

Draft Policy Statement – Minimum and maximum sizes of qualifications in terms of NQF Credits

Background

The Regulations for the NQF of Namibia (particularly in Annexure C) express minimum volumes of NQF Credits as one of the characteristics defining the different types of qualifications able to be registered on the NQF. The specification of minimum, notional volumes of credits that reward a learner effort in attaining a specific qualification type follows commonly applied international practices within national qualification systems. However, the specifications of volumes for minimum, notional learner effort can vary across similar qualification types between countries.

Minimum volumes of NQF Credits at certain NQF Levels are also utilised to determine and, consequently, verify the NQF Level at which a qualification (especially certificates and diplomas) could be registered. This expression of specified minimum credits at NQF Levels reflects an accepted understanding that learning towards a certain qualification may not all be at the same degree of complexity. The components making up a qualification could be aligned with the Descriptors for different NQF Levels.

In some cases, credit requirements are expressed as maximum values. This, however, is typically applied to certain components of some qualifications only (for example, the number of Level 4 NQF Credits that can count towards the credit volume of a Bachelor degree at NQF Level 7).

Stakeholders at the NQF Review Conference raised three areas of relevance that they believed warranted some, updated consideration:

- a statement of the rationale for the minimum of 40 NQF Credits being required for NQF Certificate qualifications
- a suggestion that the minimum volume for NQF Certificate qualifications be raised to 60 credits (or 600 notional hours of learner effort)
- the desirability of setting maximum credit values for qualification types, especially the degrees at NQF Levels 7 to 10.

Results

No clear international norms for minimum credit volumes for qualification types were found, particularly for qualifications carrying the name 'Certificate'. However, it is almost universal that *minimum* credit volumes are expressed. Few, if any, national qualification systems specified *maximum* credit values for whole qualifications. Maximum credit volumes were, however, sometimes specified for component structures of some qualifications.

Furthermore, there was no compelling, quantitative rationale for there being a minimum of 40 NQF Credits for certificate qualifications on the NQF of Namibia. The minimum volume could just as easily have been placed at 60 NQF Credits.

It would seem, however, that principles regarding accessibility and attainability (especially in a country where access to attainment was precluded for many people) may be significant enough to retain the current minimum requirements for certificates at Levels 1 to 7 of the NQF¹.

Given the breadth of learning opportunities and locations for learning embraced by the NQF of Namibia, the purpose of any qualification to 'qualify' people seems to remain a central driver towards the size of any qualification. The number of credits reflected in each qualification principally depends on the competency or outcome profile relevant to the qualification. The scope of the profile will be the main determinant towards the total credit volume.

The diversity of potential profiles suggests that a low volume of credits for Certificates would be more inclusive. Care is needed, however, that fragmentation and atomisation of learning is not promoted by very low volumes.

Groups setting qualification specifications must be mindful of the attainability of each qualification. Qualifications with large credit volumes could deter potential candidates from pursuing studies towards the attainment of the qualification.

¹**NOTE:** In another area of policy review regarding qualification nomenclature the need for additional qualification type(s) to be specified for the Namibia NQF at Levels 7 and/or 8 – ie Graduate certificates/diplomas and Postgraduate certificates/diplomas was discussed. If accepted, the minimum size for postgraduate certificate qualifications was recommended as being 60 NQF Credits.

Policy statement: Expressions of minimum and maximum credit volumes for qualification types

