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QUALIFICATIONS, CRITIQUES, AND REFORMS: THE RHETORIC SURROUNDING THE NEW ZEALAND QUALIFICATIONS AUTHORITY

IVAN HODGETTS¹ AND DARRIN HODGETTS²

1. *Doctoral student, Department of Education Studies, University of Waikato*
2. *Doctoral student, Department of Psychology, Massey University*

ABSTRACT *Qualifications reform is a prominent issue for educationalists and the general public. This paper provides a commentary on the origins of the New Zealand Qualifications Authority (NZQA), key critiques of the Authority, and its responses to those critiques. These issues are linked to shifts in policy and practice. Of key concern is the recognised failure of the educational market to provide desired outcomes and subsequent changes at the Authority level.*

INTRODUCTION

Over the last two decades, New Zealand has undergone radical social reform in health, welfare and education. These reforms emphasise reduced state intervention, increased accountability, and market regulation (Butterworth & Tarling, 1994; Rees & Radley, 1995). One central facet of these reforms in education is the emergence of the New Zealand Qualifications Authority (NZQA) which was set the task of achieving the co-ordination of post-compulsory education and training. The NZQA is the product of the policy recommendations that coalesced with the publication of the Picot (1988) and Hawke (1988) Reports which preceded the government's Learning For Life (1989) policy documents (LFL, 1989; LFL:2, 1989). In accordance with wider social and economic policy, an educational market place was to be developed. The government's intention was for the Authority to adopt a minimal oversight role. The assumption was that an education market would support the cost and generate the necessary interest for successful qualification reform. Unforeseen problems and controversy have beset the NZQA and reform of the post-compulsory education and training sector (PCET). In this paper we examine the controversy surrounding the NZQA and the National Qualifications Framework (NQF). This research is based upon a review of the critical literature, documentation on the history of the Authority, and six semi-structured interviews with NZQA officials.

THE FORMATION OF NEW ZEALAND QUALIFICATIONS AUTHORITY

The legislative charter of the NZQA was contained in the *Education Amendment Act* (1989 and 1990). These Acts were intended "to reform further the administration of education and, in particular, to reform tertiary education and training . . ." (NZ Statutes, 1990:821). The purpose of the NZQA was to reorganise, what was perceived to be, a "confused", "incoherent" and "overlapping" qualification, accreditation and award system, and to increase cost efficiency (Hawke, 1988; Picot, 1988). Evidence used to support these claims was the existence, prior to 1990, of in excess of 28 industry training boards, 30 apprenticeship committees and

over 50 examination and registration bodies (Barrowman, 1996). The NZQA was considered a pragmatic rationalising tool intended to establish a consistent approach to the organisation and provision of qualifications (NZ Statutes, 1989: section 247; NZQA, 1991b).

The most significant factor in the reorganisation of qualifications was the creation of the National Qualifications Framework (NQF) (NZQA, 1991b). The NQF is made up of eight levels that operate from senior secondary school through to post-graduate degrees and diplomas. This Framework was intended to reorganise all qualifications (in a modular manner), both academic and vocational, under one structure (NZQA, 1991a, 199b). A qualification would not be registered as a single body of knowledge but rather as a set of interrelated units, defined as unit standards. A unit standard is ". . . a statement in outcome terms of the critical factors and criteria for the assessment and recognition of achievement" (Irwin, et al. 1995:1). The NZQA was intended to be responsible for ensuring standards were set and maintained on the Framework, not for the process of their delivery which was considered a curriculum matter (NZQA, 1991a, 1991b). Hence, the information on a unit's delivery was to be produced and owned by the provider, not the NZQA. The provider's individual delivery information would give the details of their approach to assessment procedures, course content and training (NZQA, 1992).

Organising all qualifications in a modular manner was thought to make it easier to establish links between related forms of knowledge, so that credit for a particular unit in different qualifications could be given. Thus, all learning would have a purpose and a relationship on the Framework, and these relationships would be clarified by a system of pathways (NZQA, 1991a, 1991b). A pathway is a map or outline of which units are related to each other, how they can be combined to achieve a particular qualification, and to which other units and qualifications each unit is related. Each completed module or unit could stand alone, or be credited towards further learning. This policy was intended to make the system more flexible for both providers and learners (For further details see NZQA, 1991a, 1991b, 1992, 1993a, 1993b, 1993c).

