

Moderation as a Quality Management Tool

Presented by Kari Miller

1. Introduction

In New Zealand when the National Qualifications Framework (NQF) was set up it included as part of the implementation system the notion of quality assurance. This concept was designed to be incorporated at three levels:

- The development of national competency standards and qualifications.
- Before and after assessment.
- At the systems level to ensure consistent practice was taking place.

This presented a challenge as the three areas outlined above are the responsibility of different sectors in the New Zealand system.

While the development of national competency standards and qualifications are the responsibility of the Standard Setting Body (SSB) for particular areas of industry or knowledge, the overall quality assurance of the national competency standards and qualifications are the responsibility of the New Zealand Qualifications Authority (NZQA). NZQA is a government organization with a statutory responsibility for managing the NQF.

The quality assurance of the assessment process is the responsibility of the particular SSB who has developed the national competency standards and qualifications being assessed against. This is also a statutory responsibility delegated to SSB's by the Tertiary Education Commission (TEC) another government organization tasked with implementing the NQF and the government funding body for this sector.

The quality assurance of the systems each SSB engages in is the responsibility of NZQA who carries out a regular three yearly audit process that specifically checks how SSB's quality assure their assessment processes. The outcome of these audits can affect whether an SSB is re-recognised by TEC to continue being the SSB for a particular industry sector.

In this presentation I will outline how each system works, the advantages and disadvantages and the on-going challenges these processes pose to 'getting the system right'.

2. Quality Assuring National Competency Standards and Qualifications

In New Zealand national competency standards and qualifications are developed by SSBs who are approved to represent specific industry and/or knowledge areas. While the SSBs will determine the content of the standards and qualifications in consultation with their technical experts, the way the standards and qualifications are presented are set by NZQA. This means that all the national competency standards and qualifications that are registered on the NQF look the same.

While this process ensures a level of consistency in format and technical quality, it sets up an inherent tension between the SSBs and NZQA. The SSBs often have to manage pressure from their specific industries on what they want included in their standards and qualifications. These industry requirements sometimes don't fit neatly into the NZQA format. The need to meet these 'rules' can cause an unnecessarily long time between development of a set of national competency standards and their eventual registration on the NQF. It can also mean that sometimes the end product is not a true reflection of industries' requirements but a compromise that both parties can live with.

The NQF is governed by a set of level descriptors that outline the expectations for assessment for each level of the NQF. When national competency standards are developed they are assigned a level which best fits with the appropriate level descriptor. This process provides a good quality assurance focus that ensures that national competency standards developed across vastly different technical and knowledge areas are requiring similar assessment outcomes. The level descriptors enable SSBs to clearly delineate the focus for each type of learning and assessment required for their industries. For example, at levels one and two on the NQF the level descriptors expect that learners will always carry out tasks that are supervised. The type of expectations for a level 2 learner are outlined below:

Level 2	Carry out processes that: <ul style="list-style-type: none"> - are moderate in range - are established and familiar - offer a clear choice of routine responses 	Employing: <ul style="list-style-type: none"> - basic operational knowledge - readily available information - known solutions to familiar problems - little generation of new ideas 	Applied: <ul style="list-style-type: none"> - in directed activity - under general supervision and quality control - with some responsibility for quantity and quality - with possible responsibility for guiding others
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This fits very well with the definition of **capability – the assessment of underpinning knowledge and skills.**

However when you compare this with a set of level 4 expectations, outlined below, you can see the difference.

Level 4	Carry out processes that: <ul style="list-style-type: none"> - require a wide range of technical or scholastic skills - offer a considerable choice of procedures - are employed in a variety of familiar and unfamiliar contexts 	Employing: <ul style="list-style-type: none"> - a broad knowledge base incorporating some theoretical concepts - analytical interpretation of information - informed judgement - a range of sometimes innovative responses to concrete but often unfamiliar problems 	Applied: <ul style="list-style-type: none"> - in self-directed activity - under broad guidance and evaluation - with complete responsibility for quantity and quality of output - with possible responsibility for the quantity and quality of the output of others
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This level on the NQF fits very well with the definition of ***competence – the assessment of consistent performance in a context.***

Level 4 is traditionally the level of the qualification for most trades in New Zealand such as motor mechanics, plumbers, electricians or chefs.

The advantage of having a national set of ‘rules’ that govern how national competency standards and qualifications should be structured and presented ensures a consistent approach to the development of these products. The level descriptors ensure that all national standards have the same expectations of learners no matter what the subject matter is that is being assessed. Once learners, teachers/trainers and assessors understand how to read and interpret national competency standards they can expect that all the national standards registered on the NQF will look the same.

