

Report on programme and course setup concerns

4 September 2019

Purpose

The purpose of this report is to outline significant concerns relating to the set up and delivery of programmes and courses across Unitec. The report provides an outline of the issues, identified risks, and proposes solutions.

Summary findings

Investigations into the programmes and courses we are approved to deliver has been undertaken. The investigations have determined that the following situations exist, to variable degrees:

- There are a significant number of programmes for which we do not have up-to-date programme documentation
- What we have approval to deliver (from NZQA and TEC) does not always match our programme documentation
- The setup of programmes and courses in PeopleSoft does not always align with what we are approved to deliver and/or the 'current' programme documentation
- Course Duration setup within the Timetabling system does not always match what is expected given TEC approval (which is at programme/qualification level)
- Activity Duration setup *indicates* non-compliance with approved learning hours requirements
- In some areas there appears to be a lack of understanding regarding delivery against what has been approved and learning hours requirements

Identified actions to resolve the immediate issue (setup for 2020):

1. A full analysis of every course within every programme is being undertaken
2. Meetings will be held with APMs and relevant others to discuss and determine the correct course durations and to seek information regarding the week in which assessments (first and last) occur (to address the activity duration issue)
3. The Timetabling system will be setup to ensure we are compliant with what we have been approved to deliver
4. A set of guidelines will be developed over the time of the meetings above to provide consistent information regarding delivery of approved learning hours

Identified actions to resolve the longer term issues.

1. Te Korowai Kahurangi is introducing more effective programme document management procedures, including requirements around course durations
2. Academic Operations and Te Korowai Kahurangi will collaborate in the redevelopment of relevant systems and processes
3. Confirmation that all programme documentation is current and updating any that require it
4. A process to be put in place to ensure all academic staff understand the requirements around programme delivery

Issues and Risks

The above findings indicate significant actual and potential non-compliance with regulatory requirements and highlight significant risk due to the:

- potential impact on reputation with Government, including NZQA and TEC
- potential non delivery of learning hours as approved by NZQA and TEC
- potential impact on funding, via SDR reporting
- potential impact on students' loans and allowances, via Studylink
- significant actions required to address the issues once the full scale of the situation is known

Impact

Immediate

- Semester 1, 2020 course and class setup requires correction. This is complicated by lack of clarity around which source of Programme Level information is correct/actually approved.
- Semester 2, 2019 course and class setup may be incorrect. Correction/amendment of course dates after a course has commenced in a calendar year creates the potential for:
 - Significant rework for loans and allowance, timetabling and SDR and SDR personnel as well as potential financial implications resulting from this work for students and Unitec.
 - Potential questions by TEC and NZQA about the authenticity and legitimacy of our enrolments.
 - Misalignment between TEC funding and TEC expectations of delivery resulting in a potential need for financial redress
 - Delivered learning hours may not be correct
 - EPI results/reporting is determined against course duration start and end dates
 - Impacts on students' Moodle access

Longer term:

- Damage to Unitec's reputation with key government agencies and other stakeholders
- Potential inconvenience to students
- The need for significant additional (or reallocation of current) resource to rectify the issues
 - Loans and Allowances assessment by Studylink
 - Funding distribution within the year
 - Enable accurate enrolment forecasting
 - Visibility and certainty for students
- Improved processes and practices for set up of PeopleSoft, programme documentation management, and induction/training for all relevant staff

Definitions

Course duration: the time period, measured in weeks, over which the total learning hours of a course are delivered and for which TEC funding is received

Activity duration: the time period in which physical space is booked to enable face to face learning to occur. This may also include non-physical timetabled activity (i.e., fieldwork).

Learning Hours: all planned learning activities leading toward the achievement of programme or qualification learning outcomes.

Commentary

An analysis of the duration of all courses within programmes based on data from the 2020 Timetabling system has now been conducted. The analysis involved consideration of current

programme level data across three repositories: Unitec's programme document, NZQA's database of currently approved programmes and TEC's STEO. Programme level teaching durations (annual, in weeks) from each of these repositories were compared against each other and with the course duration for each course within the programme as per the Timetabling system setup for 2020. The logic applied is that:

- if a programme is approved as having a 32 week teaching duration
- then the courses will be set up at a duration divisible by 32

While this approach is not fool-proof it provides the best early indication of where there is likely to be incorrect setup.

