

The responses below:

- a) are in reply to questions raised by PEIs during EduTrust briefings for PEIs conducted from 7 – 29 Oct 2009 at MOE's Teachers' Network;
- b) are accurate as at the date of release. CPE reserves the right to make amendments to the responses when necessary and without giving any prior notification. Any future update or amendment will be published via CPE's official website (www.cpe.gov.sg); and
- c) make references to the EduTrust Guidance Document (Version 2.0) and other documents related to the EduTrust Certification Scheme.

CRITERION 1

1.3.1 **Question:**

Since it is a requirement for the organization strategic plan to be cascaded to unit/department and individual plans, how far and how detailed should it be cascaded?

Response:

As all strategies and targets should have clear ownerships, it should be cascaded to the respective owners. Targets set for unit/department and individual must be aligned to the organisation's strategic plan.

1.3.2 **Question:**

Will CPE stipulate the type of KPIs that must be set? Must all the targets be SMART?

Response:

Except for specific requirements in Criterion 1.3.2, PEIs are free to set KPIs relevant to their strategies.

All targets set in all plans should be SMART so that the PEI and its staff can evaluate their performance. Where it is not feasible to set SMART targets, then there should be proxy indicators to enable the PEI to measure its performance.

1.5.1 **Question:**

Who appoints the Management Representative (MR) for EduTrust and what are the MR's responsibilities?

Response:

The MR for EduTrust must be appointed officially by the PEI. The responsibilities of the MR are stated in Criterion 1.5 and should not be confused with the "manager" as defined under the Private Education (PE) Act or the PE Regulations.

CRITERION 2

2.1.1 **Question:**

If 2009 financial statements are not available, can PEI use the 2008 statements when applying to the credit rating agencies? Must all PEIs submit the credit rating report?

Response:

This will depend on the requirement of the respective credit rating agencies. Generally the latest financial statement would be used to assess the financial health of the organization. CPE will only accept a credit rating report which is done within 3 months before application.

Important note: CPE will reject any application for EduTrust certification that does not include the submission of a valid credit rating report. The PEIs must have a credit rating equal to or exceeding a minimum rating set by CPE before they can be considered for an EduTrust certification award. Failure to meet the minimum credit rating requirement will lead to a non-award for new applicants. For certified PEIs, they are required to submit a credit rating report annually. PEIs that fail to submit the report or meet the minimum credit rating requirement will have their award terminated.

2.1.2 **Question:**

What kind of financial documents are required during the EduTrust assessment? Will assessors be carrying out annual financial audit of the PEI?

Response:

PEIs will only need to provide 2 types financial documents for EduTrust certification:

- a) Credit rating report, and
- b) Financial statement that is submitted to relevant government agencies (e.g. IRAS, ACRA etc) or audited revenue statement.

Assessors are not financial auditors and it is not the intention of the assessors to detect financial fraud or anomalies. PEIs must appoint their own independent, external auditors to carry out financial audit and comply with all reporting requirements of government agencies.

However, assessors may carry out verifications of financial records where necessary.

2.1.3 **Question:**

Since the credit rating agencies have not been announced, will it delay our EduTrust application?

Response:

The appointed agencies will be announced on the CPE website before the launch. It generally takes less than 2 weeks to produce a credit rating report and this will not delay any PEI in its EduTrust application.

2.7.1 Question:

The certification scheme seems to protect the students and not the PEI. Can we have details of the dispute resolution framework for students?

Students tend to go direct to Case in the past to complain without going through the PEI. In future, what is CPE's stand? Will CPE be involved in handling students' claims?

Response:

The certification scheme aims to raise the standards and quality of the private education industry, such as in the area of complaint and dispute management. PEI should be the first stop for students who seek a resolution to disputes. When this fails, the disputes will be escalated based on CPE's Dispute Resolution Framework (details will be released at a later date). The power of the Council in relation to dispute resolution schemes is provided for in the Private Education Act (section 64).

CRITERION 3

3.1.1 **Question:**

What is the rationale for requiring PEIs to publish their agent list on their websites?

What if the PEIs deem the list as confidential and do not want to publish it?

Response:

The agent list is meant for prospective students to know who to approach so that they will not be misled by any unauthorised agents who may claim to act on behalf of the PEI.

It is an EduTrust requirement for all PEIs to publish their agent lists and thus it should not disadvantage any PEI in anyway. On the other hand, similar to all EduTrust requirements, PEIs have the choice whether they want to fulfil the requirements and they will be assessed accordingly.

To raise public (prospective students') awareness, CPE will be preparing materials providing guidance such as advice to contact only appointed agents. If PEI chooses not to publish its agent list, then prospective students may not know who to approach and the confidence level in the PEI may be affected.

3.1.1 **Question:**

For external recruitment agents, is it necessary to publish all the countries that they are recruiting students from, especially for those agents who are recruiting students from all over the world?

Response:

Yes. In this way, prospective students from the various countries will know if the agent is an official agent representing the PEI in that country.

3.1.1 **Question:**

For students who introduce their friends, would they be considered as recruitment agents?