- a) The size parameters of qualifications are principally determined by the competency or outcomes profile associated with each qualification. The requirements for a particular career-related role or learning milestone will determine the amount and nature of the learning to be acquired – hence the number of NQF Credits associated with attainment of the qualification.
- b) In determining the requirements of any qualification, stakeholders must give consideration to the balance between the coherence of the learning and the achievability of the qualification. Qualifications that are very small in terms of learning demand can be seen as potentially leading to the fragmentation and atomisation of learning – learning loses its holistic characteristics. Qualifications that are very large in terms of learning demand can be viewed as potential deterrents to learners and as being excessively costly.
- c) In order to reflect the need for coherence and holism of learning, the specifications for different qualification types on the NQF of Namibia shall continue to be use stated minimum credit volumes required.
- d) For certificate qualifications, the minimum volume of credits shall remain as being 40 NQF Credits.
- e) The attainability and access to qualifications can be significantly influenced by the total number of credits required. Stakeholders must be mindful of this when determining the nature and structure of any qualification. However, the diverse nature of the comprehensive NQF of Namibia makes the setting of specific, total credit maximums problematic. For this reason, no maximum credit totals will be specified in the specifications for qualification types at this time except where necessary to limit the size of some structural components of degree qualifications.
- f) Stakeholders and qualification developers are strongly urged to continue to set qualifications that represent a challenge to learners. Any challenges, however, must be fair and reasonable. The size of a qualification must not present unreasonable barriers to access or attainment.

- g) 'Stakeholders' in any qualification development exercise must be inclusive of any funding agent associated with the learning associated with any qualification. In many cases, the Government of the Republic of Namibia, as a significant funder towards general and higher education will remain a key stakeholder who must be actively engaged.

Rationale and Practice

1. Annexure G of the NQF Regulations (2006) makes a number of broad statements regarding the expression of qualification requirements:
 - qualifications represent a statement by the qualification developer and relevant stakeholders of an end-point and/or significant milestone in a learning or career pathway as expressed in terms of required (relevant and meaningful) abilities or outcomes of learning
 - the required learning outcomes represent what is considered by the relevant stakeholders as a person who is 'qualified' for a next, logical step in their learning or career pathway
 - qualification attainment requires sacrifice and effort on the part of a learner (whether in formal, non-formal and informal modes)
 - the sacrifice and effort required to attain a qualification should represent a challenging volume of learning
 - whilst being challenging, attainment of the learning outcomes should offer a fair and reasonable opportunity to demonstrate required abilities – the requirements specified for any qualification should not impose, represent or involve unreasonable barriers for people on the basis of gender, ethnicity, beliefs, orientations, health condition or circumstances.
2. In the past, qualifications and their associated pathways were often designed to fit within time periods that were manageable for the providing institution(s). Consequently, qualifications were expressed in durational terms (usually in years or months). The growing recognition that learning is not solely confined to formal and institutional contexts (much, perhaps the bulk of learning occurs by less formal means, especially in workplaces) required a reconsideration of the means of expressing the size of a qualification. This reconsideration led to the adoption of credit-based systems that reflect learner effort rather than institutional time.
3. Qualifications can be viewed as representing a specific *competency profile* that aligns with a significant end-point or milestone in required learning. Such a profile should represent all relevant, required abilities. The structure of the qualification would represent a *logical coherence* of these required abilities.
4. Because of the diversity of learning or career pathways and the diversity of potential endpoints and milestones, the size of any competency profile could also be diverse –it would be uncommon for there to be uniformity in the dimensions of the required competency profile. This has become the most compelling argument for the non-specification of maximum credit volumes.

5. The need for coherence of and within the required learning has been commonly accepted. Arguments against the unnecessary fragmentation or atomisation of learning have underpinned the development of national qualification systems throughout the world. In Namibia, such arguments led to the adoption of the principles of relevance and meaningfulness in the expression of qualification requirements. The desirability for coherence and relevance has led to the adoption of minimum volumes of notional learning required towards the attainment of qualifications.
6. In many qualification systems, certification of significant components of qualifications has been allowed for, principally because not all learners have the means to dedicate effort towards the attainment of a whole qualification within a certain durational period. Accumulation of attainments has, commonly, been made available through the registration of unit standards on the qualification system and/or the requirements for detailed transcripts of attainment to be made available.

Why 40 NQF Credits for a Certificate?