Wider social reforms which place emphasis on free markets and competition as a means of improving efficiency and reducing cost, have significantly shaped the Authority's attempt to reconfigure PCET, as one official stated:

. . . what they [government] wanted to do was really to bring about a complete revolution. . . . So a lot of what we've done has been driven by that sort of big vision of government. That they'd create the big market, they'd open the whole thing up . . . it's quite a significant shift [from previous policies] and has driven a lot of what we want to do.

The Authority developed the NQF, as an accountability mechanism that would also facilitate the functioning of an educational market. A key barrier to the creation of this market was "provider capture". The Authority hoped to circumvent provider capture by registering all qualifications in an outcome form, so that qualifications could be distinguished from the institutions providing them. By having unit standard-based national qualifications, any provider could become accredited to offer any qualification. No particular provider or sector, such as universities, would have exclusive rights to the teaching and awarding of certain types of qualifications. The 1989 Education Act, for example, removed the universities' degree-granting monopoly.

At the outset, NZQA's functions were clearly delineated. It was to develop policy and oversee qualification and provider registration. Implementation of policy was to be the responsibility of providers and stakeholders responding to market forces. However, within a comparatively short time, it became apparent to the Authority that the market was not going to develop and implement the new qualifications needed without facilitation. Respondents' comments suggest three reasons for the market's failure to provide. First, the process of development and implementation was much more complex than policy writers had envisaged. Second, the Industry Training Organisations (ITOs) were not interested in putting time and money into designing generic qualifications which everybody else could use. Third, the lack of coherent, readily-identifiable representative groups in non-industry areas made the development of relevant qualifications difficult. As a result, the Authority moved away from its "hands-off" oversight role and adopted a facilitation role to ensure that appropriate qualifications were developed. In this facilitation role the Authority has contributed to ITO costs and funded advisory boards (in non-industry areas) to ensure stakeholders are consulted and qualifications developed. The need for the Authority to take on implementation responsibilities clearly demonstrates the failure of the market model in education. State intervention and regulation is necessary for the ongoing success of the New Zealand education system. Despite its attempts to facilitate the reform process, the NZQA has been subject to considerable criticism by educationalists.

KEY CRITICISMS

In all fairness, discussion of the NQF has not been totally negative. Some of its features have been recognised as worthwhile, including: the promotion of life-long learning; greater recognition of prior learning; the facilitation of cross crediting between courses and providers; the setting of clear criteria for assessment; allowing students to work at their own pace; giving students greater choice in the courses they take; the democratisation of access; and, increased the recognition of workers' skills (*cf.* Capper, 1992; Elley, 1994; Irwin, et al. 1995; Law, 1995; Roberts, 1997). Although conceding the value of these features, many commentators also point out that there are a number of limitations to the NQF that negate much of its positive potential (Codd, 1995; Irwin, et al. 1995; Mackenzie, 1997; Tuck, 1994). Criticism of the Framework can be summarised under the following headings: administrative burden; dumbing down; academic versus vocational; one form of assessment; the reduction of knowledge to information and skills; teaching to the test; and, too rigid a structure. A brief outline of each criticism is given in this section. The following section explores responses to these criticisms voiced by NZQA staff.

Administrative Burden

A common concern with the NQF is that it imposes considerable administrative tasks upon providers. More time and resources are required for assessment, leaving less time for teaching (Chamberlain, 1996; Codd, 1996; McKenzie, 1997; Tuck, 1994). Such concerns are said to reach "nightmarish proportions" (Roberts, 1997:69) when recognition of prior learning and cross crediting are considered. In addition, the logistics of assessing students when ready, and if necessary, re-testing them implies considerable logistical difficulty. This concern was highlighted by the finding that many students fail the first attempt to pass a unit

standard (Brader, cited in Chamberlain, 1996). Re-testing is likely to further compound the administrative burden already created by the NQF accountability and assessment requirements (Irwin, et al. 1995).

Dumbing Down

Arguably one of the Authority's most controversial early proposals was its intention to remove grading. The elimination of grading was referred to as a "dumbing down" process. In a letter to the Listener (10 August 1996: 51), John Morris (school principal) stated that NZQA-endorsed assessment practices failed to promote excellence or to differentiate performance. He deplored the lack of consistent national standards which (he claimed) external exams provide. Other commentators argue that the lack of grading and a focus on measurable behaviour fails to encourage students, in particular the most able, to strive for excellence (Chamberlain, 1996; Elley, 1996; Irwin, et al. 1995). The removal of grading reflects the belief that unit standards can clearly define what is required so that people only needed to be assessed on whether or not they are able to achieve the specified criteria. Many commentators questioned whether such a 100% pass system was feasible.

