQ may stipulate condition(s) (i.e. pre-condition(s) and/or requirement(s)) and/or restriction(s) to an approval for substantial change.

10.2 HKCAAVQ shall inform the operator or assessment agency of the outcome according to the time schedule stated in the Service Agreement.

11. Fees

11.1 HKCAAVQ is a statutory, not-for-profit self-financed body. HKCAAVQ’s fee schedule is published on the HKCAAVQ website at http://www.hkcaavq.edu.hk.

11.2 The exact fee for the assessment procedure will be determined by making reference to the accreditation fee charged for an accreditation exercise at a particular QF Level and the number of criteria to be assessed. For the notification procedure, a fee of HK$1,500 per criterion will be charged.

11.3 The fee for substantial change will be set out in the Service Agreement to be signed between an operator or assessment agency and HKCAAVQ.

12. Points to Note

12.1 These Guidance Notes supersede any previously published guidance notes, guidelines and handbook(s) on the same matters. The Guidance Notes are also subject to refinement and revisions from time to time and the most updated version of the Guidance Notes is available on the HKCAAVQ website at http://www.hkcaavq.edu.hk.

12.2 The operator or assessment agency can seek advice from HKCAAVQ in preparing their substantial change documents. To facilitate the assessment of the application within the suggested timeline, the operator or assessment agency is responsible for submitting the application and all required documents in a timely manner.

12.3 For enquiries, please contact HKCAAVQ at info@hkcaavq.edu.hk, or by phone at (852) 3658 0000.
Flowchart for Handling Substantial Change Application

1. An operator submits the Application Form for Substantial Change together with supporting documents via the e-portal.

2. Upon receipt of the Application Form and required supporting documents, HKCAAVQ will confirm the handling procedures to be adopted after reviewing the nature, scale and scope of the change, and in consideration of the track record of the operator.

3. Notification procedure

4. Service Agreement is issued indicating the timeframe for the notification procedure and the fee.

5. The notification procedure normally takes about 3-4 weeks after the return of the signed Service Agreement and the fee.

3. Assessment procedure

4. Service Agreement is issued indicating the timeframe for the assessment procedure and the fee.

5. The assessment procedure normally takes about 6-8 weeks after the return of the signed Service Agreement and the fee.