

RESPONSE TO THE DISCUSSION PAPER *GRADED ASSESSMENT IN QUEENSLAND*

METHOD USED TO COLLECT RESPONSES

VETnetwork Australia, the national professional association for vocational learning, and the Association of Post Compulsory Educators Queensland circulated a draft response to the Discussion Paper to over 400 members nationally, and to employing and curriculum authorities in Queensland. Attempts were made to consult with industry groups even though the timeline has been problematic. VETnetwork Australia and APCEQ contributed to discussions with the Housing Industry of Australia, whose members are currently working on a response from their organisation.

PREAMBLE

The Discussion Paper and Principles requiring response are underpinned by a misguided assumption that because some organisations are grading competencies a consistent approach to grading needs to be implemented. As “graded assessment undermines the integrity of the national competency based learning system”(P7) surely it is more relevant to ensure that all assessors understand competency assessment rather than seek to “manage” grading of competencies. The research quoted in the Discussion Paper does not provide a balanced view, provides no evidence of consultation with industry and provides no bibliography in relation to quotations. Statements of support are generic in relation to industry, learners and training organisations.

International literature on assessment refers to three basic ways of assessing in order to give meaning to any performance. “Norm referenced” assessment compares a student performance against other students in order to rank performance and determine “winners and losers”. “Self referenced” assessment allows a student to compare their own previous performances. “Criterion referenced/Standards referenced” assessment compares performance with a “standard” which defines learning expectations and students are deemed to have met the standard or not. Competency based assessment was developed within a framework of standards referenced assessment as each competency is defined and just like core learning outcomes, all competencies must be demonstrated in order to achieve a particular AQF level qualification. Level statements ensure a sequence of developmental stages that function as standards.

A “measurement” approach assumes that performance dimension is divisible and that “grades” represent arbitrary divisions. Educational practices have moved away from a “measurement” orientation towards an “assessment” orientation which assumes that ordered standards are categorical eg outcomes, competencies.

Competency relates to skills and knowledge being applied to a workplace standard over a period of time and in a variety of settings. Units of competency are selected under the qualification rules of the Training Package to ensure that a Certificate at a specific AQF level is achieved. Dimensions of competency and critical evidence guidelines need to be reflected in assessment tools. Performance criteria for each element of competency is explicitly stated, (more detailed than criteria statements in use in academic institutions) and is determined by individual industry sectors. “Good” competency based assessment practice is therefore a complex and quality assured process.

Surely a student at Certificate I who is receiving a “Distinction” should be working at a higher Certificate level. By grading individual competencies within a Certificate, competencies will be delivered and assessed in isolation instead of within context. Will a student end up receiving a Certificate of Distinction?

The current qualification for workplace trainers and assessors - TAA 40104 Certificate IV in Training and Assessment does not consider it necessary to train participants in graded assessment. Extensive professional development would be required for teachers, RTOs and industry personnel if graded assessment were introduced. A graded reporting system would complicate the current system unnecessarily and the time and expense involved in such an exercise can not be supported.

RESPONSE TO QUESTIONS IN THE DISCUSSION PAPER

The Yes/No response has not been included as it is believed they do not allow a clear discussion of the issues.

Do you agree with Principle 1 that ‘There must be a clear need and purpose for graded assessment’?

There must be a clear need and purpose, **but** there is no such need and purpose clearly established. Competency based assessment is about applying or not applying knowledge and skills, based on extensive statements of learning outcomes and evidence required. There is no need to grade. The report states that “individual and industry want more information about a learner’s performance...”. The Schofield report (1999) and Rumsey material (1996) predate AQTF. The more recent reports eg Williams and Batement (2003) state “support for graded assessment is mixed”. A more extensive and updated research study needs to be undertaken with employers and other stakeholders, who understand the full scope of competency based assessment so that informed comment can be made. Where is the trainer and assessor voice in the report?

