Education Report: Aligning the Learning Support Action Plan and the NCEA Change Package

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<th>To:</th>
<th>Hon Tracey Martin, Associate Minister of Education</th>
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<td>CC:</td>
<td>Hon Chris Hipkins, Minister of Education</td>
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<tr>
<td>Date:</td>
<td>4 November 2019</td>
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<td>Security Level:</td>
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<td>METIS No:</td>
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<td>Messaging seen by</td>
<td>No</td>
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<td>Communications team:</td>
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Purpose of Report

The purpose of this paper is for you to:

- **Note** that the Learning Support Action Plan 2019-2025 and the NCEA Change Package mutually support each other in improving outcomes for disabled students and students with learning support needs.

- **Endorse** the direction of travel to remove barriers to NCEA for disabled students and students with learning support needs through promoting inclusive assessment design in the Review of Achievement Standards and the proposed changes to Special Assessment Conditions.

Summary

1. The Ministry of Education briefed Ministers in September 2019 on the work being undertaken to implement the NCEA Change Package. We noted at this time that we would provide you with further advice on how the NCEA Change Package and the Learning Support Action Plan align [METIS 1204631 refers].

2. Since May we have been engaging with educators and the wider community on the support needed to implement the Change Package. This has included discussions with parents, whānau and schools, along with representatives of the disability and learning support communities about how Change 1 (make NCEA accessible) would need to be supported to deliver the Government’s vision of barrier free access to assessment opportunities.

3. Our engagements on the NCEA Change Package have helped refine our understanding of the support needed to deliver Change 1. In particular the changes to SAC proposed will not be sufficient in isolation to meet the expectations of parents
and educators in removing barriers to NCEA. It will be critical that changes to SAC are enabled by our proposed work to remove barriers to NCEA through promoting the inclusive design of assessment tasks and resources as part of the Review of Achievement Standards. While this was highlighted in Change 1, we have significantly developed our thinking on how this will need to be done, as described in this paper and our proposed December Cabinet report back of Budget 2020 initiatives.

4 The Review of Achievement Standards aligns with the priorities of the Learning Support Action Plan by ensuring at every level that the design of the new suite of Achievement Standards is accessible and inclusive. In addition to this, the Review of Achievement Standards will work to ensure that the local implementation of the new standards in schools and wharekura is accessible to all.

5 In the short to medium term, changes to the SAC system will be made and will make progress to removing barriers to NCEA. We also propose that NZQA and the Ministry of Education improve the SAC system by making further investments subject to Budget 2020 funding for the NCEA Change Package.

**Recommended Actions**

The Ministry of Education recommends you:

a) **Note** the alignments between the Learning Support Action Plan 2019-2025 and the NCEA Change Package.

b) **Endorse** the direction of travel to remove barriers to NCEA for disabled students and students with learning support needs through promoting inclusive assessment design in the Review of Achievement Standards.

   Endorsed/Not Endorsed

   

c) **Endorse** the direction of travel of making changes to SAC to remove barriers to NCEA for disabled students and students with learning support needs in the short to medium term.

   Endorsed/Not Endorsed

   

d) **Agree** to proactively release this report following the release of final Cabinet decisions on NCEA.

   Agree / Disagree

Jackie Talbot
Group Manager Secondary Tertiary
Early Learning and Student Achievement

4/11/2019

Tracey Martin
Associate Minister of Education

13/1/2020.
Background

1. In September 2019, the Ministry of Education briefed Ministers on the work we were undertaking to implement the NCEA Change Package. We noted in the briefing note to you [METIS 1204631 refers] and a Rapid Response to Minister Hipkins [METIS 1207426 refers, annexed as Annex 1] that we would provide you with more detailed advice on how to ensure a barrier-free NCEA and how this would align with your priorities as lead minister for the Learning Support Action Plan 2019-2025 (LSAP).