Response:

The definition of agent is provided on page 42 of the EduTrust Guidance Document which states:

“Recruitment agents refer to people or companies who recruit international students on behalf of the PEI for monetary interests.”

For example, if these students receive financial payments or discounts of their course fees for introducing friends to the PEI, then they are considered as recruitment agents. Note that it is still the responsibility of the PEI to ensure that it provides accurate information to every prospective student even if he is introduced to the PEI by his friends.

3.1.1 Question:

For companies that send their local employees to the PEI, are these companies considered recruitment agents?

Response:

No. Refer to pg 42 of the Guidance Document for the definition of “Recruitment agents”.

3.1.1 Question:

We do not appoint agents as students are introduced by freelancers. In such circumstances, can we seek a waiver from Criterion 3?

Response:

If freelancers fit the definition of “recruitment agent”, then they must be officially appointed by the PEI and they will be assessed either in Criterion 3 or Criterion 2.3.3 whichever is applicable.

If a PEI does not have any external recruitment agents, it can apply for a waiver before application and submit relevant supporting documents.

3.1.1 Question:

If our students come from our partner institutions overseas, will our partner institution be defined as recruitment agents?

Response:

Since the institution is a “partner” of the PEI, it will be assessed under criterion 2.4. However, the PEI must still demonstrate that it adheres to its selection and admission processes (Criterion 5.3) when the students come to Singapore.

3.2.1 Question:

For training of the overseas recruitment agents, must it be done overseas?

Response:

It is up to the PEI as long as the PEI can demonstrate to the assessment team evidence of training which includes training materials and attendance records.

3.2.1 Question:

Since students can only pay to bank for escrow protection, why do we need to inform students of the different payment methods?

Response:

The different payment methods are applicable if PEIs adopt insurance for Fee Protection Scheme (FPS). For escrow, if the banks accept different payment methods, PEIs should also keep their students informed.

3.3.1 **Question:**

It is not an industry practice for PEIs to collect agent's fee on behalf of the agent. As such, can CPE review the requirement that agents cannot collect any money?

Are we punishing good agents by not allowing students to pay them for their service?

What if the agents help the students to buy air ticket, can they collect such money from the students?

Response:

The EduTrust Guidance Document has been amended with regard to collection of agent fees. An external recruitment agent will be allowed to collect solely the fee chargeable for the service rendered by the agent to the prospective student. Besides this service fee (also known as agent commission from student), agents are not allowed to collect any course-related fee from the students that are payable to the PEI. Course related fees do not include the cost of air ticket (or other transport cost).

This service fee chargeable must be declared in the **PEI-agent contract** and it will be a breach of contractual terms if prospective students pay more than what is stated in the contract. When agents are not allowed to collect other money, we are protecting prospective students from errant agents who may abscond with the students' money.

CRITERION 4

4.1.2 **Question:**

Can the PEI enter FPS data on CPE's on-line system rather than forwarding the data to CPE via softcopy?

Response:

CPE's on-line system does not allow access by external parties to protect the integrity of the system. We will require PEIs to submit the data in a prescribed format (softcopy will be available on CPE website) fortnightly.

4.1.2 **Question:**

Since students are not allowed to pay any fee to a third party, does that include Singapore Examinations and Assessment Board (SEAB) for GCE 'O' Level examination fees?

Response:

Yes, any course-related fee payable by the student to a third party must go through the PEI so that the fee is protected under FPS (escrow /insurance). This also applies to examination fee payable to other organisations such as ACCA and universities. So long as a student is studying in the PEI and the examination is part of the course requirements, the examination fee must be protected even though it may not be collected at the point of signing of the contract.

4.1.2 **Question:**

Does the third party include housing agents that students engaged for their own accommodation?

Response:

If the students were to engage their own housing agents for accommodation, then it would not be a course-related fee. Students would be able to pay these agents on their own. This is similar to other costs such as transport costs and expenses on food that students incur while staying in Singapore.

However, if accommodation fee is part of the study package offered by the PEI, then the fee payable becomes a course-related fee that must be paid through the PEI and such fee must then be protected under FPS.

Even though international students may seek other services on their own, PEIs should provide proper guidance for them as part of student support services to help them settle down in Singapore.

4.1.2 Question:

In the EduTrust Guidance Document, there is no mention of a deferment policy, e.g. deferment for student from commencing a course of study due to National Service. For a PEI with a deferment policy, is FPS applicable during the deferment period?

Response:

FPS is applicable to all fee paid by the students. As long as there are unconsumed fees with the PEI, regardless of whether the students have commenced or deferred their study, such fees must be protected under all circumstances, including the deferment period.

4.1.4 Question:

Do we have to issue receipts immediately for every payment? This is because we accept GIRO and cheque payment modes.

Response:

Yes, receipts should be issued immediately whenever a payment is made to the PEI wherever possible. For cases such as GIRO payment or telegraphic transfer, receipts should be issued within 3 working days after the money is credited into the PEI's account. For cheque payment, PEI can still issue a receipt on the spot stating clearly that a cheque payment has been made.

