

RESPONSE TO CMR FEEDBACK

8 MAY 2025

Draft CMR Section	Summarised Feedback	Response
General Feedback	Do the requirements within the common section have to be met alongside the requirements within an appendix.	<p>Yes, both must be met. To clarify, extra wording has been added to the paragraph above the list of appendices:</p> <p>Toitū Te Waiora industry or sector-specific requirements for consent to assess are set out in the following appendices. <i>Please note that TEOs and Schools must meet the common requirements of each criterion detailed in the CMR <u>and</u> these specific requirements for standards:</i></p>
General Feedback	Clarity on the use of “demonstrate equivalent skills and knowledge or experience” and how this should be addressed by TEOs .	<p>TEOs are expected to employ a process that shows and can evidence how teaching and assessing staff have equivalent competency aligned to requirements. This might involve a mapping exercise to show how outcomes within a standard are matched to other presented evidence or experience. Similar to the practice of awarding a Recognition of Prior Learning (RPL) towards Unit Standards.</p>
General Feedback	<p>While I am satisfied that the general criteria (Sections A–E) provide a robust baseline for consent to assess and national external moderation, we believe there are several opportunities to further strengthen the framework, particularly in the context of regulated, clinical, and culturally responsive practice.</p> <p>Recommendation: Development of a Pharmacy Sector Appendix.</p>	<p>The qualifications team was asked to provide feedback on this response, as there are currently no standards in Pharmacy that could be covered by this CMR. The following was provided:</p> <ul style="list-style-type: none"> Pharmacy technicians and assistants are not “regulated” or “clinically governed” in the traditional sense. The Medicines Regulations (1984) references technicians in relation to their role under the supervision of a registered pharmacist.

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		<ul style="list-style-type: none"> • Cultural competency is an area currently under review by the Pharmacy Council and being written into pharmacists' scope of practice and core competencies. • In the current review of Pharmacy Technicians and Assistants, alongside the Pharmaceutical Society and the various providers, we've taken a step toward addressing cultural competency by writing it into the general conditions. However, if the case for the regulation of pharmacy technicians is approved, this will mean a significant rewrite of the qualifications, and at that stage, cultural competency will be fully integrated into the qualification framework.
General Feedback	<p>For the moderation requirements for Mental Health and Addiction Support (Health and Wellbeing qualifications), a separate appendix is required. The graduates of this programme are expected to support and manage caseloads of one of the most vulnerable groups in our society, with complex needs and high acuity, including those not involved in MH secondary services that support workers will be meeting with.</p> <p>The minimum requirement is that TEOs must have policies and procedures to ensure that teaching and assessing staff have a relevant qualification and level of experience above the level they are teaching. Additionally, they must have regular professional development to ensure they are keeping up to date with the latest practices and research.</p>	<p>An appendix for Mental Health and Addiction support cannot be included at this time.</p> <p>In terms of programmes leading towards the qualification, the programme endorsement process does review the policies and procedures related to the programme including qualifications that teachers hold and ongoing professional development opportunities.</p>
Common Section Part A	<p>Bullet Point 1 (Assessing staff) is trying to convey multiple requirements and should be simplified to state 'hold standard 4098 or 30421'.</p>	<p>This section covers the requirements around subject expertise along with training in how to assess competency standards.</p>

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Common Section Part A	Bullet Point 1 & 2 (Assessment Design and Moderation) conveys several requirements. What would be deemed to be 'equivalent experience?' Wording changes are required to support clarity and consistency. We recommend simply stating 'must hold 11551 and 115521'. We also recommend a focus on Assessor requirements rather than teaching staff.	<p>The paragraph above these bullet points has been reworded to respond to this and other feedback to:</p> <p>The TEO or School must have policies, procedures and documentation to ensure assessment design and moderation <i>involves</i> staff that meet the following minimum requirements.</p> <p>Please note that this NZQA template comes with guidance notes from NZQA, Part A is to cover requirements of teaching and assessment staff.</p>
Common Section Part A	Reword bullet point 2 for clarity.	<p>Page 1 has been changed to clarify the wording and to provide more flexibility:</p> <p>Currently hold a qualification in <i>adult education or a New Zealand-recognised teaching qualification</i> or be able to demonstrate equivalent knowledge and skills <i>or experience</i>.</p>
Common Section Part A	Align the assessment practice to be consistent across sections within the CMR.	<p>Page 1 has been changed to:</p> <p>The TEO or School must have policies, procedures and documentation to ensure that assessment practice is <i>fair, valid, reliable, equitable, consistent, and authentic</i>, and that assessing staff meet the following minimum requirements:</p>
Common Section Part A	Reword paragraph for clarity.	<p>Page 1 has been changed to clarify the wording and to provide more flexibility:</p> <p>The TEO or School must have policies, procedures and documentation to ensure assessment design and moderation <i>involves</i> staff that meet the following minimum requirements:</p>