7. As noted above, the minimum size for any qualification is largely rationalised by the desire to avoid fragmentation and atomisation of learning. However, the actual determination of the minimum size could be deemed to be, largely, arbitrary. There is, probably, no compelling reason for the size to be 40, or 60, or any other number of NQF Credits.
8. A NQF Credit value of 40 (or, a notional 400 hours of learning) has been adopted in Namibia for all certificate qualifications and, for example, New Zealand certificates from Levels 1 to 5². Graduate Certificates and Postgraduate Certificates are treated as separate qualification types. Graduate certificates (at NQF Level 7) have a minimum of 60 Credits with 40 of these at or above Level 7. Postgraduate Certificates have at least 60 credits at Level 8.
9. In Australia, AQF Certificate I and II qualifications typically require 0,5 to 1 year of learning (though it is unclear what, actually represents a year – Calendar? Academic?). AQF Certificates III are typically 1 – 2 years (with, perhaps, 4 years when learning is covered by an employment relationship). AQF Certificates IV typically require 0.5 to 2 years of learning, with variations permitted on the grounds of pre-entry qualifications. Graduate Certificates (again, a separate qualification type) typically require 0,5 to 1 year of learning at Level 8. There is a requirement that the volume of learning for a Graduate Certificate must be deemed sufficient to attain the required outcomes of learning. The volume is also dependent on whether the purpose of the qualification is to deepen or to broaden knowledge and skills.
10. In South Africa, certificate qualifications at Levels 5 and 6 of the Higher Education Sub-framework are required to be a minimum of 120 credits, all at the level of certification. This

²The countries mentioned have a credit value similar to that of Namibia, where 1 Credit = 10 notional hours of learning.

credit volume is similar to the credit minimum for Certificate qualifications on the initial NQF promulgated by SAQA. This minimum requirement has, subsequently, created some concerns regarding the formal recognition of learning that does not lead to a qualification.

11. In the Malaysian Qualifications Framework, 1 Credit has been given the value of 40 notional hours of learning. Vocational and Technical Certificate qualifications at Levels 1 – 3 of the eight-level framework require a minimum of 60 credits – or 2400 notional hours. Graduate Certificates at Level 6 require a minimum of 30 credits – 1 200 notional hours of learning. Post graduate certificates at Level 7 require a minimum of 20 credits – 800 notional hours (the decreasing minimum requirement is likely because of the likelihood of prerequisite qualifications being required for entry).
12. Skills Certificates in Malaysia (primarily for work-based learning utilising predominantly manual skills) have no credit minimum specified.
13. Therefore, there seems to be an element of variety in the minima required across the international community.
14. It is commonly assumed that, particularly at the lower levels of the qualification systems, a full time academic year would represent about 1200 notional hours of learning³. This is based on an assumption that institutions conduct tuition for 30 weeks of the year and that, typically, a learner would 'work' for 40 hours per week in directed and self-directed learning events and in assessment activities.
15. If this 'norm' is left unchallenged, then the minimum size of a certificate qualification at the lower levels of the Namibian and New Zealand QFs would represent about 1/3 of an academic year. Such a minimum would seem logical where institutions operated with three distinct operational periods.
16. The minimum requirements in Australia would seem to be logical where institutions operated with two distinctive operational periods. A certificate qualification could be completed in one semester or across the full year.
17. In South Africa, certificates would require a full year of institutional-based learning. In Malaysia, approximately two years of institutional learning would be required for the lower-level certificates.
18. However, it must be acknowledged that not all learning towards qualifications is institutionally-based. Work-based, community-based and self-directed learning can all be contributory towards qualification attainment in Namibia and other countries.

³In South Africa, an academic year in higher education is generally deemed to be 1800 notional hours.

19. It would seem, therefore, that there is no quantitative rationale underpinning the setting of 40 NQF Credits for certificate qualifications in the Namibia NQF. The number seems to have been agreed upon as being a realistic balance of attainability and coherence considerations.
20. Namibia has been free of its apartheid, colonialist past for a generation of people. There are, however, still a significant number of people that still carry some of the burdens of past inequalities in access to quality and broad education and training. Many still do not hold a qualification document of any significance and this is a major obstacle in their entry to and progression in careers and lifelong learning. Thus, having (or retaining for some additional years to come) a small-ish credit volume makes gaining a 'first' qualification more realistic yet retaining the requirement for the attainment to represent a (surmountable) challenge.