The Authority claimed that excellence could be accounted for by the proposal to allow students to move on to other standards when ready (Hood cited in Chamberlain, 1996). Although allowing students to accelerate their learning without the constraint of time served is considered a good thing by Irwin et al. (1995), this benefit may be constrained by the impact of administrative pressures on the ability of teachers to assess students when ready. In addition, excellence is considered a referential concept based on a high level of achievement in relation to one's peers. Without this reference point excellence may become a matter of speed in accumulating credits rather than striving for the highest level of achievement (Irwin, et al. 1995). It is also questionable to assume that completion of a large number of units automatically implies excellence.

One Form of Assessment

Critics proposed that the separation of Framework standards from the curriculum and teaching is an arbitrary distinction that may be a constraining force on the curriculum (Codd, 1996; Elley, 1996; Peddie, 1994;). A key concern is that specifying an outcome plays a substantial role in designating the route taken to reach it (Codd, 1995, 1996; Irwin, et al. 1995; McKenzie, 1997).

In addition, there is concern that a standards-based assessment model will lead to a fragmentation of the curriculum (Codd, et al. 1994; Elley, 1994, 1996; Irwin, et al. 1995). Fragmentation is at the heart of a widely-held concern that the unit standards compartmentalise learning into discrete, trivial parts which may be difficult to bring together as a coherent whole corpus of knowledge. University staff argue that degrees will be fragmented at the expense of overarching coherence and international credibility (NZVCC, 1995; Sharp & Tarling, 1996).

The differing forms of knowledge and degree of focus on skills across subject areas, limits the applicability of a single standards-based assessment model to all PCET (Irwin, et al., 1995). The unit standards were premised on the notion that clear standards could be specified and used as a bench mark for assessment. This premise, Irwin claims, is invalid because not all unit standards follow that format. A level three Art History unit standard is an example of the difficulties a rigid unit

standards approach can cause. In this unit standard, the statement of purpose and performance criteria do not constitute an outcome-oriented and clearly defined standard. The statement of purpose is that:

Those credited with this unit are able to examine the term "style" by identifying, analysing and comparing characteristics of: personal artistic style; style arising in historical periods and/or places; and style relating to an art movement (NZQA Unit No:5804).

One of the performance criteria is that "the distinguishing characteristics of an artist's work are identified and described with reference to the artist's work". In such cases there is not "a 'standard' in the sense of describing the standard of performance required" (Irwin, et al. 1995:3). Rather, the performance criteria merely restate the unit's purpose. The required standard is not defined. We are not told how many characteristics should be identified or in what way they should be compared and related to the artist's work. There is also the difficulty of clearly defining concepts such as "style" and assuming that aesthetic appreciation can be measured.

The underlying flaw with this model is that specifying standardised performance criteria is inherently behaviouristic and assumes that teaching and learning is a simple process of information transmission (Hyland, 1994). An assessment system built on an intention to tell us exactly what people know and can do, and hence remove any ambiguity, is like all such behavioural models, inherently flawed. The problem is caused by two assumptions: first, that it is possible to specify exactly what it is that people need to know and second, that they can communicate what they know to the assessor in a clear, concise and unambiguous manner (Codd 1995; Elley 1994). Assessment is not an exact science. Without clear standards, those involved in assessment will continue to be required to make judgements that are likely to lead to inconsistencies (Chamberlain, 1996; Irwin, et al. 1995; Elley, 1994, 1996). Therefore, the critics conclude that the complexities inherent in assessment and in particular academic knowledge preclude the specification of exact standards.

Academic Versus Vocational

The Authority considers the academic/vocational distinction an outmoded product of elitism (NZQA, 1993a) that should be overcome by "rearranging the learning hierarchy so that theory and applied learning are equally important" (Barrowman, 1996:15). Many educationalists consider this divide important as it captures the divergent characteristics of subject areas (vocational subjects tend to be skills-based, and the academic are knowledge-based). Irwin, et al. (1995) and Elley (1996) argue that standards-based assessment may be applicable to vocational subjects, but is not appropriate for academic subjects which involve multi-dimensional, complex areas of knowledge that cannot be reduced to such a mastery process. For Elley (1996), academic subjects involve large bodies of knowledge which "cannot be summarised into neat, logical, harmonious categories or ordered into a linear progressive sequence as you can in many skill-based subjects" (p.69). Many critics argue that the loss of this academic/vocational divide leads to a loss of pure learning in an increasingly utilitarian PCET environment (Codd, 1996; Peddie & Tuck, 1994).