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Common Section Part D	<p>Practical Experience - the use of 'off site provider' is not the correct term to use for industry. For example, apprentices are employed and come to a TEO for training. There is no contract with the employer because the learner is employed. It is unclear what the expectation is for somebody who is in employment and seeking training support from a TEO. This relates to short courses as well as longer programs.</p> <p>Name and contact details of a learner attending an off-site location seems unlikely unless this links back to a Training Agreement.</p>	<p>No change has been made to this wording, as it must cover a variety of instances:</p> <p>The TEO or School must have policies and procedures in place for a learner who <i>spends time within industry for training</i>, work experience and/or assessment.</p> <p>Name and contact details of a learner is to cater to a variety of work-placement type delivery not just situations where a training agreement is in place. For example, work placement in a range of subject areas and qualification requirements such as health or youth work.</p>
Common section E	What drives a decision that a visit of a provider is required?	<p>A site visit might be required where the TEO:</p> <ul style="list-style-type: none"> • Has applied for a large number of standards that is in a new subject area from their current delivery. • A new TEO who plans to deliver complex practical subject areas. • Where new premises or specialist equipment and resources are required for assessment.
Appendix 1 – Emergency Services	Part A Paragraph 1, Intermediate Care Officer is no longer a used title, change to Emergency Medical Technician (EMT).	<p>This has been changed to:</p> <p>Assessing staff must have significant operational experience working in the field as ambulance officers or have worked in a related area such as a hospital emergency department. Significant experience is seen as having spent at least 12 months working at a minimum of <i>Emergency Medical Technician (EMT)</i> (or equivalent).</p>

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Appendix 1 – Emergency Services	Does US 23406 fall into this appendix? Are there any additional or amended requirements that TEOs need to be aware of?	US 23406 is within the Fire and Rescue Services – Structural and Industrial domain and is not covered by this appendix. All requirements are within the Common section and related appendix.
Appendix 1 – Emergency Services	The requirement for an additional 120 hours of work experience is not always practical. Does this apply to organisations who provide training in US 29321 as a standalone course. Propose this is changed to providing relevant professional development across the year to ensure trainers stay updated with the latest guidelines and best practices.	The stated 120 hours of work experience is a recommendation , not a requirement. This applies to all standards within the stated Domain. Further change here could be presented during the review of the standards within the First Response Domain, changes can be made to the CMR as part of the review if industry requires this.
Appendix 1 – Emergency Services	Bullet point 3 - Instructors must be trained in standard-based assessment. They must have obtained credit or unit standard 4098. There appears to be a mismatch between what is stated in the appendices and what is stated in the Core Domain of the CMR.	As the requirements come from both the Common section and the appendix this has been removed from the appendix.
Appendix 1 – Emergency Services and Appendix 2 – First Aid	General Feedback: The draft refers to a regulatory industry body, recommend this is named as the Association of Emergency Care Training Providers (AECTP).	There is no reference to a regulatory industry body within appendix 1 or appendix 2.
Appendix 1 – Emergency Services	It is proposed to add a table of equivalencies to provide a clear reference for comparable qualifications, ensuring fair recognition across training providers.	No addition information has been added. It is not possible to provide a table of comparable qualifications, including international qualifications, within this document.