Compliance overview

The following compliance requirements apply to this situation:

- Compliance with NZQA Programme approval
NZQA approves programmes on the basis of a set programme duration, average number of learning hours per week
If the findings from this analysis also apply to 2019 delivery, then:
 - o Unitec is highly likely to be non-compliant against:
 - NZQA approved teaching duration
 - Delivery of learning hours (at 10 notional hours per credit)
- Compliance with TEC funding requirements:
As funding is based on course duration and TEC only holds programme/qualification level durations then:
 - o the likelihood of being non-compliant from a funding perspective with respect to course duration is minimal
 - o the likelihood of being non-compliant with regard to delivery of learning hours is very high
- Compliance with StudyLink requirements:
 - o As StudyLink calculations are based on course duration, then the likelihood of being non-compliant is very high

Background – Approval to deliver

In order to deliver programmes which lead to qualifications, Unitec is required to seek NZQA approval for what is to be delivered and TEC approval for funding and fees.

When NZQA approval is granted it is on the basis that the programme will be delivered as it is approved, including over a set number of weeks with an average number of learning hours per week. For example, a 120 credit programme at Unitec is typically delivered over 32 teaching weeks with an average of 37.5 learning hours per week. Where changes are made to a programme, including courses within a programme, then these must be notified or approved by NZQA (depending on the Type of change) prior to the change being implemented. In certain instances TEC must also be notified. Programme Documentation should be fully updated at this stage.

It is an *ongoing* requirement of maintaining programme approval and accreditation that the programme, and the institute, continue to meet the relevant NZQA criteria¹. A key requirement of these ongoing requirements is that any change to the *Data Requirements* (as defined by NZQA) require NZQA approval *before* they are implemented. The Data Requirements include (but are not limited to):

¹ <https://www.nzqa.govt.nz/assets/About-us/Our-role/Rules/prog-app-accred-rules-2019.pdf>

- Aim
- Entry requirements
- Content
- Outcome/Graduate profile
- Total weeks of the programme including holidays
- Teaching weeks – excluding Holidays
- Average Self Directed Learning Hours (per week)

(*these are the seven elements referenced below)

Changes to the Data Requirements are considered to be a Type 2 change.

TEC funds the delivery of courses, using the *course duration* and the average number of learning hours per week (amongst other factors) to determine the level of funding. One EFTS (equivalent full time student) is equivalent to 120 credits and 1200 notional hours of learning.

In order to access TEC funding, Unitec must provide to TEC:

- confirmation of approval from NZQA (approval letter and R0482 report)
- details required for STEO which are predominantly the same as the NZQA *Data Requirements*

Delivery against course duration requirements is managed by TEC through SDR reporting and by NZQA indirectly through assurances from an institute's self-assessment practices, and directly through monitoring (i.e., the recent New Zealand Diploma in Business (NZDB5) monitoring visit), External Evaluation and Review and data sharing with TEC.

Unitec does not currently stipulate in any of its documentation the required course durations. Rather this is extrapolated from the programme teaching weeks and confirmed with the Schools (see below). If courses are set up with incorrect durations then they are highly likely to be, but not necessarily, non-compliant with both NZQA and TEC requirements.

Process to address issues

The overarching approach to rectifying the issue for 2020 delivery is, for each programme, to:

- Identify the correct programme level duration. Where there are inconsistencies, the STEO duration will be the preferred option.
- Engage with relevant Schools/Programme Teams to identify the correct course duration for each course, and that this information will be used to create a set of definitive course durations which will form part of the definitive programme documentation.
- Clarify requirements regarding the delivery of required learning hours over the full course duration
- Validate the course duration and activity duration and first and last assessment dates for each course following timetabling setup

It must be noted that every course in a programme does not need to be setup with the same course duration, however, this is typically the case.

Project Backgrounds

1. Data Consistency Project

The need to undertake the Data Consistency Project was identified in 2018 and confirmed during the External Evaluation and Review when inconsistencies in some Unitec records and documentation

were confirmed. This project sought to confirm that key programme level information (i.e., the NZQA *Data Requirements* noted above) was consistent across relevant systems/repositories, including: NZQA's programme database, the Unitec Programme document Factual Summary, TEC qualification details (STEO), the Academic Programme Table in PeopleSoft and the Unitec website.

