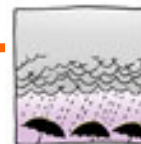


four seasons in one day –

literacies in changing climates

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Adult literacy courses and the machinery of quality compliance

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The fundamental problem with VET policy is that the needs of industry and the needs of individuals are conflated...(and) skills formation is seen as a question of supply and demand, rather than an iterative and developmental process...

This comment was made by Leesa Wheelahan in an article about *Moving On*, the report on the high level review of Training Packages, printed in *Campus Review*, July 7 – 13, 2004. It is a comment that applies as much to the Australian Quality Training Framework (AQTF) as it does to Training Packages. The AQTF is designed to regulate the outcomes of a complex system of public, private and community providers delivering Training Packages and other vocational qualifications. While, as stated in *Moving On*, "it was never intended that Training Packages would become synonymous with VET provision" (p 15), the quality standards were not written with non-vocational courses in mind. Formally, accredited courses are acknowledged in the AQTF as a second form of VET qualification, however, a close reading of the Standards reveals that these second products are imagined to function in exactly the same way as Training Packages and an assumption is made that they also provide vocational outcomes. This can be easily illustrated by the definition given to Assessment on page 5 of the *AQTF Standards for Registered Training Providers*:

Assessment means the process of collecting evidence and making judgements on whether competency has been achieved to confirm that an individual can perform to the standard expected in the workplace, as expressed in the relevant endorsed industry/enterprise competency standards or the learning outcomes of an accredited course.

Competency standards are components of Training Packages, while learning outcomes are components of accredited courses. However, the assessment underpinning the award of either qualification confirms that 'an individual can perform to the standard expected in a workplace'. What if there is no workplace? What if the course delivers an educational outcome, describing a standard of performance in essay writing expected, for example, to be able to enrol in a course at university? What if the course is delivering language or literacy outcomes where 'standards' are much harder to define because the context of performance is the whole of life, encompassing a myriad of social roles individuals may play, and where, for each role, the discourse rules will be different and therefore competence will be differently defined?

The definition of assessment given above suggests that the AQTF was designed to regulate ONLY the issuing of vocational qualifications and that the term 'accredited course', where this appears in the documents, specifies a course that produces a credential that is recognised by industry for the purposes of employing skilled staff. Surely it should be possible to argue that, according to this definition, wherever the word assessment is mentioned in the AQTF, courses that do not produce a vocational qualification are exempted from a requirement to meet that component of the Standard? It may even be possible to extend the argument to exempt non-vocational courses from needing to meet any Standard that regulates the issuing of credentials (qualifications or statements of attainment). It is not difficult to identify components of Standards 4, 7, 8 and 9 that cannot be sensibly applied to non-vocational courses (see below for a detailed discussion).

The AQTF is a very good example of how VET policy has conflated the needs of individuals and industry. Unfortunately, there are serious ramifications of this conflation because one defining difference between vocational and non-vocational qualifications is that non-vocational qualifications either serve the needs of the individual, or they serve the needs of nobody. In a language or literacy or basic education course, it is the individual student who defines the purpose for their learning, and by extension, identifies the (language or other) context-dependant competencies that will define the standard of

performance they must meet in order to realise their goal. A student's goal may include a broadly defined 'vocational outcome' but may just as easily be related to parenting, achieving personal satisfaction, going shopping, meeting new people and engaging in new activities, negotiating with government agencies, becoming independent, being assimilated into a new culture or effectively resisting being assimilated into a foreign culture while becoming competent to operate within it. There is a fundamental discordance between the iterative and developmental activity that defines the kind of teaching that might produce learning to achieve these wide ranging, inter-related and complex goals (and the wide variety of language practice implied by them) and the limitations implied when a course document lays out set of descriptors of language competence most often defined by a rather narrow set of language practices closely associated with educational institutions. The definitions of language practice standards (course documents), when compared to the infinite complexity of real people acquiring real language skills, result in artificial restrictions for teaching and learning, and this restrictive impact is doubled when the course documents are then coupled to framework of standards that attempts to define the characteristics of teaching and assessment processes, particularly when this is attempted by an exclusive focus on one component of teaching and learning: assessment.