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and Appendix 2 – First Aid		It is the responsibility of a TEO to manage this process for staff they employ or contract. New staff may also meet the requirements for an international qualification to be assessed and recognised by NZQA.
Appendix 1 – Emergency Services and Appendix 2 – First Aid	<p>Staff involved in assessment design and moderation requirements - propose a change of wording to:</p> <p>The applicant TEO must have policies and procedures to ensure assessment design and moderation involves staff that meet the following minimum requirements.</p>	<p>Common section - Page 2 paragraph reworded to:</p> <p>The TEO or School must have policies, procedures and documentation to ensure <i>assessment design and moderation involves staff that meet the following minimum requirements</i>:</p>
Appendix 2 – First Aid	First Aid as a Life Skill document, is referred to as a living document, should remove the statement it is a living document.	<p>The text has been changed to:</p> <p>Further information about requirements for providing standard-based first aid training is provided in <i>First Aid as a Life Skill: Training Requirements for Quality Provision of Unit Standard-based and Revalidation First Aid Training and Assessment</i>. It is published on the toitutewaiora.nz website.</p>
Appendix 2 – First Aid	Part A bullet points, requested changes to first three bullet points.	<p>The changes have been made to:</p> <ul style="list-style-type: none"> • <i>Instructors have</i> first aid unit standards 6402, 6401, and 6400 and maintain a current first aid certificate through revalidation training. • <i>Instructors have</i> unit standards in the <u>Emergency Care - First Response</u> domain (e.g., 29321 or the expired 14470-14773) or demonstrate equivalent knowledge and skills. • Instructors must hold a current <u>New Zealand Resuscitation Council Emergency Care Instructor Certificate</u> or demonstrate equivalent knowledge and skills.

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Appendix 2 – First Aid	<p>There is little guidance for TEOs to determine what constitutes sufficient language comprehension to ensure learners can meet safety and compliance requirements.</p> <p>Recommendation to reinstate clear language proficiency criteria for learners. (ref US 6402v8).</p>	<p>This is a TEO responsibility and should reside in their policies and procedures for entry requirements into short courses or workshops.</p>
Appendix 2 – First Aid	<p>Feedback provided a rewording on the bullet points in Part A and Part B of this appendix.</p>	<p>Part A wording has not been changed, as the proposed changes did not differ from the draft provided.</p> <p>Part B has been removed from this appendix because of the NZQA feedback to remove reference to programme content. This feedback will be provided to the current Skill Standard review.</p>
Appendix 3 – Occupational Health and Safety	<p>We note the withdrawal of Australian Units of Competency. What impact will this have on trainers who were previously approved against Australian Units?</p> <p>The appendix requires staff to hold an Adult Education Qualification or demonstrate equivalent skills and knowledge. How is this different to the core requirements of the CMR?</p>	<p>There is no change to previously approved trainers, where the version of the CMR was applied at that time.</p> <p>The TEO would be expected to employ a process to determine equivalency in knowledge and skills. This could be aligned to the TEO policy on Recognition of Prior Learning (RPL).</p> <p>This appendix has been reworded to remove those requirements that are already stated within the Common section.</p>
Appendix 3 – Occupational Health and Safety	<p>Overall, the requirements are clear and appear workable.</p> <p>It is noted that in places the document is worded for providers who offer campus-based or online programmes, rather than those who offer industry training (also known as work-based learning).</p> <p>For example, there are references to ‘teaching staff’ and ‘teachers’. It is not clear in the document that teaching</p>	<p>Please note Section D within the Common section and within appendices where appropriate.</p> <p>Teaching staff or teachers are referring to employed or contracted staff by the TEO. The term teachers is part of the NZQA template and used within the sub-headings.</p> <p>In most instances we see in programme endorsement that work-based training is usually supervised within that workplace,</p>

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	<p>staff/teachers do not feature within a work-based learning delivery model.</p> <p>Similarly, the meaning of the reference to 'off-site providers' for 'work-based training' in the context of work-based learning is unclear.</p> <p>It is also not clear in the main body of the document that not all sectors have sector-specific requirements covered by appendices, this aspect could be strengthened to make navigating the document easier for users.</p>	<p>however teaching staff may be providing pastoral care of the learner.</p> <p>Off Site Providers is encompassing work placement, workplace experience, workplace delivery.</p> <p>Appendices are usually developed during a review of unit standards or development of skill standards. These can be added to the CMR document as the need arises.</p>
Appendix 3 – Occupational Health and Safety	<p>"Particular skills and knowledge of teachers and assessors"</p> <p>this statement is added to the final paragraph about staff involved in assessment design and moderation.</p> <p>"or can demonstrate equivalent knowledge and skills."</p> <p>Given that some staff come from working at NZQA in moderation and assessment or have been long term in tertiary adult education and already have deep experience in this area and are able to demonstrate it.</p>	<p>This has been reworded considering this and other feedback received, to:</p> <p>The TEO or School must have policies, procedures and documentation to ensure assessment design and moderation involves staff that meet the following minimum requirements:</p>
Appendix 5 – Early Childhood Education and Care	Feedback on rewording of Part A regarding programme delivery requirements.	<p>The latest NZQA feedback on CMR review is to remove all information related to programmes, as this is evaluated as part of the programme endorsement process.</p> <p>Part A – Removed this section:</p> <p><i>The applicant organisation must have policies and procedures for the development, delivery and evaluation of teaching programmes that include the standards in the scope of the application to ensure that:</i></p>