It was disappointing to read the Queensland Minister’s Foreword stating “Graded assessment provides the opportunity to enhance what is currently offered through the vocational education and training system. It can provide valuable information on learner performance but it should not be valued more highly than the attainment of competency.” This suggests the decision has been made that graded assessment is a positive move. The responses below suggest that graded assessment will put VET in schools at risk and de-value Training Packages. The assumption (page 4) that “graded assessment is a reality” is an unsupported simplistic statement, and does not instil confidence in the document being a “Discussion Paper”. Readers are also reminded that “The policy will also provide Queensland with a clear and well articulated position on graded assessment and form the basis for work with other states, territories and the Australian government to promote a nationally consistent approach to grading in VET.” If graded assessment of competencies is a “reality”, as stated in the Discussion Paper, there needs to be an acknowledgement of the current motivation for including graded assessment. The purpose appears to be for ‘ranking’ students for further education, particularly in the tertiary sector. This is not in the best interests of planning training and assessment for industry needs.

A graded unit of competency does not facilitate course entry - at Certificate I or II which is primarily the domain of secondary schools, such a certificate does not even attract a ranking for tertiary entry in Queensland. The motivation for students is to attain a certificate and the motivation for teachers is to ensure that that certificate is credible in the eyes of industry. Is it suggested that a graded unit of competency would attract more than 3.6 towards a ranking as is

the case in the schedule used by the Queensland Tertiary Admission Centre?

Do you support the proposition that recognition and reward for excellence be considered the primary purpose of grading?

This question and many others requiring a yes/no response assume grading will occur – this makes it difficult to apply a yes/no response. Competency is not about ‘excellence’ it is about being successful and linking to higher challenges. Which is more “excellent” – a “Distinction” result in a lower level competency of a “Credit” result in a more demanding competency. Grading competencies would be a complicated process and cause confusion.

Do you support the rest of the guideline?

The statement (p12) that “The risk factor for graded assessment is low...” is in conflict with the information on page 10 “Potential risk associated with introducing graded assessment”.

Do you agree with Principle 2 that “Graded assessment must be criterion referenced, reflect good assessment practice and align with the Standards for Registered Training Organisations outlined in the Australian Quality Training Framework”?

This is not a question to which yes/no can easily be answered, as there is too much detail. (See notes in preamble re criteria and standard referenced assessment.)

Graded assessment must be criterion referenced, but applying criterion referencing to vocational competencies will be extremely difficult and suggests Training Packages are deficient. This is not the case according to the recent review of Training Packages. In the Report of the High Level Review of Training Packages, April 2004 (p19) it is suggested that ANTA investigate the range of graded assessment models - it does not state that graded assessment is appropriate.

Do you support the proposed guideline statement?

To say criterion referenced and competency based assessment are compatible seems outdated. The Queensland Studies Authority has just removed the two types of assessment from Queensland school syllabuses so that teachers and trainers can focus on either industry expectations or school based assessment. Returning to two types of assessment will threaten the credibility of the VET system.

Should any information be added?

The whole document lacks the teacher/trainer voice. There is no mention of imposing an undue assessment burden on the teacher/trainer – the person who has to record the information and collect the evidence – and try to explain the need for this added requirement. Schools have built the status of VET largely because of Training Package confidence. Graded assessment puts at risk the uniqueness of training and seems to suggest ‘real learning and assessing’ will only occur if grades are awarded. The promoters of graded assessment need to be aware of the damage this may cause to confidence in the VET system.

Do you agree with Principle 3 that “Graded assessment must be cost effective?”

Increased costs will be another factor in turning people away from delivering VET. VET is already seen as an expensive option given the need for constant upgrading of human and physical resources, and the time needed to ensure quality.

Schools have shown a commitment to nurture partnerships with industry and other training authorities and to assume that all would understand and be able to implement graded assessment is unrealistic and certainly not cost effective. Queensland experience indicates that employers who participate in placements are not keen to assess students, let alone grade them. Many schools

lack confidence in the comments from employers and to have a shared understanding of grading would be unrealistic - employers understand competency to industry standard.

Do you support the proposed guideline statement?

Reading the list on assessing, grading, moderation, maintaining the grading schema, recording and reporting, professional development, auditing... is very depressing. This is a lot of extra work for little benefit and has a high risk of turning people away from VET. Teachers are now becoming more confident with AQTF and value the need for ongoing quality improvement. Repeating the process for graded assessments would be burdensome and not likely to be valued.

To suggest that assessment could be a centralised process which controlled competency assessment in all arenas - schools, TAFE Institutes, Private Providers, Employers (all being publicly funded for VET in some form) across all States is totally unrealistic. A climate of self regulation within a Quality Framework is more manageable and cost effective.

