

Design Evaluation of *Draft* Policy on Community Colleges (Oct 2014) Draft Findings and Recommendations



higher education
& training
Department:
Higher Education and Training
REPUBLIC OF SOUTH AFRICA



THE PRESIDENCY
REPUBLIC OF SOUTH AFRICA

DEPARTMENT: PERFORMANCE MONITORING AND EVALUATION

DHET/DPME

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The Presentation

1. Purpose of the Evaluation
2. Background and Context
 - Policy Context
3. Approach and Method
 - Theory of change and Logical Framework
 - Literature and Policy Review
 - Interviews
 - Policy Analysis
4. Findings
5. Recommendations

Purpose of the evaluation

The Purpose of the Evaluation

To assess the relevance and appropriateness of the *Draft Policy on Community Colleges (PCC)* October 2014 in respect of:

- Fitness for purpose
 - Internal and external coherence
 - Implementability
-
- It is understood that the findings of the evaluation will feed directly into the policy refinement process.

Policy context

Policy Ccontext

- The ***Continuing (Further) Education and Training Colleges Act 2006***
- The 2011 ***Community Education and Training Centres Task Team Report***, advocates:
 - Establishment of community learning centres: and
 - A new and differentiated college sector which includes the introduction of community colleges.
- The ***Continuing (Further) Education and Training Colleges Amendment Act, No. 3 of 2012***
- The ***Continuing (Further) Education and Training Colleges Amendment Act, No. 1 of 2013***
 - Provides for the proposed function shift
- The ***White Paper for Post School Education and Training*** (DHET 2013)
 - Elaborates on the nature and function of the proposed new institutional type – the Community College

Policy Context

- ***Draft Policy on Qualifications in Higher Education for Adult Education and Training Educators and Community Education and Training College Lecturers (DHET:2014)***
 - Prioritisation of expansion, strengthening and development of a community education and training
 - Importance of well-qualified adult and community education and training educators
 - Responsibility of state to provide education and training in a wide range of areas that are responsive to community context
- ***Draft National Youth Policy 2014-2019 (2015)***
 - seeks to “*produce empowered young people who are able to realise their full potential ...*” through skills development & training for youth
- ***Further Education and Training Colleges Act, 2006 – Consultation with Centre Governing Bodies and merger of PALC into Community Colleges (Nov 2014)***
- The ***Continuing Education and Training Colleges Act, 2006 Establishment of Public Colleges*** (DHET: March 2015)

Approach and Method

A Policy *Design* Evaluation Approach (Specified in the TOR)

- Serves to pilot an approach to policy design in SA
- Requires a developed Theory of Change (ToC) and Logframe - against which the evaluation is conducted (*Typically ToC and Logframe process occurs before the policy/or programme is evaluated*)
- Therefore ToC done retrospectively (However, legislation already gazetted and function shift for PALCs planned for 1 April 2015)

ToC & Logframe Development Process

(Undertaken with officials from DHET AET Directorate and PED AET)

STEPS

- A. Draft vision for the new Community Colleges (initial draft – will require further refinement)
- B. Stakeholder analysis
- C. Problem analysis
- D. Objectives analysis and determination of key results areas and the change pathway
- E. Logframe matrix for the Policy on Community Colleges

A Draft Vision for Community Colleges

Policy	Aligned with vision and goals for the country and developed with full stakeholder participation
Location	In an accessible location with a central site and satellite Community Learning Centres widely distributed
Beneficiaries	For adults and especially those not in employment, education or training (the NEETs)
Functioning	Fully functional with teachers teaching Interactive and responsive Linked to community and its challenges Well run, managed, governed Viable A sophisticated learning institution Community orientated
Provision	Easy access to meaningful, useful programmes and courses Variety of programmes offered to the local community A “One stop shop”

Draft Vision (Continued)