Consequences of changing the credit minimum for NQF Certificates

What is the average size of NQF Certificates Levels 1 – 4?

How many have less than 40 credits?

21. The need to balance attainability and coherence principles should also be applied to any consideration of increasing or decreasing the minimum credit value for NQF Certificates.
22. An increase of the minimum to 60 could be seen as appropriate in cases where institutions organise their timetables into two blocks within an academic year. It is debateable, however, whether qualification sizes should be determined by administrative conveniences rather than by ability needs. Given the autonomy of many providers, dictating how they should schedule their instruction periods becomes questionable. Qualification attainment is accepted as being the result of learner effort rather than provider delivery.
23. Increasing the size of the minimum could lead to learners or funders paying for learning that is not essential to the endpoint or milestone in the learning or career pathways. To reach the registration minimum, qualifications may have to be 'packed' with non-essential outcomes. Anecdotal evidence from South Africa indicates that there was some employer reaction to the size and structural features of the NQF Certificates at the lower levels. Employers observed that they often had to pay for training that was not relevant⁴.
24. Decreasing the minimum credits to a number below 40 could also be considered. The risk, however, is that learning could be seen as becoming atomistic and fragmented – it would lose its coherence and depth.

⁴It must be accepted, however, that many employers prefer to pay only for specific, work-related abilities rather than more general, broader personal development abilities. Their interest is with meeting vocational and occupational needs rather than general education needs – something they consider to be a state responsibility.

25. Recognition of attainment that does meet the credit requirements of a registered (ie, less than 40 NQF Credits) is currently possible through:

- issue of certification for separate unit standards⁵ and/or
- the issue of transcripts (such as the often talked about Record of Learning proposed to be administered by the NQA).

Expressions of maximum credit values

26. Few, if any, national qualification frameworks or systems state maximum credit volumes for qualification types. This is likely an acknowledgment that the outcome profiles for significant endpoints and/or milestones will vary across the broad scope of the fields of learning.

27. Historically and currently there have been some qualifications requiring or reflecting substantial volumes of learning. Medical doctors, for example, often require up to seven years of focussed learning before becoming qualified and eligible to seek access to practice. In many apprenticeships, completion of the associated certificate required 5000 or more hours of work-based activities that consolidated competency following initial instruction. This would suggest that many of the vocational qualifications at a skilled artisan level could represent a Namibian NQF Credit total of 500 or more. Few do.

28. In national qualifications systems here are, however, commonly statements that implicitly limit the volumes of credits. These statements generally refer to attainability and the lack of unreasonable barriers whilst retaining the need for the contents of a qualification to be both challenging and relevant. The 2006 Regulations for the NQF of Namibia contains statements of principle and good practice in these regards (highlights added)

- each qualification should require effort and sacrifice in attainment, *yet offer people fair and reasonable opportunities to demonstrate their abilities*
- requirements must be *fair and achievable* and not impose or involve unreasonable barriers to access or attainment.

29. In the New Zealand Qualifications Framework requirements the NZQA has stated that a qualification developer must be able to explain any significant variance in credit values in relation to similar qualifications. In the South African Higher Education Sub-Framework credit ratings are expressed as minima. There is an acknowledgement that *programmes* related to each qualification may require credit or learning loads above the stated minimum but these should not be 'unrealistic'.

30. Stakeholders involved in qualification development have, therefore, a significant influence in determining the upper sizes of qualifications. They must be mindful of the deterrent effect of

⁵For example, certification is available to Assessors who meet the requirements of NQF Units 336 or 337 or to Moderators who meet the requirements of NQF Unit 498. There are insufficient credits available to certificate the role of Assessor or Moderator in the form of a NQF qualification type.

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large qualifications. As the government of Namibia is a significant contributor to funding for qualification attainment, 'stakeholders' in any qualification development must be inclusive of relevant government organs that contribute to funding.

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