

# Review of the AVETMIS Standard for VET providers: outcomes from the discussion paper

NATIONAL CENTRE FOR VOCATIONAL  
EDUCATION RESEARCH



**AVETMISS**

 **NCVER**



Australian Government  
Department of Education, Employment  
and Workplace Relations





# AVETMISS

## Review of the AVETMIS Standard for VET Providers: outcomes from the discussion paper

NCVER

The views and opinions expressed in this document are those of the author/project team and do not necessarily reflect the views of the Australian Government or state and territory governments

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# Introduction

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## Purpose

This document provides a summary of feedback from the discussion paper for the Review of the Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) for vocational education and training (VET) providers (hereafter, the Standard). The discussion paper provided opportunities to gather feedback on a range of issues. Based on this feedback, some issues will not be pursued; however, in most cases further investigation is required before final recommendations can be made. This report gives an overview of the process to date and areas where the National Centre for Vocational Education Research (NCVER) will undertake further work on the Standard.

## Background

The Standard is currently being reviewed by NCVER.

Due to the lengthy cycle time (12 to 18 months as a consequence of the lead time required by registered training organisations [RTOs] to change their systems, processes and student enrolment forms) and the cost of implementing changes, versions of the Standard generally have a lifespan of three to five years. The current release of the Standard (6.0) came into effect in January 2007. Since then, there have been significant changes in the training sector and the accompanying information requirements which have triggered this review.

This review is taking place in an environment of change in the VET sector and the broader tertiary education sector. The current Commonwealth Government has changed the way it funds training and there have been modifications to the requirements for registration of training organisations. Furthermore, the regulatory framework is being tightened.

A broad range of people and organisations use the Standard and the associated VET Provider Collection. They include registered training organisations, government departments, peak bodies, industry groups, researchers, and software developers.

# The review process

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## Progress to date

### Initial consultation and identification of issues

The first phase of the review involved identifying information needs and the issues of concern with the current Standard that had already been identified.

As a first step, in June 2010 NCVER distributed a discussion paper. The paper provided a framework for feedback and identified some key issues for consideration. In particular, it sought comments from stakeholders on:

- ✧ the information needs of the sector and how they could be addressed via the Standard
- ✧ the structure of the Standard, including the file structure, entities, and accompanying documentation
- ✧ information currently collected which could be omitted.

This paper also included a register of issues that had been identified by a range of users since the last release of the Standard, which came into effect in January 2007.

NCVER has undertaken to consolidate the submissions and provide recommendations to the National Training Statistics Committee (NTSC, a subcommittee of the National Senior Officials Committee and currently responsible for the data Standard) for their 18 November 2010 meeting.

### Criteria for change

Changes are assessed against the following broad criteria:

- ✧ whether there is a clear requirement to have this information
- ✧ whether the change can be incorporated into a training organisation's normal business processes, such as enrolment forms and student management systems
- ✧ the impact of implementing the change.

These criteria are elaborated in table 1.

**Table 1 The review process: considerations for changes to the Standard**

Criteria	Consideration
Requirement	What is the <i>information need</i> and is it supported by stakeholders? If yes, can the information need be <i>defined</i> ? (If no, further work is required before it can be considered further.)
Within VET business processes	If yes, is <i>the Standard for VET Providers</i> the best place to collect this information or can the information need be better met by other means? (If no, then this information need has to be pursued via other data-collection means.)  What is the <i>source of the information</i> and is it currently being collected? If not already collected, what is the additional burden on state training authorities (STAs), and RTOs? What are the methods for data collection and how accurate will the data be? Sources of information include the student enrolment form and other VET data sources such as the National Training Information System (NTIS), STAs, and RTOs.
Impact	What <i>further consultation</i> is required to determine the best method for collection and the business rules for incorporation within the Standard?  What are the required <i>timelines and support necessary for implementation</i> to minimise the burden on data providers? What level of communication and documentation is required? Are there changes to student enrolment forms and other collection processes? What other system changes are required?

## Next steps

### Further consultation and implementation

NCVER has undertaken initial consultations and identification of issues. Preliminary findings from submissions received on the discussion paper are presented in the following section of this report.

NCVER compiled some broad recommendations for the National Training Statistics Committee based on feedback received from the discussion paper and considerations of criteria for changes to the Standard. These recommendations are included in this report.