The Reduction of Knowledge to Information and Skills

The policies of the NZQA, by incorporating the proposal to ensure all PCET is linked to employment, are said to reflect a change in "the relationship between society, knowledge and higher education" (Codd, 1996:1). Drawing on the work of Barnett (1994), Codd (1996) argues that we are seeing a shift in what counts as knowledge in higher education. Our society is said to be moving away from an emphasis on knowledge as process, to one where knowledge is considered a product made up of vocationally-oriented information and skills. Increasingly institutions such as universities will be expected to provide students with the ability or competence to perform specific tasks. Codd (1996) refers to this as the ideology of instrumentalism, favouring as it does knowledge in the form of information and skills. If an instrumentalist ideology is applied to university studies, the pursuit of knowledge and basic research that does not prepare directly for jobs, may suffer. The role of the university as critic and conscience of society would also be jeopardised. In addition, technological changes may quickly render this skills-based education and training obsolete. In future, demand may well be for a broader, more liberal education that prepares workers to problem-solve in unusual and unforeseen situations (Lee & Hill, 1996).

Teaching to the Test

Critics argue that flexibility in learning may be constrained, as specified outcomes may not be met if the teacher accommodates variation in interest and focus expressed by students (Irwin, et al. 1995; McKenzie, 1997). The emphasis on proving competence is said to come at the expense of a more open-ended, liberal educative process in which higher level cognitive abilities such as creative problem-solving are important (Duncan, 1996; Elley, 1996; McKenzie, 1994, 1997). In a climate of consumer choice, the best way for providers to retain consumer confidence, and thus continue to attract students, is to perform well. In other words the market demands results. This is said to exacerbate the behavioural teach-to-test tendencies of an outcomes-based assessment model by focusing the provider's energies on achieving defined outcomes rather than on maintaining flexibility (Hughes & Lauder, 1991). Where such concerns are addressed, the principal implication identified is that market-driven competition may exacerbate a focus on measurable behaviour and put teaching to the test. This may further reduce education and training toward a vocationally-oriented process which imparts only information and skills (Codd, 1996; Hughes & Lauder, 1991; McKenzie, 1997; Peters & Marshall, 1996; Tuck, 1994).

Too Rigid a Structure

The concern over the administrative tasks involved with the Framework is also raised with regard to change or revision of the unit standards and the NQF in general. Because the rewriting and re-accrediting of unit standards are unlikely to keep pace with curriculum changes, there is a possibility of the Qualifications Framework becoming too rigid (Duncan, 1996). Not only must there be a reason to employ new or alternative knowledge, but a purpose and relationship on the Framework must also be retained. This raises the question of whether one can simply review a single unit standard or whether the entire corpus relating to that qualification (including those connected through the system of pathways) would

have to be addressed to assess its relationship to the new unit standard. Hence, not only is this incredibly complex matrix of pathways considered extremely difficult to establish and far from easily understood, change is a process which would involve a major time-consuming effort. Most people are unlikely to have the time, resources, or even the inclination to undertake such change (Duncan, 1996). The conclusion to be drawn is that, although the NZQA states that all standards are to be revised, reassessed and updated, the expense and time involved may make regular revision unlikely.

THE AUTHORITY'S RESPONSE

This section outlines respondents' perspectives on some of the key criticisms levelled at the Authority. It is important to point out that NZQA staff were well aware of these criticisms and shared many of the critics' concerns.

In response to the question as to whether NZQA staff believed the Authority's perspective on qualifications reform had been represented fairly by its critics, a resounding "no" was given. Staff believed misunderstanding was a principal reason for the way the Authority has been represented by critics, but admitted that the Authority had contributed to the misrepresentation of its policies and practices. They indicated that a combination of people's fears about the changes and the Authority's loss of perspective in its rhetoric, had led to misunderstanding and controversy. All respondents agreed that had there not been so much difficulty in explaining the Authority's intentions, and had there been more evidence of the Framework in action, winning public acceptance for the Framework concept would have been easier.

Administrative Burden

Respondents acknowledged that the Framework has increased administrative burdens. However, they said that any change would initially create higher workloads that would reduce over time. It was also claimed that some teachers have fewer problems in adjusting to the reforms than others. Keown's (1996) research on sufficiency in assessment substantiates this claim. He found that the workload involved varied between teachers and did decrease with time. Respondents tended to downplay administrative concerns as, in part, an implementation rather than an ongoing issue. Nonetheless, they agreed that the shift to an increased focus on assessment and moderation would require more work.