It would be unrealistic to expect that students in schools, studying Certificate I or II would have equitable opportunities to access supporting evidence. The Queensland Studies Authority (QSA) is loathe to mandate workplacement within Certificates due to equity issues.

Do you agree with Principle 4 that “Graded assessment must be applied once competency is determined”?

Graded assessment should never follow competency or come before. The grading performance on a continuum against the unit of competency will result in ‘game playing’. Learners and trainers may be pressured into choosing those units with ‘increasing levels of sophistication’ and not necessarily the units students are interested in or need. This could be very detrimental to tailoring training to the workforce. The only people who benefit from such a system are those in charge of a spreadsheet to sort students for tertiary entrance or further education.

A certificate is of value in its own right not the individual units of competency. QSA have organised curriculum so that students are able to complete certificates, not just individual units of competency, so it seems contradictory to support grading individual units.

Do you support the position that graded assessment should be based on supplementary criteria and applied once competency has been determined?

With the second model, many Queensland teachers could relate experiences of how “assessment tools used to gather evidence for two purposes” does not work as well as focused assessment on either competencies OR criteria.

Do you support the statement that the supplementary criteria should not require activity beyond the scope of the unit of competency or the relevant AQF descriptor?

It is vital we protect the unit of competency or AQF descriptor, but this may be an impossibility if grades are applied. Supplementary criteria will require a different way of thinking of the competency achieved. There is only so much students and trainers can use as a focus. It would be much better to concentrate on the critical evidence requirements already in Training Packages, the dimensions of competency and the processes to ensure that trainees/students can apply their skills in a workplace setting rather than just participate in institutional learning.

Should the criteria be weighted?

The word 'weighted' is outdated. Queensland teachers have not dealt with 'weighting' for many years. 'Weighting' requires values judgements. Who is to say whether a simple skill in a complex setting is more valued than a complex skill in a simple workplace setting? VET is not the type of learning which can be analysed devoid of context. Is a written response 'weighted' higher than a spoken response? Weighting does not take into account equity issues – some students may be able to provide an excellent oral response and a poor written response, and the workforce may require predominantly oral responses. Are the 'higher order' skills weighted higher because of a taxonomy discriminator, regardless of the fact that in the workplace a simple, quick and efficient response may be more appropriate? Weighting suits the mathematical/spreadsheet/sorting mentality, not necessarily those committed to providing a skilled workforce for Australia. As stated earlier, applying grades to competencies for the purpose of sorting students for further education is not a justification for mixing incompatible systems of assessment, and reducing confidence in the VET system.

Should underpinning breadth and depth of knowledge be one of the supplementary criteria?

There is no need for supplementary criteria. The Training Packages contain enough detail.

Could the Employability Framework be useful as a basis for developing supplementary criteria?

There is no need for supplementary criteria, and this would be a difficult matching process. Employers who need 'supplementary criteria' can gain information on attitude, aspirations, experience, community involvement, literacy and numeracy skills, employability skills etc through other documentation. Key competencies, employability skills, national reporting system for literacy and numeracy are currently built into Training Packages.

Do you agree with Principle 5 that “Graded assessment must be conducted and reported consistently”?

Graded assessment has no part in competency based assessment. Competency is awarded when the knowledge and skill component is reached. To discuss reporting by marks or percentages shows a total lack of current reporting modes. Industry and others want to know what a student knows and can do, not an arbitrary mark that indicates nothing of the performance criteria used to make such judgements.

Do you support having two grades above competent?

There is no need for grades in a competency system.

Do you support the suggested reporting schema?

It would be inappropriate to apply 'Credit' and 'Distinction' to all competency assessments. In the workplace you must be able to do the work to the required standard or you should not be allocated the task.

Do you support the rest of the guideline statement?

When assessing if someone can, for example, use a MYOB accounting package, they should be able to use it without making errors. Credit/Distinction becomes a nonsense. The certificate levels indicate the type of independence/support the user can expect. This is the key discriminator.

Do you agree with Principle 6 that “Grading must be underpinned by quality assurance measures designed to produce quality and consistent assessment outcomes”?

This would be an administrative burden which would turn people away from VET. Schools are now working to the AQTF very well and have been encouraged to strive for quality by focusing on industry expectations. It would be a backward step to impose a quality assurance system for grading as well, and would negate much of the value of workplace learning. Grading is an institution assessment model not a workplace model. VET is about workplace standards.

