

Performance-Based Research Fund Sector Reference Group: Consultation paper #9 - Review of the TEO Audit process

Sector feedback and TEC decisions

Purpose

The Performance Based Research Fund (PBRF) Sector Reference Group (SRG) sought feedback from the sector and other stakeholders on the proposed changes to the tertiary education organisation (TEO) audit process.

This document provides:

- a summary of the responses received;
- a summary of any concerns raised relating to the proposals; and
- the Tertiary Education Commission's (TEC's) decisions on each aspect of the proposal.

Introduction

The *Review of the TEO Audit process* consultation paper provided the sector and other key stakeholders with background information on the 2012 Quality Evaluation audit process, set out the proposed framework for the auditing of the data submitted by TEOs for the 2018 Quality Evaluation, and invited feedback on the proposals and any other matters not raised in the paper.

Feedback on this consultation paper was invited through the Tertiary Education Commission (TEC) from 13 July to 21 August 2015. Consultation has now closed.

A total of 13 responses were received. These were from:

- Auckland University of Technology
- CPIT
- Eastern Institute of Technology
- Lincoln University
- Massey University
- Otago Polytechnic
- Tertiary Education Union Te Hautū Kahurangi o Aotearoa
- University of Auckland
- University of Canterbury
- University of Otago
- University of Waikato
- Victoria University of Wellington
- One individual

The Ministry of Education and Callaghan Innovation also provided feedback. Feedback has been anonymised.

Process information

The SRG has considered the feedback from the sector and other stakeholders relating to each of the matters identified in the consultation paper and have indicated their preferred option, which has been recommended to the TEC.

The TEC has approved these recommendations on the understanding that the consultation process is on-going and other decisions or external factors may require these recommendations to be reconsidered as part of the development of the final guidelines.

Next steps

The SRG will use the decisions as the basis of the draft guidelines for the 2018 Quality Evaluation. These guidelines will be provided to the sector and other stakeholders for consultation before they are finalised in June 2016. The purpose of the consultation on the draft guidelines is to ensure that the guidance is clear and unambiguous, not to re-consult on matters already consulted upon and agreed.

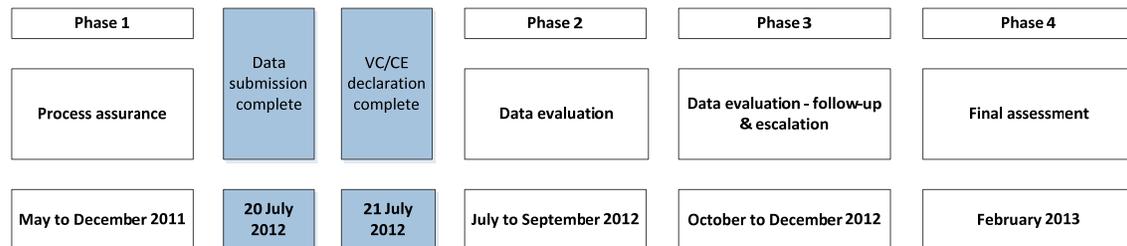
Organisation of summary

Each of the 13 responses has been analysed. Feedback is summarised according to the following sections:

- A. Review of the TEO Audit process
- B. Any other matters

A. Review of the TEO Audit process

The TEO audit process for the 2012 Quality Evaluation was undertaken in four phases over three years as shown in the diagram below.



The SRG sought feedback on whether the 2018 Quality Evaluation audit process follow similar timing as the 2012 Quality Evaluation.

A review of the responses has been undertaken and summarised below.

Should the 2018 Quality Evaluation audit process follow similar timing as the 2012 Quality Evaluation?	Response %	Response #
Yes	92.3%	12
No	7.7%	1

Responses indicated strong support for maintaining similar timeframes with one response suggesting extending the timeframes for some activities, specifically more time to complete the audit questionnaire and the CEO declaration.

Decision

The timing of the 2018 Quality Evaluation audit process will be as follows:

- Process assurance - May to December 2017 (including sector workshops) with eligible organisation having 21 working days to complete the audit questionnaire.
- CEO Declaration - No more than 24 hours following final data submission.
- Data evaluation audit (including follow up and escalation) – July to December 2018
- Final reporting – February 2019

More specific details regarding the timing will be included in the TEO audit process documentation by the TEC auditors when they are appointed in 2017.