One official related the workload issue to the make-up of some standards and people's perception of what they entail:

I think it's valid for how some people have perceived what they have to do. And I think it's valid because some of the standards have simply . . . required people to do too much.

Further, unit standards, particularly early ones, contained too many performance criteria which required the gathering of too much evidence. This problem affected schools where standards are developed from the curriculum; as a result people attempted to ensure the entire curriculum was covered with overly prescriptive standards. It was felt that identifying the key outcomes without being too

prescriptive would reduce or avoid this problem. Work is being undertaken to lessen the burden of Framework activities put on teachers.

Another official claimed that the NQF was not the sole offender. He believed all New Zealand secondary teachers to be overworked, regardless of whether they use the Framework, and that there is a need to understand the drivers of "workload". He implied that Framework issues were often unfairly blamed for the recent increases in teacher's workloads:

Everybody is overworked aren't they? You find me a secondary school teacher who is not using the Framework and you tell me if they haven't got a heavy workload . . . some of it's Qualification Framework and some of it is social change. . . disciplinary changes . . . expectation changes in schools, all sorts of things.

Thus, the Framework must be seen as only one of a number of factors contributing to workload difficulties. Curriculum changes and inadequate resourcing contributed to the resentment of secondary school teachers who felt they were being asked to do too much. Despite these comments, the increased workload that the Framework does cause was considered justifiable, as it will lead to improved national consistency in assessment.

Dumbing Down

The criticism that the Framework "dumbed students down", came, NZQA staff alleged, from those interested in retaining the status quo. Respondents denied the Framework would lead to a dumbing down; indeed, there is concern at the high number of students who fail to earn unit standards at their first attempt. In response to this criticism the NZQA initially argued that a learner could strive for excellence by moving on to more units (Hood, cited in Chamberlain, 1996). An official pointed out that the original philosophy was to have a flexible Framework that catered for the needs of individual students by allowing them to work at their own pace (the learner-centred approach). The Framework was designed to open up opportunities, to accelerate learning, not to dumb down. The original model was not put in place, however, due to "practical constraints". Respondents suggested that grading was now necessary because the original student-centred philosophy behind the Framework was difficult to put in place. As critics predicted, organisational constraints prevented schools from assessing students when ready and allowing them to move on to higher standards. If students are to continue to be taught at the same pace, then grading is a necessary means to differentiate performance. Hence both in response to public pressure and logistical problems, grading is to be implemented (Burge & Quaintance, 1997). The precise nature of this scale has not yet been explained; but it is hoped it will help to alleviate the dumbing down concern.

One Form of Assessment

Respondents said the Authority did not expect all PCET to be assessed in the same way because the unit standards do not dictate a particular form of assessment. Any means can be employed (including exams); the only criterion is that the mode of assessment should be a valid means of measuring the predetermined outcome.

There is something of a contradiction in the Authority's claim that it encourages freedom of assessment. The argument that it is not advocating a particular form of assessment, appears to hold water with respect to the means employed to assess the achievement of the predetermined outcome. However, freedom at this level is somewhat constrained by the requirement that the methods used must be deemed valid, presumably by the Authority. One conclusion that can be drawn is that the NQF does require change at the macro level to internal outcomes-based assessment, but not to the form of assessment used to measure that outcome. However, the matter of what constitutes valid assessment muddies this distinction somewhat.

The NZQA has always assumed that moderation and other quality control measures will provide consistency. To deal with inconsistency the NZQA intends to provide additional assessment guides (exemplars). Although giving such guidance in establishing standards would improve the reliability of assessment, it is also an example of the Authority having to recognise that clear standards cannot be established (Elley, 1996; Irwin, et al. 1995).

Respondents argued that concerns regarding fragmentation were unfounded. One used the analogy of university papers to make the point:

. . . unit standards . . . wouldn't be a hell of a lot different from university papers. Now I did a Bachelor of Arts . . . There wasn't a lot of holistic relationships . . . The relationships were extremely vague. But within them, there were presumably outcomes that eventually I was assessed against.

The NZQA's response is that degrees are already in modular form (papers) and the Authority does not intend to break them down any further. They claim to be advocating only that the outcome be specified (Asare, 1996). This argument fails to alleviate many concerns, as the continued request to have outcomes specified is itself considered problematic.