Since endorsement of the recommendations by the National Training Statistics Committee, NCVER is proceeding with further consultation as required, as well as implementation work. NCVER has convened the VET Provider Technical Reference Group to discuss the changes outlined for Release 6.1. The Technical Reference Group is made up of representatives from state, territory and Commonwealth training departments, the Australian Bureau of Statistics (ABS), TAFE Directors Australia, and the Australian Council for Private Education and Training. NCVER will commence a broader consultation process for the information needs under consideration for Release 7.0.

NCVER undertakes to continue this process of keeping stakeholders informed and involved with progress of the review.

# Summary of feedback from the discussion paper

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## Summary of findings

There was support to change the Standard to:

- ✧ capture skill sets and fee-for-service activity
- ✧ identify Commonwealth Government programs
- ✧ incorporate alternative file formats (for example, XML)
- ✧ cater for different types of training organisations (for example, private fee-for-service, enterprise)
- ✧ align VET and higher education data collections to produce a single set of tertiary statistics.

The following areas were recognised as information gaps but there were a variety of views on whether the Standard for VET Providers is the most appropriate collection mechanism:

- ✧ pre-apprenticeship programs
- ✧ student intention to complete a course
- ✧ socioeconomic status
- ✧ student pathways across schools, VET, and higher education
- ✧ offshore activity
- ✧ VET workforce information.

There were some concerns about collecting income and parental occupation data in the Standard. There was no support to change the Standard to capture partial recognition for prior learning or expand the scope of the collection to include non-accredited activity of private registered training organisations.

Ensuring accuracy of data and being mindful of the burden of reporting were ongoing themes across many responses.

## Summary of recommendations

Feedback to the discussion paper identified a significant number of required changes. Some changes were clear cut, with minimal impact on training organisations, and could be made in the short-term. Other changes require longer-term consultation, planning, and implementation. Therefore a two-phase approach has been proposed. The first phase comes into effect from January 2012 and the second from January 2014.

NCVER recommends that:

For 2012

- ✧ Skill sets are identified within the Standard.

- ✧ Information identifying Commonwealth programs should be included in the Standard.
- ✧ Work should be undertaken with jurisdictions to define a set of pre-apprenticeship or prevocational courses.

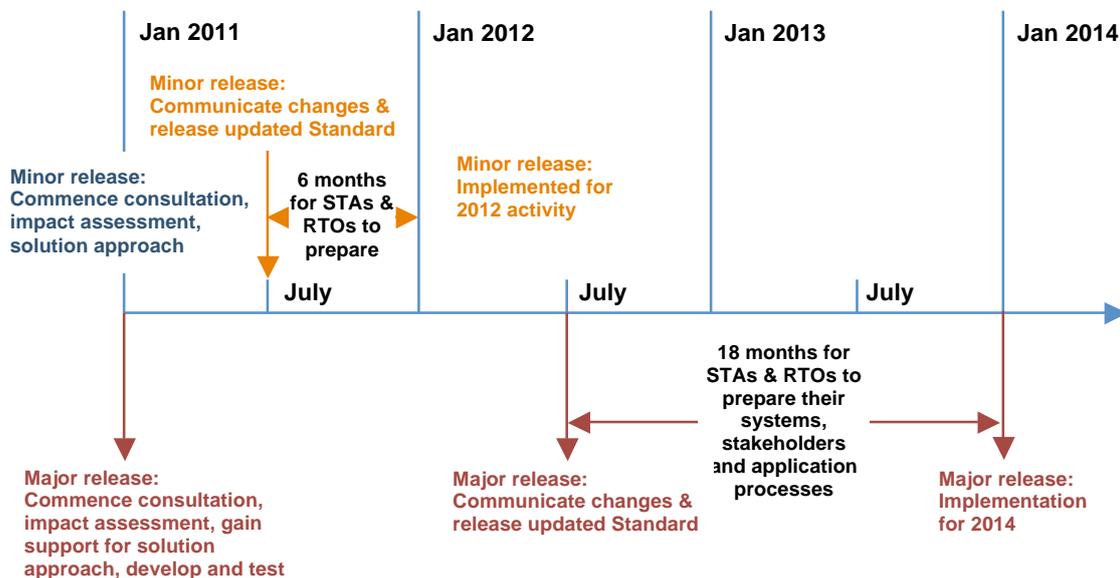
For 2014 further investigation is required on:

- ✧ students' intentions
- ✧ the definition of socioeconomic status in VET
- ✧ international students
- ✧ alignment of the VET and higher education data standards.