On the understanding that graded assessment is not subject to AQTF audit, do you agree with each of the components of the minimum quality assurance requirements?

This is a huge ask on top of AQTF requirements. It is very well to say ‘not subject to external AQTF audit’, but quality assurance for graded assessment of competencies still has to be undertaken if the ‘minimum requirements’ listed are to be taken on board. .

Would any of these requirements be difficult to implement? What would be the cause of the difficulty?

Again, why would anyone want to consider promoting trades in schools if this is to be the expectation on all VET assessors and administrators? VET in schools is an important environment for promoting trades and apprenticeships. If schools revert to a curriculum largely driven by academic subjects and grades, this will increase the risk of even further decreasing the number of skilled workers in Australia. Some states may use graded assessment of competencies for sorting students for post school courses, but in states such as Queensland, there is no need to impose the system of graded assessment of VET.

Do you agree with Principle 7 that “Graded assessment should be available to all learners, in all qualification but be optional for the learner”?

Common sense suggests parents and young people want as many pieces of paper and qualifications as possible. “Options” soon become mandatory. If graded assessments are introduced, VET in schools will decline significantly because the extra workload will apply to all students in VET, not those opting for graded assessments. There is nothing optional about entry level training standards - a student demonstrates the competencies at a workplace standard or they don't. Options are not equitable as they would not be available to all learners who wanted them - it would be a decision of the RTO.

Are there any levels or pathways where this principle would prove difficult to implement?

Teachers, trainers, students and parents are now having to understand what it means to gain Certificates (and credits for qualifications eg Queensland Certificate of Education), through achieving competencies, and... choosing authority or authority registered subjects which award grades. Applying grades to competencies will cause more confusion with little benefit. Graded assessment would not only be difficult but counter productive to implement at Certificate I and II and in the workplace.

Do you support the statement that grading should be optional for the learner?

This could set up another ‘status’ situation. ‘I have grades and you don't...loser mentality...’.

At what level do you believe that decisions about what units of competency within a qualification will be graded should be made – state, RTO or assessor level?

Another ‘values’ dilemma. The competency cannot be assessed as ‘worthy’ of being graded, in isolation. The workplace context will make a difference, and it would be difficult to make a decision given the number of workplaces, and changing workplaces. It would be very difficult deciding which competencies should be graded. Are we heading towards a magical ‘number’ on a report card which helps employers decide if someone is a better office worker than another? Will we reach a stage where we do not have to RPL students if they have the ‘magical number’? Will the work context become less important?

What role should industry have in this decision making process?

If industry wants to protect the Training Packages and encourage teachers and trainers to focus on the workplace, then grading competencies should be avoided. Trainers need to concentrate on fewer things well, not be overwhelmed by administration. Does industry want trainers with current industry knowledge and skills, or trainers who can set a multitude of assessment pieces and maintain a complex reporting system? Surely the former can be assumed.

The Queensland government’s green paper *Skills for jobs and growth*, June 2005, highlights six priorities. Some of these priorities do not appear consistent with the proposal to impose graded assessment to workplace competencies. For example,

Tackling the urgent shortage of trades skills now by reforming and modernising the trades apprenticeship system.

Applying graded assessment to competencies may not ‘reform and modernise’, given competency based and criteria based assessment are philosophically opposed.

Developing a more responsive and flexible VET system.

Applying graded assessment to all competencies may have the effect of reducing the uniqueness of competencies to workplaces, by imposed pre-determined simplistic value judgements.

Initiating a new engagement with employers to tackle skills shortages by working more closely with industry to develop a shared future skills agenda in Queensland’s major industries.

Employers need to be asked if trainers should put their efforts into keeping up to date and providing industry relevant training, or spend more time on assessing and reporting. Do employers want more skilled workers, or more information on a depleted workforce?

Developing a workforce and skills response to the ageing population.

Applying two types of assessment will not necessarily build ‘age-friendly workplaces’.

Increasing labour force participation through new skilling strategies for the underskilled.

Grading and ‘weighting’ results may further marginalise those needing to gain new skills.