The criticism that outcomes cannot be specified was discussed in the context of the unit standards debate. Respondents admitted that delineating an outcome for a vocation was easier than for a broad academic subject. One proposed that if teaching is of a high standard and standards are written well there shouldn't be a problem. Another responded to this issue with a rhetorical question:

How do people assess? . . . How the hell do they assess you if they are not clear on what they are assessing you against?

It is, therefore, not possible to assess someone without knowing what the outcome is expected to be. This comment may shed light on why the Authority does not consider that its model implies a particular form of assessment. If all assessment must at some point be based on certain criteria, or outcomes, then all the Authority is insisting on is greater clarity in what those outcomes are.

Respondents highlighted two factors that led to the poor standing of unit standards. First, initial descriptions were too dogmatic in claiming that all unit standards would give a clear definition of the expected outcomes. Second, the government's half-hearted, grudging support for facilitating the reform process meant that initial support was limited to lower levels of the Framework and in particular TOPS programmes. As a result, initial unit standards confirmed the predictions of the critics that unit standards were narrow, restrictive, vocationally

oriented and inapplicable to higher level learning. This view of unit standards does not reflect the Authority's current intentions or their actual application further up the Framework, where a more flexible approach was encouraged and employed. In higher level standards, the emphasis in establishing the expected outcomes shifts from the unit standard itself to moderation and professional judgement.

Academic Versus Vocational

The NZQA staff thought this divide was an arbitrary distinction lacking in clarity and often inappropriate for many PCET sectors. Examples, such as medicine, were used to highlight this point. Moreover, little foundation could be seen for the claim that its loss would impact on knowledge:

I think that's a good thing. You know, what's academic and what's vocational. So would you say that, people training to be doctors should do that in a polytechnic . . . philosophy . . . in a University . . . I think it's rubbish.

Another saw that conventional academic subjects like Mathematics, English and Science were "a core vocational requirement" in gaining employment. This, he thought, was proof that it is difficult to distinguish the academic from the vocational. Respondents did not claim there were no differences between qualifications and forms of knowledge; rather, they thought that a binary split on an academic/vocational basis did little justice to the variety of content and approaches to PCET.

The issue of "pure learning" also arose in this discussion. Staff were conscious of the importance of ensuring PCET in New Zealand does not become an exclusively training-oriented process. One official did not deny the importance of pure learning, although, like other respondents he did not see why outcomes for such learning could not be identified:

I mean it would . . . seem to me, that you want to respect pure learning . . . I mean there that's if you like academic learning and you clearly don't want that to be constrained. You want people to be able . . . in learning philosophy to have freedom to think, to challenge and all that. That's good. And surely you can identify outcomes for that. I mean people have always had examinations, haven't they in philosophy?

Contrary to what some critics of NZQA policies allege, there is recognition by its senior staff of the importance of a liberal education. This indicates an acknowledgement of a non-utilitarian role for PCET, something supposedly alien to Authority thinking. Whether this recognition reflects the government's official perspective or carries over into practice, however, cannot be ascertained from these comments.

The Reduction of Knowledge to Information and Skills

The critics claim that unit standards tend to be a reductive constraint on knowledge. One respondent argued that inherent in any performance of an outcome is underlying knowledge and understanding. For one official the unit

standards model cannot remove those underlying processes, although they may not be specified:

. . . you can [not] demonstrate skills and understandings without having underpinning knowledge . . . When a dentist drills a tooth, they apply a whole lot of their knowledge about the structure of teeth, the issues that can emerge, the techniques that should be used or whatever. The outcome may be a perfectly filled tooth, that we're looking for. But we're assuming a whole lot of things.

This argument was that, although knowledge and understanding are not specified, principally because of the focus on outcomes, knowledge and understanding were often necessary to the performance. Hence, although not stated, such knowledge, was inherent in the requirements of programmes. Peddie and Tuck (1994) have pointed out, however, that rather than assume such underlying skills are present, the Authority could employ methods which assess knowledge and understanding:

Any attempt to infer knowledge and understanding from performance on an assessment task designed to assess competence involves a number of levels of inference. We should recognise that we *can* assess such knowledge and understanding much more directly, and that this assessment may not fit easily into a model which does still appear to be behaviourally based (Peddie & Tuck, 1994: 203).

Respondents acknowledged potential problems with the way some standards are written. A well written standard was not considered reductive, however a poorly written one was considered a cause for concern.

