



"**The blind leading the blind**" is an idiom and a metaphor in the form of a parallel phrase which can be traced back to the Upanishads, written between 800 BCE and 200 BCE. The first translation into English gave us:

Abiding in the midst of ignorance, thinking themselves wise and learned, fools go aimlessly hither and thither, like blind led by the blind.

For this article, you will need a comfy chair, a clear head and a strong coffee or two.

I started writing this article a few weeks ago but have recently read ASQAs 171-page report 'A review of issues relating to unduly short training'. A few things caught my eye, none more so than the statement 'Regulation of duration in VET is complex and confusing'. I just don't see why this needs to be confusing or in fact complex.

I just want to say from the outset, this article is not designed as a criticism of anyone or anybody or organisation although as we all know it is an issue, someone needs to take the lead and deal with it. As usual, my VET Gazette articles are designed to start conversation and this is a fire side chat we need to have.

People that know me know I am from a background in engineering, specifically aircraft engineering. I worked for some years specialising in the overhaul, testing and troubleshooting of F111 jet engine fuel control systems. Sounds all very technical and it is. It is complex but not confusing once you are trained. If we don't train and listen to the experts, complex remains confusing. The two terms don't necessarily have to go together.

In the 16 years that I have been directly involved in the regulatory aspect of the Australian VET sector, I have seen rules applied to RTOs which often have no clear value for the RTO. I have seen plenty of subjective rules, some of which have good intentions but just aren't workable for many RTOs. I have also seen practices that are terrible for which no rule applies and regulators are largely powerless to act upon.

In the context of this article, I am referring to rules as compliance requirements and specifically the volume of learning and the amount of training.

Never in my time have I seen a rule so poorly defined, so inconsistently applied and so incredibly frustrating to decipher for both auditors and RTOs. Finding RTOs *not compliant* on the amount of training/volume of learning is like shooting fish in a barrel. You just can't miss.

For some reason though, we don't want to talk about it and I can't see why it is so difficult to work out. As usual, I am happy for feedback and discussion; I am just one person with

one opinion and there are a lot of smart people out there in the VET world and I may or may not be one of them but I want to know why we aren't talking about this?

Why is this such a big deal? Because of the subjectivity of this rule, auditors are guessing what they think is right and what they think is wrong. No two auditors will come up with the same result. RTOs are guessing what is right and what is wrong (trying to predict what an auditor might say) and no two RTOs will apply the same interpretation. We are told that we must consult with industry when we structure courses etc. and despite what industry might say, they may not agree with the AQF that all Certificate III courses need to be stretched out to twelve months for example. I would almost guarantee that, excepting traineeships, most wouldn't.

Remember when the idea of national regulation was first touted and we were told that we needed greater consistency across the country? This is not about ASQA and the way they apply the rule, it's about the standards for RTOs and how, while well intentioned, are not workable. They are creating inconsistency. In fact, I will propose that in many cases they can have the opposite effect to what they intended to do. I'll cover that soon.

A failure to better define this is costing a lot of RTOs a lot of business. It is forcing RTOs to create a false proposition just to get through an audit. Apart from survival as an RTO, there's no value in that.

WE NEED TO RESOLVE THIS – NOW!

Before we start, let's have a little test using one of my favourite types of questions, multiple choice (those easy multiple guess questions). See how you go!

Clause 1.1 of the RTO standards mentions the '*amount of training*'. The amount of training can be best defined as:

- (a) The number of hours allocated to all teaching activities including tutorials and any on the job training
- (b) The number of hours allocated to formal activities such as classes and other activities as well as workplace learning
- (c) The number of hours allocated to all teaching, learning and assessment activities whether scheduled or self-paced
- (d) The number of hours allocated to trainer led teaching activities and summative assessments but excluding any time spent on formative assessment.

Looking at the question and options above, if you selected (b) you are correct. But (b) is the only one of the options which contains two concepts that are hard to define and in trying to interpret the standard, we must first figure out what it wants us to do. What are formal activities and what are other activities?

