Outcomes-based quality assurance: what do we have to lose?

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Abstract

This paper explores a deep conceptual flow in the emerging approach to quality assurance in South Africa – that the quality of an academic course can be evaluated through judging it against pre-specified learning outcomes. The central claim in the paper is that the internal coherence and the substance of a learning programme that are produced, in the main, by the logic of the discipline knowledge that informs it, cannot be externally regulated by a quality assurance process that condenses knowledge into learning outcomes. By implication, we question the validity of judgments made about quality that are based on the specifications of outcomes. We argue that this approach inevitably marginalizes discipline content, even when there is a formal assurance to value it, and even when peers are used in the evaluation process. The paper is divided into 4 parts. The first is a discussion on the context and principles that inform the formation of quality assurance systems in South Africa. The second analyses a small case study in quality assurance. The third part elaborates on the logic of a quality assurance process that relies on statements of outcomes rather than on discipline and content related statements. The fourth part analyses recent policy developments in quality assurance in Higher Education and their implications for evaluation of academic work.

Introduction

> *The panel is concerned that your learning programme outcomes are not measurable, e.g. you have used the phrase 'to develop an understanding' 14 times. How does one measure understanding?*

So reads the official form from the panel of evaluators employed by the ETDQA,[1] explaining the rejection of a short course on mentoring run by the University of the Witwatersrand (Wits). The panel of evaluators (henceforth, the evaluators) had rejected our application for accreditation on the basis that the course did not seem to them to comply with the outcomes captured in the two unit standards against which we had attempted to get the course accredited. We had thought that outcomes are a guideline to be interpreted against the needs of a specific course, and the evaluators claimed to agree with this approach. But the language of their evaluation reports and the spirit of the discussions we held with them suggested that the evaluators used the outcomes in the unit standards in a far stronger way. When we challenged them on the rigidity with which they enforced their technical interpretation of the outcomes, they told us on the one hand, that "It's not us, it's the law", and on the other, that we should not call their processes technicalities because "this is what we have been struggling for, for many years". No matter how we tried to show that the course met all the specific outcomes of the unit standards, albeit through our list of learning programme outcomes that foregrounded content, the communication hit an emotional and conceptual deadlock that we were unable to break through. The evaluators were unable to see what our course consisted of, and unable to hear what we were saying about it. Why?

In this paper we explore the conceptual differences which we believe operate behind this deadlock. Although it draws on our experience of a quality assurance process, we do not offer it as 'just a bad experience (shame)'. This would be a limited empirical exercise, which would not establish what the problem was really about. Instead, we use our analysis of the experience to demonstrate our central claim in the paper: that the internal coherence and the substance of a learning programme that are produced, in the main, by the logic of the discipline knowledge that informs it, cannot be externally regulated by a quality assurance process that condenses knowledge into learning outcomes. By implication, we question the validity of decisions made about quality that

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1 The quality assurance division of the Education, Training and Development Practitioners Sectoral Education and Training Authority (ETDP SETA).

are based on specified outcomes. We argue that this approach inevitably marginalises discipline content, even when there is a formal assurance to value it, and *even when peers are used in evaluation processes*. We believe that the academic community, including the HEQC, must address itself to the limitations of outcomes-based quality assurance.

The paper is divided into four parts. The first is a discussion on the context and principles that inform the formation of quality assurance systems in South Africa. We then move on to the second part, our experience of quality assurance with the Education, Training and Development Practitioners Sectoral Education and Training Authority (ETDP SETA). We show the conceptual deadlock that arose during the process of 'quality assuring' our course. We describe our experience from the point of view of the following question: what counts as giving access to the knowledge base of a course, and how can we describe it for the purpose of quality assurance? The third part elaborates on the logic of a quality assurance process that relies on statements of outcomes rather than on discipline and content-related statements. In this section we show that quality assurance which regulates curriculum design and programme evaluation through a content/outcome alignment marginalises discipline knowledge and as a result offers highly superficial regulation. The fourth part of the paper analyses the Higher Education Quality Committee (HEQC) draft document (2003) on 'Improving Teaching and Learning Resources'. This document acknowledges the importance of discipline knowledge in curriculum design. It also declares its adherence to the complexity of learning. Nevertheless, these two emphases get lost in the HEQC's attempt to marry two very different discourses: alignment to a specialised field of knowledge, and alignment to outcome statements.

The emerging quality assurance system in South Africa

Quality assurance became a focus of attention in South Africa with the introduction of the National Qualifications Framework (NQF) through the SAQA (South African Qualifications Authority) Act of 1995. Regulations under this Act passed in 1998 enabled the creation of Education and Training Quality Assurance (ETQA) agencies. Some 25 such bodies were created as part of the Sectoral Education and Training Authorities (SETAs), to (amongst other functions) quality assure programmes designed for their respective sectors of the economy (Departments of Education and Labour, 2002; SAQA, 2000b).

In South Africa, the justifications of quality assurance procedures foreground social values and a political project: many South Africans have been denied access to quality education, and quality assurance has been linked to the project of transforming the apartheid education system and opening up access more broadly to quality education and training. It was feared that in response to the desperate desire for education in South Africa many providers would offer poor quality education, while some would continue to offer high quality education to an elite, and regulation of provision would be difficult. This was in a climate in which formal educational institutions were labelled as unaccountable 'ivory towers', and in which there was also a strong desire to validate informal and non-formal learning (Allais, 2003b). Quality assurance was conceived of as part of the reforms to transform education and training, through the key mechanism of the NQF (SAQA, 2000b). Thus, while quality assurance, and in particular outcomes-based quality assurance, has been vigorously critiqued elsewhere in the world (see Vidovich and Slee, 2001), in South Africa they have tended to be above critique, strongly associated with the democratisation process (Allais, 2003a).