However there are also disadvantages to this system. While most SSBs would not have any difficulty with assigning level descriptors to their national standards they often find the constraints of the technical presentation criteria to be onerous. This mainly arises because the national standards are evaluated by personnel in NZQA who have no specific technical expertise of the area they are evaluating. While this enables the evaluators to concentrate on ensuring the technical criteria are met it also means that they question areas that are specific to particular industries such as technical terms, definitions or specific wording requirements. As national standards are only accessed by those that have the expertise to actually teach and assess them, this level of rigidity can often cause huge delays when industries are trying to develop national competency standards for ‘just in time’ training.

The challenge for the New Zealand system is how to maintain a level of consistency of its registered national competency standards while allowing enough flexibility for specific industries to develop and maintain those standards in a way that is meaningful for their requirements.

One way to achieve this would be to maintain the integrity of the level descriptors but to be more flexible with the criteria governing the presentation of the actual national standards. As long as the SSB could prove that the content of the national standards met the expectations of the assigned level descriptor and that the competency expectations were clear, unambiguous and assessable for the stated target audience, then the detail of the presentation could fit within a much looser set of guidelines. This would still ensure an acceptable level of quality assurance was taking place but would give SSBs the ability to develop and maintain their national competency standards and qualifications in a timely manner that fitted with their specific industries' requirements.

3. Moderating Assessments

In New Zealand the term that is used for the quality assurance process that governs assessment is **moderation**. The purpose of moderation is to ensure that all assessment against national competency standards no matter whether it is carried out in the training provider or the workplace is consistent and fair.

Moderation takes two forms. **Pre-use moderation** of the assessment tools, and **post-use moderation** which checks that the assessments that have been carried out have been done so correctly.

Pre-use moderation is the quality assurance process that checks that the assessment tools that are developed either by SSBs or training providers meets the requirements of the national competency standards. National competency standards are generic in nature. Even if they are covering specific technical skills they are designed so that they can be used by any organization that needs to train and assess against those specific skills. To make the national standards meaningful for specific workplaces, SSBs develop assessment tools that provide guidance on the types of evidence that learners will need to supply to meet the standard. This could be in the form of questions to cover underpinning knowledge and skills or in the form of specific observations that need to take place either in the workplace or simulated in the training provider. While SSBs often make these assessment tools available to anybody approved to train and assess their national competency standards, training providers and some large corporations often prefer to develop their own training and assessment materials. If this is the case then they are required, as part of their approval to train and assess against specific national competency standards, to have these materials moderated before they are used. The SSB will then check that the assessment tasks included in the material meet the assessment requirements of the specific

national standards incorporated in their training programmes. In this way the SSB can ensure that assessment is taking place within an agreed area of variance that makes allowances for contextual differences but keeps to the intent of the national standard. Once assessment tools have been pre-use moderated they are then approved until either the national competency standard is reviewed and/or amended or the training provider or organization changes their material.

Post-use moderation is the quality assurance process that checks that the assessments that have been carried out meet the requirements of the national competency standards. While this is an on-going quality assurance process it keeps to an annual cycle. For most SSBs this is a sampling process. As most national competency standards and qualifications are formally reviewed every five years to maintain currency, most SSBs ensure that all the national standards they are responsible for are moderated within that five year cycle. Only national competency standards are moderated as qualifications are only made up of national standards registered on the NQF. The implication being that if the national standards are formally moderated then the qualifications will automatically be considered 'fit for purpose'.

The process for choosing the sample for annual moderation varies from SSB to SSB. Only the SSBs can determine the requirements for moderation and once those annual requirements are set then all accredited organizations who are using that particular SSBs national standards, must comply with the moderation requirements. This can be problematic for training providers and large organizations if they are interacting with a number of SSBs as they may have a number of different moderation requirements they have to comply with. To choose the sample for moderation the SSB will confer with their industries to determine what national standards they are likely to be assessing against in that particular calendar year. Once this information is received it is analysed to determine the volume of assessments that will be carried out over specific national standards. A total of 20% of the SSB's national standards are selected for moderation in any one year and are often comprised of:

- Standards that will have a large number of assessments. This information is gathered from the data supplied by the SSB's industries.
- Standards that would pose a high risk if the assessment was not carried out correctly.
- Newly developed or reviewed standards.
- Standards that have had a high non-compliance result.

Accredited organizations and registered workplace assessors are then asked to supply three learner samples of completed assessments for each of the standards being moderated. It is preferable if they can supply samples for a learner that is competent, one that is not yet competent and one they considered borderline.

