

PROPOSED POLICY ON
CREDIT ACCUMULATION, EXEMPTION, RECOGNITION AND TRANSFER
UMALUSI DISCUSSION DOCUMENT

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1. Introduction

Recognition of Prior Learning (RPL) and Credit Accumulation and Transfer (CAT) are two related but separate concepts that have become closely associated with the transformation of the education and training system in South Africa. With the introduction of a National Qualifications Framework (NQF) since 1995, RPL and CAT have been touted as key indicators of a transforming system. In the NQF Act, 2008 (Act 63 of 2008), the importance of these concepts was reiterated. Quality Councils (Umalusi, the Council on Higher Education and the Quality Council for Trades and Occupations) are tasked to (Chapter 5, 27, (h),(ii)):

- (ii) *develop and implement policy and criteria...for assessment, recognition of prior learning and credit accumulation and transfer*

However, despite the importance and prominence of these concepts in the emerging education and training system, both still seem to be at the level of *policy symbolism* (Blom, 2006). This means that while the principles are broadly supported, and despite a national policy in the case of RPL, no systemic effort has been made to implement these processes.

While Credit Accumulation, Exemption, Recognition and Transfer (CA(ER)T) recognizes prior, *formal* learning and is not an unfamiliar concept in the Umalusi context, albeit not formally documented as policy; RPL which recognizes prior *informal* learning, presents many conceptual and implementation difficulties throughout the education and training system. Consequently, to a large extent, it does not yet have a solid status within the education and training system. This may be because of the socio-political nature of RPL. For this reason, this discussion document will discuss only a Credit Accumulation, Exemption, Recognition and Transfer policy at this time. This will allow Umalusi to progress in respect of its policy mandate while providing it with the “space” to consider and conceptualise how it envisages implementing RPL.

This paper provides a brief historical and theoretical background to CA(ER)T and will then proceed to a definition for such a system, as well as propose the principles according to which the system could function.

3. Clarifying Credit Accumulation, Exemption, Recognition and Transfer

3.1 Background

Credit accumulation and transfer (CAT) systems are closely associated with National Qualifications Frameworks, but do not need an NQF to function. In fact, some credit systems existed prior to qualifications frameworks, e.g. the Northern Ireland Credit Accumulation and Transfer system (NICATS) and the Southern England Consortium for Credit Accumulation and Transfer (SEEC). Other systems, such as the United States of America, makes extensive use of local and national credit systems, but do not have an NQF at all. Nevertheless, the notion of CA(ER)T¹ clearly emerged from pragmatic considerations of what happens in practice. The fact is that many students either learn in fits and starts; or transfer to other institutions; or change direction midway, moving from one qualification to another; necessitating some system whereby the work already completed could be recognized in order to prevent the necessity that the individual start from scratch.

Yet, as in the case of RPL, a formal, system-wide CA(ER)T system has not been implemented at any great extent in South Africa. There are many reasons for this state of affairs.

Firstly, credit and notional learning hours is a relatively new phenomenon in the South African education and training system and the necessary work whereby credit is recognized across institutions and sectors has not yet taken place.

Second, the system is not homogenous and conceptually, the different parts of the system are quite disparate. Hence, the differences between unit standard based qualifications and non-unit standard based qualifications cannot be dismissed. It is unlikely that articulation between these (conceptually different) qualifications would be possible (Blom, 2006). The 'fundamentals' of both types of qualifications, for example, were originally intended to enable transfer between qualifications and institutions, as these would be common at a particular level of the NQF, but due to vastly different teaching, learning and assessment, as well as standard setting and quality assurance approaches, (for example centralized/decentralized assessment) the level and quality of the fundamentals were not trusted and even these failed to enable credit

¹ The terms 'exemption' and 'recognition' have been added to the current definition. See terms and concepts later.

recognition or transfer. Therefore, linked to the above, and despite the notion of 'fundamentals', there is currently no common currency, such as an agreed unit of learning (or subject), according to which credits are awarded, exempted, recognized and transferred although there seems to be emerging synergies across qualifications by awarding 20 credits per unit of learning (e.g. a subject) as reflected in the NSC, NCV and in the proposed QCTO awards.