The SRG proposed that the Data Evaluation audit provide assurance to the TEC and peer review panels that the staff eligibility data, the Research Output and Research Contribution components of EPs submitted by TEOs are complete and accurate.

The SRG also sought feedback on whether there were other aspects of the Quality Evaluation that needed to be included within the TEO audit process.

A review of the responses has been undertaken and summarised below.

Are there any other aspects of the Quality Evaluation that should be included in the TEO audit process?	Response %	Response #
Yes	33.3%	4
No	66.7%	8

Responses indicated that the staffing data collected by the Ministry of Education and used in the Average Quality Score (AQS) denominator should be included in the audit process. The TEC considers this data to be outside of the scope of the TEO audit process, however agrees that this data needs to be robust. The Ministry of Education is considering that an audit process be put in place and will discuss this further with the PBRF Sector Reference Group and the Tertiary Advisory Group.

Other responses indicated that conflicts of interest, new and emerging research EPs, the contributions identified in co-authored papers and academic staff contract changes be included in the TEO audit process.

- The TEC can confirm that conflicts of interest are reviewed as part of the internal audit process. This will continue for the 2018 Quality Evaluation.
- The audit of the application of the staff eligibility criteria including the application of the new and emerging researcher criteria is already a part of the TEO audit process.
- All aspects of the Research Output data are already included within the TEO audit process, and panels are able to raise concerns about the validity of information submitted in an EP, including the contribution claimed for a research output. These concerns will be raised with TEOs as happened in the 2012 Quality Evaluation.

Other feedback that suggested minor changes to specific parts of the TEO audit process will be considered and included, where appropriate, in the guidelines.

Decision

No other aspects of the Quality Evaluation will be added to the TEO audit process.

The SRG proposed that the Data Evaluation audit would continue to focus on two broad categories of errors: 'fundamental' and 'serious'.

The examples provided within these categories were revised and the SRG sought feedback on whether the broad categories of 'fundamental' and 'serious' errors were appropriate.

A review of the responses has been undertaken and summarised below.

Are the broad categories of 'fundamental' and 'serious' errors appropriate?	Response %	Response #
Yes	90.0%	9
No	10.0%	1

Responses indicate that the broad categories are appropriate.

Clarification was sought regarding the eligibility of outputs, specifically what the final version of a research output being publicly available outside the assessment period would mean for the 2018 Quality Evaluation. The SRG has addressed this as part of the review of the Research Output component consultation paper and in-principle decisions.

A number of responses also requested further definition of what is considered 'similar content'. The SRG has determined that panels are best placed to determine what is considered 'similar content' and apply their judgement accordingly. This means that this will not be categorised as a 'fundamental' error in the context of the TEO audit process.

It was also suggested that the 'fundamental error' category not apply to Research Contribution items. The SRG does not support this suggestion as it is important that items submitted in either of the two components are treated equally within the audit process.

Some concern was also raised regarding the incorrect categorisation of 'new and emerging' as a 'serious' error in the 2012 Quality Evaluation, and the effect of reporting these errors for TEOs. The principle for determining 'new and emerging' researchers has been agreed and the criteria will need to be revised to ensure that it reflects the principle. These actions should ensure that the criteria are clear for all TEOs participating in the 2018 Quality Evaluation.

Decision

The Data Evaluation audit for the 2018 Quality Evaluation will focus on two broad categories of errors: 'fundamental' and 'serious' as set out below.

Fundamental errors

Fundamental errors are those that render staff ineligible to participate in the Quality Evaluation, and research outputs or contributions ineligible for assessment.

Fundamental errors are likely to include, but are not limited to:

- staff members not meeting the staff eligibility criteria, for example:

- not continuously employed;
- being based overseas; or
- employed for less than a minimum of 0.2 FTE throughout the census year.
- the final version of a research output being publicly available outside the assessment period for the 2018 Quality Evaluation;
- a research output not authored by the person who submitted the relevant EP;
- no evidence confirming the research output's existence;
- a research output that doesn't meet the definition of research;
- a research contribution not attributed to the staff member submitting the EP; or
- a research contribution occurring outside the assessment period for the 2018 Quality Evaluation.