4.2.1 Question:

Since there will be an EduTrust standard PEI-student contract, when do we have to use it?

Can PEIs be allowed to add other conditions to the new contract e.g. to include deferment conditions or use a non-standard contract?

Response:

PEIs may use the new contract once it is available. However, from the date of EduTrust application, the PEIs must adopt the new contracts or contracts approved by CPE for all their new students. Existing students of the PEIs (at the point of EduTrust application) do not have to sign the new contract. The use of an addendum to the existing contract is encouraged. However, PEIs are responsible for informing their existing students of the new FPS requirements and ensure that they are adequately protected.

To add or amend the clauses in the standard contract, PEIs have two options:

- a) PEIs may use non-standard contract subject to CPE's approval and a fee may be levied on PEI for such a service, or
- b) Include an addendum (which must be fair, reasonable and cleared by PEI's lawyers and approved by CPE) to standard contract.

4.2.1 Question:

What is the legal age for students to sign the PEI-student contract? What is CPE's definition of "guardian"?

Response:

The legal age for signing the PEI-student contract and the criteria for being a guardian will be stated in the EduTrust standard PEI-student contract.

4.2.1 Question:

Can discounts be given for course fees?

Response:

Yes, discounts for course fees are allowed so long as the PEIs declare them in the student contract together with the original course fee.

4.2.2 Question:

Is CPE going to simplify the refund policy table in the current CaseTrust student contract to factor in the maximum refund during “cooling off” period?

Response:

Yes, we are in the midst of refining the current CaseTrust contract, as far as possible, to make it easy for PEIs to use and easy for students to understand. The illustration used using the briefing adopts the current CaseTrust student contract format. The new EduTrust standard PEI-student contract will be available in due course.

We are finalizing the new EduTrust standard PEI-student contract. It will incorporate a refund policy table that allows PEI to specify, in an easily understood manner, the maximum refund during the cooling off period. During the EduTrust briefing, the refund policy table based on CaseTrust’s student contract was used for illustration purposes only.

4.2.2 Question:

Is the 7-day ‘cooling-off period’ applicable for students entering a new contract when switching to a new course?

If our policy is not to refund any course fee after course commencement, do we still need to follow the cooling period requirement? Will CPE be stating the maximum refund that students can get?

Can we charge administrative fee for withdrawal during the cooling off period?

Response:

The cooling-off period (minimum 7 days) is applicable whenever a student sign any contract. It is to allow the student the opportunity to get back the maximum refund (to be decided by the PEI but which must not go against provisions in the student contract) as stipulated by the PEI in a hassle-free manner.

Regardless of the refund policy or transfer/withdrawal policy adopted by the PEI, the cooling off period is applicable whenever a student contract is signed. Hence, the PEI is advised to provide proper pre-course counselling to ensure that students are enrolled in the proper course to minimise course transfers.

As refund policy is a business decision, CPE will not control the refund quantum so long as the refund policy is “fair and reasonable” and transparent to all parties.

If the PEI decides to charge any administrative fee relating to the cooling off period, it must be fair and reasonable and declared in the student contract at the point of signing the contract.

4.2.2 Question:

Will there be any exception to the requirement of contract signing?

Response:

In general, one contract per course per student is required. However, there will be some exemptions if the course meets certain criteria which will be spelt out in the EduTrust Terms and Conditions.

4.2.2 Question:

If money can only be collected after signing the contract, does it mean that we must pay other parties (e.g. suppliers, ICA) with own money first?

We depend on cash flow for operation, so why are we not allowed to collect money before signing the contracts?

Response:

Students should only pay the PEI after they have gone into a legal, contractual relationship with the PEI. Thus, PEI will have to design their administrative procedures with this constraint in mind.

4.3.1 Question:

Will there be a prescribed refund policy for PEIs? Can PEI declare different amounts of refund for different students? Can PEI declare different amount of refund for students who sign up at different times?

Response:

Except for the refund policy stated in the student contract, PEIs are given the liberty to set their own refund policy so long as it is fair and reasonable and meets the requirements stated in Criterion 4.3.1.

4.4.1 Question:

Does the PEI need to inform ICA when a student changes his course of study?

Response:

The PEI must comply with ICA's requirements stipulated for the issuance of a Student's Pass, including updating of student information with ICA arising from any change of course or otherwise.

4.5.1 Question:

Is it the intent of CPE not to include outpatient services in the medical insurance coverage?

Response:

As outpatient cost is relatively more affordable to students, it is not the intention of CPE to cover outpatient services now. PEIs may choose to exceed EduTrust's minimum requirements e.g. by including coverage of expenses arising from outpatient services in their medical insurance plan.

4.5.1 Question:

Does CPE expect small PEIs to provide pastoral counselling services for students as well?

Response:

As with any other EduTrust requirements, PEIs have a choice whether or not to meet the pastoral counselling requirement. Assessors will then score the PEIs based on the extent that the PEIs have met the requirement.

4.5.1 Question:

Are PEIs required to provide medical insurance for existing students?

Is there a list of CPE-appointed medical insurance providers?

Is the insurance compulsory for part-time students?