Other recommendations:

- ✧ The validation rules should be introduced progressively for new fee-for-service providers.
- ✧ Work should be undertaken to present a cut-down version of the Standard for registered training organisations so that information that can be collected from other sources is not required from RTOs.
- ✧ Multiple-file formats are supported as part of the current redesign of the NCVER Validation Software.
- ✧ No changes are made to the Standard to capture partial recognition of prior learning.
- ✧ Further work should be undertaken to define a Standard for VET Workforce information, separate from the Standard for VET Providers.

**Figure 1 Proposed AVETMISS implementation timeline**



## Respondents

NCVER received over 70 formal submissions in response to the discussion paper canvassing the information needs of the sector.

Submissions received included 16 from state training authorities or other government organisations, 13 from peak/policy bodies, 18 from private training organisations, 16 from public training organisations, five from enterprise registered training organisations, four from software developers and three from industry skills councils.

With the exception of some submissions where the respondents did not give permission for their submission and organisation name to be published, submissions from 30 stakeholders will be available on the NCVET website from 8 November 2010. A list of these organisations is provided in attachment A.

The response to the discussion paper has provided NCVET with valuable insights into the information needs of the sector and where the AVETMIS Standard may be utilised to support these needs.

NCVET thanks all respondents for their time and effort in responding to the paper and looks forward to their ongoing involvement in the review process.

## Issues identified in the discussion paper

### Intention to complete a qualification

There was strong agreement that data relating to student intentions could complement existing qualification attainment and completions data and help to explain low completion rates. However, concern was expressed over the validity of the data and the cost of obtaining it from enrolment forms.

Currently, the inability to collect information on enrolments and completions in skill sets relies on the assumption that all students who enrol in a course intend to complete. Identification of those enrolling in skill sets would allow refinement of course-completion rates.

The elements 'Commencing course identifier' and 'Study reason identifier' in the current Standard include some intentions-related information. 'Commencing course identifier' captures commencing or continuing enrolments in a qualification and competency or module enrolments, and 'Study reason identifier' allows a student to select from a list of ten reasons that best describe their main reason for study, for example, to get a job, develop an existing or start a new business, for personal interest, to increase skills and a job requirement.

NCVET is conducting a student intentions survey in 2011 which will capture student intentions comprehensively. This will allow a detailed investigation of the relationships between intentions and the data currently collected. A decision on whether further information should be collected on the enrolment form can then be taken, noting that considerable feedback did not support collecting intentions data routinely on enrolment forms.

*NCVET will undertake further work on student intentions.*

There was a high level of support for the need to capture skill sets for the purposes of complementing existing qualification completions data. Several peak bodies, state training authorities and training organisations supported this.

The introduction of the website <training.gov.au> in late 2011 will bring skills sets onto the national register.

NCVET notes that skills sets could be identified and collected within current file structures using the qualification/course recognition identifier.

*NCVET recommends that skill sets are identified within the Standard once skills set information is properly defined. This will require consultation with the Technical Reference Group about the preparation of definitions and a mechanism for implementation.*

## Socioeconomic status

Responses to the discussion paper revealed some agreement that collecting data on the socioeconomic status of individuals is useful for resource allocation.

There was a high level of concern about privacy issues in relation to collecting information on occupation and income and the likelihood of high non-response rates for such data.

Respondents were adamant that collecting parental occupation information is not appropriate in the Standard, despite parental education and occupation being asked on enrolment forms in the higher education sector.

Alternative proxy measures, such as concessions and fee waivers, were suggested. However, these are of limited use nationally because there are no nationally comparable data.

*NCVER will undertake further work into defining socioeconomic status in VET.*

## Unique student identifier

Responses to the discussion paper noted that the unique student identifier is of particular interest as it will enable the extraction of student pathways information.

Several state training authorities that provided feedback advised that the current student identifier within the Standard is used by states and that a unique student identifier should be an additional element rather than replace the existing field.

A paper summarising the results of a separate consultation process regarding the unique student identifier has been presented by the National VET Data Strategy Action Group to the Data and Performance Management Principal Committee (which is currently preparing a business case for Ministers).