Appendix A: Summary of responses from members of VETnetwork Australia and APCEQ

This response has been prepared by VETnetwork Australia and the Association of Post Compulsory Educators Queensland.

vetnetwork@bigpond.com.au Tel: 07 32541431; apceq@apceq.org.au Tel: 07 3358 5880

VETnetwork Australia acknowledges the input from Sandra Kenman, Executive Officer VETnetwork Australia, and Sandra Harrington, Private Consultant and member of VETnetwork Australia and APCEQ.

VETnetwork Australia includes the following member associations:

ACT - ACTIVE (ACT Teachers in Vocational Education)

VIC - CEAV (Career Education Association of Victoria)

QLD - APCE(Q) Association of Post Compulsory Educators Queensland)

TAS - TasVETA (Tasmanian Vocational Education and Training Association)

WA - WAVETNET (Western Australian Vocational Education and Training Network)

SA - PCETA(SA) (Post Compulsory Education and Training Association South Australia)

NT – VETANT (Vocational Education and Training Association Northern Territory)

VETnetwork NSW (Vocational Education and Training Network NSW)

Appendix A

Comments from members of VETnetwork Australia and APCEQ.

Of the members responding to the draft response, almost all were against graded competencies. Following are some comments from members.

“No” to graded assessment of competencies:

- 1 Qld member. Do not believe employers will use the extra information; will cause confusion for VET in schools personnel; risk of lowering the value of VET in schools; may create a divide between schools and other registered training organisations ie if schools decide not to offer VET it may be perceived as ‘schools can’t do VET’ and yet recent research suggests VET in schools is managed very well.
- 2 Tasmania member. Strongly opposed. Competent/not yet competent is a fair system because the evidence required is clearly stated and discussed with the client. There would be enormous complications for the assessing of the training packages with our clients (who are employed) when much of their assessment is on the job.
- 3 WA member. Grades would not work. It would be confusing to award Excellent to a lower year level student, and Credit for a higher year level student, for similar competencies. Stand alone is simpler and eventually understandable.
- 4 State unknown, private RTO and lecturer. This email provides my brief response to the subject discussion paper. My background involves 25 years in administration and management positions and the last 10 years as an educator in both private and government-funded organisations. Currently I am teaching Business Services Training (BST) units at a private RTO; and am lecturing and tutoring at a University (undergraduate and post graduate subjects).

I believe the basic question to ask before grading assessments is **why is the client undergoing this training?** While "the client" may also include the employer, a parent or a university, the person undergoing the assessment is invariably the primary focus. The next question is **what does the client want** - does he/she want a graded assessment. The answers to these questions should determine whether a graded assessment is suitable.

For a person who is in the workforce and is seeking to increase or improve their skills the BST package is useful and relevant, especially if the training is done in conjunction with their current employment environment. **In my experience, these clients neither need nor want graded assessments.** They want to be able to apply their newly-acquired skills and knowledge productively and as soon as possible. For them choosing relevant units is far more important than a graded assessment, and they are usually motivated to produce the best they can, given their other time/family/work commitments. For these people, graded assessments are neither warranted nor embraced - and can be counter-productive.

On the other hand, a person who is not in the workforce, has little or no work experience, and is doing a VET course to gain credits for university entry, a graded assessment may have some initial appeal. However, for such a person a VET unit is not really useful unless it is designed and delivered as an undergraduate subject - and here the educator has to be flexible in designing course-delivery and assessment instruments that both meet CBT requirements and are useful to the student, in preparing them for university. But **my experience has again been that graded assessments have no impact on their final goal of achieving advanced standing at a university** - students who have been assessed as Competent in units undertaken have been given the same

entry credits as those who were awarded (in some form or other) a graded assessment (given in addition to a Competency grading). In other words, a great deal of effort on behalf of the educator in planning and assessing students' work has achieved nothing of consequence. The major benefit of VET to these students comes about if they are given skills such as essay and report writing, researching and referencing, time-management and group-study. The content of their BST unit is of secondary and limited importance. **Therefore, for this group of clients, graded assessments would only be useful if the unit content and performance criteria were changed to reflect a goal of university entrance rather than workplace competence.**

In summary, graded assessment for the current BST units is unnecessary and irrelevant as the units now stand. It would only become relevant for a group of students if course content and performance criteria were change to reflect a goal of university entrance rather than workplace competence.