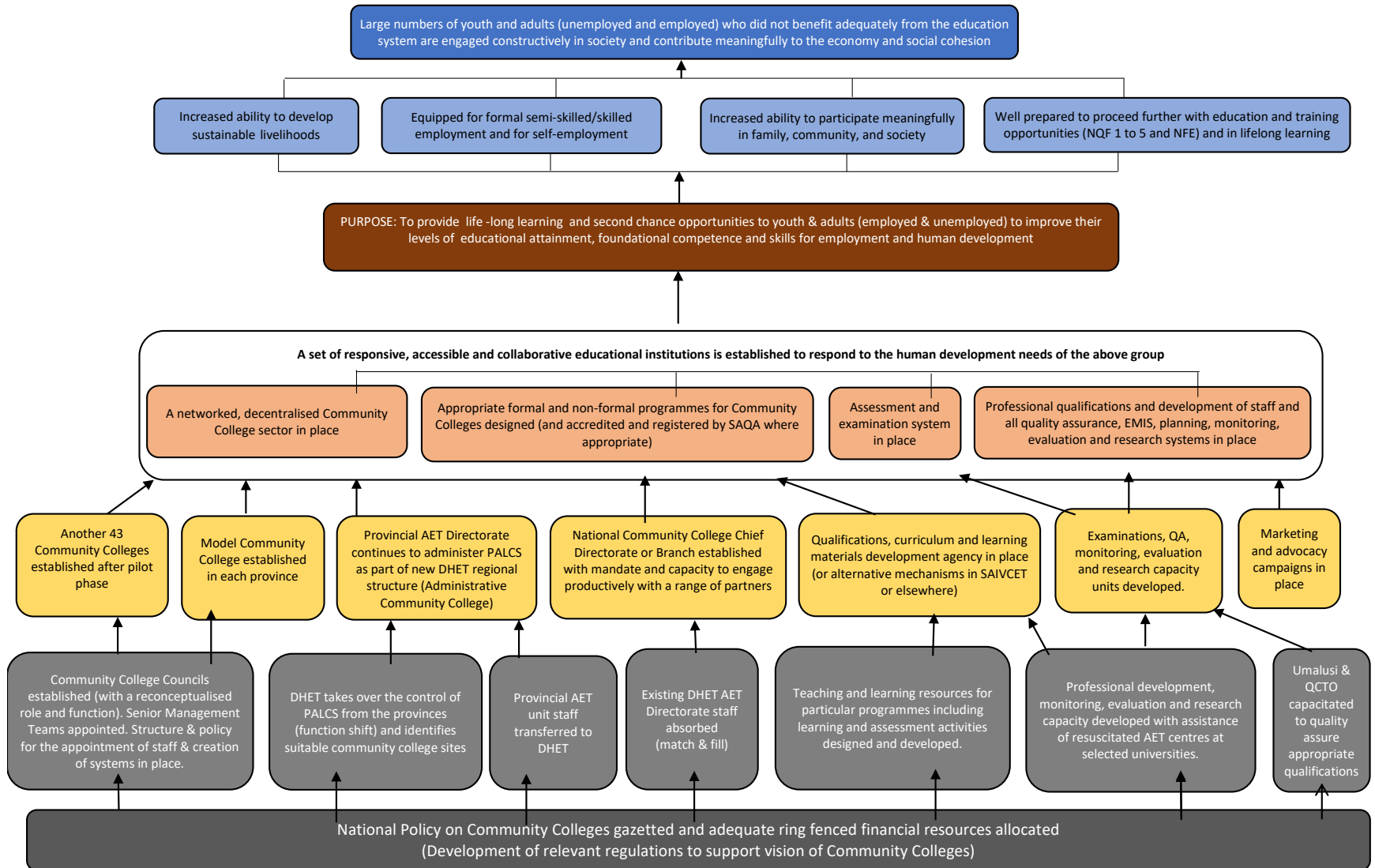
Programmes	School equivalency programmes and Foundational programmes for university Facilities for Independent study Vocational skills Learners doing apprenticeships with SETAs People learning skills - such as plumbing, cooking, etc. Skills programmes Livelihoods related programmes
Materials	Good learning materials wherever possible
Articulation	Programmes articulate with further education and employment opportunities
Partnerships	Variety of partners sponsoring various projects including Learners doing apprenticeships with SETAs
Staff	Good, qualified, knowledgeable, well-motivated teachers teaching Community members as teachers

Draft Vision (Continued)