*NCVER recommends that the unique student identifier be incorporated into the Standard (in a future release), contingent on Ministerial endorsement of the business case.*

## International students (onshore and offshore)

Responses to the discussion paper revealed some agreement that data relating to international students (onshore/offshore) were appropriate and useful, for example, for quality control and planning purposes. However, there was also a strong argument against the inclusion of off-shore delivery within the Standard, with respondents citing that no clear purpose for collection had been given and no clear indication on how this information would inform policy. The accuracy of information collected on off-shore delivery was also an area of concern.

There was a high level of concern over the challenges and resource burden associated with collecting the citizenship/residency status, and entry year information.

*NCVER will undertake further investigation on international students, particularly with regard to the purpose and data requirements relating to citizenship/visa information.*

## Fee-for-service funded activity

### *Accredited activity*

The majority of stakeholder feedback from peak bodies, state training authorities and public registered training organisations was in support of the Standard being applied to fee-for-service accredited activity. Even a private registered training organisation noted the benefit of not having to upload data separately for the reporting of qualification completions. Obtaining a complete and accurate picture of accredited VET activity, and in particular qualifications, was clearly the main benefit cited by many stakeholders.

Those opposed to the extension of the Standard to fee-for-service activity included a few software providers, who noted problems with enforcing compliance and problems collecting student information from students studying short courses.

*NCVER recommends that all nationally accredited activity be reported according to the full AVETMIS Standard for the National VET Provider Collection. In the first instance, NCVER will investigate the progressive application of the validation rules by being flexible in applying the rules initially to new fee-for-service providers. This will support the submission of data by new submitters with the view to implementing the full set of rules over time.*

### *Non-accredited activity*

While a few state training authorities noted that some providers already report non-accredited delivery, many other state training authorities and other stakeholders were against the collection of additional non-accredited activity through the Standard. Reasons against collection included: costs of compliance; lack of value/justification to collect; and difficulty in identifying and collecting (due to differences in content, duration and outcomes of courses).

Also, respondents noted that much of other non-accredited activity is delivered outside registered training organisations.

The majority of responses to the discussion paper indicated that there was little support for the collection of additional non-accredited activity under the Standard.

*NCVER recommends that no change be made to the current scope of the Standard regarding the collection of non-accredited activity for fee-for-service training providers.*

### Identifying activity under government programs and initiatives

There was only one stakeholder opposed to the collection of program-level information and they questioned why this information could not be gathered from state departments, since they have the records.

With the exception of enterprise registered training organisations, who did not provide feedback on this topic, all stakeholder groups voiced support for the collection of program-level information.

Peak bodies confirmed the need for and benefits of program-level information. Public registered training organisations stated that they already report at program level to state training authorities. Industry skills councils confirmed that this information is critical.

*NCVER recommends that information identifying Commonwealth programs be included in the Standard. NCVER will consult with the Technical Reference Group over appropriate definitions and validation processes.*

### Student pathways

There was general agreement in responses that the ability to map student pathways will be enhanced through the implementation of the unique student identifier. Although considered of interest, there was no clear support for the collection of information directly from students about other studies they have previously attempted or are currently undertaking if a unique student identifier does not exist.

However, there was clear support from peak body/policy groups, state training authorities, both public and private registered training organisations and industry skills councils for capturing pre-apprentice activity. Peak body/industry groups, state training authorities and public registered training organisations stressed the need for a nationally consistent definition of pre-apprenticeships for use in the collection. An issue here is that the pre-apprenticeship label depends on a student's

subsequent intention. To deal with the lack of clarity one approach is to define courses as pre-apprenticeship or prevocational, according to certain characteristics.

*NCVER will work with jurisdictions to define a set of pre-apprenticeship or prevocational courses. It will also explore the Student Outcomes Survey as an alternative (and possibly more appropriate) method of collecting information about other educational experiences and for the identification of pre-apprenticeship activity.*

## Recognition of prior learning

There was strong support from most respondents for not changing the Standard to enable the collection of data on partial recognition of prior learning (RPL). This was primarily due to the administrative burden on registered training organisations and the complexity of capturing it correctly.

Other respondents supported the collection of information on partial RPL and also the consideration of whether students who withdraw from an RPL process before being fully assessed should be in scope for the collection.