2. LSAP, released in July 2019, builds on the Learning Support Delivery Model and sets clear priorities for investment and further developments to meet learning support needs within the education system. These include actions that respond to significant feedback on the need for a more flexible range of supports for children and young people with low to moderate needs, who do not qualify for the highest level of support and resourcing, and those who are at risk of disengaging from education.

3. Summarised, the Action Plan’s priorities of direct relevance to senior secondary schooling are:

   i. strengthen in-school support through the introduction of Learning Support Coordinators (LSCs);

   ii. develop new screening tools to strengthen the early identification of learning support needs;

   iii. improve support for neurodiverse children and young people;

   iv. better meet the learning needs of gifted children and young people through increased access to learning opportunities;

   v. improve education for children and young people at risk of disengaging.

4. The NCEA Change Package was agreed to in principle by Cabinet in May 2019. Change 1 of the Change Package sought to make NCEA more accessible by:

   i. Ensuring achievement standards are accessible by design

   ii. Identifying existing Special Assessment Conditions (SAC) that can be reasonably extended to all students

   iii. For other forms of SAC, simplify the application and evaluation process where possible to facilitate access

   iv. Eliminating fees for NCEA.

5. Cabinet also agreed in principle to 6 other changes to NCEA which indirectly support LSAP for example by recognising the unique needs for disabled ākonga Māori as part of recognising mātauranga Māori, or by simplifying NCEA’s requirements.

6. Change 1 has significant alignment with LSAP as it specifically seeks to improve outcomes for the same target groups as LSAP: students with disabilities and learning support needs who are currently facing barriers to accessing equitable opportunities and receiving recognition for their learning outcomes. In particular, Change 1 aligns with priorities 4, 5 and 6 of LSAP through making NCEA a more accessible qualification for neurodiverse
young people, gifted young people and young people at risk of disengaging from education.

7. In addition to the changes outlined in the May Cabinet Paper, we have further developed our thinking on removing barriers to NCEA by strengthening and promoting the local implementation of inclusive pedagogy and assessment tasks in schools and kura as part of the Review of Achievement Standards. This will ensure that the end users of NCEA are able to fully access the significant learning contained in NCEA achievement standards no matter their circumstances, disability or the school they attend. This work programme will be reflected in our December Cabinet report back.

8. The rest of this paper describes how our engagements on the NCEA Change Package informed this direction of travel, how the work programme of the Review of Achievement Standards aligns with LSAP, and how changes to SAC can support LSAP in the short to medium term.

Conclusions from Engagement on the NCEA Change Package relevant to LSAP

9. Between May 2019 and September 2019 we engaged with over 2,700 parents, teachers and other stakeholders in NCEA via public workshops and focus groups, including meeting with a range of organisations with a learning support or disability focus, including the Disabled People’s Organisations Coalition, Disability Connect, the Blind Foundation, the Dyslexia Foundation of New Zealand, and the Disability Rights Commissioner. We have collated all of the engagement data and analysed it to understand the public reception to the NCEA change package.

10. What we heard from the engagements is that although the Change Package commitment to improve access to the SAC system would improve access to NCEA, parents and educators had a number of concerns that changes to SAC would be insufficient to create a barrier free NCEA. In addition, educators highlighted that the SAC system itself was a barrier due to the workload and resourcing issues associated with making applications for SAC and implementing SAC. There were also concerns that making SAC easier to access would lead to higher administrative workloads due to higher application rates. This was coupled with feedback requesting further learning support resourcing.

11. Our engagement also revealed that many parents and teachers view SAC through the lens of their experience with Learning Support. Dissatisfactory experiences with some aspects of learning support likely influenced how those parents and teachers viewed SAC as a tool to remove barriers to NCEA. For example, parents’ dissatisfaction with the level of support for their children’s learning support needs led to feedback on SAC which was sceptical of the ability for SAC to adequately support their children. Situations like this may contribute to students and parents not engaging with the SAC application process even if the process was simplified.