Teaching to the Test

In response to the criticism that educators' will simply teach to the test, reference was made to both the teaching context and the unit standards. Respondents proposed that teaching to the test is likely, because educators want to get their students through. As one stated:

Yeah . . . it's easy for that to happen . . . You want to get your students through. And you know that 60 words a minute or whatever is a critical thing . . . because that's on the test. And then you might say, hey what about all the other good things you should have been doing, like . . . some programme [in] ethics . . . for office workers. Oh you know toss that out of the window because we are concentrating on tests. So yeah . . . it's an imperfect world so you'll have some of that.

By relating the teach to the test criticism to the way standards are written and the actions of teachers, the above comment implies that some of the blame for teaching to the test should be placed on the pressures within the teaching environment (getting students through), not just the NQF. Other respondents made similar points and said that because people will always teach to outcomes, these should be made as clear and explicit as possible. One argued that even University teachers teach to a test:

So when you've sat your University exams, the lecturer has never said "these are the things that will be tested. And if you want a good idea of what is going to be in it go look at all the old exam papers"? . . . that's teaching to the test.

It is certainly true that the NQF cannot be blamed entirely for producing a "teach to test" approach to learning. However, the issue of national consistency in outcomes invariably requires a greater focus on achieving specific outcomes. In acknowledging that national consistency limits the flexibility of the Framework, respondents highlight that national consistency is perhaps the most difficult measure that they have attempted to put in place.

Too Rigid a Structure

The respondents agreed that the NQF could be seen as imposing a rigid inflexible structure, one that would make change difficult. For one official the rigidity issue is one of a trade off between greater consistency and flexibility, a matter of finding the right balance in standard specification for a subject area. Another pointed out that a unit standard for structural safety in plumbing was likely to be quite specific, whereas a university history standard would be "much less specific because of the context and the objectives of that sort of area of study". This example was the basis for commenting that unit standards are not as prescriptive as implied, and one official remarked that, "most qualifications are . . . defined in a very open manner", much like an undergraduate degree with a broad option base and greater specificity toward the top. Such comments suggest that the level of a qualification and the specificity of its standards (including their place in the qualification) are significant factors in the degree of rigidity implied.

No one believed that it would be difficult to change qualifications given that changes were internal to a particular standard. One official explained that change at this level was considered easier than changing an entire qualification, and another agreed that this had not been the case so far but did indicate that there were organisational concerns with the Framework:

. . . it's a lot easier to actually change a unit standard than it ever was to change whole quals . . . you've got a discrete piece that you can change without any impact on others surrounding it . . . It is quite complex in other areas though . . . Because you are changing this unit standard, it becomes version 2 . . . [and so on] It is extremely flexible; that has some draw backs but not the rigidity. It's probably the flexibility because it has some implications for managing the process and for the provider who has to keep abreast of changes and versioning.

Respondents did not foresee a great deal of difficulty with the review process in terms of changing unit standards and qualifications in general, other than keeping up with revised versions of standards. However, respondents accept there could be difficulties ahead when changes to unit standards or sets of standards, have a 'knock on' effect. One believes difficulties are most likely to occur when the review of a standard affects its size.

. . . I mean I recognise that is a difficulty . . . if we've got a modular structure, then you've really got a giant matrix haven't you . . . And you should be able to just pull out one little bit . . . Now if you actually plug in another one of a different size . . . then of course things get upset.

The reason for acknowledging this criticism also stemmed from ongoing funding and stakeholder support issues. It was thought that whether the NQF becomes an immovable monolith or something "big and flexible and ever changing" is dependent on both ongoing government funding and a supportive attitude from industry. As he put it:

I would hope it would be forever movable and flexible, but it is easy particularly if government doesn't continue to resource it, us, or industries become inflexible and unwilling to update their qualifications as technology and shifts in new ideas come in, then there is a problem and a possibility of it ossifying. I'm sure.

Staff repeatedly referred to the importance of government funding to maintain the ongoing flexibility of the NQF. This suggests another problem with the devolution model limiting state intervention to an oversight role. The Framework will require ongoing resourcing if it is to operate effectively. However, the Green Paper, *A Future Qualifications Policy For New Zealand* (Ministry of Education, 1997a), suggests that the government intends to return the Authority to its original oversight role. This will leave the financial burden of developing unit standards, or their equivalents, to ITO's, National Standards Bodies (NSBs) and providers who may be unwilling or unable to continue the work of NZQA's present Framework Development Team. As a result Framework qualifications could become out of date and inflexible.