Moderation can take place by a number of methods. Most SSBs combine a number of moderation methods. The most common are:

- peer moderation at moderation workshops
- postal moderation where samples are sent in
- moderation visit where the workplace or training provider is visited and their assessment processes audited on site.

Peer moderation at moderation workshops requires assessors to bring their assessment samples to an agreed location. Workplace assessors and provider assessors are often combined in this process although some SSBs keep the two groups separate as they do have distinct differences and issues that they face with the assessment process. At the workshop another assessor looks at the assessment sample against an agreed set of criteria and decides whether they would have supported the assessment decision or not based on the evidence they have before them. This is designed to be a supportive process with constructive feedback provided upon completion of the moderation process. Moderation workshops are a good networking opportunity for assessors that may be working in isolation or who only carry out a few assessments per year and have difficulty maintaining consistency in their assessment decision making. The disadvantage of this method is it is time consuming and workplace assessors often have difficulty in finding time to attend. It can also be costly if assessors work in isolated areas and have to travel great distances to attend.

Postal moderation requires assessors to send in their assessment samples for moderation that is carried out usually by a moderation expert within the SSB. Moderation samples can either be chosen from an agreed list developed in the same way as the peer moderation sample, or randomly where the assessor sends in the first and every fifth or tenth completed assessment, for example. Postal moderation may also be used as a secondary compliance check for assessors who have been unable to attend a peer moderation workshop. The process for postal moderation is similar to that of peer moderation. The assessment sample is checked against an agreed set of criteria and the assessor's decision is either supported or declined. If the moderator does not support the assessor's decision then further investigation is undertaken to determine whether this is a one-off event or a trend. To determine this, the assessor will be asked to supply further samples for moderation. If it is a single occasion the assessor will be given feedback on their performance and their assessments will be monitored for an agreed period of time. If there is evidence of a consistent trend the assessor could have their assessor registration suspended while further training and/or coaching occurs. It is very difficult to remove the award of credit from a learner once it has been registered to them and the incorrect awarding of credit can have serious consequences. The advantage of postal moderation is that it is easier to administer especially if the industry is made up of self-employed or small businesses who would have difficulty releasing staff to attend moderation workshops. The disadvantage is

that assessors are unable to network and share ideas which is a useful upskilling process.

Moderation visit is where a moderator visits the workplace or training provider to look at the completed assessments on site. A number of SSBs reserve this method of moderation for issues of non-compliance or for areas where the preferred method of assessment is observation and it is important to check that this is being rigorously achieved. A moderator visiting a site will also carry out the moderation using a set of agreed criteria. However they may also widen their moderation process to look at processes and resources as well as assessment samples. The advantage of a moderation visit is that it is easy to see exactly how assessments are carried out in the workplace and/or training provider. Not only is the collected evidence available but also the assessments techniques that are being used. The disadvantage is that it is a moderation occasion so the workplace or training provide can be on their best behaviour for the visit and it may not reflect actual reality. Moderation visits are a costly exercise both in time and expense especially if there are a number of workplace assessors or training providers that need to be visited.

Whichever method is used moderation is an annual exercise that occupies considerable time and money resources for an SSB. While it is necessary to ensure rigorous quality assurance of assessment, especially as it can affect learners in a major way if it is sub-standard, it is important to ensure we are not moderating for the sake of it. Traditionally in New Zealand there has not been a history of high trust between SSBs and their workplace and training provider assessors. This has seen all assessors being extensively moderated each year rather than using a graded method of moderation. Now that the system has been in place for over 10 years and most SSBs have been operating for between 5-10 years it is time to look at moving to a risk management model of moderation rather than one of total compliance.

In a risk management model SSBs would assign a rating to their assessors based on a number of factors. These could include:

- The assessment history of the workplace assessor or training provider.
- The level of the national standards being assessed against. Those assessing against standards at the bottom level of the NQF pose less risk than those assessing against the higher levels on the NQF.
- The type of national standards being assessed against. Those assessing against high risk performance standards e.g. health and safety, technical expertise, or standards required to complete an apprenticeship, would require a higher level of scrutiny than those assessing against low requirement knowledge standards.
- The experience of the assessor. Assessors who had been assessing consistently against large numbers of learners could be moderated less often than those only assessing occasionally who have less chance to practice and perfect their skills.

This would enable SSBs to use their moderation resources more efficiently to assist those new to assessment or who carried out infrequent assessment and to target high risk areas to monitor variance.

4. Quality Assuring Moderation Systems

All SSBs are audited by NZQA on a three yearly cycle. While the quality standard they are audited against has a number of criteria, one of the major areas is that of assessment and moderation.