*NCVER recommends no changes to the Standard to capture partial recognition of prior learning. Further investigation will be undertaken by NCVER on the scoping implications of being able to identify students who withdraw from recognition of prior learning processes.*

## Data-sharing protocols

Feedback from responses to the discussion paper on data-sharing protocols has been consolidated and forwarded to the VET Data Strategy Action Group for consideration. The work of this group was presented to the Data and Performance Measurement Principal Committee (23 September), and approved by the National Senior Officials Committee (8 October) and considered out of session by the Ministerial Council on Tertiary Education and Employment. The new protocols will be published on the NCVER website and stakeholders notified at that time.

## Tertiary statistics across sectors

There was clear support for collecting a core set of tertiary data from peak body/policy groups, state training authorities, public registered training organisations, and the industry skills councils group. One registered training organisation did not support the collection of tertiary data, noting the reporting burden on small private registered training organisations. The enterprise registered training organisations group did not indicate support or disagreement.

From the groups who supported collecting tertiary data, there was clear support for including common data items that can be easily mapped, such as demographic items, the course level and field of education. There was support for aligning the codes for data items already collected, but there was a view that changes should also be considered to the higher education standard rather than just changing the AVETMIS Standard.

Four submissions requested the inclusion of a residency/citizenship indicator. However, overall, there was mixed support for adding new variables, again citing the increased burden on providers and students.

Two submissions indicated that the addition of new variables should be further investigated in a separate consultation, and one submission indicated that the Strategic Cross-sectoral Data Committee (SCDC) is also investigating the alignment of data collections across the sectors.

*NCVER will work with the Strategic Cross-sectoral Data Committee to align the VET and higher education data standards.*

## VET workforce information

Fifteen stakeholders (including peak bodies, state training authorities, public and private registered training organisations and industry skills councils) explicitly supported the collection of VET workforce data, citing many benefits and uses. Stakeholders were able to identify various types of workforce data they considered should be collected.

Most of those stakeholders who did not support the collection of VET workforce data were against its collection as part of the AVETMIS Standard for VET Providers—which has a scope of students and courses.

Stakeholders also argued that such a collection would require significant resources and system enhancements and present workload issues for data providers, with no clear benefit to them or their students. Stakeholders stated that various workforce data were already supplied via registered training organisation registration and audit processes, while some ABS surveys also collected relevant data.

Stakeholders suggested a number of alternative workforce data-collection mechanisms and stressed the importance of a ‘unique worker ID’ in the context of the majority of the VET workforce working part-time and across more than one provider.

*NCVER recommends that further work be undertaken to define a Standard for VET Workforce information (separate from the Standard for VET Providers) and that an appropriate method for collection be considered subsequent to this initial work.*

## Current file structure

The current file structure was generally seen as adequate and there was little support for changing the current entities. Nonetheless, improvements could be made in the presentation of the Standard to cater for the separate audiences (for example, registered training organisations, state training authorities etc.) rather than providing just the single format, as available now.

The layout of the Standard should be restructured to improve its ease of use by various groups. Currently, training organisations are required to provide information that includes some data which are already available from other sources, such as state training authorities or the National Training Information Service. A more layered approach to providing the data could be taken, which would mean that training organisations would only supply information that cannot be sourced elsewhere. The physical presentation of the Standard would reflect this customised approach; that is, training organisations would see only the files and data elements they are required to submit.

These changes fulfil a recommendation of the Total VET Activity strategy to make the Standard more user-friendly. It would also assist those new users who are accessing the Standard for the first time because of the AVETMISS compliance requirements included in the Australian Quality Training Framework (AQTF 2010).

*NCVER will undertake work to present a cut-down version of the Standard for registered training organisations.*

## File format

There was strong support for investigating alternatives to the current fixed-file format. XML was seen as the preferable alternative by many. At a minimum, there is a need to provide more flexibility for data suppliers, while recognising that state training authorities have systems designed around the current flat file format.

*Multiple file formats will be supported as part of the current redesign of the NCVER Validation Software being managed by NCVER.*

## Comments on frequency of the collection

Comments from industry and provider peak bodies and enterprise registered training organisations on the frequency of collection centred on the need to balance the additional administration compliance and burden on data providers against relevant benefits. One state training authority noted that any change in the frequency of collection would require a change to the scope and validation of reported student activity outcomes.