Serious errors

Serious errors are those that materially affect the PBRF status of a staff member in terms of assessment, or materially affect a panel member's judgement on the quality of research outputs or research contributions.

Serious errors are likely to include, but are not limited to:

- incorrect recording of a staff member's FTE;
- incorrect application of the new and emerging researcher criteria;
- incorrect classification of research output type;
- a research output with similar content to other research outputs submitted in the EP;
- identification of research outputs as quality assured when they are not;
- failure to include the names and/or contributions of co-authors; or
- misrepresentation of the contribution of the submitting staff member to a research output or research contribution.

The SRG proposed a process to manage errors in data submitted to the 2018 Quality Evaluation. The changes introduced to the process were aimed at providing certainty to both TEOs and panels that any data issues would be addressed and closed off in a timely manner.

The SRG sought feedback on whether there were any other changes to the process for managing errors that need to be considered.

A review of the responses has been undertaken and summarised below.

Are there any other changes to the process for managing errors that need to be considered?	Response %	Response #
Yes	38.5%	5
No	61.5%	8

While a number of responses indicated that there were changes to the process that needed to be considered the majority of these were relatively minor and will be addressed in the development of the guidelines.

A question was raised regarding how this process would apply to any errors discovered during or after the panel meetings. While the TEC would expect these to be in the exception, the same process will apply. However, responses and resolutions would need to occur in a significantly shorter timeframe.

Decision

Implement the proposed process for managing errors in the 2018 Quality Evaluation.

The outcomes of the process will be included on the online forum to ensure that issues are understood and decisions are transparent. Information on this process and the outcomes will also be included in the reporting on the audit process.

The SRG proposed advice on how the TEC will determine if and when sanctions are applied to TEOs. This advice included sanctions and consequences that would apply to certain fundamental errors.

The SRG sought feedback on whether there were other sanctions that need to be considered.

A review of the responses has been undertaken and summarised below.

Are there other sanctions that need to be considered? For example, not reporting the average quality scores for TEOs where there have been systemic errors identified.	Response %	Response #
Yes	30.0%	3
No	70.0%	7

Responses indicated that the sanctions and consequences set out were appropriate. Some responses indicated that in cases of systemic errors where data had been deliberately manipulated the sanctions could be increased and more substantive sanctions should be considered, for example a one-off fine against the first revenue year of the 2018 Quality Evaluation round, or excluding eligible staff along with publishing information on the errors.

Decision

No other sanctions will be included to the TEO audit guidance.

B. Any other matters

Some questions have been raised regarding who should prepare and submit an evidence portfolio, what is considered the 'minimal' amount of evidence of research activity, and are there publication categories considered as having 'limited or no significance/impact'.

Information on who should prepare and submit an EP is determined by the staff eligibility criteria. In-principal decisions have been made and published on this. TEOs should also note that the audit process will only consider information on staff with an EP submitted. There is no number of outputs that would be considered the 'minimal' amount of evidence of research

activity, but EPs must have at least one NRO to be submitted. All publication categories are considered on their merits within the Quality Evaluation process.

The question of having an open forum of questions and responses to queries regarding PBRF related issues was also raised.

The TEC has previously advised that it supports the development of a question and answer portal to allow TEOs to raise questions about aspects of the guidelines and display any TEC response to these questions as a way of increasing the transparency of the PBRF process. We have previously advised that we expect to implement this when the draft guidelines are released for consultation.

The TEC can also provide assurance that the information received through the TEO Audit process will only be used for the purpose of the PBRF audit. This is no different from previous years. However, to ensure compliance with the privacy laws, the TEC will review the privacy requirements as they relate to the Privacy Act with the PBRF Audit Workstream team before commencing this programme of work. In addition, consideration will be given to including a statement in the CE Declaration to confirm that the TEO agrees to provide information required for the purpose of auditing 2018 Quality Evaluation submissions.