When SSBs register national competency standards and qualifications on the NQF they have to accompany them with an Accreditation and Moderation Action Plan (AMAP). This document outlines the criteria the SSB will use, in conjunction with NZQA, to accredit (license) a training provider or another SSB to deliver and assess against their national standards. This is a quality assurance process that ensures before a training provider or another SSB can deliver training or carry out assessment against specified national standards that the owner of those standards agrees that they have the resources (financial, personnel, equipment, and documentation) to do the job. Training providers and SSBs are accredited for five years and then have to be re-accredited where they are checked to ensure they still comply with the set criteria. The AMAP also outlines how an SSB will carry out its moderation processes, both pre-use assessment and post-use assessment. Once this document has been approved by NZQA it is registered on the NQF and available to any organization that wants to go through the accreditation process for specific national standards. Like national standards and qualifications this document is reviewed every five years for currency.

When SSBs are audited by NZQA they are audited against the criteria set out in their AMAP. The focus of the audit is to check whether the SSB is carrying out the processes it has outlined in the moderation section of its AMAP. The focus of the AMAP is on external moderation. In other words, how the SSB interacts with the accredited organisations it moderates. This covers training providers and other SSBs who may be delivering and assessing against the SSB's national standards. Workplace assessors are not covered by this process. In the New Zealand system workplace assessors are registered with the particular SSB that covers their area. Workplace assessors are not registered as trainers, only assessors, and are specific to particular approved workplaces and have an approved scope they can assess against. They are registered on the SSBs assessor database and it is the SSBs responsibility to train them and monitor their performance. To do this the SSB has to have a set of internal moderation procedures that govern how workplace assessors will be moderated. In reality the methods used to moderate them are the same as those outlined in section three above. The NZQA audit also covers the processes used to moderate workplace assessors.

The advantage of auditing the SSBs moderation systems on a regular basis is to ensure consistency of practice across all 41 SSBs. The audit forces the SSBs to use their AMAPs as quality assurance documents not just documents they have to develop and register to keep NZQA happy. It also means they have to have robust internal moderation systems to ensure there is consistency of practice across all assessors whether they are from the workplace or a training provider.

The disadvantage of the process is that it has created an artificial divide between workplace assessors and training provider assessors. In reality SSBs don't treat either category any differently. SSBs often combine their workplace assessors and training provider assessors in the same moderation workshops. There are advantages to both parties being able to look at each others assessments. Not only are methods shared but a greater degree of trust is built in the integrity of each others assessment processes. Having to create separate sets of documents and systems for each target audience is costly and time consuming.

If NZQA want to create a climate of trust between workplace assessors and training provider assessors it needs to examine whether the current audit criteria are achieving the desired outcomes. A system that builds on the strengths of both parties would engender a better outcome. Training providers are experts in delivering and assessing capability while workplace assessors are experts in assessing competence. A system that mixed the two target audiences and built on their strengths would enhance the overall quality assurance process.

5. Summary

'Best practice' principles in quality assurance should include:

- A process for quality assuring national competency standards and qualifications that provides a benchmark for consistency but that does not constrain SSBs from reflecting their industries' requirements.
- Moderation as a quality management tool.
- Moderation that makes use of both pre-use and post-use moderation.
- Pre-use moderation that is based on assessment tools being 'fit for purpose' before they are used.
- Post-use moderation that is based on moderating an assessor's professional judgement over an agreed sample of assessment decisions.
- A moderation process that is used to upskill and educate assessors.

- A moderation process that is based on trust between the assessors and the SSB and between the SSB and NZQA.
- A moderation process that is an on-going process that provides feedback between the assessors and the SSB on the assessment process and the assessment tools.
- A moderation process that is based on a risk management model.
- A process for auditing the quality assurance processes of SSBs based on agreed criteria that cover both accredited organizations and workplace assessors and ensures consistent assessment within agreed levels of variance.

If we can include the factors listed above in a robust set of best practice principles for quality assurance we can have confidence that the training and assessment systems we use to implement national competency standards will have validity and the confidence of the end users.

References

The following publications and papers were used for the literature search for this paper:

- Good Practice Moderation – Good Practice Principles for the Moderation of Unit Standards-based Assessment; New Zealand Association of Private Education Providers, Industry Training Federation, Institutes of Technology and Polytechnics of New Zealand, March 2005.
- Tertiary Education Organisations (TEO) Moderation Manual 2007, NZQA 2007.
- Quality Assurance Standard for Industry Training Organisations, NZQA 2007.