Do we need to provide any evidence to show that students who are eligible to opt out of the insurance scheme and who choose to do so have their own medical insurance?

What if our international students have their own medical insurance?

Response:

At the point of EduTrust application, PEI is required to fulfil the medical insurance requirement for all their existing and new full-time students who are enrolled in any course.

The PEI may choose any insurance company so long as the terms for minimum medical insurance coverage required by EduTrust are met.

Medical insurance coverage is not compulsory for part-time students, SC/PR students and non-STP international students. Students who choose to opt out of the medical insurance are to show proof that they have their own medical insurance before making a declaration in the PEI-student contract to opt out of the medical insurance scheme. PEI must verify that the students' medical insurance cover their entire course of studies (*it is not mandatory that the students' medical insurance coverage meets CPE's requirements*) before allowing them to opt out of the insurance scheme. The PEI is responsible for explaining the medical insurance scheme to them so that they can make informed choices.

It is unlikely that international students have their own medical coverage that meets our requirements. However, should this happens, the PEI is to declare such cases to the EduTrust assessors and provide relevant documents that demonstrate compliance during site assessment. Otherwise, PEI must meet this critical requirement on medical insurance for students.

Transition from CaseTrust to EduTrust

At the point a PEI applies for EduTrust, the PEI is exempted from the medical insurance requirement for students with less than two calendar months before leaving the PEI.

4.5.1 Question:

If group medical insurance has been purchased for our students, is it compulsory to give out individual medical insurance certificate to the students?

Response:

Group medical insurance is allowed so long as the PEI can demonstrate that every student enrolled is covered by the minimum requirements stated. Under group medical insurance, as long as students are informed of the critical details of the policy (such as through the student handbook or the PEI's website) to show that they are covered, there is no necessity to issue individual policy certificate.

The PEI must ensure that the terms of their existing medical insurance coverage meets EduTrust requirements as this is one of the critical requirements of EduTrust.

CRITERION 5

5.1.1 **Question:**

The Academic Board is required to evaluate and approve any adoption of external courses. What if the Academic Board is not permitted to change the course content?

Do we have to show proof of our Academic Board's involvement (e.g. in course development) in courses that we currently offered?

Response:

The purpose of involving the Academic Board is to ensure that through the evaluation and approval, the content of the course to be adopted suits the PEI's strategic business intent.

Should the PEI find the content unsuitable, then the PEI should reconsider the decision for offering the course. With the introduction of renewable contract (Criterion 2.4.1), this will allow the PEI to review their partnerships external course owners.

If the PEI is permitted by its External Degree Programme (EDP) partner to suggest amendments to any aspect of the EDP, then the Academic Board will also be responsible for such changes before forwarding to the EDP partner for approval.

The PEI should take this opportunity of preparing for EduTrust certification to involve its Academic and Examination boards in its course and assessment review processes.

5.1.1 **Question:**

Are the duties and responsibilities of the Academic and Examination boards limited to those stated in the Guidance Document?

Response:

The setting up of both boards is a requirement under the PE regulations which also stipulates the minimum duties and requirements expected of both boards. PEI may stipulate additional roles and responsibilities for both boards if necessary for their operations as long as it is clearly spelt out in their appointment letter.

The Guidance Document also states the minimum areas which both boards should be involved in. PEIs are free to deploy members of the boards in other additional areas that are necessary.

5.3.2 **Question:**

Can we accept students from non-appointed agents?

Response:

No. Non-appointed agents do not have any contractual relationship with the PEI and thus they are not trained by the PEI nor obliged to provide a quality of service comparable to that of the PEI. Thus, students may be subject to mis-selling or given inaccurate information by such agents. The PEI should sign an annual renewable contract with agents who provide quality service and have good track records so that they can become appointed agents for the PEI.

5.4.1 Question:

If the PEI can show evidence that students need not attend classes e.g. through web-based learning or distance learning, will the attendance requirement still apply?

Response:

In such cases, PEI will need to seek a waiver from CPE with relevant supporting documents before applying for EduTrust.

5.4.1 Question:

If we do not meet the “7 hrs per day” requirement, does it mean that we will not be able to get EduTrust (Star) award? When must we start implementing this requirement?

Does it mean that for PEIs which do not have international students will never get EduTrust (Star) award?

Is this requirement applicable to part-time and full-time students holding other passes (e.g. dependent’s pass and work permit)?

How does CPE define the 7 hrs? Does it include lunch hour and can it include time for an activity held outside the PEI’s premise?

Response:

This requirement is a pre-requisite for EduTrust Star award unless the PEI has submitted a waiver application (the PEI does not take in international students) that has been approved by CPE. The PEI must implement this requirement by the time they apply for EduTrust certification.

This requirement is solely applicable for international students who are holding a student pass issued by ICA.

The “7 hrs per day” requirement refers to the duration that students are to be engaged in academic studies or meaningful activities within the PEI’s premises each day. It excludes any break or lunch time. It is up to the PEI to justify the activities that the students are engaged in and show evidence that this requirement is implemented. For activities outside the PEI’s premises, PEI will have to justify how they are related to students’ learning and assessors will make a decision based on the merits of the activities and the documentations shown.