12. Given the limitations of SAC to make NCEA a qualification accessible to all, we recommend that the best way to remove barriers to NCEA and align the NCEA Change Package with LSAP is through ensuring that the long term future of NCEA is accessible by design as highlighted with Change 1 of the May Change Package. This will be carried out through aligning key actions from the LSAP with the Review of Achievement Standards which will redesign all Achievement Standards as a part of the NCEA Change Package.
Removing barriers to NCEA in the medium to long term: the Review of Achievement Standards

13. The Review of Achievement Standards is the main vehicle for implementing the NCEA Change Package. Over the next 5 years, all achievement standards within NCEA will be redeveloped into new standards which will:

i. Be part of new subject matrices with larger, fewer standards.

ii. Be accessible by design.

iii. Show clearer pathways.

14. The Review of Achievement Standards aims to make the new suite of Achievement Standards accessible by design at all levels, from the design of the standard specification to the actual assessment tasks and resources. To support this goal, accessibility and inclusive design principles are being built into the Review of Achievement Standards at all levels. For example, the Subject Expert Groups and technical writers who will design and write the new achievement standards will be supported to incorporate accessibility principles of Universal Design for Learning in the development of the new subject matrices and achievement standards.

15. Over the long term the change package will support disabled students and students with learning support needs through:

i. Allowing a variety of modes of assessment to accommodate a diverse range of students and their needs.

ii. Designing subject matrices so that the significant learning in each subject is not ‘locked’ behind standards which are not accessible for certain students e.g. ensuring that significant learning in science is not locked behind a practical standard that can only be carried out by able bodied students.

iii. Ensuring that the grade step-ups in each standard are inclusive and do not unfairly exclude disabled students and students with learning support needs.

iv. Supporting schools and kura to be able to offer all achievement standards to all students without having to consider disabilities.

v. Removing barriers to pathways for disabled students and students with learning support needs by making all standards along the pathway accessible by design.

16. Although making the design of NCEA accessible theoretically removes barriers for disabled students and students with learning support needs, NCEA can only be as accessible to those students as the local implementation of NCEA in school and wharekura curriculum allows. To support the implementation of inclusive assessment design, the following actions have been incorporated into the change and implementation planning for the Review of Achievement Standards on top of the work mandated by the NCEA Change Package:
i. Incorporating accessibility sections into the Teaching, Learning and Assessment guides to support teachers to develop inclusive pedagogy and assessment opportunities

ii. Providing a wide range of sample assessment tasks to schools and kura to showcase the possibilities for inclusive assessment design within the new standards

iii. User testing assessment activities and external assessment briefs with disabled students, students with learning support needs and educators with a focus on those students throughout the process.

iv. Working with NZQA to ensure that external assessment tasks are inclusive by design, or are supported by more inclusive platforms for assessment such as NCEA Online.

17. Following the implementation of the new Achievement Standards throughout the early 2020s further work outside the Review of Achievement Standards and the NCEA Review can support schools and kura to use the new Achievement Standards inclusively. This may include providing ongoing supports for schools to design accessible and inclusive assessment tasks and ensuring that processes such as moderation support inclusive assessment design. We will also continue to engage with stakeholders in the disabled community to collect ongoing feedback on the implementation of inclusive assessment design in schools.

Removing barriers to NCEA in the short to medium term: SAC

18. The Review of Achievement Standards is expected to take until 2025 to complete, with new Level 1 standards becoming available by 2022, Level 2 standards by 2023 and Level 3 standards by 2024. Until then, students will continue to complete NCEA using the current suite of Achievement Standards. To ensure that gains in accessibility to NCEA can be made in the short to medium term before the new, inclusively designed Achievement Standards and assessments are available, changes can be made to SAC to make the system more accessible and equitable.