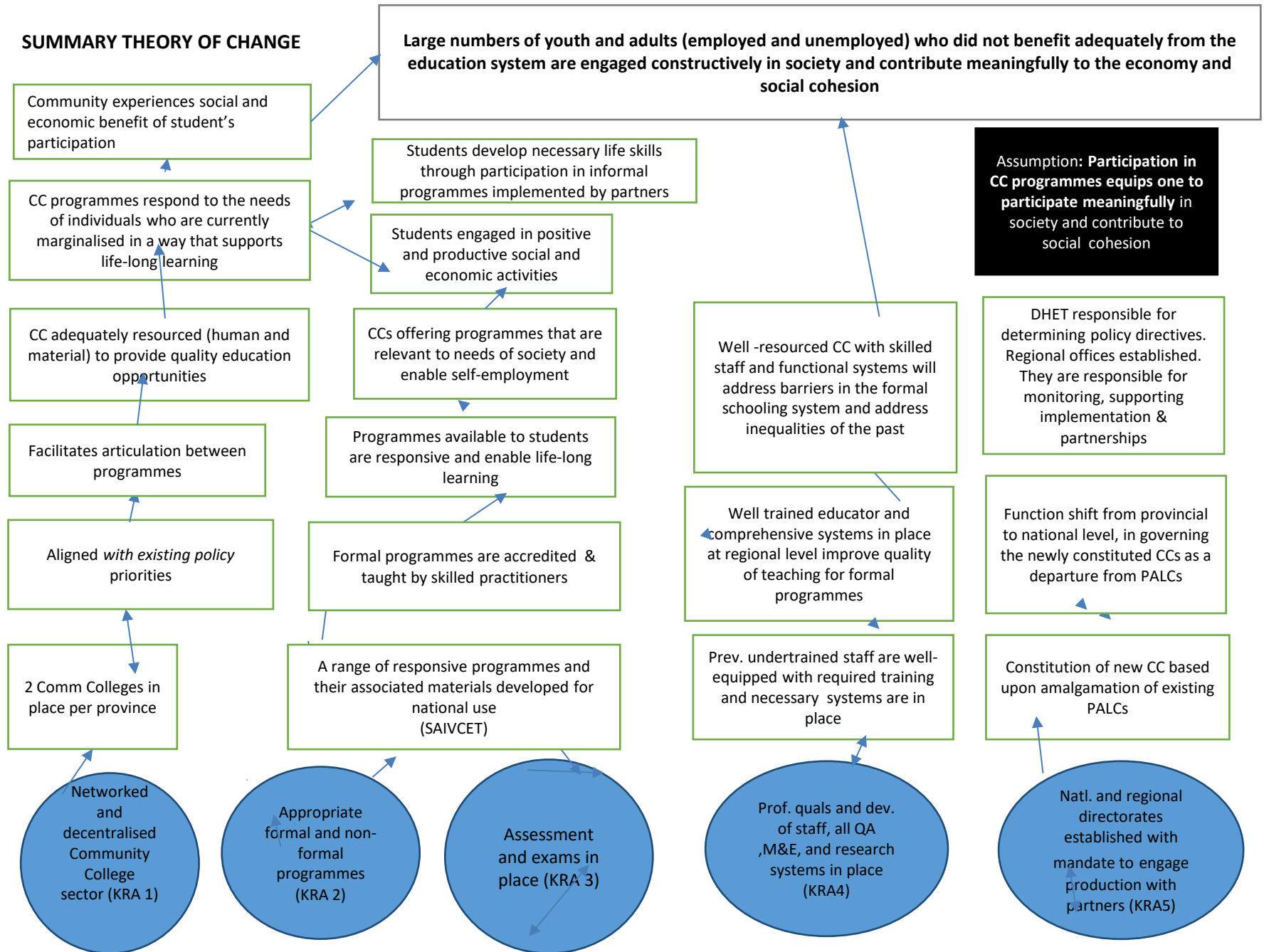
Hours	Open week days and weekends from morning till night (10 pm)
Infrastructure and resources	Really well resourced with stress on access to modern state of the art information technology (computers and ubiquitous free wi-fi) Good physical infrastructure Accessible, supportive, responsive spaces Lively noisy spaces and quiet areas for independent study Many spaces for group work Good signage Outdoor lunch area
Quality	High standards
Diversity	Of people ('races'), languages, ages and skills Programmes and courses (formal and non-formal)
Atmosphere	Vibrant, engaging, learning, enabling, happy centre and spaces with many young people around

Objective Analysis (ToC)

Appendix F: Objective Analysis



SUMMARY THEORY OF CHANGE



Five Key Result Areas

(the solutions and the pathway to the solutions identified as part of the objectives analysis in the ToC)

Purpose: To provide life-long learning and second chance opportunities to youth and adults to improve their levels of educational attainment, foundational competences and skills for employment

1. A networked, decentralised community college sector is in place.
2. Appropriate formal and non-formal programmes for Community Colleges (CC) are designed and accredited where appropriate.
3. Assessment and examination system is in place.
4. Professional qualifications and development of staff; all quality assurance, EMIS planning, monitoring, evaluation and research systems are in place.
5. A national Chief Directorate or branch and regional AET directorates are established with mandate and capacity to engage productively with a range of partners.