It is important to understand, however, that at the same time as these policies for the democratisation of access to education were being developed, the South African state was also developing a macro-economic framework which called for a greater role for the market in various ways. In South Africa the quality assurance system stems partly from the desire to protect learners and build quality education, and partly from the need of the state to create a regulatory framework for an education system which could then be opened up to the market (Allais, 2003a).

Outcomes as the basis for quality assurance

The notion of outcomes, located in standards and qualifications developed and located outside of institutions, seemed to meet all of these aims. The idea was that the NQF would provide standards against which institutions could be held 'accountable'; it would specify criteria of outcomes and outputs and thus would protect the public. The criteria to be used for such assurance would be contained in the exit-level outcomes of whole qualifications, as well as unit standards and programme learning outcomes (SAQA, 2000a) (SAQA, 2000b). The original formulation of the NQF conceptualised three processes of quality assurance: the creation of standards, curriculum development and teaching, and quality assurance. Each process would take place in entirely separate

institutions. This was based on the notion that the creation and guardianship of knowledge should not be the exclusive domain of experts (Nkomo, 2001). The argument (which largely remains intact) was that there should be a coherent division of roles: experts should develop and deliver learning programmes against common criteria and specifications of learning outcomes which are developed, monitored, and quality assured by stakeholders' representatives (Nkomo, 2001, p.23; see also Oberholzer, 2001, p.26). This division of roles in fact meant wresting away from educational institutions the power of defining knowledge and skills; they should no longer exclusively control the benchmarks of what was worth knowing, or be the arbiters of what learners had achieved (Allais, 2003b).

In the recent NQF Consultative Document (Departments of Education and Labour, 2003), it is proposed that the creation of standards as well as the quality assurance of programmes against these standards should take place in the same organization, albeit in separate parts of the organisation, but outside of providers. What remains unchallenged, therefore, is the organisational separation between 'provider's role' (conceptual design, teaching, and assessment of learners) and 'state evaluator's role' (creation of standards and quality assurance evaluation against the standards). This view of organisational separation is also advocated by the recent recommendations made by the HEQC draft proposed policy document (2003).[2]

The central conceptual thrust which underpins the current approach to quality assurance is thus the idea that an educational programme, designed and delivered by a provider, can be expressed by a configuration of learning outcomes and that this will enable an outside body to evaluate its quality using transparent procedures. Learning outcomes, and not discipline content, are seen to provide the basis against which a learning programme is to be designed and evaluated. In other words, the essence of a qualification is mapped as a configuration of learning outcomes, which are articulated up front, and which determine the design of the learning programmes that make up the qualification (or of a course in the case of unit standards).

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[2] In the "suggested good practice descriptors for institutional level evaluation" the draft stipulates that there should be an institutional authority "that is *independent* of the programme team" and that its role would be to approve the programme on the basis of "transparent criteria" (p.20).

The argument in support of this 'design-down logic' (*Ibid*, p.18) is that it makes the aims of the learning programme transparent to the various parties who have a stake in it, whereas a discipline or content-based logic of design is exclusionist and is only open to peers who are familiar with the content of the programme. It is also argued that the 'design down logic' has an advantage for the process of assessment and quality assurance, because outcomes enable the development of clear and transparent criteria. Thus, this approach is thought to enable an independent institutional authority to evaluate whether student learning and the curriculum are aligned with the exit level outcomes. What is not foregrounded is the assumption, which we claim is a false assumption, that outcomes are the type of knowledge that disclose meaning within and across disciplinary boundaries and thus enable the essence of a programme to be understood *similarly enough* by different stakeholders. Armed with this assumption, the idea of judging whether a learning programme meets the stipulated outcomes and enables students to attain them seems a straightforward enough exercise. In the following section we describe how this exercise turns out not to be straightforward at all.

Seeking accreditation

Reaching a deadlock

In 2003 the Wits School of Education applied to the ETDP SETA for accreditation of its short course entitled *Becoming a Mentor and Assessor for Educators in Schooling.* The course covers two unit standards registered with SAQA: *Guide and Support Learners* and *Plan and Conduct Assessment of Learning Outcomes*.[3] The purpose of the course is to provide knowledge and skills for experienced teachers who are allocated to be mentors of student-teachers. The course consists of 15 two-hour sessions. Each session consists of a conceptual lecture as well as group exercises in which mentors reflect on the complexities of their task or practise necessary skills. Many of these tasks are based on videos and transcripts taken from interactions between mentors and student teachers, so they provoke quite deep discussion. The course was running for the third year, and, since the previous year, had been under contract to the ETDP SETA as a component of their Learnership for Educators

[3] The two unit standards together amount to 27 credits at NQF level 5.

in Schooling at NQF level 6.[4]

In order to fulfil the accreditation requirements, we comprehensively filled in a file describing the course in outcomes-based language and providing some samples of activities and reading materials that we give to course participants. But the application for accreditation was rejected twice. The main criticisms were that:

- There were not enough programme learning outcomes, and many of the existing ones were not measurable;
- The order of the sessions and the programme learning outcomes did not follow the sequence of the unit standard outcomes;
- The programme learning outcomes were not sufficiently designed down from the unit standards.

The evaluators' report insisted that the submission did not demonstrate all the step-by-step outcomes that would scaffold participants' learning to enable them to attain the unit standard outcomes. After much heated discussion and a third submission containing considerable technical revision and far greater detail, the course was finally accredited.

During this process, not once did we discuss the perspective on mentoring which this course takes, its conceptual framework, or even mentors' performance on the course. In addition, it became clear that the context and purpose of the course had been misunderstood, even to the extent that evaluators were not clear about who the learners were.