Assessment is defined by both Training Package constructs and by the AQTF as the *product* of the VET system. Assessment is now the key function that enables the VET sector to supply the skills needs of industry. Assessment is no longer defined as an integral function of learning. Assessment is what is bought these days by the State Training Agencies from the RTOs who sell to them. Assessment is what produces the national measures of accountability for the VET activity funded under the ANTA Agreement and for the separately purchased Commonwealth labour market programs. Assessment defines industry demands (for skills) and it defines the supply of these demands by the Australian and State governments. The National Reporting System (NRS) is another example of a construct that regulates assessment and provides evidence that a purchase of skills has been made and supplied. Every effort has been made to incorporate this construct into the Training Package construct (with limited success to date) so that the State governments might supply more language and literacy skills through ANTA to industry. What is so sad about all of this serious effort to develop skills is that there does not appear to be much evidence that the trading in assessment is enhancing the capacity of the sector to develop skills more effectively. There is however plenty of evidence that the national focus on the regulation of assessment is a major distraction from the core activity of teaching for VET practitioners, whether they are lecturers or managers.

This paper now focuses on the 'distractions' generated by an application of quality processes driven by the AQTF identified by teachers of the Certificates in General Education for Adults (CGEA) in Western Australia. The major 'distraction' concerns assessment and the demand for over-schematised methodologies and processes. A second 'distraction' relates to the definition of staff skills in Standard 7. The discussion attempts to integrate three kinds of comments. Firstly it attempts to locate existing practices for assessment and moderation of assessment of the CGEA within the Standards of the AQTF; secondly it identifies requirements imposed by quality systems that conflict with the principles of good practice and good sense for language and literacy teaching; and thirdly it identifies those components of Standards that have no relevance whatsoever for a course like the CGEA.

Assuring consistency of assessment

Participation in a formal moderation process is one of a number of ways assessors can ensure consistency of assessment according to the principles of validity, reliability, fairness and flexibility. There are other mechanisms by which assessors can achieve some of the same ends and these include the development of standard assessment tools, pre-assessment validation of assessment tools and version control applied to all

assessment tasks. Effective participation in the CGEA Moderation Network enables RTOs to demonstrate compliance with a number of the components of AQTF Standards 8 and 9 and may obviate the need to apply some of the other mechanisms for achieving consistency of assessment.

The needs of CGEA students are served if their assessment complies with the four principles named above. However their needs are not met if, in the name of these four principles, inappropriate processes described as options in national and state guidelines, are adopted willy-nilly by the purveyors of quality processes in RTOs and teachers are given no option to mediate the process.

What follows is a closer look at components of Standards 8, 9 and 4 where an explanation of the 'fit' between popular interpretations of the Standards and the demands of good practice for teaching language and literacy may be useful.

Standard 8.1

All of the sub-components of this Standard can be relevantly applied to the CGEA except for **8.1.v. – Aspects of workplace performance**. The words 'where relevant' in this Standard indicate that not all courses produce outcomes that relate to a standard of performance required in a workplace. The CGEA produces educational rather than vocational qualifications. It is not appropriate to apply this Standard to CGEA Learning Outcomes in order to show that aspects of workplace performance are demonstrated. All of the other eight sub-components may be addressed, albeit in varying degrees, by the processes for moderation that are long established in the State and involved the participation of all providers of the course. Compliance processes for two of these sub-components have associated problems (see below).

Standard 8.1.iv – Information for applicants

The interpretation of this Standard can adversely affect the quality of service to students in the CGEA. The principle of providing prospective and current students with clear, explicit and relevant information about the means by which they will be assessed is highly relevant to CGEA delivery. However, this Standard may give rise to practices that impact adversely on the student and on the way the literacy course is delivered and are therefore counter productive to providing high quality literacy or general education courses. If this Standard leads directly to the development of a highly schematised **assessment plan** that details the type and timing of each assessment the student will undertake, this constitutes an **inappropriate** interpretation of the Standard. If the student is provided with complex written texts to inform them of how judgements will be made about their competence, this too is inappropriate as a means providing students with information.

Students must be made aware of what is expected of them but it is not realistic to expect that complex written documents are the most effective means to ensure that there is understanding. Students may need to be given some information in writing but their understanding of what is expected of them will be developed through verbal interaction with the teacher as an on-going part of their teaching and learning. The student will be made aware of the process the teacher is using to recognise the student's developing skills formally. In teaching the technicalities of writing, for example, teachers will need to make explicit the criteria by which they are making judgements about students' work. Teachers will also need to make sure that students understand what work they must produce in order to be awarded the qualification. These understandings will be developed as part of the course and reflect the nature of teaching literacy to adults where assessment opportunities are found and provided for as an integral component of the writing and other outcomes the student produces.