19. As outlined in the Rapid Response to Minister Hipkins on SAC on 2 October [METIS 1207426 refers], NZQA have been making changes to the SAC system to make SAC more accessible since the beginning of the NCEA Review Process. As of now schools and kura already can, or will from 2020 be able to ask for the following SAC, without needing to provide evidence towards any criteria other than an identified need:

i. Larger print papers and other assistance for visually impaired students

ii. Extra time, rest breaks and separate accommodation in examinations from 2020 to support neurodiverse students, students with mental health concerns and other students who need such conditions

iii. Computer use in examinations—with evidence currently, but on request from 2020

iv. All other SAC relating to physical disability.

20. To make NCEA more accessible in the short to medium term, NZQA and the Ministry are proposing to improve the SAC system in the following ways subject to Budget 2020 funding for the NCEA Change Package:
i. Contract an additional 2 School Relationship Managers (including one with kura experience and te ao Māori capabilities) at an estimated cost of $250,000 per annum to target schools with low SAC uptake to support students to access SAC entitlements.

ii. Explore centrally procuring tools for schools for identifying learning support needs and provide low-cost evidence for SAC.

iii. Investigate the development or adaptation of tools for identifying learning support needs which are suitable in Māori-medium education.

iv. Provide more targeted communications, particularly for parents and whānau of students new to NCEA, to increase awareness of SAC entitlements.

Proactive Release

21. We recommend that this Education Report is proactively released following the release of Cabinet's final decisions on NCEA. It is intended that this Education Report is proactively released as per your expectation that information be released as soon as possible. Any information which may need to be withheld will be done so in line with the provisions of the Official Information Act 1982.

Annexes

Annex 1: Rapid response to Minister Hipkins on SAC – 2 October
Annex 1: Rapid Response to Minister Hipkins on SAC – 2 October

RAPID RESPONSE

**Drafter:** Bill Dieckermann  
**Metis Number:** 1207426  
**Date:** 2 October 2019

To make NCEA more accessible to all students, Cabinet agreed in principle to:
- Ensure achievement standards are accessible by design, so students are not unfairly impeded by disability or additional learning support needs.
- Identify existing Special Assessment Conditions (SAC) that can be reasonably extended to all students.
- For other forms of SAC, simplify the application and evaluation process where possible to facilitate access.
- Eliminate fees.

*Ensuring achievement standards are accessible by design*

Although changes to SAC can increase accessibility, the overall goal is to remove the need for SAC in as many cases as possible. Accessibility will addressed through implementing universal design principles in the Review of Achievement Standards (RAS) to ensure that Achievement Standards and assessment tasks do not unfairly exclude disabled students and students with other learning support needs.

The Ministry is taking the following steps through RAS to ensure that accessible design considerations are present throughout the entire RAS process:
- Ensuring that the Subject Expert Groups and technical writers incorporate accessibility and Universal Design for Learning into the development of the new subject matrices and achievement standards.
- Incorporating accessibility sections in Teaching, Learning and Assessment guides and ensuring there are wide range of sample assessment tasks displaying inclusive assessment design to support teachers to develop inclusive assessment opportunities and pedagogy.
- User test assessment activities and external assessment briefs with SAC students and SENCO throughout the process.

*Special Assessment Conditions*

In the shorter term, Cabinet agreed to working towards making access to Special Assessment Conditions (SAC) more equitable by making some SAC, such as extra time, more readily available to all students and working with users and experts to ensure that the process is as simple and low-cost as possible. The purpose of SAC is to support students with a sensory, physical, or medical condition, or specific learning disorder, to be fairly assessed for the National Certificate of Educational Achievement (NCEA) and New Zealand Scholarship.

From early in the NCEA Review process it became apparent that students and schools and kura faced a number of issues when accessing SAC, including:
- Student, parent and whānau awareness of the opportunities to access SAC
- Managing logistics
- Access to specialist capability such as SENCO support and reader/writers
- The costs of assistance for internal assessment (NZQA meets the cost of external assessment SAC).
NZQA has made a number of changes to make applying for SAC easier and cheaper, such as the introduction of school-based evidence and simpler but more personalised processes for the provision of larger-print papers. As of now schools and kura already can, or will from 2020 be able to, ask for the following SAC, without needing to provide evidence towards any criteria:

- Larger print papers and other assistance for visually impaired students
- Extra time in examinations from 2020
- Computer use in examinations – with evidence currently, but on request from 2020
- All other SAC relating to physical disability

Note however that NZQA continues to ask for some information to check the best available SAC is provided.