A web of knowledge versus measurable outcomes

On reflection, it seemed to us that the difficulty we experienced was a principled one. Our course description (see below) is informed by two key

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4 The ETDP SETA insisted on accreditation for the course, although it had not been a requirement when the tender contract was originally signed. The reason given was that successful mentors could not be awarded registration status because the ETDP SETA database required a verification number, which in turn required an accreditation number. This particular aspect of the story, best left for another paper, is worth mentioning because it illustrates the unnecessarily complex bureaucracy that has emerged around quality assurance.

curriculum design questions. Firstly, what content knowledge is necessary in teaching the task of mentoring and secondly, what sequence and learning activities could assist our students in learning this content? Yet the description we were required to produce for the ETDP SETA had to follow the language of outcomes. So although our ability to describe the course in terms of outcomes became more 'refined', (as the lists of outcomes we provided became more specific) our description did not capture the conceptual logic of the course nor our pedagogical efforts to create access to its key ideas. In the following section we describe our conceptual difficulty to capture the logic of the course. We trace it to the *gap* between two very different discourses: the discourse of discipline knowledge, and the discourse of specification of outcomes.

The course design

The conceptual framework of the course is drawn from sociology of education and international research into mentoring in schools. Based on Furlong and Maynard's (1995) work on mentoring, the course constructs 'Socialisation and Development of Student Teachers' as the key narrative. This guided us in selecting and sequencing the knowledge about mentoring and assessment. We claim that our selection and sequence are necessary for mentors in order to choose *appropriate* methods of assessment and observe with *discernment*, record *relevant* evidence, provide feedback in a *constructive* and focussed manner, and plan for *improvement*. In our design, the trainee-mentors are introduced to a framework for understanding mentoring which follows the development of student teachers through four phases: 'Beginning Teaching and Personal Survival'; 'Dealing with Difficulties'; 'From Teaching to Learning' and 'Autonomous Teaching'.[5] At specific points we insert conceptual issues pertinent to the practice of mentoring, such as 'dialogue', 'reflective listening', 'the cognitive and affective dimensions of feedback', 'the cultural and social dimensions of classroom lives', 'identity', 'holistic assessment', 'criterion-referenced authentic assessment', and 'empowering the profession through mentoring'. These issues diversify the discourse, thus creating a conceptual web embroiled with more depth. Throughout the course, the trainee-mentors work through tasks that draw on day-to-day mentoring activities. These tasks work with the familiar, but also get trainee-mentors to

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5 The course is structured so as to examine the specific difficulties that are anticipated in each of the four phases of student-teacher development and the corresponding changes in mentoring roles. **Phase 1:** 'Model'; **Phase 2:** 'Coach'; **Phase 3:** 'Critical friend'; **Phase 4:** 'Co-Researcher'.

rethink that which feels familiar, by recruiting the new conceptual framing. This knowledge web and the attempt to make the familiar strange are a common academic approach to designing a course.

The evaluators' requirements

But this kind of design description was not allowed for anywhere in the specific outcomes of the two unit standards against which the course was measured. It was not recognised by any of the evaluation reports either. The quality assurance file requires providers of a short course to supply task specifications. In the case of our course, this referred to showing how our course prepared trainee-mentors for specific outcomes such as 'Identify learners' needs regarding anxiety and barriers to learning'; 'Provide advice to learners'; 'Plan and prepare for assessment'; 'Conduct assessment and document evidence'; 'Provide feedback to relevant parties', and so on.[6] The evaluators told us to demonstrate the specific steps to scaffold the path of attainment of the specific outcomes. These steps (or learning programme outcomes) needed to be described in a specific way: they had to start with an active verb and be specific enough to be measurable.[7]

The evaluators provided us with an example of designed-down learning programme outcomes. The steps were presented as a scaffold to learning the following specific outcome of 'Conduct Assessment and Document Evidence':

1. 'Review the task specifications against which the learner must perform'
2. 'Agree on the standard of performance to achieve'
3. 'Agree on the tools to use when observing the learner'

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6 Specific outcomes 1 and 3 of the 'Guide and Support Learners' unit standard and specific outcomes 1, 3 and 5 of the 'Plan and Conduct Assessment of Learning Outcomes' unit standard.

7 Here is how the evaluators formulated this requirement: "The general rule for programme development is that firstly the programme is aligned to the relevant unit standard/s and that there is evidence of learning programme outcomes that demonstrate the scaffolding steps that the learner will follow towards achieving the necessary competencies." They also stated that "an outcome, whether it is specific or a learning programme outcome [more general or generic outcome] starts with an active verb, e.g. Identify, Plan, Prepare etc. Your learning programmes are stated as objectives. . .", adding "the panel is concerned that your learning programme outcomes are not measurable, e.g. you have used the phrase 'to develop an understanding' 14 times. How does one measure understanding?"

4. 'Observe the learner'
5. 'Give feedback to learner on present competence'
6. 'Give feedback to learner on further development needs'.[8]

The first thing to note about this example is that it conflates outcomes, the supposedly end product of learning, with the steps of learning that are required to attain the outcomes. This means that the process of learning and the content knowledge are backgrounded. The steps above do not describe learning but give only a sequential *specification* of the learning outcomes. Secondly, five of the six learning programme outcomes listed above arguably fit in better with other specific outcomes of the unit standard.[9] This means that the relationship between the steps and the specific outcomes is fairly arbitrary. Thirdly, the steps are presented as a prescription. They are formulated in an official 'policy speak', as 'things' to be followed like a set of binding rules. To use Davis' metaphor (1996), the evaluators present the steps as an 'official map' or 'script'. Fourthly, the core issue of what kind of understanding of mentoring and assessment is necessary in order to choose *appropriate* methods of assessment, observe with *discernment*, and record *relevant* evidence, is completely silenced. What is notably missing is a broader perspective on the practice of mentoring. The discourse of specification of outcomes ignores that the professional judgement required when, for example, observing a learner, can never be totally objective but is always enhanced or limited by the knowledge base of the assessor. Thus, a good description of a course, from an academic point of view, is a description of the knowledge of the course, which is discipline-based and not outcomes-based, and which is presented together with justification of the selection.