Logframe Matrix Format

Description of the project's hierarchy of objectives

Targets and standards of performance

The means for monitoring progress

Conditions affecting the project not under your direct control

Logic of intervention	Objectively Verifiable Indicators	Sources of Verification	Assumptions
Overall objective (goal/aim)			
Purpose (specific objective(s))			
Results (outputs)			
Activities	Means	Costs	
			Preconditions

What conditions must be there for the project to start?

Literature Review

Literature Review - General Findings

- The NEETs
- Having undereducated people bad for the economy – R800 billion down
- Little evidence of unique institutional forms – it is access and articulation that matter
- Trends and general tendencies:
 - Rights are nice but comprehensive adult education policies and strategic plans better
 - Successful delivery needs substantial governance and planning nodes at both national and state/regional level with autonomy from the schooling bureaucracy

Literature Review - General Findings

(Continued)

- Insufficient trained practitioners , poor career prospects, poor conditions of service
- RPL hard to implement
- Need good monitoring, evaluation and research (all need good data flows)
- Preferential support for disadvantaged and poor regions
- No tuition fees

Literature Review - Community Colleges Specifically (mainly USA evidence)

- No need to “reinvent the wheel”
- Positive impact of community colleges: cognitive and developmental and low cost
- Self governing though some state regulatory boards
- Go higher than NQF 4 with good articulation and credit recognition
- **Closeness to home is vital for access**
- Problem of underprepared students and open access may worsen problem – failed high school students “get in anyway”

Literature Survey - Community Colleges

(Continued)

- Non-formal courses are often the most dynamic
- Online courses – yes but not suitable for underprepared students
- Data problems compromise accountability and benchmarking
- Funding mix from state, municipal and tuition fees
- Pressure to graduate more students
- Open access but with placement tests
- Adult Basic Education and Remedial (“developmental”) courses do not easily “fix” under preparedness
- Growing taxpayer concern at teaching the same students multiple times – fix the school system which should not pass its ill-educated learners on to post-schooling

Methods

Methods

Qualitative methodology used

- Literature review
- Review of relevant policies
- Theory of Change and Logical Framework developed
- Individual and focus group interviews with:
 - The advisor to the Minister of Higher Education and Training
 - A representative from national Treasury
 - A representative from the Auditor General's Office
 - 15 Senior DHET officials including the DDG
 - 12 Provincial AET personnel from 7 provinces
- A qualitative analysis of the DHET Draft Policy on Community Colleges

Four Key Questions for Evaluation of PCC

1. Design of the policy (*internal and external coherence*)
2. Relevance and appropriateness of the policy (*appropriateness for and of purpose*)
3. Measurability, and ability to evaluate the policy
4. Readiness for implementation
 - *To what extent is the PCC ready to be implemented?*
 - *Sufficient evidence that the resources and capabilities required to implement the policy, are in place and are adequate to address the scale of the policy challenge?*

Findings

Findings

Policy Purpose

1. **Function Shift and Management of PALCs so that they:**
 - continue to operate
 - are over time transformed to a more effective means of operation where they are linked to district level community colleges.
2. **To create an entirely new institutional form** -“the community college” closely linked to local and interest communities, and to pilot some at a limited number of sites.

Findings:

- **No substantive explanation of *how* the policy will achieve these purposes**
 - No information on management of PALCS
 - The name “*Interim Community College*” is itself misleading – these are clusters of PALCs and not a new institutional type
- **No explanation of *how* these two purpose will meet the actual educational needs of adults and youth**
- An interim “community colleges” would bear no resemblance to the community colleges envisaged in the ***White Paper*** – or the vision promoted in the ToC.

Purpose and nature of the new Community Colleges (Policy Design)

- The PCC does not take forward the vision of the *White Paper, the Task Team Report on Community Education and Training* and other congruent policies which:
 - Promote the idea of an institution that can offer a diverse range of possibilities to people for whom vocational and technical colleges and universities are not possible (real alternative)
- There is no expression of this idea, instead, it puts forward a narrow, mechanistic model of TVET Colleges.
 - The particular characteristics of Community Colleges are not taken into account

Respondents views on Policy purpose

Consensus on need for Community Colleges (CCs)

Policy purpose

- National DHET Staff believe the PCC gives effect to the vision of CCs in the White Paper on Post Schooling
- Provincial officials believe it is merely a political instrument to meet DHET performance targets
- A number of provincial officials reflected that the policy merely facilitates (another) name change for AET Centres

Lack of alignment and consultation with other stakeholders

- Little evidence in the policy of prior consultation with other stakeholders or of incentives to further consultation and collaboration.
 - [e.g. Civil Society Organisations]
- PED AET officials report lack of consultation

Does the Policy's ToC address the identified problems of youth & adults? (Relevance?)