Afternote: The “7 hrs” requirement has been changed to “5 hrs” in EduTrust Guidance Document version 2.0.

5.4.1 Question:

Is the “75% attendance” requirement for local students applicable to part-time students?

Response:

No, the requirement is only for full-time SC/PR and non-STP international students in the absence of any more stringent requirements. For STP international students, ICA’s attendance requirement is currently set at 90%.

5.6.1 Question:

For PEIs catering to students with special needs, the assessment modes are very different. Will CPE assess such PEIs differently?

Response:

These PEIs should seek necessary waivers from CPE with relevant supporting documents before applying for EduTrust if they feel that the EduTrust requirements are not applicable to them.

5.6.3 Question:

The requirement that assessment results must be released within 3 months may not be feasible as some overseas university examination boards meet only twice a year.

Response:

Generally, a period of 3 months is a reasonable duration. However, if need be, the PEI may seek a waiver with relevant supporting documents from its partner universities before applying for EduTrust.

5.7.1 Question:

Would a PEI be penalised for using only part-time academic staff? Does CPE stipulate a cap on the number of such staff?

Response:

EduTrust does not stipulate the number of part-time academic staff that a PEI can engage. However, EduTrust assessors will examine how the PEI selects, recruits, manages and monitors the performance of all academic staff (part-time and full-time) to ensure quality educational services for its students.

CRITERION 6

6.1.2 **Question:**

Criterion 6.1.2 requires a PEI to have data showing “3-year positive trend”. How is this requirement related to the Band 5 Banding Descriptor that also requires data showing “3-year positive improvement trend”?

Does it mean that a PEI will not be able to get EduTrust (Star) award if it cannot show a 3-year positive trend for all criteria?

The requirement for 3-year data seems to disadvantage new PEIs. Does it mean that a new PEI will not be able to achieve EduTrust?

Can a new PEI seek a waiver from this 3-year trend data?

Response:

The Band Descriptor is applicable to all criteria. So wherever applicable, the PEI must demonstrate a 3-year positive improvement trend with relevant data before it can be awarded Band 5.

As for the requirements spelt out in Criterion 6.1.2, they are the key results (minimum) that assessors will look for before awarding Band 3 for Criterion 6.1.2.

The EduTrust (Star) award is never dependent on one criteria but as a whole assessment. Without a 3-year positive improvement trend throughout, a PEI may not be able to score band 5 but it is not disadvantaged as it can still achieve band 4 consistently to qualify for EduTrust (Star) award.

EduTrust is a quality framework that aims to help all PEIs to strengthen their systems and processes. It is not meant to disadvantage any PEI. As long as a PEI can demonstrate that it can meet the requirements, it can still achieve EduTrust Provisional award with a minimum of 500 points.

No waiver will be granted for 3-year data trend in any relevant criterion. The difficulty in having such trend data shows that it is more difficult to achieve the higher awards (i.e. EduTrust or EduTrust Star). Alternatively, PEIs may start with recruiting non-international students to build up its store of relevant documentations before applying for EduTrust.

6.2.1 **Question:**

Are there any expectations on the Policy and Operation manuals?

Response:

CPE will specify the minimum documents that must be included in both manuals. However, PEIs may include more documents to meet their operational needs.

6.2.2 Question:

Are there any specific criteria for the person who carries out the internal assessment? Can our consultant perform the internal assessment?

Response:

We do not stipulate who can conduct the internal assessment (i.e. the self-score). It is up to the PEI to select an appropriate person who knows its operations, is appropriately trained and independent of the areas being assessed. In doing so, the person can then critically assess the job area to give an honest score that truly reflects the current status. A scoring that is not done properly may not provide the right indication to the PEI on areas to improve.

GENERAL QUERIES

1 Question:

If a PEI operates different centres and conducts the same programmes in its different centres, will assessors be doing site assessment for all its centres or just one?

What if we have an overseas centre and offering courses there, will this also be assessed?

If for some premises we do not enrol international students, do we have to meet EduTrust requirements for these premises?

Response:

If the different centres are registered as different entities, then each entity will have to get EduTrust certification separately. Our assessors will look at the programmes separately.

However, if all the centres are registered as one entity, then we will look at the programme once because EduTrust certification will cover all these centres.

EduTrust certification scheme is a Singapore-based scheme, it is not meant to certify overseas operations at this moment. Overseas operations will be governed by the respective overseas government legislations. Hence, PEI is not permitted to use the CPE and/or EduTrust mark for their overseas operations.

EduTrust requirements will be applicable to all premises that are registered under the same UEN (Unique Entity Number) regardless of whether a premise has international students.

2 Question:

Can we apply for registration under Enhanced Registration Framework (ERF) and EduTrust certification concurrently?

Response:

Yes. PEIs will only be assessed by EduTrust assessors after they have been registered.

3 Question:

For a PEI which does not recruit international students, how will this affect its EduTrust assessment?