The argument for no change (maintenance of the annual collection) was based on the imperative not to increase the administrative burden on training providers. More frequent reporting was linked to the likelihood of incomplete and incorrect data. One state training authority suggested maintaining the annual collection but allowing any more frequent reporting as ‘work-in-progress’.

In the context of the administrative burden one registered training organisation suggested that quarterly reporting would be the best option rather than anything more frequent. Another registered training organisation suggested a monthly upload, while another mentioned immediate upload to a web-based service.

Senior VET officials have recently considered frequency, along with a number of other initiatives designed to improve quality, and are currently seeking feedback from state training authorities on costs and other implementation issues.

## Other issues raised by stakeholders

A number of organisations took the opportunity to identify additional issues in their discussion paper submissions.

These issues have been grouped and summarised below.

- ✧ Responses highlighted the need to be clear about why any new national data are being captured. Enterprise registered training organisations argue for exclusions to some aspects of the Standard.
- ✧ There were quite a few general issues raised regarding understanding of the business rules, classifications and definitions associated with the implementation of the Standard.
- ✧ A number of respondents identified issues relating to the burden of collecting additional student information. Respondents also commented on how the standardisation of enrolment forms and technology could be used to reduce the cost of data collection.
- ✧ Various issues were raised in relation to e-learning and ‘online’ not being delivery modes and the need for reporting blended delivery modes.

Other issues raised in the submissions included the need for TAFE (technical and further education) representation on the National Training Statistics Committee, the development of a VET reporting software program and a review of the consistency of reporting credit transfer and RPL.

*NCVER has consolidated all feedback and will undertake further work to clarify business rules and definitions within the Standard.*

## Feedback relating to the current Standard

The discussion paper feedback template provided an opportunity for feedback on specific issues relating to the current version 6.0 of the Standard for VET Providers.

Considering the number of submissions, there were few ‘stand out’ issues addressed by multiple organisations. Individual issues have been grouped as: items suggested for removal; modification of

existing items; new items; and items requiring clarification or further guidelines. All issues are summarised in table 2.

The issue where there was most consensus related to information captured in the ‘Course and module/unit of competency’ files—that data should not be entered by training organisations but reported by jurisdictions or sourced from the National Training Information System.

*NCVER has noted all the issues and will examine them as part of the ongoing process of review of the Standard.*

**Table 2 Additional items raised still to be reviewed**

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<p><b>Modification of existing items</b></p> <ul style="list-style-type: none"> <li>✧ Delivery mode, Enrolment file: three submissions identified the need to capture multiple delivery modes to encompass blended delivery. Another submission suggested that two new codes be added ‘Community based’ and ‘Classroom or employment based with web based online delivery’. Capturing online delivery was also raised in another submission and it was suggested that a ‘delivered online’ flag could be added to the Enrolment file.</li> <li>✧ Labour force identifier, Client file: one submission asked for ‘not employed’ to be changed to ‘not in the labour force’ as the current code does not accurately capture those who choose not to be employed. Another submission also identified this as an area to be addressed but suggested that two new items needed to be added: ‘Unemployed’ and ‘Casual’.</li> <li>✧ Name for encryption length to be extended to equal combined length of first name and second name.</li> <li>✧ Course file definition to be altered to reflect the real time lag that occurs.</li> <li>✧ Validation software: provide the option to validate data for multiple years.</li> </ul>
<hr style="border-top: 1px dashed black;"/> <p><b>New items</b></p> <ul style="list-style-type: none"> <li>✧ the inclusion of employer details</li> <li>✧ an existing worker flag</li> <li>✧ the inclusion of software name and version in the Training organisation file</li> <li>✧ address file line added to the Client file</li> <li>✧ a training org ID so that Training org locations are unique to this id as well—prevents issues when collating at jurisdiction level</li> <li>✧ a new entity to capture state-specific information such as the Learner Unique Identifier in Queensland and the Victorian Student Number</li> <li>✧ Completion file be changed to a course enrolment file to help capture information at the course level; would need to include course start date and end date</li> <li>✧ reason for withholding a record; ideally this field should be included in the Client postal details file; however, this is not a required file so the field would not always be available so would need to be on the Client file</li> <li>✧ registered training organisation course code</li> <li>✧ the addition of two questions: How did you find out about this organisation? Why did you select this training organisation?</li> </ul>
<hr style="border-top: 1px dashed black;"/> <p><b>Clarification/further guidelines</b></p> <ul style="list-style-type: none"> <li>✧ postal address of students studying VET as part of their Senior Secondary Certificate</li> <li>✧ disability (students respond/misunderstand this question)</li> <li>✧ study reason (clarification/further guidelines for helping teachers support students to provide answers)</li> <li>✧ calculation of hours; a standardisation or guidelines on how to calculate these would be useful and help to provide consistency between providers</li> <li>✧ proficiency spoken in English</li> <li>✧ expansion of data elements ‘Client first given name’: is this legal names?</li> <li>✧ expansion of the definition of ‘Year program completed’ to include on-the-job training component.</li> </ul>