This fourth point gives rise to a crucial question: what counts as 'giving access' to the knowledge base of a course, and how do we describe it for the purpose of quality assurance? Surely, a good process of quality assurance should request a description of the means and processes of giving learners

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8 Quoted verbatim from ETDP SETA evaluators' report.

9 For example, in our view, 'Review the task specifications against which the learner must perform' fits better with Specific Outcome 1: Plan and prepare for assessment. 'Agree on the standard of performance to achieve' and 'Agree on the tools to use when observing the learner' fit better with the Specific Outcome 2: Prepare candidate for assessment. 'Give feedback to learner on present competence' and 'Give feedback to learner on further development needs' fit better with Specific Outcome 5: Provide feedback to relevant parties.

access to the knowledge base of the course and, by implication, to the practice they are entering? Such a description is a complex endeavour. In the next section, we briefly explore this complexity and draw some implications for quality assurance.

Can webs of knowledge be aligned to outcome statements?

Technical effectiveness versus principled judgement

Carr (2000, p.94) makes a distinction between 'technical effectiveness' and 'principled judgement'. Broadly, Carr distinguishes between the actions that persons do as habits of day-to-day events and the more complicated actions that they can do only after a due process of reflective education. So a person can be trained to act with respect in the presence of a higher authority without embedding her/his self in the question of how this authority came to be respected in the first place and whether the claim to being an authority is rationally justifiable. To take an example from mentoring: a common requirement when observing a lesson is to watch out for the student-teacher's management of discipline in the classroom. The mentor needs to make a judgement about whether or not the student-teacher knows how to maintain discipline within the culture and context of the school. The question for a mentoring course becomes: what is involved in learning to observe a student-teacher maintaining discipline in a classroom? Should a course primarily furnish the trainee-mentors with task specifications (see above) for what to observe regarding classroom management ('technical effectiveness'), or should a course primarily provide access to the knowledge base of understanding discipline issues ('principled judgement')? Learning for 'technical effectiveness' is relatively simple, as it generally does not require learners to go beyond what Walzer calls "immediate objectivity" (1993, p.169), i.e. a sense that ways of doing things are familiar and right.

It is quite possible for a group of experienced teachers on a mentor course to agree on some of the pre-specified techniques of control that are listed in a task specification about classroom management because the list invokes a sense of 'immediate objectivity'. This is the sense with which all teachers interact in their day-to-day school environment. They deal with it through actions and understandings that have been developed over time and which strike them as the right way, the useful way and more than that, as the only

way. Their dealing with the daily school environment is 'immediate' in the sense that they do not need to attune to the density of meanings which inform their actions and understandings in the quick flow of events. This also means that if the reading of 'specifications' and 'standards' elicits ambiguities, trainee-mentors would normally ignore the ambiguities and instead recruit meanings from their practice so as to impress some order on the 'map' with which they can then proceed.

Learning for 'principled knowledge' is far more involved. It requires course designers to create what we would like to call 'cognitive distance', i.e. ways of understanding that disturb or rupture the sense of 'immediate objectivity' by creating new connections and relationships between concepts. So, in the example above, of preparing trainee-mentors to observe and assess the management of classroom discipline, the notion of discipline does not refer to a set of isolated actions that can be technically implemented from a list of specifications. It is embedded in the *idea* of teacher control, which in turn derives its meaning from a web of conceptual relations: between *context* (the culture of authority in the school), *age relations* (the way in which authority is constructed for young or older learners), *subject knowledge* (what kind of regulation is preferred for the content of the lesson) and a *teaching philosophy*. In addition, the *socialisation phase* of the student-teacher (whether s/he is in her first or third phase of development) will influence the emphasis that is placed on discipline. Course designers therefore need to create a cognitive distance between classroom discipline as listed in the task specifications and classroom discipline as constructed through a conceptual web. They cannot rely on what appears to be consensual objects like 'tasks specifications' and 'standards of performance', but must instead initiate them into new ways of seeing. In Beck's and Young's (2003) terms, relying on "task specifications" and "standards of performance" smacks of knowledge authoritarianism, as denying trainees "access to the forms of knowledge which permit alternative possibilities to be thought" will inevitably "negate the possibilities of understanding and criticism".

Cognitive distance

Understanding the value of cognitive distance has direct implications for the process of quality assurance, as cognitive distance cannot be measured by any degree of specificity, although it can be evaluated by peers who share the "language of specialisation" (Bernstein, 1996). If we take the specific

assessment criteria of: "Assessment planning addresses the need for cost-effectiveness and takes into account the assessment context",[10] a course designer may claim that thinking about cultural differences, including the meaning of culture and cultural practices, is a relevant learning process. Nevertheless, it is likely that quality assurance evaluators, who want to see specifications of programme learning outcomes, will perceive this kind of preparation as *too distant* from the above assessment criteria. On the other hand, providing trainee-mentors with a cost-effective assessment plan[11] will be perceived (by academic designers) as being too *thin* for developing the discerning judgement required by mentors' practices. At stake here is that when the cognitive distance between a specific performance and the prescribed learning outcome is perceived as 'too big', judgements about claims of quality (of design and of teaching) require inferential thinking, which in turn requires familiarity with the specialised content that supports the link between a performance and an outcome. When the cognitive distance is perceived as 'very small', a non-specialised gaze is probably sufficient.