Any information a student is given must describe a process that is consistent with the principles of good practice in teaching literacy to adults. One key principle is that the student will be involved in decisions to identify and design learning and assessment tasks and the teacher's role is to fit these to the learning outcomes from the course structure. No student should be given a test. All learning activities should be generated from the student's identified learning goals and needs and will be situated in real-life social contexts for reading, writing, talking and doing maths that are relevant to the student's situation.

Teachers may adopt a number of strategies for making sure that students know what they have accomplished and what they must still undertake to meet the requirements of the qualification. Simple documents can record these understandings and these can be kept in an appropriate place that is accessible both to the teacher and to the student. This provides evidence that is also accessible to an AQTF Auditor. If students' work portfolios are kept in a filing cabinet in the classroom, for example, a record of progress can be kept with the portfolio.

Standard 9.1.a – Learning and Assessment Strategy

RTOs are required to produce a written assessment and delivery strategy for each of the qualifications that are delivered. For the CGEA, the organisation's assessment and delivery strategy should identify the principles of good practice in teaching literacy, particularly where these may differ from accepted practice associated either with the delivery of qualifications for industry or with guidelines published to assist with AQTF implementation for qualifications for industry. The CGEA is not a Training Package and it does not produce a vocational outcome. The delivery and assessment strategy should make reference to the participation of the RTO in formal moderation processes and, if necessary, explain what this involves and how these ensure consistency of assessment. In teaching literacy to adults, the concepts of relevance and currency can only be determined in relation to the purposes the individual student has for study. These purposes may be related to the world of work, family, personal enrichment, or social engagement. The student's choices will be informed by their interests, their needs (linguistic and other), their situation and their life plans. The CGEA competency framework creates opportunities to recognise literacy and numeracy skills developed for any of these contexts.

The curriculum document specifies 'performance standards' in terms of technical, structural and process attributes of text production or text interpretation (for Reading and Writing) or use of number (for Numeracy and Mathematics). Learning outcomes are differentiated in the curriculum document by means of reference to different, socially-defined contexts or purposes for application of skills. These categories (or 'domains') are not usually mutually exclusive and many of the skills used to perform in one 'domain' can also be applied in others. A person may well use a combination of linguistic and numerical skills to solve a problem or achieve a practical outcome. The teaching learning and assessment tasks devised by students and teachers should reflect the characteristics of real-life activities (where skills are used in clusters) rather than the characteristics of the curriculum document which stratifies and lists skills as separable elements.

9.1.b - Consultation with industry

The CGEA does not produce industry outcomes and the learning outcomes are not referenced to a 'standard of performance required in a workplace'. There is no requirement to consult with industry or enterprise in the development of a learning and assessment strategy for the CGEA.

9.2 - Validation of Assessment Strategies

The CGEA Moderation Network is the means by which this Standard is addressed. The second sub-component of this Standard requires the documentation of action taken to

improve the quality and consistency of assessment and this can be appropriately supplied if quality improvement processes are documented.

9.3 – Developing, adapting, delivering training and assessment

There are nine sub-components in this Standard, three of which (9.3.v, 9.3.vii and 9.3.viii) are not relevant to the CGEA. Arguably, the sub-component of the most specific relevance to the CGEA is 9.3.vi ‘delivery modes and training and assessment materials which meet the needs of a diverse range of clients are identified’.

4.3 – Version Control

The requirement in this Standard is to ‘develop and implement version control procedures for managing material that relates to (the RTO’s) scope of registration’. Examples of ‘material’ include ‘learning and assessment materials’ but this clarification is given in brackets, and it is open to argument as to whether it counts as a definition or as an illustration only. If an interpretation is made that all learning and assessment materials ought to be subject to version control, this requirement will create problems for teachers of literacy to adults for the reasons explained below.

It is not appropriate to set standardised assessment tasks to be undertaken by all students when teaching literacy to adults. Students demonstrate that they meet CGEA Learning Outcomes by producing written material or performing other tasks that are closely connected to their reason for learning literacy. As a matter of good practice, every student will be involved in customised learning activities and assessment opportunities arise out of these learning activities; what students are not asked to do is participate in whole-of-class activities that lead to a unitary assessment point. Adult literacy students should not be required to sit tests.

Assessment tasks should never be administered separately from the reading, writing, numeracy or other learning activities determined by the individual student as likely to meet his or her goals and purposes for learning literacy skills. This means that every student helps to determine the appropriate assessment activities as they engage in learning, and that these are not determined by the teacher alone on behalf of a whole class or even for a single student prior to that student engaging in learning activities. The assessment tasks for each student are different and the timing of the assessment is a matter for the student to determine. Version control applied to assessment activities designed to function in this way implies an enormous administrative burden and will inevitably reduce the flexibility with which the teacher can operate to identify opportunities for skills recognition as they arise in the student’s self-determined program for learning.

