



NEW ZEALAND QUALIFICATIONS AUTHORITY
MANA TOHU MĀTAURANGA O AOTEAROA

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NZQA Aide-Memoire: Offshore online delivery

To:	Hon Chris Hipkins, Minister of Education
From:	Dr Karen Poutasi, Chief Executive, New Zealand Qualifications Authority
Date:	7 April 2020
Reference:	CR20489

Purpose

1. This aide memoire advises NZQA's proposed approach to offshore online delivery by non-university tertiary education providers (providers) in the context of COVID-19 border restrictions, for current international students and longer-term.

Background

2. In response to the rapidly evolving Covid-19 situation that has significantly impacted education providers, NZQA has granted temporary approvals to deliver online to domestic and international students in New Zealand, until 30 June 2020.
3. NZQA has a streamlined application process to check providers' plans and online capability. So far 138 private training establishments (PTEs) have temporary approval, with 27 under consideration. Institutes of technology and polytechnics (ITPs) have NZQA's indicative agreement to shift to online delivery, where they have the capability. Wānanga are exploring their online capability.
4. Tertiary education organisations especially ITPs and PTEs are now seeking approval for offshore online delivery.
5. NZQA has an existing Offshore Delivery Rules framework with eligibility limited to Category 1 and 2 providers. The Offshore Delivery Rules require equivalent quality delivery offshore to that provided in New Zealand and address specific offshore delivery quality issues including validity of assessments conducted offshore, relationships with offshore education partners and student fee protection.
6. NZQA considers applications on a case-by-case basis and approval is based on the proposed delivery mode. A 'Type 2 change' approval is required to shift to online delivery. There are currently 17 providers with offshore approvals.
7. An example is one PTE, New Zealand Tertiary College (NZTC) holds a range of programme approvals for offshore online delivery. A Category 1 provider specialising in teacher education, NZTC enrolled around 90 offshore online students in 2017.

Proposed two-pronged approach to offshore online delivery

8. The proposal is to enable offshore online delivery to two cohorts:
 - a) **Current international students** unable to continue/catch up on their studies because they are offshore and unable to enter the country. These students have paid fees, hold a valid visa and have not yet withdrawn from courses. They were part-way through or about to start their studies when travel restrictions came into effect. The cohort is not large e.g. there are 697 PTE students remaining offshore with visas expiring after 15 April 2020.
 - NZQA proposes a temporary approval for offshore online delivery until 30 June, via a streamlined application process.
 - Only Category 1 and 2 providers would be eligible.
 - Providers must reissue enrolment contracts that allow students to opt-in to study offshore online, make adequate fee protection for students wishing to withdraw and alternative delivery arrangements in the event of provider closure.
 - The temporary streamlined approval excludes courses with practicum requirements unless the provider can adequately evidence alternative delivery and assessment consistent with the qualification purpose and graduate profile.
 - From 1 July, a full application under the Offshore Delivery Rules would be required, with ongoing approval conditional upon satisfactory validation of educational quality within 6 months.
 - b) **New international students** unable to enter New Zealand due to border restrictions.
 - NZQA would require a full application under the existing Offshore Delivery Rules to quality assure new offshore online delivery proposals.
 - Eligibility would be limited to Category 1 and 2 providers, as per the Offshore Delivery Rules.
 - NZQA would need to be satisfied that the student enrolment contract allows students to opt-in, makes adequate fee protection for students wishing to withdraw and alternative delivery arrangements in the event of provider closure.
 - Approvals would be conditional on satisfactory educational quality validation within 6 months.
9. This is a pragmatic approach that supports current international students and maintains a moderate pipeline of new international students - assuming continued border restrictions and declining international education revenues in the foreseeable future. The approach is likely to reduce pressure on the Export Education Levy (EEL) by reducing provider closure numbers.
10. It supports the transformation/new market agenda for export education. Provided that quality is maintained, offshore online delivery could incentivise innovation to survive, as providers compete with other countries delivering education online and realign their portfolios in the economic downturn.
11. However, offshore online delivery is associated with some specific issues and quality risks. Online delivery will attract fewer students from certain countries, who are currently attracted by student visa pathways to work and residency. The Chinese market is very unlikely to recover via offshore online delivery due to current Chinese government restrictions on overseas qualifications studied online.
12. Irrespective of whether it is online, there are some protections not available to learners offshore that are available to onshore learners. Under the EEL regulations, providers do not pay the levy for students studying offshore. The Education (Code of Practice) for the Pastoral Code of International Students also explicitly excludes offshore students.
13. The Ministry of Education supports the flexible approach to current students but recommends caution with new offshore online delivery models. The proposals are supported by the Tertiary Education Commission, Immigration New Zealand and Education New Zealand.

14. Increased offshore online delivery introduces new risks to educational quality. These risks can be mitigated by rigorous front-end approval processes, introducing strengthened quality monitoring and reporting requirements, along with additional support and advice to providers.

Ongoing NZQA quality monitoring and support

15. Facilitating online delivery is a priority for NZQA at present. Provider monitoring and reporting is being developed to include learner support, systems to manage quality and authenticity of online assessment and identify the probable rise in cheating services, and whether programmes are being provided in line with the original approval including the stated learning hours.
16. NZQA is currently developing provider support and advice around online assessment for publication on the NZQA website.



Karen Poutasi (Dr)

Chief Executive, NZQA

7 April 2020

Noted/Approved

Hon Chris Hipkins

Minister of Education

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