However, a number of schools, kura and parents still hold strong perceptions of SAC as a difficult process based on previous experiences with SAC which continues to deter some schools, kura and students from applying for SAC entitlements.

To address this, NZQA and the Ministry is preparing further detailed advice to on how we will:

- Ensure that supporting students to access their SAC entitlements is an explicit focus on change and implementation activities (with both schools and kura and whanau and the community).
- Expand NZQA-delivered support (e.g., School Relationship Managers) focused on schools and kura with particularly low uptake of SAC
- Continue to deliver more training workshops for schools and kura, and refine the tools and processes via focus groups.
- Provide additional detail on the contribution the Learning Support Action Plan can make to delivering expanded access to SAC (an Education Report on this linkage will be provided to Minister Martin by November 2019).

We are still in the process of refining costings for these changes, and will present final costs as part of the Programme Business Case for the NCEA Change Package, prior to submission to Cabinet in December.
NZQA’s response to the feedback gained through NZQA’s involvement with schools and kura on SAC and in 2018/19 during the course of the NCEA review (Education Conversation and consultation feedback) is as follows:

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<th>Issues</th>
<th>Actions in 2018 and 2019 to address the NCEA review feedback</th>
<th>Planned actions 2020 onwards</th>
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<td>Make it as simple as possible for schools to get the support for students</td>
<td>SAC requirements for mental health issues were simplified in 2019. Schools only need to confirm the student’s need with NZQA to coordinate logistics. Assessing logistics, arrangements and additional workforce costs associated with making extra time provisions universal, with plan completed by November 2019. Simplified in 2018/19 the process for students with illegible handwriting – schools only need to confirm the need for a computer or writer (by simply uploading a sample of the student’s handwriting) Other requirements related to physical disability such as enlarged papers only require confirmation of the need to ensure that the right supports are available</td>
<td>Computer use (previously a SAC provision) will be available to all students on request from 2020 without any application or evidence Engage with schools in February 2020 to communicate changes and address school administration issues. Evaluate with schools in February/March 2020 any further improvements to support accessibility Evaluate how schools are managing computer provision Seek school feedback on how NCEA Online and computer provision can be used in conjunction with other SAC entitlements (e.g. reader/writer) Evaluate how NCEA Online is working for students and implement further changes Make extra time provisions available to all students in 2020</td>
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<td>Made it easier to get SAC for wherever possible</td>
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<td>Find ways of removing barriers further</td>
<td>NZQA has carried out ten of 11 focus workshops with the specialist learner support in Schools to identify means of reducing barriers including their views on more devolved decision making for SAC to schools.</td>
<td>Consult schools in February/March on the feasibility of devolving decision making further for SACs</td>
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<td>Make SAC accessible by removing the cost to students and parents of</td>
<td>Increased the training of the key staff in schools to promote awareness of the availability of school-based evidence tools which do not cost parents.</td>
<td>As above — consult schools in February/March 2020 of devolving decision making further for SACs.</td>
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<td>external reports for accessing a SAC</td>
<td>Overcome misconceptions</td>
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<td>Make sure that all schools know about, and how to use school-based evidence to apply (at no cost to parents) for specialist support (mainly readers/writers)</td>
<td>- As at 30 September 94 percent of applications for learning difficulty from low decile schools used school-based evidence and 70 percent of all applications – up from from 60 percent in 2018 and just under 50 percent in 2017. Used new kura engagement seminars to support kura with SAC Identified schools with low or no uptake of SAC to target for additional support to apply for SAC</td>
<td>Incorporating feedback from kura to introduce te Ao Māori into the SAC process.</td>
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