One of the most appropriate means by which to manage assessment for the CGEA is the compilation of a portfolio of each student’s work from which judgements can be made by the teacher in consultation with the student. This process, designed to support the learner and the teacher, becomes part of the process by which quality assurance is managed. The primary source documents (student work and teachers’ instructions, descriptions, comments, feedback and judgements about competence) are housed together able to be accessed by all the relevant stakeholders. The portfolio of work is available for scrutiny by managers, AQTF auditors and others (for example other teachers involved in assessment and moderation for the course). The documentation required from the teacher is limited to that needed to conduct the teaching and learning process.

The validity, reliability, fairness and flexibility of assessment outcomes for the CGEA are products of the teachers’ interpretations of the assessment criteria for Learning Outcomes. Teachers’ interpretations must be capable of flexibility since part of their role is to devise assessment opportunities and tasks that derive from whatever the individual

student has described as their particular learning goal. Both flexibility and consistency are required of teachers and these skills are developed by their participation in the moderation process. The formal process for moderation is designed to produce consensus between experienced teachers about assessment tasks that meet the requirements and specifications of the Course Accreditation Document and that allow students to demonstrate competence for qualifications at different AQF levels. The consensus is made explicit in the documentation produced as a result of moderation activities (the moderated tasks file, for example) and this documentation should be subject to version control. CGEA moderation products assist classroom teachers to assess students' skills using different assessments tools for every student, at the same time ensuring consistency of assessment outcomes. It is the shared understanding between teachers that produce reliable assessment outcomes, not the use of standardised assessment tools.

This on-going process of moderation serves the same purpose as **pre-assessment validation**. Assessment tools are validated through the process of teachers' arriving at a consensus judgements about assessments tasks and students' performance of them. If every new assessment tool, customised to suit an individual student had to be subject to a pre-assessment validation the administrative burden would be excessive. Moreover, under conditions where the teacher and learner are constantly negotiating both learning and assessment tasks, the necessity of seeking a formal validation of an assessment task by a third party disrupts this method of planning and devising a learning program. For the CGEA, the purpose of post-assessment validation is to confirm (or question) teachers' judgements both in the appropriate design of assessment tasks and in the decision that are made about students' competence. The purpose is not to develop a bank of standardised assessment tasks for use by other teachers with other students. The products of the CGEA moderation process are used as a professional development resource to illustrate individual teachers' judgements and the consensus view. The resource provides concrete illustrations to teachers designing their own assessment tasks for their own individual students which inform the judgements they will make. This process is used instead of a pre-assessment validation process.

No valid educational or quality assurance outcome is served by the requirement to apply version control to CGEA assessment tools. Moderation is the process by which CGEA teachers arrive at consensus about a very wide diversity of assessment tasks and how they meet or fail to meet the requirements of the Course Accreditation Document. It is more appropriate to apply version control to CGEA moderation tools and processes since the moderation process functions to ensure consistency of assessment outcomes incorporating the purpose of both pre-assessment and post-assessment validation.

Does not appear in any Standard – Assessment plan

No AQTF Standard requires the development of an **assessment plan**, however, both ANTA and the WA Department of Education and Training have provided models for the development of assessment plans in publications that provide advice on the interpretation of Standards to RTOs.¹ Several models of assessment plans have been adopted from these publications and are now in use in many RTOs where their use is prescribed as a mandatory part of the quality assurance policy and process.

The ANTA publication² describes an assessment plan as 'a document developed by an assessor that includes the units of competency to be assessed, when the assessment will occur, how the assessment will occur, the assessment methods to be used and an overview of instructions for the candidate(s)'. It goes on to advise that a plan of this sort 'is useful to use in conjunction with the candidate as a planning tool'.

¹ *Guidelines for Competency Based Assessment*, Department of Training, 2002, page 28 and *Quality Assurance Guide for Assessment (Kit 10)* Department of Education, Training and Youth Affairs, 2001

² *Quality Assurance Guide for Assessment (Kit 10)* Department of Education, Training and Youth Affairs, 2001, page 16

It is not necessarily the case that an assessment plan of this kind **is** useful to use in conjunction with all students, and it certainly **not** the case that it is appropriate for adult students in a literacy course. Having a clear plan for the timing of assessments may be of critical importance when these must be linked to activities undertaken in an industry or enterprise that are cyclical in nature: for example stocktaking in the retail industry. Since, in an adult literacy course, it is the student who will provide information to determine the timing of an assessment, a plan such as the one described above cannot be used. Nor is it necessary.