The Data Consistency Project reviewed 120 Unitec Programmes and identified the following:

- All programmes have inconsistent data to some extent
- 74 (61.7%) did not have consistent data across the NZQA, TEC and Factual Summary data sets
- 19 (15.8%) had 1 out of 7 elements* consistent across all platforms
- 15 (12.5%) had 2 out of 7 elements* consistent across all platforms
- 11 (9.2%) had 3 out of 7 elements* consistent across all platforms
- 1 (0.8%) had 4 out of 7 elements* consistent across all platforms
- A significant number of elements*, particularly in the NZQA and TEC data sets were blank
- 27 (22.5%) programmes did not have an NZQA approval letter on file
- Programme documentation version control has not been effective. Changes and updates have not been effectively managed

It is worthwhile noting that through the Annual Attestation Compliance exercise completed in May 2019 Schools collectively identified 16 programmes which responded negatively to the question:

The programme is delivered as set out in the latest approved Programme Approval Document (the Definitive Document), including approved changes (including adhering to the Programme Regulations).

The effectiveness of the Annual Attestation Compliance exercise with regard to this question is therefore questionable.

From the findings noted above, and from other sources such as the Annual Attestation Compliance exercise, it is apparent that (broadly speaking):

- Much of our programme documentation is not current
- As an institute we cannot be certain we are delivering programmes as they are approved
- Programme teams do not have sufficient understanding (either currently or historically) of the importance of delivering what has been approved for delivery
- We are not compliant with NZQA and TEC requirements across a number of programmes

A number of factors likely contributed to this situation, including:

- Ongoing restructuring over the last few years which has led to loss of institutional knowledge and a breakdown in quality systems
- Poor documentation management
- Lack of process, clear requirements, and accountability for correct programme setup in PeopleSoft
- Lack of action being taken to resolve issues as they have arisen (i.e, from SDR errors/corrections)
- Lack of understanding amongst staff

2. Course Durations Investigation

The Course Durations investigation sought to determine the extent to which courses have been set up in PeopleSoft (in particular, the Timetabling system) and whether the setup was consistent with what was, and is currently, approved by NZQA. This investigation was triggered by anomalies in the Timetabling system and errors in SDR reporting and commenced in mid-2019.

Background to course and activity setup

Historically, course duration has been confirmed by Schools and input into the system by Academic Administration. This process was problematic and in 2017 an Annual Data Planner was introduced along with a Class Validation process to address known issues, including poor planning, over-allocation of physical spaces and incorrect course and activity duration setup.

The Class Validation process involves Timetabling extracting Class reports and sending these lists through to the relevant Academic Leader to verify the correct Class Duration which is used as the Course duration. If, during this process, Academic Leaders do not respond, or do not wish to alter any of the dates, then they remain as they have been generated. It should be noted that Schools are not specifically requested to confirm Course Duration as such, though this is implied and is what the data is used for. It should also be noted that the reports generated at the commencement of this process are based upon planned teaching weeks (not approved course duration).

The Timetabling Team took over the Class Validation process in November of 2018. Though the class validation for 2019 classes had already been facilitated by the Academic Administration Team which was disbanded as part of the ATOM process. Timetabling has identified and followed up with Academic Leaders, where required, to confirm the correct course durations. Changes resulting from this process contributed to the identification of the issues outlined in this report.

Responsibility for confirming the correct course and class durations is not explicitly stated in any policy, nor has the requisite data been collected at programme approval stage.

The Investigation

The original investigation analysed courses across a sample of eight programmes. The sample of programmes confirmed that incorrect setup of course duration and activity duration in the system, and ergo the hours students are directed in their learning, was a widespread and systemic issue.

Following the sampling exercise, ELT was made aware of the issue on 16 August and a full analysis of all available Timetabling data was commenced.

The analysis to date (as at 23 August 2019) indicates that a significant number of programmes have courses which are set up with the incorrect duration. The majority of these have already been validated by the Schools. The analysis is ongoing as data becomes available.

From the analysis conducted so far, it is clear that a significant number of courses are set up with incorrect durations.