Response:

The PEI may write in to CPE with supporting documents to seek a waiver so that certain requirements in EduTrust may be waived. CPE reserves the right to grant any waiver based on the documents submitted. Generally, there will be no waiver from the critical EduTrust requirements (where applicable) for any students.

4 **Question:**
What are the benefits for PEIs to differentiate between the EduTrust and EduTrust (Star) awards?

Will the benefits be comparable to SQC-PEO benefits?

Will PEIs awarded EduTrust (Star) be given the option to provide industry attachments for their students?

Response:

Details of the benefits for PEIs awarded EduTrust and EduTrust (Star) will be announced in due course.

PEIs that intend to provide industry attachments (or internships) for their students must apply to MOM for such requests.

5 **Question:**
How will the EduTrust scores of PEIs that have obtained waivers for certain requirements be affected?

Response:

As stated in the Introduction of the EduTrust Guidance Document (pg 4), if a PEI has sufficient supporting documents to justify that one or more EduTrust requirements are not applicable, then the onus is on the PEI to write in to seek a waiver. CPE reserves the right to grant any waiver.

EduTrust assessment and scoring will not include areas that have been waived. However, the PEI will not be allowed to implement the exempted requirements during the period of certificate validity.

Note that if the condition(s) that led to CPE granting the waiver is(are) no longer valid, the PEI must inform CPE. CPE may subject the PEI to an ad-hoc assessment where necessary.

6 **Question:**
Existing students of PEIs are recruited under the CaseTrust regime. It is not fair for PEIs to provide fee protection and medical insurance for these students at the point of EduTrust application. Can CPE review these requirements to give PEIs some support? What can PEIs do if the students refuse to pay any money to help PEIs meet the requirements? Does it mean that the PEIs will have to bear all the implementation costs themselves?

Response:

Since PEIs choose to apply for EduTrust, PEIs will have to meet all EduTrust requirements including protecting all existing students. PEIs will have to communicate to their existing students that this is an EduTrust requirement and not a new requirement of the PEI. As to who bears the cost for this implementation, the decision lies with the PEIs.

- 7** **Question:**
Whenever there is a requirement that stipulates approval by “management team” or “academic board”, does it mean that all members of the team/board must approve?
- Response:**
As a general rule, where “management team” or “academic board” is referred to, whether to grant approval or otherwise, at least one member of the team/board should be involved. However, the PEI should also look at the context in which the reference is made and decide if all (or partial) members should be involved. For example, during strategic planning, it would be best to include the entire team.
- 8** **Question:**
Since there are so many changes, does it mean that PEIs must change their student handbook, website and other materials? Is CPE going to announce the new requirements to students?
- Response:**
PEIs should update all their documents, including their student handbook and official website, as part of their preparation for EduTrust application.
Educating the students is a long term strategy of CPE. Unlike the PEIs, students will not have mass briefings by CPE. It is up to the PEIs to keep their students informed. If students are in doubt, they may approach CPE’s student services centre which will be set up soon.
- 9** **Question:**
If a PEI is not awarded an EduTrust certificate, will it still receive a report from CPE? Does it mean that when a PEI is not asked to pay the 2nd stage fee, it means that the PEI has failed?
- Response:**
Yes, a report will be given for each EduTrust application. A PEI which is not given any award can only re-apply after 3 months from the date of notification of non-award. This is to allow the PEI time to put in place or improve their systems and processes before reapplying for certification. All fees paid to CPE are not refundable regardless of the result of the application. When PEI is not asked to pay the 2nd stage fee, it means that the PEI has failed to get EduTrust award. On the other hand, a PEI which has to pay 2nd stage fee does not automatically mean passing the EduTrust certification because PEI may have under-declared information in the application and is asked to pay the difference in fee before the result is released.

- 10 Question:**
What is the purpose of interim assessment since a PEI has been issued with a 4-year certificate and the PEI is already expected to do annual reporting?
Will there be an interim assessment for a PEI with an EduTrust (Provisional) award?
- Response:**
As with all quality frameworks, PEIs are expected to maintain or improve on their quality standards throughout the certificate validity period. The interim assessment and annual reporting are means to verify that the PEIs continue to maintain their quality standards.
CPE may also use the annual report as a basis to direct the PEIs for ad-hoc assessment if there are reasonable causes to belief that the PEIs have not maintained their quality standards.
Interim assessment is not applicable for EduTrust (Provisional) award as the PEI will be due for a renewal assessment towards the end of the first year of award.
- 11 Question:**
With all these increase in requirements that the PEIs have to meet, it is inevitable that some, if not all, of the cost to implement the requirements will be passed on to the students. This will make PEIs less competitive in the global market. What is CPE's response?
- Response:**
This increase in requirements is part of CPE's regulatory efforts to raise the quality of the private education industry. While the consequential increase in cost is inevitable, CPE will strive to balance the rise of quality educational services and its associated cost with the competitiveness of PEIs. PEIs should take this opportunity to strengthen their systems and processes. By leveraging on the higher baseline standards of educational services that CPE has set and continually enhancing their reputation for offering quality educational programmes and services and level of trust, PEIs will be well placed to attract prospective students. Competing solely on cost factor should not be a long term strategy of PEIs.
- 12 Question:**
EduTrust requirements are very stringent and demanding, will CPE eventually relax some of these requirements?
- Response:**
As of all schemes, the requirements will be reviewed after a period of implementation to ensure continued relevance. Depending on the industry's maturity, the requirements may become stricter or be eased.