CONCLUSION

Many of the Authority's problems, apparent confusion and consequent "bad press", stem from the reactionary position in which it was placed by government policy. The initial failure by government policy advisors to recognise the need for the state to facilitate reform put the Authority on the "back foot"; it had to respond to problems as they emerged rather than having the ability to plan ahead. If the government had not based its policy on the ideology of the market, thought could have been put into the requirements of development and implementation. The Authority could then have developed plans to ensure reforms were facilitated where necessary from the outset.

The proponents of the NQF promised its introduction would bring a more flexible approach to teaching and assessment that would allow students to work at their own pace. This promise was unlikely to be fulfilled because of a lack of resources and practical difficulties in organising flexible instruction and assessment. In promoting a flexible Framework the Authority appears to have failed to take into account the administrative difficulties the NQF has created for large organisations, which are restricted by finance and logistics.

Considerable changes have occurred as the Authority has adapted to fresh challenges and responded to its critics. The most significant change alluded to, is in the role of the Authority as the developer and implementor of its own policies; functions it does not have a legislative mandate to perform. The Authority now

agrees that all qualifications no longer need to be registered in the unit standard format and it has given in to pressure to introduce a grading scale. Non-unit standard or provider qualifications are to be included on the Framework in line with the recommendations of the Tertiary Action Group (TAG) Report (1996). The recently released white paper on tertiary education will lead to a review of the term "unit standard". The fact the Authority has had to adopt a "hands-on" role in implementing the early 1990s education reforms, points to a mistaken government view that once education policies had been determined the market would take over development and implementation. This did not happen. However, the government's view seemed to be that once the system was up and running the Authority could leave the responsibility for ongoing development and revision to supply and demand. Further implementation and development would then be the responsibility of ITOs, NSBs, providers and stakeholders. But the matter of continuing development is not as clear-cut as government advisers perhaps think. Areas outside the bounds of industry training, lack coherent representative bodies thus making consultation with appropriate stakeholders difficult. The Authority has filled this void by creating and funding advisory boards. If as a result of the NQF Green Paper (Ministry of Education, 1997a), government ceases to support the development and implementation activities of NZQA, failure of the market to provide will inevitably force the government to again fund facilitation and implementation.

The concept of national consistency appears to have been the cause of a number of the Authority's teething problems. Respondents in this survey considered workload to be predominantly an implementation issue. However, when an ongoing increase in workload was acknowledged, the cause and justification for it was the continuing quest for national consistency. This is a fundamental flaw in the Authority's proposals. The fact that many unit standards rely heavily on the moderation and quality assurance processes to establish a standard and to ensure its consistent application, shows that the attempt to get national consistency is the cause of many workload concerns. The number of checks and balances required must inevitably create a paper war.

The Authority is in something of a quandary with the national consistency issue. To claim that consumers can rest assured that the same qualification offered by different providers meets a minimum standard benchmark, requires a means to ensure nationally consistent outcomes are achieved. To simply move away from this objective would require a rethink of the whole concept of national qualifications. The advent of provider qualifications on the NQF highlights the implications of removing the consistency assumption. The problem with such qualifications is that they remove the possibility of a credit based system and automatic credit to other qualifications; Lockwood Smith's so called "seamless" system is immediately under threat.

Another obstacle to national consistency is the fact that a market economy generates competition. If consistent outcomes are to be established via dialogue between people working in different institutions, then a curious paradox emerges. Competing institutions are being asked to work together. It is a matter of conjecture as to whether competing institutions will be willing to help each other. Evidence has already emerged in the teacher education sector that some "established" providers are unwilling to provide moderation procedures for private providers (Ramsay, 1998).

This study suggests that when considering the debate surrounding the NQF and the unit standards, we must account for such mechanisms as more than a

potentially flawed assessment/accountability device. It is clear that it is the market model that requires that this accountability mechanism be seen to be distinct from the curriculum and provider activities. As one NZQA official stated, "a lot of what we've done has been driven by that big vision of government". Clearly, further investigation of how the NZQA negotiates a relationship between its accountability mandate and the freedom of a market is required. In further research we will endeavour to offer an account of that process.

What has become clear from this study is that the Authority has not clung stubbornly to original policies. To portray its employees as inflexible and unwilling to consider new approaches is inappropriate. The evidence suggests very strongly that senior people in NZQA have given considerable thought to current policy and are prepared to change. However, it is apparent that their ability to reconsider policy and practice is constrained by broader government objectives. Although the government's green paper on the NZQA and white paper on tertiary education suggested we may have experienced an intensification of the market-driven problems of the past, the recently released Bright Future plan suggests that issues of market failure have begun to enter the government's policy agenda.

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