Further, while the South African NQF may have as its intention to implement a CA(ER)T system, such a system cannot be developed without consideration of the intrinsic logic of a credit framework, i.e. 'the design features, such as flexible pathways and the establishment of equivalences between different qualifications' (Raffe, 2003) that will enable progression and credit transfer between sub-systems (Blom, 2006). Importantly, a credit system can be agreed in principle, but cannot be enforced by political fiat, (but ironically can be agreed politically). For this reason a meaningful credit system needs principled agreements between partners. Such agreements could include what would constitute a common currency; and, when and how credits could be accumulated, exempted, recognized and/or transferred (Blom, 2006). The point is, a credit accumulation, exemption, recognition and transfer system, cannot be established without establishing a rationale within a particular context for such a system. 'Equivalence' or recognition across systems and qualifications, for example, needs one-on-one comparisons of qualifications, curricula and syllabi, which is then captured in policy. Such principled agreements can only arise from within communities of practice and trust, which despite the intention of the NQF, is sorely lacking in the current system.

It is clear therefore that as in the case of RPL, a CA(ER)T system is still, except for local, ad hoc arrangements, far from being systematized. Nevertheless, a CA(ER)T system within and across sub-frameworks, such as the GENFET and QCTO frameworks, is perhaps more urgent than an RPL system, particularly in the context of the need to develop meaningful progression pathways for post-literacy, post-compulsory schooling and post-school learners.

3.2 Terms and concepts in respect of CA(ER)T

The terms credit and notional time are inextricably linked. In the South African system, one credit is awarded for 10 notional hours of learning where

... notional hours of learning refers to the learning time that it would take an average learner to meet the outcomes defined. It includes concepts such as: contact time, time spent in structured learning in the workplace, individual learning and assessment (SAQA, 2006, p. 4).

Internationally, credit is described in different ways but a broad common understanding seems to be:

Credit is the quantified recognition of verified [assessed] achievement of learning outcomes at a specific level of performance. It represents a particular volume of learning (SAQA, 2006, p. 4)

The intent of the NQF has always been that credits could be accumulated and transferred where the credits attained in different contexts are recognized.

However, first, it is important to note that credit accumulation and credit transfer are not the same. Credit accumulation is

...the totaling of credits required to complete a qualification... usually limited to a specific programme, often within a particular institution.

Credit transfer is

...the vertical or horizontal relocation of specific credits towards a qualification... on the same or higher level, that usually takes place between programmes, often between different institutions (SAQA, 2006, p. vii)

Credit accumulation therefore relates to, for example, achieving subject statements/certificates over an extended period of time (i.e. not within a single academic year) towards a qualification. This practice is common, particularly at distance education institutions where students often study half of their courses in a year, extending their study time. This practice, if it stays within a particular institution, is relatively unproblematic as long as the credits remain current. This is a practice that Umalusi is familiar with, for example where subject certificates are awarded for a part of the General Education and Training Certificate (GETC), after which, when a learner has completed the qualification, the qualification certificate could be issued.

However, the minimum number of years allowed to achieve a qualification, and how many subjects must be examined in one sitting, needs to be captured in the regulations and directives related to the qualification.

Credit transfer, on the other hand, consists of two dimensions (Butler and Hope, 2000, 9. 8):

Horizontal credit transfer involves students moving between institutions at the same level and receiving credit at their home institution for the time spent away.

Vertical transfer involves a student moving from an institution at one level ...to another institution at a higher level taking with him/her the credits earned at the former institution.

In the case of 'horizontal transfer' it seems to suggest exchange programmes in the United Kingdom. In the South African system it could simply allow for movement of students midway through an academic year, e.g. moving from one province to another. However, in Umalusi's context, 'horizontal' transfer could also mean transfer between qualifications within the GENFET framework, or through negotiated agreements between qualifications on different frameworks, i.e. the GENFET and QCTO (OFO), or the GENFET and HEQF.