- 13 Question:**
Since the onus is on the PEIs to provide evidences, how many months of evidences must the PEI provide for assessors?
Can we choose not to show past information and data?
Can email be used as a form of evidence?
What if we have just changed the name of our PEI, can we use our track records under the previous entity name?
- Response:**
The onus of showing relevant evidences to support the assessment process lies with the PEI. When the PEI is not able to show evidences, then it will be impossible for assessors to conclude the requirements have been met or implemented by the PEI.
The amount and types of evidences to provide for assessors depends on the PEI as long as the following objectives are achieved:
- evidences to prove that PEI has met the EduTrust requirements, and
 - evidences to prove maturity (i.e. implementation supported by relevant data) of the system/processes/procedures.
- Assessors may request for past data to ascertain if the PEI has achieved a 3-year positive improvement trend. If the PEI chooses not to show such data or shows data that have not been clearly analysed or presented to reveal the required trends, then the PEI must understand that assessors will not be able to accord them higher scores.
Electronic mails (email) may be used as a form of evidence but it is strongly encouraged that electronic information should reside with the company for future reference rather than residing in an individual's email account.
If the PEI can substantiate its claim with documented evidence that the two entities (old and new names) are related, then the track records of the former may be used and the new entity will not be treated as a newly set-up PEI.
- 14 Question:**
Will CPE reveal the allocation of points for each sub-criterion?
Is there a passing score for each of the 6 main criteria?
- Response:**
CPE will not be revealing sub-criteria scores at this moment. Only the weightings for the 6 main criteria have been announced. This is to give PEIs sufficient information to know the relative importance of the various criteria. The strengths and AFIs highlighted in the assessment report would inform PEIs on the extent that they have met the requirements in each main criterion.
The passing score depends on the total score. PEI will be given a minimum of EduTrust (Provisional) award if they achieve at least 500 points.
- 15 Question:**
Is it possible for a PEI's award to drop from a higher EduTrust award to a lower one or vice-versa as a consequence of Interim Assessment?
- Response:**
If the PEI improves on or does not maintain its standards as revealed in the Interim Assessment or any other assessment for that matter, the EduTrust award given to the PEI may change.
In a similar note, an EduTrust achiever may be upgraded to EduTrust Star award if the PEI can demonstrate a higher level of standard during the interim assessment.

16 Question:

What is the transition plan from CaseTrust to EduTrust?

Since the EduTrust launched date has not been announced, will we be given enough preparatory time?

Will CPE assess us on time and give us our award in time before our CaseTrust certificate expires?

Response:

If a PEI has a CaseTrust certificate that expires before 31 Mar 2010, it has the option to renew the certificate but the new certificate will only be valid till 30 Jun 2010.

For certificates that expire after 31 Mar 2010, CaseTrust will no longer renew these certificates.

PEIs are strongly encouraged to start preparing for the certification with the Guidance Document and not wait till the launch date.

So long as the PEI applies on-time, submits all documents on-time, and replies promptly to CPE's request for Corrective Action Plans (CAP) or confirmation of assessment report, there should be no delay or lapses in the award. For example, if the certificate expires in June 2010, application should be before March 2010 and all documents must be submitted by 1 Mar 2010 including full implementation of EduTrust requirements by 1 Mar 2010.

CPE will not be responsible for any delays on the part of the PEI as EduTrust is a voluntary scheme.

17 Question:

What will happen if we choose not to apply for EduTrust since less than 1% of our students are international students?

Do we need EduTrust if our international students hold other passes such as dependent passes and work permits?

Response:

For a PEI which chooses not to renew their CaseTrust certificate or let its CaseTrust certification lapse without applying for EduTrust, they can continue to operate as usual until its CaseTrust certificate expires. Thereafter, the PEI will no longer be able to recruit international students since ICA will no longer issue any Student's Pass (STP) to such PEI's students. Existing international students who are with the PEI can continue, subject to ICA's renewal of the students' STPs, to attend their courses even though the PEI no longer holds a valid CaseTrust certificate.

Students who are of other nationality and holding passes other than STPs, e.g. dependent passes and work permits, are not defined by EduTrust as international students. (Under EduTrust, only students who are required to hold an STP are known as International Students.) It is one of ICA's pre-requisites for issuance of an STP that the international student be enrolled in an EduTrust-certified PEI. Hence, EduTrust is a voluntary scheme so long as the PEI decides not to recruit any international student .

18 Question:

The EduTrust Guidance Document makes time references such as '7 days' and '3' days. Are you referring to working days?

Response:

Yes. Unless otherwise specified, these durations refer to working days.