Findings

The analysis identified the following

Programmes setup as at 23/8/19	Compliance status by programme
Compliant	12
To be confirmed	9
Non-compliant	37
Grand Total	58

Top 30 Programmes as at 23/8/19	Compliance status by programme
Compliant	3

To be confirmed	5
Non-compliant	11
Grand Total	19

Programmes setup as at 23/08/2019				
	Compliant	To be confirmed	Non-compliant	Grand Total
Applied Business			4	4
Architecture	1		6	7
Bridgepoint	2		5	7
Building Construction	1		3	4
Community Studies	4		3	7
Computing & Information Technology	2		3	5
Creative Industry		2	3	5
Engineering & Applied Technology	1	1		2
Environment & Animal Sciences		2	1	3
Health & Social Practice		2	3	5
Trades & Services	1	2	6	9
Grand Total	12	9	37	58

Top 30 Programmes as at 23/08/19				
	Compliant	To be confirmed	Non-compliant	Grand Total
Applied Business			2	2
Architecture			2	2
Bridgepoint	1			1
Building Construction	1		1	2
Community Studies			1	1
Computing & Information Technology			1	1
Creative Industry		1		1
Engineering & Applied Technology	1			1
Environment & Animal Sciences		1	1	2
Health & Social Practice		1	1	2
Trades & Services		2	2	4
Total	3	5	11	19

Impact on Timetabling system

The impact on timetabling, and hence the opening of the enrolment cart for 2020, is dependent on two factors:

- Course Durations changes: Worst case scenario – this would require an additional 50 hours of work
- Activity Durations: Worst case scenario – at least another 2-3 months of work

The most likely perceived outcome will be to amend the course durations, with a small number of Activity Durations. However, it is not possible to determine this until such time as the Schools are directly engaged in addressing this issue.

The following two situations have been confirmed to exist:

1. Most courses are set up to be delivered over a 16 week period. Of these, many have activity durations (the duration for which teaching spaces are booked) of 13 weeks. From a small number of discussions and based on the sampling undertaken, this is due to a misunderstanding (by some) that all courses are taught for 13 weeks, have 1 week study leave, and two weeks exams. However, only a small number of courses (about 150) have exams. For these courses, the 13+1+2 set up is appropriate. For courses without formal invigilated exams, it may not be.
2. For courses without formal exams, whether the appropriate amount of teaching / learning is occurring depends on the due date of the final course assessment. If it is due in week 16, then there is no issue. If it is not due in week 16, then it is highly likely that the course is non-compliant. This is due to the NZQA definition of learning hours as:

All planned learning activities leading toward the achievement of programme or qualification learning outcomes.

Ergo, if learning is not being assessed, then it does not lead to programme or qualification outcomes.

In addition:

- there are known instances of Grades being published *prior* to course end dates, and in the odd instance, prior to course start dates
- Unitec has never required course duration details at programme approval and setup, which would have significantly reduced the opportunities for the above situations to occur
- There has been a significant spike in the number of course-date alterations after a course has commenced delivery and this has caused a substantial amount of rework
- Alteration of durations between SDR returns is likely to trigger investigations by TEC
- Alteration of durations (including start and end dates) may impact StudyLink support for students
- In 2013, the Unitec Auditors and the (now) Data Analyst within Commercial Services raised concerns about the lack of a process to update STEO for changes post original approvals. This work, assigned to the Academic Service Centre, did not progress.

These findings indicate that:

- in some instances we are under (and potentially over) delivering in terms of teaching and learning hours
- there is significant misunderstanding or lack of knowledge around course delivery requirements

- there may be issues with course and programme design
- we are non-compliant with NZQA and TEC requirements
- there are potential financial implications for Unitec and students

In addition, there is general uncertainty, or lack of clarity around:

- how to manage non-standard face to face delivery (Block course, Off Campus delivery, work based learning)
- the definitions and processes for the setup of programme and course teaching weeks and the setting up of classes, i.e.:
 - the distinction between delivery weeks (course duration) and on campus face to face delivery (activity duration) is not made clear
 - assessment information (exam and assessment due date)
 - whether Orientation is included in the course duration time (it shouldn't be)

Contributors (to varying degrees)

Katrina Kanaris, Team Leader, Timetabling Office

Hung Ngo, Principal Scheduler, Operations

Rakesh Patel, Business Analyst, Commercial Services

Hiroko Hodge, Specialist, Quality Partnering, Te Korowai Kahurangi

Trude Cameron, Schools Operations Manager