We use the terms 'too distant' and 'too thin' to suggest that an outcomes-based discourse of quality assurance is saturated with false epistemological assumptions about what kind of performances can show a learning path with reliability. Wolf's detailed empirical and conceptual critique (1995) has shown the flaws in the assumption that a specification of outcomes can reveal standards of quality. She shows that the desire to reach an agreement on the meaning of learning outcomes and assessment criteria often leads to a level of reduction that is educationally unsound:

> The more serious and rigorous the attempts to specify the domain being assessed, the narrower and narrower the domain itself becomes, without, in fact, becoming fully transparent. The attempt to map out free-standing content and standards leads, again and again, to a never-ending spiral of specification (Wolf, 1995, p.55).

Unless the evaluators are very familiar with the field of practice that they evaluate, this madness of spiral specification, Wolf argues, will never end. In our example of the mentoring course, we experienced a lack of congruence between the conceptual webs we tried to create for accessing the knowledge

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10 Unit standard: *Plan and Conduct Assessment of Learning Outcomes*, Specific Outcome 1, Assessment Criteria 1.2

11 For example, where task specifications that are not relevant to a poor context are cut out and standards, which are not appropriately linked, are adapted.

base of the practice of mentoring on the one hand, and what we were required to describe for quality assurance purposes on the other. Our increasingly detailed attempts to demonstrate specifications of the learning outcomes led to a successful completion of the bureaucratic aspects of quality assurance and thus earned us accreditation by the ETDP SETA. Yet the process did not provide information about whether or not our design and pedagogy successfully generated the access we intended to create.

Why does an alignment of a course to outcomes marginalise discipline knowledge?

Any quality assurance process must be able to evaluate a course against something. The question becomes: to what is a course aligned? There are two main possibilities: the first is alignment to a specialised field of knowledge (disciplinary content-based alignment) and the second is alignment to outcomes (outcomes-based alignment).

Alignment to disciplinary content

When the description of a course is aligned to disciplinary content, the line of accountability is to the schemes of perception and appreciation, key procedures, and concepts that together inform the logic of a field of knowledge and the practices it adopts for socialisation of practitioners.[12] In this notion of alignment, content knowledge is *valued in and for itself*. Aims are articulated in relation to specific content; they do not determine the content. Their appropriateness is judged in relation to the specialised demands of the content, as the point of providing a course is primarily to give learners access to this specialised content. In this view one does not discount instrumental goals of using the knowledge for 'things' in the everyday or for the workplace. Nevertheless, one would not pretend to have the power to generate direct causal connections to skills that have to be demonstrated in the workplace (neither would one assume that the knowledge relayed is a configuration of absolutely true statements).

Describing a course from a disciplinary perspective foregrounds very different kinds of questions for quality assurance assessment. Firstly, is the content

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12 The notion of accountability is our adaptation. The ideas with which we describe 'knowledge field' content are drawn from Messer-Davidow, et al. 1993; Knorr-Cetina, 1999.

sufficiently representative of the field and its debates? Secondly, does the course give students opportunities to meaningfully account for what they know; using ways of seeing that are specific to the specialised content? Thirdly, does the course provide a sequence of content and modes of representation that could enhance students' "epistemological access" (Morrow, 1993)? Fourthly, does the course help to promote scholarship of work in the institution? A description of a course that attunes to these goals could highlight how the course accommodates the difficulties that students have in coming to understand new conceptual relations and what pedagogical strategies are used to address their misconceptions and gaps. It could also include a description of the course's approach to assessment or even a short analysis of students' performances and the kind of support (criteria of assessment, feedback, opportunities of self and peer assessment, and so on) the course presenters attempted to provide. This kind of description would enable, if desired, an "assessment conversation" (Black and Wiliam, 1998) about how the ideas are combined and which ideas matter most to the specific field of inquiry covered in the course.

Alignment to outcome statements

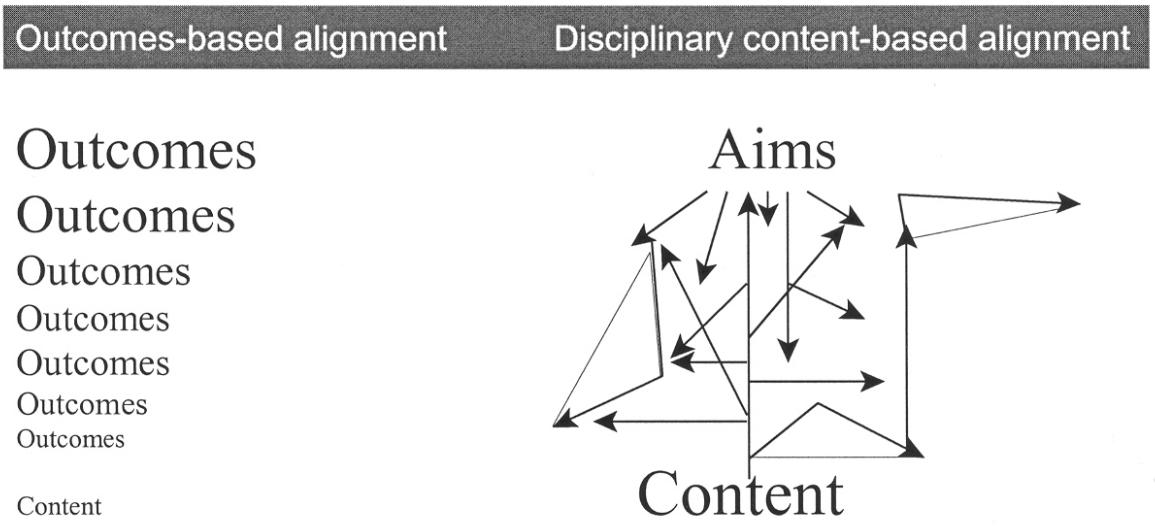
When the description of a course is aligned to outcomes which are created independently of the process of course design, the line of accountability is to a list of specifications. In this view, alignment can only be shown by describing how the content of a course and its pedagogy *serve the outcomes*. This gives rise to a false perception that a segment of content selected from a discipline can be causally related to a specific learning outcome, i.e. the segment of content is judged to contribute directly to the attainment of the outcome. This is commonly expressed in South Africa in the phrase 'content is the vehicle through which the outcomes are achieved'. This move makes the schemes of perception and appreciation embedded in content a secondary issue, instead of the primary point of a learning programme. In this sense it instrumentalises knowledge.