- 19 Question:**
We recruit students of very young age, can their guardians pay money on their behalf?
Response:
Yes, so long as the requirements of EduTrust are not violated.
- 20 Question:**
If our CaseTrust certificate expires, will ICA continue to extend our international students' Student's Pass (STP)?
Response:
The administration of STPs rests entirely with ICA. It is entire the prerogative of ICA to extend or reject any application for STP renewals.
- 21 Question:**
Would PEI be penalised when assessors interview young students who may not be able to answer the questions? Most briefings by the PEI are given to the guardian instead of the young students. Hence, they may not be suitable for interviews by EduTrust assessors.
Response:
Interviews will involve a range of the students. Since interviews are conducted in a group, the assessors will use their discretion when they pose questions for the interviewees. Assessors' judgement is never based on isolated evidence but rather collective evidence in most instances. Hence, PEI should not worry that they are disadvantaged because of their young students. PEI will have to provide evidence to show that guardians have been properly briefed of the necessary details.
- 22 Question:**
International student has been defined as student issued with a student's pass from ICA, so how does EduTrust define an international student who is holding a dependent's pass?
Response:
Assessors will make references to three groups of students:
a) STP international students (defined on page 4 of the guidance document);
b) Non-STP international students (holding dependent's pass, work permit, social visit pass etc); and
c) SC/PR (Singapore citizen / permanent resident) students.
- 23 Question:**
What happens to existing international students if the EduTrust award of a PEI is suspended, terminated or withdrawn?
Response:
When a PEI's EduTrust certificate is suspended, terminated or withdrawn, it is no longer valid. Under this condition, the PEI cannot recruit new international students. PEI is still obliged to complete the course for its existing students. If EduTrust award is terminated due to the de-registration of the PEI under ERF, then the regulations under ERF will apply.

- 24 Question:**
When it is said that assessors will conduct “sample check”, what is the sample size?
Response:
Sample size will vary and it is very much dependant on the complexity of the process or system. Generally, a complex system would require a larger sample size for verification. PEIs are expected to cooperate with assessors to submit the required quantities requested for verification purposes.
- 25 Question:**
What are the differences between audit, assessment and accreditation?
Response:
Audit is simply compliance to a stated requirement.
Assessment involves compliance but it also examines the extent of implementation to provide a score base on the results that are observed. Assessment covers the systems, processes and procedures to ensure that they are deployed to provide quality outcomes.
Course **accreditation** involves looking into the details of the course content and assessing its quality.
In this aspect, EduTrust is deploying an assessment approach as we do not assess the quality of the course content but stipulate the systems and processes that are required to produce quality courses.
- 26 Question:**
What is the cut-off date that ICA will stop accepting applications for student’s pass from non-EduTrust certified PEIs?
Response:
So long as a PEI has a valid CaseTrust or EduTrust certificate, ICA will consider issuing STP to new students of the PEI, provided other pre-requisites of ICA for issuance of STP are met.
- 27 Question:**
If all the students are part time students who attend classes in the night and if the interviewee list is only told on the day of interview, how do you expect the students to turn up for interviews?
Will the interviews involve our stakeholders and Academic Board members?
Response:
If all students are part-time students, assessors may interview the students in the evening when they attend the night classes. Hence, MR must highlight such constraints to the lead assessor.
Depending on the document submissions and the roles and responsibilities of various staff and stakeholders defined by the PEI, assessors may call upon any person related to the PEI’s operations for interview.
- 28 Question:**
Do we still need to apply for EduTrust if MOE has already approved all our courses?
Response:
Registration of courses and EduTrust certification are mutually exclusive activities. Course registration is under the Enhanced Registration Framework (ERF) while EduTrust is a voluntary certification scheme.

- 29 Question:**
If a PEI's EduTrust application is at the stage of "Pending Award Decision" from CPE and receives bad publicity in the mass media, will this influence CPE's decision?
Response:
Any valid adverse publicity on any PEI may affect the award status of the PEI. Actions to be taken will be decided by CPE based on the details of the cases.
- 30 Question:**
Will assessment be carried out by CPE's own assessors or external assessors?
Response:
All assessments will involve full-time assessors of CPE. The assessment team may involve external assessors when the need arises.
- 31 Question:**
How does CPE define "full-time" studies?
Response:
A "full-time" course is one that requires a student to attend classes for at least 3 hours per day and 5 days a week for at least one month.
- 32 Question:**
It was mentioned that all courses offered by the PEI must meet the EduTrust requirements, is this applicable if we conduct a two-day course?
Response:
All courses offered by the PEI that meet the following criteria will be assessed during EduTrust assessment:
a) a course of duration that is more than 1 calendar month; or
b) a course with total contact time of more than 50 hours.
- 33 Question:**
If all our records are in the Chinese Language, can we apply for EduTrust?
Response:
We prefer the language medium to be English as it is our official working language. The documents are to be written in, at the least, comprehensible English and can serve as evidence to show implementation of EduTrust requirements. Hence, PEIs with documents in languages other than English that they want to use to show that EduTrust requirements have been met are advised to have the documents translated into English. The MR may also want to highlight such a situation to the lead assessor during the application for EduTrust.