So, that is the amount of training. Its partner in vagueness is the '*volume of learning*' which we don't find in the RTO standards but in the AQF. Whilst a good concept, I don't believe it should be applied at the AQF level. It should be articulated at the individual qualification level by those who develop training packages. In fact, the volume of learning's inclusion in the AQF was designed to drive those developing training packages (Skills Councils at that time) to ensure that the qualifications could not be delivered in short timeframes. The

volume of learning was never intended to be an '*indication*' of how long the training provider would structure a course over. Unfortunately, this is exactly what it seems to have become. Time constructed competency based training and assessment is an oxymoron.

By definition, the volume of learning includes all teaching and learning activities such as guided learning (classes, lectures, tutorials, online or self-paced study), individual study, research, learning activities in the workplace and assessment activities. The amount of training provided by your RTO is part of the overall volume of learning and relates primarily to formal activities including classes and other activities as well as workplace learning.

So, here's my dilemma. If we don't know what 'other activities' means, we have the following equation:

The amount of training			=	Volume of learning
formal activities including classes and other activities as well as workplace learning	+	WHAT?		guided learning (classes, lectures, tutorials, online or self-paced study), individual study, research, learning activities in the workplace and assessment activities

The amount of training + WHAT = Volume of Learning?

Here's what I do know in broad terms.

Classes	Traditional face to face usually - I can work out how many hours of those there are.
Lectures	Could be face to face or online – synchronous or asynchronous - easy to work out in hours.
Tutorials	Could be face to face or online (synchronous typically) – easy to work out in hours.
Self-paced study	Homework reading – online or from a book or notes – student is to pace themselves but I can work out what the 'average' student would take to read it in hours.
Individual study	I am not entirely sure if this is the same as self-paced?
Research	May be directed or self-directed but if directed I can work out the hours.
Learning in the workplace	Very difficult to allocate hours to but this would be where a traineeship would be very different to an institutional model for example.
Assessment activities	Whether formative or summative, easy to allocate hours to.

If we take the term '*amount of training*' literally, what does it say to us? Training is directed and is typically trainer driven. It is hopefully, student centred, but it is trainer directed. It could be face to face or it could be online or blended. If I supply reading materials in any media and ask a student to read them, I am training them also. Assessment is not part of training.

Confused? But wait there's more ...

The Western Australian Training and Accreditation Council have, in my opinion, always provided good fact sheets and in this case, they again have provided a fact sheet on the amount of training. What is interesting though is that in their attempt to define the issue of the amount of training, they include assessment (potentially).

Their fact sheet outlines that:

'The amount of training is the notional time that an RTO expects a learner to formally engage with learning resources provided by the RTO and managed by the RTO in order to meet the requirements of the unit of competency or a cluster of units of competency'.

The fact sheet goes on to say that this would include all supervised and/or prescribed activities specified in the RTOs strategy such as:

- Lectures and/or tutorials, online tasks and forums
- May include assessments
- Structured workplace experience (if it contributes to the learner meeting the requirements of the units)
- Workshop activities
- Project, assignments
- Structured prescribed readings and
- Prescribed follow up activities

When I see the two key words in here '*structured*' and '*prescribed*', I use the word '*directed*'. Now as far as I can tell, the only possible thing that a student may undertake which is not on the list above, is additional readings (those extras we give them that they may read if they wish) and learning in a workplace which is unstructured. This might be called non-directed, self-paced learning.

Isn't Western Australia's definition a bit different to the RTO standards?

Let's try and solve this.

This conversation doesn't account for the variables in learner's capacity to learn at different paces. To factor that in would require a thesis which this is not. My example is a 'typical' one with all the variables and you can look at any number of RTO websites to see how 'typical' this is.

I see the volume of learning as the overall duration of the program in weeks or months but not necessarily hours. The example below is a 'very close to reality' course and is structured so that the average learner should complete all tasks in a six-month period (an 18-week semester). Now within that six-month period, I articulate the amount of training using this example.

Example:

I deliver a Certificate III in Business as a non-traineeship and it is a Fee for Service course.