The marginalisation of knowledge

It is important to understand what happens to disciplinary content when it needs to be described as something other than itself. As mentioned earlier in the paper, the knowledge base of the course was drawn from sociological research into mentoring in schooling, foregrounding the four phases of development that student-teachers pass through. Embedded in this selection is a claim that understanding *this* knowledge *enables* a mentor to make nuanced and appropriate judgements about the quality of the student-teacher's

teaching. What happened to this knowledge in the process of description and negotiation that led up the accreditation of the course? Was our (embedded) claim interrogated?

Firstly, the course content became marginalised. There was no question in the accreditation file that asked us to describe it. During discussions, we were told that we should not explain it because "it is just theory, which is less important than what people learned to actually do". Secondly, when we tried to fit it (align the content) to the specific outcomes of the unit standard for mentoring, we felt that it was crucial for nearly all of them, even though it did not relate to any one outcome in particular; the content was what would enable cognitive distance in relation to all the outcomes. Now, from a point of view of curriculum design, this is not an unfamiliar problem. When the design of a curriculum follows a specialised knowledge base it is common to find a broad contextualisation of content, where content relates to several aims. However, the significant difference between the notion of aim and of outcomes lies in the 'design down' requirement that follows from content/outcome alignment – that the content can be derived from outcome statements, instead of keeping them in cognitive distance as allowed by a content/aim alignment. Figuratively the difference between these two notions of alignment resembles the difference between a maze/web relationship and a Russian Doll alignment:



In the quality assurance process, the discussion on the knowledge was completely marginalised. The relationship between the content and the outcomes in the course was left to arbitrary interpretation. Thus, in our opinion, our course was never properly evaluated.

Thirdly, the knowledge lost its value. Because it was not prominently in the centre of the course description, it could not influence or generate a new perspective on mentoring. The content of the course was thus mystified – just the opposite of the transparency that outcomes-based education is aiming to achieve. Taking this argument a step further, if we had designed the course starting from outcomes and had not given content knowledge a prominent place in our design, the process of accreditation would have been short and efficient and yet our course would have lost its power to enable transformative learning, which requires that knowledge is explored deeply enough for learners to discover the multiple ways in which it could be used. Fourthly, it was this knowledge that differentiated our mentoring course from others. The outcomes that all providers must meet are the same – it is the differing inputs they offer that makes for the difference in quality. So if the knowledge input becomes silenced, then on what basis can a comparison actually take place?

In sum, in our interaction with the ETDP SETA it was not possible to have a discussion about the knowledge-base of our mentoring course (or any mentoring course for that matter) because the evaluators were acting in the role of generic assessors who look for causal links between activities and outcomes. Thus the key aspect that makes for different qualities – the selection and sequence of a body of knowledge, its contextualisation and the pedagogy – were left unevaluated.[13]

Does the CHE offer a better way to use outcomes in quality assurance processes?

Support for deep learning

Sitting in this darkness, we then turned to the Higher Education Quality Committee (HEQC) of the Council on Higher Education (CHE). In view of our experience of the gap between the outcomes-based discourse of the ETDP SETA and our discipline and learning-based discourse, we decided to

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13 It is true that many academics, in South Africa and elsewhere, do not work rigorously with the knowledge web as we have described it when designing courses, and the approach could be seen as more an ideal than a reality. However, it is the ideal we should be striving for. Appropriate quality assurance mechanisms would therefore be those likely to encourage and develop this type of approach, as opposed to driving academics away from it, or using declared adherence to an outcomes-based approach to hide weak provision.

investigate the quality assurance approach more broadly. We wanted to understand whether the problem was specific to the ETDP SETA, or whether it was in fact symptomatic of a conceptual problem with the outcomes-based approach to quality assurance. Could the HEQC provide a way of working with outcomes which also worked with content? Or was the 'genericism' that we found in the ETDP SETA process in fact somehow internal to an outcomes-based approach?

A key document for quality assurance in Higher Education is a draft document entitled 'Improving Teaching and Learning Resources', put out by the HEQC, (2003). In this document, the HEQC attempts to deal with the problem of marginalising knowledge by stressing the role of subject experts in quality assurance: "Judgements about the attainment of learning outcomes and curriculum alignment are difficult to make, and are usually best conducted by suitably qualified and experienced expert peers, familiar with the profession/ discipline(s) and educational practices involved" (HEQC, 2003, p.27). We agree completely, and agree that the purposes of quality assurance, i.e. improved learning and teaching, are more likely to be achieved by an evaluation conducted by peers than by a committee of stakeholders.