Vertical transfer is more contentious, particularly where institutions do not offer a common curriculum. Where a common curriculum is taught, it simply means that a learner could transfer with his/her credits intact, and continues at the next level without having to repeat any part of the qualification (see below). In order to accept credits for vertical transfer, Hart (2005) suggests that a comparison be made between two learning programmes, which could lead to three possible results:

- *The outcomes are identical*
- *The outcomes are comparable enough to allow the full credit value of programme A to be counted in programme B*
- *The outcomes are sufficiently comparable to make programme A worth some credit in programme B*

Umalusi has always argued that outcomes were not sufficient in themselves to "hold / set a standard"; and that the linking of credits to notional hours only took into account "volume" and not "complexity". Therefore Umalusi's approach would be to consider the curriculum statements of qualifications, as well as the curricula and syllabi, the linked pass requirements and possibly even quality assurance approaches. Nevertheless, it recognizes that recognition decisions are made based on an agreed common currency, which could be common in content and/or size and cognitive demand.

A fourth definition not evident in international literature, but which has particular significance for Umalusi's emerging sub-framework, as well as its links with the QCTO and the HEQC, is the notion of 'recognition' of credits. These credits would not be the comparable or equivalent credits, but *complementary* credits in relation to a linked qualification, for example credits for the classroom based theory and practice part of an artisan qualification.

Other applications of the 'recognition of credits' could include credits between the sister qualifications such as the NSC and the NCV, particularly in relation to those 'fundamental' parts of each of the qualifications. Here, credit recognition

would refer to possible 'exemptions' (again, a concept not unfamiliar to Umalusi).

Likewise, in the establishment the National Independent Certificate (See Appendix 1: GFET Qualification Framework), credit transfer/ recognition/ exemption would need to be considered between all three types of qualifications on the same level on the framework. Further, with the development of core curricula for the Umalusi Independent Certificate, it should be possible for a student to transfer between institutions for those parts of the qualifications that are common, or where appropriate, specialized parts of the qualification, e.g. where one institution offers, in addition to the core curriculum for Management, a specialization in 'Golf Management' or suchlike.

Thus, a CA(ER)T system would open up the system and enable flexibility and mobility. As noted in the SAQA Bulletin (2006, p. 11):

In South Africa, part-time learning, as opposed to formal full-time, classroom-based learning, in the form of short learning programmes (short courses and skills programmes)[as well as extended study periods]is very prevalent. Numerous learners have been frustrated by the lack of credit transfer between short learning programme outcomes and the requirements of the full qualification from where the short programme is derived. A CAT system could encourage meaningful articulation of credits within the institution, but also, if such credits are awarded against a set of commonly agreed national outcomes [or curricula], across institutions and other contexts.

However, an important characteristic emerging from older credit systems is the development of communities of trust or zones of mutual trust (as it is called in the European context – Coles and Oates, 2005). Communities, or zones of mutual trust are reflected in the many consortia established within which institutions' credits are mutually recognized in various forms, e.g. the Southern England Consortium for Credit Accumulation and Transfer, the Higher Education Credit Initiative Wales, the Irish NICATS project and the Scottish SCOTCAT, as well as agreements between Ireland and the European Credit Transfer and Accumulation Systems (ECTS). This comes from having a common professional agreement regarding the general value of the qualification, curriculum and its assessment.

This is the important point – a CA(ER)T system is only feasible and meaningful within conceptually agreeable qualifications. Thus, the definition of the CAT system needs to be extended from (SAQA, 2006, p. 10):

A credit accumulation and transfer (CAT) system is an arrangement wherein the diverse features of both credit accumulation and transfer are

combined to enable lifelong learning. CAT system depend on the development of communities of trust where there is mutual acceptance of quality assurance processes ...to:

*A credit accumulation, **exemption, recognition** and transfer (CA(ER)T) system is an arrangement wherein the diverse features of credit accumulation, **exemption, recognition** and transfer are combined to enable **mobility, maximum student choice and flexibility, to encourage lifelong learning.** A CA(ER)T system depends on the development of communities of trust where there is mutual **agreement on conceptually similar qualifications** and mutual acceptance of quality assurance processes.*