- 1 NSW member. As a classroom teacher of many subjects besides VET Hospitality I would be appalled if more of my already over committed time to VET subjects had to be increased yet again to prepare more paperwork. VET subjects are taught by teachers who are very dedicated and who put in a lot of voluntary time to complete the already required accountability for recording VET activities, preparing units etc.
We are expected to keep copious records and entries even on eBos (Board of Studies) computer website. It all takes time. Not to mention the audits which we have every two years. They do take up a lot of time to prepare for. We love teaching VET courses, and would be very disappointed if VET went back to TAFE and other providers. If schools lose VET, it would be unfair and incorrect to suggest schools cannot deliver and are not committed sufficiently. We are. We have trained long and hard and we continue to keep up our knowledge and skills. We have had continuous changes to the syllabuses in the last 10 years (since we started delivering VET subjects) very often, and quite frankly more changes will push some staff over the line and they will not teach VET subjects. This has happened in several schools in my district already. VET subjects require too much time in dedicated teaching, record keeping and accountability and so these schools have gone back to offering Board Of Studies course only. We at our school have seen many of our students take up apprenticeships and traineeships and been awarded top of their group etc. So we must have helped teach them well. They have completed their courses with us without being deemed a credit or a distinction in their competencies. They have then gone onto TAFE and been accredited. We do not need such grading. If one looks at the vetassess on line assessment website www.assessit.net they will see that teachers as assessors are able to assess their students most adequate already. Please no more changes to what is already working well. Teachers are experienced in assessing and why change what is going so well and risk losing more schools and teachers not willing to put in the hard slog? Thus we are going to reduce the numbers of students taking VET subjects in our schools. This goes against the Federal government's wishes at the present time for more VET students.

“Yes” to graded assessment of competencies (with reservations noted):

- 5 The following comments are my own opinion based on my experience teaching and managing VET courses over the past 18 years. The perspective of the discussion below is as a VET coordinator in a high school. It is not the opinion of the school. The debate on Graded Competencies is one of the oldest in VET. In principle, the concept of a non-competitive reporting system on students learning is the most desirable from a social

justice perspective. However, in practice, employers and tertiary institutions operate in a competitive environment, and therefore any measurement which can be expressed assist them in their processes of allocating resources (human, financial and educational). As a teacher, students want to know how they are performing relative to others. This is a part of cultural conditioning.

The major problem I see is how the judgement can be fair and equitable. For example, if my school has a hospitality student who bakes a sponge cake well given 2 opportunities that are available in a multi-dimensional timetable of their learning, her teacher may deem that she is competent in baking sponges. In fact, on both occasions, if she produced an exceptional quality sponge, her teacher might grade her with a distinction. Her sister who has a traineeship at Quality Cakes, may be required to bake 200 sponge cakes before she is suggested to be noted with a distinction. Given that the school cannot provide the same number of opportunities to produce sponge cakes (cost alone), the school would be obliged to not give grades as a way of acknowledging the limited assessment opportunities available to her. I would expect that schools would ultimately be the institution least likely to give graded competencies which could be read and acknowledged by industry. The context in which schools operate (reports to parents, all other subjects being graded) would on the other hand result in pressure from this sector to give grades. Therefore, in my example the students would be given a grading that would not be comparable with her sisters. Currently, industry in fact knows the difference between school awarded competencies and industry awarded competencies. These differences are unstated but universally known. After all the AQTF requires mutual recognition. My concern is that the QSA may be obliged to direct schools not to grade competences, to establish the validity of the industry measurement and in so doing drive students away from participating in VET in schools.

As we currently have an unstated but implied system of grading CBT, the issuing of grades makes the comparison more transparent. As long as the principle is retained of firstly awarding competency and then offering a subsequent opportunity to students for grading upon request, then the grading of competencies should provide for all training provider segments (schools, RTOs and Industry). There is a real danger that schools, like other RTO's would not be able to afford the secondary assessment methods needed to grade students. The audit process of ensuring equity of competency would be very difficult. If we go down this track, school students would need to complete a demonstration of the competency in industry through industry placement and a statement from their supervisor about the level of their competency.

“Already use it for some students”

- 6 Victoria has had graded assessment progressively introduced since 1999, and is now used for all students undertaking Unit 3-4 sequences in 12 VCE VET programs.