Appendix One

NQF LEVEL DESCRIPTORS

Level	Process	Learning demand	Responsibility
1	Carry out processes that: <ul style="list-style-type: none"> - are limited in range - are repetitive and familiar - are employed within closely defined contexts 	Employing <ul style="list-style-type: none"> - recall - a narrow range of knowledge and cognitive skills - no generation of new ideas 	Applied <ul style="list-style-type: none"> - in directed activity - under close supervision - with no responsibility for the work or learning of others
2	Carry out processes that: <ul style="list-style-type: none"> - are moderate in range - are established and familiar - offer a clear choice of routine responses 	Employing: <ul style="list-style-type: none"> - basic operational knowledge - readily available information - known solutions to familiar problems - little generation of new ideas 	Applied: <ul style="list-style-type: none"> - in directed activity - under general supervision and quality control - with some responsibility for quantity and quality - with possible responsibility for guiding others
3	Carry out processes that: <ul style="list-style-type: none"> - require a range of well-developed skills - offer a significant choice of procedures - are employed within a range of familiar contexts 	Employing: <ul style="list-style-type: none"> - some relevant theoretical knowledge - interpretation of available information - discretion and judgement - a range of known responses to familiar problems 	Applied: <ul style="list-style-type: none"> - in directed activity with some autonomy - under general supervision and quality checking - with significant responsibility for the quantity and quality of output - with possible responsibility for the output of others
4	Carry out processes that: <ul style="list-style-type: none"> - require a wide range of technical or scholastic skills - offer a considerable choice of procedures - are employed in a variety of familiar and unfamiliar contexts 	Employing: <ul style="list-style-type: none"> - a broad knowledge base incorporating some theoretical concepts - analytical interpretation of information - informed judgement - a range of sometimes innovative responses to concrete but often unfamiliar problems 	Applied: <ul style="list-style-type: none"> - in self-directed activity - under broad guidance and evaluation - with complete responsibility for quantity and quality of output - with possible responsibility for the quantity and quality of the output of others
5	Carry out processes that: <ul style="list-style-type: none"> - require a wide range of specialised technical or scholastic skills - involve a wide choice of standard and non-standard procedures - are employed in a variety of routine and non-routine contexts 	Employing: <ul style="list-style-type: none"> - a broad knowledge base with substantial depth in some areas - analytical interpretation of a wide range of data - the determination of appropriate methods and procedures in response to a range of concrete problems with some theoretical elements 	Applied: <ul style="list-style-type: none"> - in self-directed and sometimes directive activity - within broad general guidelines or functions - with full responsibility for the nature, quantity and quality of outcomes - with possible responsibility for the achievement of group outcome

Level	Process	Learning demand	Responsibility
6	Carry out processes that: <ul style="list-style-type: none"> - require a command of wide-ranging highly specialised technical or scholastic skills - involve a wide choice of standard and non-standard procedures, often in non-standard combinations - are employed in highly variable routine and non-routine contexts 	Employing: <ul style="list-style-type: none"> - specialised knowledge with depth in more than one area - the analysis, reformatting and evaluation of a wide range of information - the formulation of appropriate responses to resolve both concrete and abstract problems 	Applied: <ul style="list-style-type: none"> - in managing processes - within broad parameters for defined activities - with complete accountability for determining and achieving personal and/or group outcomes
7	Carry out processes that: <ul style="list-style-type: none"> - require a command of highly specialised technical or scholastic and basic research skills across a major discipline - involve the full range of procedures in a major discipline - are applied in complex, variable and specialised contexts 	Requiring: <ul style="list-style-type: none"> - knowledge of a major discipline with areas of specialisation in depth - the analysis, transformation and evaluation of abstract data and concepts - the creation of appropriate responses to resolve given or contextual abstract problems 	Applied: <ul style="list-style-type: none"> - in planning, resourcing and managing processes - within broad parameters and functions - with complete accountability for determining, achieving and evaluating personal and/or group outcomes
Level	Involves skills and knowledge that enable a learner to:		
8	<ul style="list-style-type: none"> - provide a systematic and coherent account of the key principles of a subject area; and - undertake self-directed study, research and scholarship in a subject area, demonstrating intellectual independence, analytic rigour and sound communication. 		
9	<ul style="list-style-type: none"> - demonstrate mastery of a subject area; and - plan and carry out - to internationally recognised standards - an original scholarship or research project. - Demonstrated by: - the completion of a substantial research paper, dissertation or in some cases a series of papers 		
10	<ul style="list-style-type: none"> - provide an original contribution to knowledge through research or scholarship, as judged by independent experts applying international standards. 		