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## Feedback relating to issues/changes already identified

Appendix B of the discussion paper included issues or changes that had already been proposed by users or by NCVER.

As part of the ongoing review process of the Standard, the Technical Reference Group (which is responsible for the technical implementation of the Standard) endorsed a number of issues at a meeting in July 2008. These issues were:

- ✧ Remove option for recognition of current competency activity. (The Department of Education, Employment and Workplace Relations no longer requires recognition of current competency activity to be separated from recognition of prior learning.)
- ✧ Align the definition for recognition of prior learning to that of the Australian Qualifications Framework Council.
- ✧ Add a new qualification/course recognition identifier for bachelor and above qualifications.

*NCVER recommends that these three changes be made to the Standard.*

The AVETMISS Review feedback template included the opportunity for respondents to indicate their support or otherwise for changes that were still to be endorsed by the Technical Reference Group. These issues received support in the review:

- ✧ More accurately identify enrolment outcomes and higher-level qualifications (for example, bachelor).
- ✧ Adopt ANZSCO Revision 1.
- ✧ Report state identifier for clients.
- ✧ Identify specific Commonwealth programs.
- ✧ Collect funding source for completed qualifications.

*NCVER recommends that these changes be made to the Standard.*

Feedback on the remaining issues is still being examined and changes may be considered for future revisions of the Standard. These issues were:

- ✧ providing a clearer definition of the Indigenous status field in the Client file
- ✧ including 'Autism Spectrum disorder' as an option on the Disability file
- ✧ clarifying how to report residential address information when it is not supplied by the client
- ✧ including a sample privacy statement for the enrolment form
- ✧ changing the outcome identifier categories to 'Assessable' and 'Non-assessable'
- ✧ adding the word 'all' to the definition for '30 – Competency not achieved/fail'
- ✧ including a value to capture a withdrawal from recognition of prior learning process
- ✧ changing the validation rule so that a continuing enrolment can be concurrent with the delivery mode identifier 'Not applicable'
- ✧ amending study reason rule to ensure all reasons for study are the same across all units of competency in the same course/qualification
- ✧ categorising study reason codes into sub-categories
- ✧ reviewing the exclusion of non-award courses in the Qualifications completed file
- ✧ clarifying the rules relating to the level of education data element.

# Attachment A

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The following organisations gave permission for their AVETMISS Review submission and organisation name to be published on the NCVER website.

Australian Council for Private Education and Training  
ACT Department of Education and Training  
Ausdance Victoria  
Australian Bureau of Statistics  
Barkuma Inc.  
Canberra Institute of Technology  
Construction Industry Training Centre  
Construction & Property Services Industry Skills Council  
First Strike Solutions Pty Ltd  
Flexible Learning Advisory Group (TVET Australia)  
ForestWorks Industry Skills Council  
Insurance Australia Group  
International Education Services Ltd  
JobReady Solutions  
LINK CPR  
Metropolitan South Institute of TAFE (Qld)  
NT Department of Education and Training  
NSW Department of Education and Training

Otway Community College  
Queensland Studies Authority  
Queensland Tourism Industry Council  
SA Department of Further Education Employment, Science and Technology  
South Australian Office of the Training and Skills Commission  
Service Skills Australia  
Skills Tasmania  
Software Dreams  
Southbank Institute of Technology  
Southern Queensland Institute of TAFE  
Tasmanian Polytechnic & Tasmanian Skills Institute  
Tropical North Queensland Institute of TAFE  
TVET Australia  
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