Assessment plans are nominated as one possible strategy that RTOs can adopt for the quality assurance of assessment. Only those strategies that are clearly linked to a Standard are mandatory.³ Because the CGEA has a number of strategies to ensure quality in assessment, including a formal documented process for moderation, it is not necessary for RTOs to insist that CGEA teachers produce an assessment plan of the type described in the ANTA publication.

Nevertheless, CGEA teachers need to manage the assessment process with each individual student, and it is useful to document this process to ensure that the student has contributed to the planning process and is aware of how the teacher will be making judgements about their competence. The documentation can and should be quite simple and can be kept as a record with the student's portfolio of work. As a rule, the teacher's time should be taken up with processes that serve students' learning needs directly, rather than producing documents whose primary users are AQTF Auditors or managers of quality assurance processes.

Staff skills

Standard 7 provides inappropriate advice for the determination of staff skills in respect of teaching and assessing for AQF qualifications that do not produce an industry outcome. The CGEA Course Accreditation Document specifies that AQTF requirements are met if staff have a teaching qualification – ideally a post-graduate level qualification. The Certificate IV in Assessment and Workplace Training cannot be considered sufficient as a qualification to teach and assess the CGEA. Because graduate or post-graduate teaching qualifications are higher-level qualifications than the Certificate IV, it is not necessary for teachers and assessors in the CGEA to obtain this qualification, unless they are teaching and assessing a Unit of Competence from a Training Package as part of the course. If they are doing this, they must also hold the industry qualification (or its equivalent) if they conduct assessment.

Furthermore, it is clearly not appropriate that teachers of Certificate I be considered sufficiently qualified to teach this Certificate if they themselves possess this level of qualification (Standard 7.3.a.ii). This anomaly occurs because CGEA qualifications are not vocational qualifications automatically defined as qualifications gained in adulthood (post-compulsory) and associated with competent performance in a workplace. The Standard is incomplete until it is worded in such a way that the difference between vocational and non-vocational qualifications is clearly delineated when these are being used to specify staff competency. In the meantime, any interpretation of this Standard must acknowledge the anomaly.

When a teacher meets the Human Resource requirements of the Course Accreditation Document (holds a relevant teaching qualification), this person need not be required to work under the supervision of someone who holds a Certificate IV in Workplace Assessment and Teaching even if the CGEA teacher does not hold such a qualification on the grounds that the Certificate IV is neither a necessary nor sufficient qualification to meet the Human Resource statements in the Course Accreditation Document.

Conclusion

The above discussion serves to identify a number of practices, particularly those related to the regulation of assessment, that are associated with AQTF implementation, but are

³ Op cit page 11

unlikely to contribute to improved outcomes for students enrolled in literacy and language courses with a general education outcome such as the CGEA. It also serves to identify components of AQTF Standards or whole Standards that should not be applied to CGEA delivery in their current iteration. The fact that anomalies occur suggests that the Standards were not developed with non-vocational courses in mind and that too little attention has been paid to critical differences between vocational and non-vocational courses and what constitutes worthwhile professional practice in the delivery of these different services. One reason for this may be the overweening focus of VET policy on the specifications of qualifications for industry, exemplified by Training Packages. A second reason may be the attempt to resolve issues of quality improvement in teaching and learning using a supply and demand model where the commodity is assessment.

That said, the AQTF Standards that do not attempt to define teaching, learning and assessment practices are as relevant to the interests of students enrolled in a course like the CGEA as they are to students seeking credentials that have an industry focus. The Standards that do relate to teaching, learning and assessment may well be applicable to a course like the CGEA in terms of the principles they enshrine. Where this is the case, a problem only arises where an inappropriate interpretation of a Standard becomes part of standard practice. Such interpretations often narrow the intent of the original wording, and, like all processes of compliance, the more deeply reliant they become on processes of documentation and evidence gathering, the more likely they are to follow a trajectory of increasing narrowness and conservatism. There is plenty of evidence that RTO staff are frightened of the consequences of being found non-compliant and prefer to, or are coerced into, changing their practice to meet the real or imagined demands of AQTF Auditors even when these are not consistent with serving the needs of their students. Ironically AQTF Auditors in WA hold up the CGEA as exemplary in matters of compliance. This reassurance is in stark contrast to the concerns expressed by teachers, particularly in large RTOs, about inappropriate practices that are being foisted upon them in the name of quality improvement.