- The PCC shows no, or only weak links with the following principles & overall objective, purpose and results or outputs of the retrospective ToC.
- The PCC articulates the following laudable principles summarised from Section 2.1 of PCC:
 - Expansion of access to education and training to all youth and adults, **especially marginalised**;
 - Quality formal **and non-formal** programmes;
 - Training for participation in both the **formal and informal economy**;
 - **Close partnerships with local communities**, including local government, civic organisations, employers' and workers' organisations
 - Local **community participation** in governance; and
 - **Collaboration and articulation with** other sections of **the post-school system**.
- However, the rest of the PCC does not give expression to these.

Does the Policy Respond to the (retrospective) TOC?

- The Five Key Result Areas identified in the Theory of Change are either not addressed or inadequately addressed in the Policy.

To what extent is the policy measurable?

(And therefore able to be evaluated in the future?)

- No specific target groups mentioned. Only vague references to:
 - *“Eligible youth and adults”*
- No clarity on enrolment expansion:
 - *From current 265 000 to over 1 million in 15 years time (2030)*
- No mention of data and data management systems in measuring policy implementation achievements
 - *Current PALC EMIS system is known to be particularly weak*
- No quality or other indicators against which to measure the efficacy of Community Colleges
 - *The “merger” of the PALCs into Community Colleges will be done almost instantly through legislative “decree” .*
 - *The possibility of the nine “real” pilots has no timelines or scale criteria.*

In summary:

The draft policy as currently constructed is not measurement or evaluation friendly.

Extent to which the policy is ready to be implemented?

Evidence of resources and capacity in place to address the scale of the policy challenge?

- ***The implications of merging a large number of mainly dysfunctional PALCs into a well functioning interim Community College system is not elaborated.***
 - *No “framework to guide the management of the shifting of the AET function from the PEDs to the exclusive competence of the DHET. (4.1)”*
 - ***PALCs are envisaged operating as they always have*** - little evidence of them moving “into the emerging community education sector”.
 - ***The framework for establishment of Community Colleges - only the barest of detail*** – lacks information on governance, management, staffing, funding, programmes & qualification, quality assurance, examinations and assessment, and M&E
 - ***No mention of an implementation plan*** – at very least there is need for next key steps to be stipulated
 - *No adequate conceptualisation or planning for the actual development of genuine pilot community colleges.*
 - *The policy states that “Details with regard to governance and management structures will be finalised after the conclusion of the pilot process.”*

Implementation readiness? (Continued)

- ***No plans for curriculum or materials development; ICT development; and practitioner development:***
 - *National Treasury is opposed to the establishment of SAIVCET as this was not discussed with Treasury prior to legislation establishing the entity; and because Treasury believes that curriculum/ materials / professional development functions should be located within DHET.*
- ***Funding:*** Funding norms for existing PALC are inadequate and cannot possibly fund the erection of a new system of community colleges.
- However, a Ministerial Committee has been established to set in place an “*Adult Learning Funding Framework*”
- At the same time, indications from Treasury are that there is no additional budget and no plan to resource this sub-sector which is targeted to increase enrolment from its current participation rate of 265,000 to over one million in the next 15 years (2030).
- ***There is no risk management plan.***

In Summary:

Given all the above, it can be argued that the policy is not ready to be implemented

Recommendations

Recommendations

Addressing the Policy Purpose

- Assumption - the **two** purposes of the draft Policy:
 - the “**function shift**” of PALCs from PEDs to the DHET
 - the initiation of a **new** institutional form of education and training provision, the **community college (and its associated community learning centres)**

Finding: Neither purpose adequately served by the draft Policy

Function Shift Findings

- Little conceptualization of how merged PALCs would operate as an Interim Community College
- Nothing in draft Policy of a detailed plan *or* process *or* funding to improve the acknowledged dysfunctionality of PALCs
- No risk analysis of nominal ‘legal fiction’ consolidation of all PALCs into nine “interim community colleges”
- Well functioning PALCs supported by district officials may well be disadvantaged
- Total lack of any budget estimates and likelihood that reallocation of past provincial budgets may be less in practice
- Little buy in from previous provincial directorate officials
- Potential negative consequences of the concept of a **new** institutional form of community colleges being seen by the public as simply the old dysfunctional PALC model renamed