3.3 Rules and principles of CA(ER)T

- 3.3.1 *The mutual recognition of credits offered by another system may come about as a political agreement between two bodies in different countries on the strength of the respective reputations of the two bodies making such an agreement. This is often the case in regional CAT systems, such as the European Qualifications Framework (EQF) system, but closer to home, has come about between South Africa and Germany in terms of their respective school leaving certificates.*
- 3.3.2 *Mutual recognition of this nature may also take place between two local quality assurance bodies, e.g. between the three Quality Councils in South Africa.*
- 3.3.3 *A credit accumulation, exemption, recognition and transfer system will be established according to a credit matrix, which is agreed, developed and established amongst partners within a community of practice and trust. A credit matrix takes as its point of departure the rules of combination, credit values and weighting of theory and practice of the qualifications, as well as the relative *complexity* and size of the various components of particular qualifications.*
- 3.3.4 *Credit accumulation refers to credits achieved over time within one curriculum, and one institution, including any credit-bearing short courses derived from such a qualification. It may also refer to credits achieved against a common curriculum, e.g. the National Certificate Vocational: Hospitality.*
- 3.3.5 *Credit exemption and recognition refers to the acceptance of credits in relation to a sister qualification, e.g. the NSC and NCV; and to linked*

qualifications, e.g. a qualification on the GENFET framework linked to QCTO awards (and vice versa).

- 3.3.6 *Credit transfer* means horizontal and vertical transfer. Horizontal transfer refers to credits at the same level transferable between institutions where the outcome/curriculum statements (subject content) are identical or comparable. Vertical transfer is where credits of a preceding year at one institution are accepted for entry into the next academic year at another institution.
- 3.3.7 In principle, the recognition of credits for the purposes of *transfer from one qualification to another* is determined by the nature of the qualifications, the relationship between them, the nature, complexity, and extent of the curricula associated with the specific subjects to be recognized for exemption and/or inclusion, and the nature of the assessment used.
- 3.3.8 Agreements reached will be *cast in the directives* that govern certification, but may also need to be more widely publicized, e.g. through regulation.
- 3.3.9 Ideally, the recognition of some portion of the qualifications (generally subjects) involved should be bi-lateral, but there may be conditions in which the *recognition only occurs in one direction*. Such decisions are best made through an analysis of the portions to be transferable.

3.4 Conclusion

While CAT systems elsewhere in the world are often as a result of globalization and the consequent mobility of labour across regions and borders, a CA(ER)T system within South Africa is much more about the realities facing thousands of students that, if they drop out of school, fail matric or fare poorly in their final examinations, have nowhere else to go without starting from scratch. However, Umalusi is in the fortunate position that it can change this situation with almost an immediate opening up of the system. It has two new qualifications which were conceptualized as 'sister' qualifications (See Appendix 1: GFET Qualifications Framework). Further, it is developing its framework with a number of other qualifications, where from the outset, a credit accumulation, exemption, recognition and transfer system could be established. Finally, through the mechanism of a convener system, Umalusi could draw on the inputs, ideas and expertise emerging from its sector. Hence, all the elements of a meaningful CA(ER)T system are already available:

- Conceptually similar/comparable qualifications;
- A centralized/common core curriculum;

- A well established quality assurance system; and
- An emerging community of practice.

4. References

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- New qualifications are highlighted

NQF level	Qualification types and qualifications					Certificates for units of learning
Level 1: Qualification type	General Certificate (GC)					Unit of learning (subject) certificates for adult learners
Designated variants	General Education Certificate (GEC), at Grade 9	General Certificate of Education (Adult) (GCE (Adult))		General Certificate of Education and Training (Adult) (GCET (Adult))		
Level 2: Qualification type	Elementary Certificate (EC)					Unit of learning certificates towards one or more qualification designated variants
Designated variant	(Grade 10)	(National Certificate (Vocational) 2)		Elementary Certificate		
Level 3: Qualification	Intermediate Certificate (IC)					Unit of learning certificates towards one or more qualification designated variants
Designated variants	(Grade 11)	(National Certificate (Vocational) 3)		Intermediate Certificate		
Level 4: Qualification	National Certificate (NC)					Unit of learning certificates towards one or more qualification designated variants
Designated variants	(Grade 12) National Senior Certificate (NSC)	National Senior Certificate for Adults (NSCA) / National Senior Certificate for Out-of-school candidates (NSCOC)	National Certificate (Vocational) 4	N3	Independent National Certificate	
	Further Certificate (FC)					
Level 5			National Certificate (Vocational) 5	N4 N5 N6	Further Independent Certificate	Unit of learning certificates