The course has 12 units of competency and my schedule looks like this:

Two classes per week for 6 hours per day – 32 classes. (I am leaving the last two weeks as an assessment block)	192 hours
Homework reading (paper or online) and some online tutorials - per week – 5 hours.	80 hours
Formative assessment – online quizzes – 1 hour per week	16 hours
Summative assessment – 2 full weeks of role plays, scenarios and practical tasks. 5 days per week, 6 hours per day.	60 hours
Total	348 hours

Hang on! The AQF says that I should be pitching at 12 months and/or 1200 hours. I am only at six months and only at 348 hours. The auditors are coming so I need to make this look better. I can't push it over six months because they are Certificate III learners and they'll get bored if I make it any longer and my retention rate will no doubt decrease which I don't want.

What if, I increase the homework to 10 hours a week instead of 5? That will give me another 80 hours. Now I'm up to 428 hours but still too short. What if I download a whole heap of readings, put them into my LMS or in a workbook and suggest the learner reads these too. Let's say another 10 hours' worth per week. That's another 160 hours. Running tally is now 588 hours. Great I am nearly half-way there but sadly I have run out of ideas. I have also made the course pretty boring because there's just too much reading. 20 hours per week outside of class time? Remember it is a Certificate III level and really, what Certificate III student is going to come to class 2 days a week and then go home and read a further 20 hours per week? If I give them the weekend off, they have to do another 6+ hours for the next three days each week. Is this realistic? Of course, it isn't.

Here's the negative I spoke about before. In trying to extend a course to make it '*reach a target*' we could actually make it less engaging especially for learners who are not advanced learners like those undertaking Cert III's (typically). A decrease in completion rates is a very likely result. So, is it a problem or am I over-reacting here?

Idea anyone? This is where I want the discussion to begin.

Many people have heard me say this repeatedly, anything that forms part of a quality system must be pitched at some type of standard and processes must be standardised. When trying to look for a benchmark upon which we can base or calculate our amount of training, there's only one that I am aware of (excluding some qualifications that mandate a '*placement*' component). That of course is the nominal hours.

Now I know nominal hours seems to be a dirty term that only applies to funded courses etc. but they are the only benchmark that exists so I ask, why do we continue to ignore them. Someone, somewhere has gone to some trouble to work these out and the NCVER publishes them for all units of competency as do the Victorian purchasing guides and others.

If a Government is going to fund a course using tax payer's money, I would hope that due diligence has been undertaken in working these things out.

Nominal hours are defined in the AVETMISS as:

‘Nominal hours is a value assigned to a program or subject that nominally represents the anticipated hours of supervised training deemed necessary to conduct the training and assessment activities associated with the program or subject.’

Back to my Certificate III program. The nominal hours (pending elective choices) will be in the range of 320–400. Remember, these hours are for training, which includes the face to face time, the materials I give them to read at home (paper or digital), and assessment (doesn't specify formative and summative so let's say both). Based on my model, it covers all that I wanted until I added all the superfluous extras to try and bump up the hours.

Looking back at the formula earlier, the only thing not included is extra readings and workplace learning. In my scenario, it is an institutional based learning program as the learners don't have a workplace in which to practice and I haven't included any placement. I don't want to give them too much work to do at home.

To keep the maths simple, I will aim for total nominal hours of 360. Based on a 40-hour week (real full-time study), whether that's full face to face or a blend of face to face and take-home reading, on or offline, its only 9 weeks. If my students work part time and I make the course part time (20 hours per week), it is (neatly) 18 weeks. So again, I ask, why are we being pushed to make it longer?

If a Government is prepared to fund a course to 360 hours, what or who says it should be longer and not a bit longer, but a lot longer? Nearly three times longer.

Now, a very general rule of thumb is the 80/20 rule, not necessarily as Pareto explained, but just a rule of thumb. If I work on 360 hours for all training, learning, formative and summative assessment, 80% of that (288 hours) would be for training and learning and the other 20% (or 72 hours) for assessment. Average that out over 18 weeks and it equates to 16 hours per week teaching and learning and 4 hours per week assessment which I think most would agree, is reasonable.

This scenario is neither confusing nor complex and we must stop dismissing nominal hours as being of no use to us.

IF WE USE THE NOMINAL HOURS AS A BENCHMARK WHEN WE DESIGN OUR COURSES, HAVEN'T WE AT LEAST GOT SOME GUIDE AS TO WHETHER WE ARE IN THE RIGHT "BALL PARK".

This is far better than what we have now which is *the blind leading the blind*. In fact, no one is leading anyone so it's the blind arguing with the blind.