Function Shift Recommendations

- Ideally PALCs should stay as PALCs under Regional offices – 2013 Amendment Act and Nov 2014 Govt Gazette 38158 precludes this... So
- Need a conceptualization of how merged PALCs would operate in different provincial contexts (Compare Gauteng and KZN say)
- A more substantive Policy be developed that deals with the ongoing, even if only interim, existence and support of youth and adult learners at the old PALC sites and does not confuse it with the new institutional form
- Need for detailed implementation and improvement plan, including
 - Proper registration, enrolment and student tracking system leading to a reliable MIS
 - Role & function of AET Officials to go beyond administrative support to support for teaching & learning
- The name “Interim community college” is inappropriate and misleading. Ideally a replacement should be found

New Institutional Form Findings

- The notion of building a **new** institutional form is missing from the draft Policy. Though some things are listed, little detail, so impossible to judge whether they truly do reflect what is a totally new institutional form for South African education.
- The proposals for the set-up of both the PALC conglomerate colleges and the pilot colleges slavishly follows the old TVET legislation and do not appear to meet the principles (Section 2.1) nor reflect the vision in the White Paper and the Task Team report of a decentralised system close to learners.
- TVET Colleges and Community Colleges are different in key respects
 - Largely full-time students vs largely part-time students
 - Need for easy short distance access from home
 - Different stakeholders with TVET Colleges' stakeholders being largely industry and business and Colleges being local community interests
 - Hence Community participation in College governance

New Institutional Form Findings

(continued)

- The White Paper & Task Team report notion of a local networks of community learning centres supported by Community College totally inverted to one of a centralised community college modelled on a TVET college with some satellite campuses.
- The draft Policy gives no attention to the key concept of community learning centres and how they would be supported and networked, except to say that their heads must be appointed by the Minister
- Total lack of attention to budgeting for the new system
- Given that new programme, curriculum and materials development will be crucial in improving provision, the absence of any proposal on an appropriate mechanism for this, is significant in the Draft policy.

New Institutional Form Recommendations

- Welcome the new DG Task Team to develop a comprehensive policy for Community Colleges
- Encourage the Task Team to embark upon broad consultation, especially with civil society to follow on from and elaborate the White Paper proposals.
- Encourage DHET to establish a significant internal structure (such as a Branch) to handle the conceptualisation and building of this whole new sector is not dealt with.
- Encourage DHET to ensure that the crucial SAIVCET functions be made operational, especially in regard to programme and materials development

New Institutional Form Recommendations

- A more substantive and imaginative policy be developed that deals with the creation and sustainable continuation of a new institutional form of distributed provision of adult and youth education in community learning centres supported by community colleges and with the requisite resources of programmes, curricula, materials and educators and trainers.
- Careful consideration should also be given to:
 - Refinement of the Theory of Change process
 - The five or more Key Result Areas identified through the Theory of Change process
 - Funding provision and criteria for success established
 - The funding formula should include support for education and training that does not necessarily lead to qualifications – i.e. not on the NQF
 - Professionally trained adult educators – university capacity to support this is
 - An M&E framework for the pilot implementation to be developed before implementation to ensure deliverables and timeframes are clear and that lessons can be extracted and documented to inform the full implementation of the new community college system.
- This recommendation should in no way interfere with initiation of genuine pilots of community colleges.

Can anything be done by 1 April?

- Propose careful evaluation of new draft Policy on Community Colleges to ascertain whether there is anything additional that might be required in a Policy for the function shift of the PALCs to the DHET? We believe that the enabling legislation for this is in the Continuing Education and Training Colleges Act of 2006 as amended in 2012 and in 2013 and as well the Govt Gazettes of Nov 2014 and possibly of 16 March 2015
- Consider carefully whether all the requirements of the 2006 Act as amended have been fulfilled in respect of mergers, particularly the stipulation in 6(6) on Merger of Public Colleges, have been met. This does not require policy but rather an operational step.

After April 1 2015?

Recommend

- A set of guidelines be developed for the pilot Community Colleges, include the notion that they should incorporate a number of local Community Learning Centres (PALCs, PALC satellites or NGO Centres)
- Conceptualization and Implementation Plan for the merger of PALCs into a new entity(ies) which systematically address(es) areas of dysfunctionality and prepares them for development into the Community College sector
- Comprehensive Community College Policy including all dimensions mentioned above, as well as the possible revision of legislation to move from that appropriate to TVET Colleges to that appropriate to the emerging conceptualisation of Community Colleges.