The starting point for quality assurance in the HEQC document (pp.6-8) is rooted in a meta-narrative of learning and teaching. The discussion on teaching and learning (p.7) articulates an approach to teaching and learning that foregrounds a well-structured knowledge base and a focus on underlying meanings and conceptual work. The document rightly points out the need for 'transformative' learning that must be met by certain forms of good practice in teaching. Among these forms is the need to create powerful learning environments in which students are given opportunities to reflect on their ideas, to recognise the difference between 'deep', 'strategic' or 'surface' learning, and in which teachers attempt to make the epistemic principles of the discipline explicit:

> Clearly, it is only a deep approach to learning that results in transformative learning, for it is characterised by a focus on underlying meaning, the use of a well-structured knowledge base, relating new knowledge to old knowledge and working conceptually and relationally as opposed to learning isolated facts (the surface approach) (HEQC, 2003, p.7).

As the HEQC proposes on page 8, a lecturer should try to facilitate transformative learning. This happens through "facilitating the development of cognitive structures by 'lending' learners one's own conceptual anchors,

cognitive structure and strategies to assist their thinking and acting" or by "getting students to make connections with previous knowledge and maximising their awareness of their own knowledge construction". The HEQC expects academics to "be responsive to the needs of its student body" by integrating "teaching and learning strategies that develop language proficiency, academic skills and academic literacy and enhance linguistic, cognitive and epistemological access to specific academic discourses and their practices" (p.55). We agree, and would argue that in order to meet these laudable goals it is desirable for academics to embark on self-reflection, immersing themselves in the content and debates of the discipline through reading and research, analysing students' work so as to diagnose what they don't yet understand, discussing these issues with colleagues, and so on.

Even more promising is that the document acknowledges that a quality assurance strategy for the improvement of learning and teaching should not constrain teaching innovation. The document approvingly quotes Gibbs who warns that "institutional factors that constrain teaching innovations on the ground and that are typically not addressed include time-tabling, the allocation of teaching time for contact hours but not for curriculum development, and *assessment regulations and practices,* et cetera" (quoted on p.9, our emphasis).

Recognising the complexity of learning and the goal for teaching to create the conditions for transformative learning to occur, the HEQC document then declares its purpose to develop a comprehensive teaching and learning strategy at the level of institutions. We were curious to understand how this institutional level policy with its aim to establish systemic assessment of quality assurance would carry forward the conception of teaching and learning described above.

Constraints of the 'design down' discourse of outcomes

On the one hand, the HEQC emphasises that the curriculum design and teaching of a course should reflect developments in a specialised field of knowledge. It requires that a curriculum of a programme offers "sufficient disciplinary content and theoretical depth. . . and that the content and theory taught on the programme are current and up-to-date with recent developments in the discipline/field" (p.22). The HEQC document also admits that:

> The nature of teaching is context related, uncertain and non-provable. Effective teaching refuses to take its effect on students for granted. It sees the relation between teaching and learning as problematic, as uncertain and relative. Good teaching is open to change; it involves constantly trying to find out what the effects of instruction are on learning and modifying that instruction in the light of evidence collected (Ramsden, 1992, p.102 quoted in HEQC, 2003, p.7).

This implies that, given the changes and development in the content one teaches and its contextualisation for students' needs, a responsible academic practice is inwardly attuned. On the other hand, the HEQC quality assurance process requires a demonstrated alignment in which content should serve the learning outcomes. The document refers to the 'design down logic and method' of programme development. This 'nationally preferred method' involves using:

> Exit level qualification learning outcomes *to determine* the means of the teaching-learning process, e.g. the module or course combinations and their specific learning outcomes, disciplinary content and teaching and assessment methods that are employed to deliver the programme (HEQC, 2003, p.18, our emphasis).

This notion, in which outcomes *determine* the means of the teaching-learning process, suggests a view of causality.[14] The HEQC document, despite its initial statements about teaching and learning, does not provide us with a way of working with content because it is locked into this 'design down' approach.

In addition, we found that the strategy emphasises new administrative and structural interventions, which are rooted in an outcomes-based discourse. The document draws a division of labour between an institution's quality management system, which is responsible for the administrative organisation and evaluation of programmes and those who actually design and implement the programmes, namely the academics. The main 'Resource' is a new management strata that includes a senior manager, a quality committee, quality promotion staff "with expertise and theoretical understanding of higher education and evaluation", programme directors, et cetera (HEQC, 2003, p.30-31). The other 'Resource' consists of many pages of evaluative questions and descriptors of good practice which need to be responded to by a massive data collection about management, administration, statistics, student opinion, curriculum outcomes alignment, and so on.

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14 In conversation with Nazir Carrim.

Clearly what we have here is a conceptual misalignment between problem and solution, whereby epistemological difficulties that affect academic learning are addressed primarily by bureaucratic practices of regulation, and as a result, we argue, get marginalised by the quality assurance process. We believe this is not a simple resurgence of bureaucratic control, but is driven by two conflicting approaches to quality in education.

Other possible approaches to using outcomes without 'design down'

It is conceivable, however, to have a 'soft' reading of outcomes, in which outcomes, defined by subject experts at a sufficiently general level and interpreted by subject experts from the same professional community of practice, can provide a context for a professional conversation that can improve practice within a discipline, knowledge area, or profession.[15] As such, and as long as the community of professionals understands the inherent limitations of the outcomes discourse and shares an understanding of the field or discipline, outcomes could play a useful role in conversations about quality.[16]

There are two concerns, however. The first is that this approach can be marginalised by the genericism that is inherent in the idea that different learning pathways can be designed and measured by equivalent (broad) sets of outcomes. Genericism is based on an assumption that there is no significant difference between disciplinary, occupational, and everyday knowledge; it highlights 'skills' and 'competencies' that can be gained through or without immersion in specialised fields of disciplinary content, and it re-invokes the 'design-down' approach.[17] The second is that Genericism claims to authorise various stakeholders to have a stake in the design of a curriculum pathway.

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15 The outcomes for the teacher education qualifications, for example, which were developed by a standards Generating Body external to any course/programme design processes, do integrate knowledge and understanding into outcome statements, and seem to be general enough to provide useful direction to course designers.

16 See Shalem and Slonimsky (1999).

17 This genericism is also expressed through the attempt, through the outcomes-based approach of the NQF, to validate formal, non-formal, and informal learning against the same standards, as if essentially they are the same thing.

For evaluation and quality assurance, the idea of multi-voices means a preference to use general 'experts in outcome-based assessment' over and above discipline content specialists.

Here are some of the questions that remain unanswered in the 'soft reading' of outcomes-based alignment:

- Can we convince multi-voices that outcomes have a role in a description of a course, but they do not form its essence? In other words, will the inherent limitations of statements of outcomes be understood, and, hence, the limitations of multi-voices/stakeholders?
- Will there be a move away from 'design down'?
- Won't the bureaucratic mechanisms of accountability and the epistemological limitation of 'outcomes language' undermine the specialised knowledge of 'peers', so that even if they are appointed to serve on evaluation panels, they will not be able to insist on an inward reading of course content?

A different 'soft' approach argues that, when working in a disciplinary form of alignment, it is possible to conceive of useful statements of aim that enable academics to describe their understanding of their field of knowledge. Course designers, and not an external body, design these statements deriving them specifically from what they are trying to teach. This means that instead of starting with outcomes and designing the content down from them, this approach derives the aims from within the logic and emphasis specific to the discipline content of the knowledge field. For example, the statement of aim for a course on assessment could be: "The course aims to help students understand and defend interpretations of validity and reliability in assessment", or "The course will model assessment methods which attempt to transmit criteria in more explicit ways and to diagnose students' difficulties". These kinds of statements would make the relationship between content and aims a descriptive one and would not require speculations on which content best serves which aim. The obvious critique that could be raised by the quality assurers against this ('soft') approach is that if course designers decide on the content, methods and aims, there is no way to externalise their decisions or to ensure their quality. This criticism is often accompanied by declarations of

mistrust in academics.[18]

But as we have demonstrated above, outcomes, particularly at a very general level, are essentially self-referential statements. On their own they do not refer to anything. In order for them to refer to something, they need to be specified to such a degree that they destroy the richness of content knowledge. As such, outcomes cannot arbitrate between conceptions of the good, and hence cannot harness judgements of evaluation against possible inconsistencies and unreliability.

In conclusion

If 'cognitive distance' is to remain an important educational goal of academic practice, then the alignment between disciplinary content and learning outcomes needs to be re-negotiated. Currently, the "nationally preferred method of design-down logic" emphasises that outcomes "will *determine* the means of the teaching-learning process" (CHE, 2003, p.18, our emphasis). This suggests a view of causality in the outcomes-based alignment that we hope we have proved to be unsustainable.

The analysis of our experience has illustrated how evaluators of an outcomes-based quality assurance process try very hard to account for learning through a configuration of learning outcomes, yet are unable to make meaningful judgements about the quality of the course. We believe that this problem can no longer be ignored by academics and that instead of compliance with the new regime of regulation, they should engage in a debate on re-centering academic knowledge in accountability processes.

The problem with compliance is that outcomes-based quality assurance processes are not simply an irritation, whether necessary or unnecessary. They are part of what Bernstein argues are processes which are creating

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[18] This is particularly worrying in the light of the low trust in academics' professionalism displayed by the HEQC document. The HEQC document describes academics' loyalty to their discipline as causing "anarchic behaviour" (p.9). It suggests that because academics pursue three sets of goals, namely disciplinary, departmental, and individualistic goals, their loyalty to the institution is in conflict. This implies a deep lack of trust in academics' ability to make discerning judgements, one of the most important conditions of possibility for achieving 'transformative learning'!

> a new concept of knowledge and its relation to those who create and use it. . . Knowledge, after nearly a thousand years, is divorced from inwardness and literally dehumanised. . . what is at stake is the very concept of education itself (2000, p.86, quoted in Beck and Young, 2004, p.2).

Simply wishing that the audit would go away, or filling it in as fast as possible, to be able to 'get on with our real work', does not acknowledge that by accepting this approach to measuring quality, we are in fact complicit with the emergence of a new culture of knowledge production, a culture that flattens depth, eradicates the value of tradition, and inculcates serious mistrust in academic practice. There are no short cuts to quality. Genuine ethical responsibility can only develop where the practitioners themselves are entrusted with the responsibility of ensuring the quality of the service they offer. This requires an intensive socialisation into the values and standards of a professional community (Minztberg, 1993). Only a meaningful socialisation into academic practice that is respected for its autonomy will cultivate responsible, highly motivated, and highly skilled individuals. As argued by Minztberg, changes and accountability can only be introduced through the slow process of changing the professionals; changing who can enter the profession, what they learn in its professional schools, and how willing they are to improve their content knowledge.

Post script

This paper should not be read as an argument that there is no place for external review outside of the peer review mechanism, nor that the peer review mechanism in its current form is adequate. This paper has analysed the problems with a particular approach to quality assurance, and does not have the space to address alternatives. It is clear, however, that the academic community, including the HEQC, must address itself to the development of such alternatives, if we are to avoid the problems inherent with using outcomes as the basis for quality assurance. One possibility worth exploring could be greater control over the peer review process, with, for example, a nationally approved list of peer reviewers, and stipulations that the same reviewers cannot be continually used. Funding should also be channelled into this mechanism, as its current weaknesses are probably at least in part caused by the small amount of money available for peer reviewers.

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