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		<ul style="list-style-type: none"> • <i>Recognised good practice and current research from authoritative sources informs programme development;</i> • <i>Consultative mechanisms with appropriately experienced personnel, learners and consumers inform programme development, delivery and evaluation.</i> <p><i>These requirements are designed to ensure current research, sector and community expertise, and the post-participatory experiences of the learners, inform ECE training programmes.</i></p>
Appendix 4 – Cervical Screening	<p>Cervical screening practice will change with the recent decision to fund the self-screening test kits for specified groups:</p> <p>https://info.health.nz/keeping-healthy/cancer-screening/cervical-screening/doing-a-vaginal-swab-self-test#doing-an-hpv-swab-self-test-3740</p> <p>The National Screening Unit policy and procedures will be updated to accommodate this change in practice and to reflect the change in the Enrolled Nurse scope of practice which means they no longer work 'under the direction and delegation' of Registered Nurses.</p>	<p>Once the updates have been finalised, the CMR can be amended to ensure the requirements are updated as needed and if relevant to consent to assess requirements. Please contact moderation@toitutewaiora.nz</p>
Appendix 5 – Early Childhood Education and Care	<p>Part A, bullet points</p> <p>Rewording to adjust this for assessing and teaching staff for levels 3 and 4 registrations at or preferably one level above.</p>	<p>Changes not made, as sufficiently covered by existing wording within the appendix and in the Common section.</p>
Appendix 5 – Early Childhood Education and Care	<p>Strengths: Emphasis on good practices, safety checks under The Children's Act, and involvement of community expertise.</p>	<p>The latest NZQA feedback on CMR review is to remove all information related to programmes, as this is evaluated as part of the programme endorsement process.</p>

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<p>And</p> <p>Appendix 6 Adult Education and Training and Generic Education and Training</p>	<p>Gaps: While it includes Māori pedagogy, the content could delve deeper into how iwi/hapū-specific mātauranga can shape programmes, especially regarding whānau engagement.</p> <p>Adult Education and Training (Appendix 6)</p> <p>Strengths: Strong focus on integrating Māori teaching methods, stakeholder consultation, and professional development.</p> <p>Gaps: The framework could expand on delivering training in hapū/iwi-specific contexts and supporting trainers in incorporating localized mātauranga Māori.</p>	
<p>Appendix 6 Adult Education and Training and Generic Education and Training</p>	<p>Feedback on programme delivery content within Part A.</p>	<p>The latest NZQA feedback on the CMR review is to remove all information related to programmes, as this is evaluated as part of the programme endorsement process.</p> <p>Part A – The following has been removed this section:</p> <p><i>The applicant organisation must have policies and procedures for the development, delivery and evaluation of teaching programmes to ensure that:</i></p> <ul style="list-style-type: none"> • <i>Recognised good practice and current research from authoritative sources informs programme development.</i> • <i>Relevant stakeholders are involved in programme development, delivery and evaluation including appropriately experienced personnel, learners and consumers, and Māori and/or other cultural and/or ethnic groups if relevant to the organisation's community and/or programme.</i>

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		<ul style="list-style-type: none"> Feedback from learners once they have applied their learning is obtained and used to inform the development of future programmes. <p>These requirements are designed to ensure current research, industry and community expertise and the post-participatory experiences of the learner, inform adult education and training programmes.</p> <p>Where Māori are the Ākonga, the applicant organisation must have policies and procedures for the development and evaluation of teaching programmes to ensure that:</p> <ul style="list-style-type: none"> Māori pedagogy is accommodated in terms of Māori teaching styles, language, culture and spirituality. The Māori community is involved. The teaching resources are culturally authentic and appropriate. A holistic and integrated approach to programme design, delivery and assessment is used.
Appendix 6 Adult Education and Training and Generic Education and Training	Part B, update domains as some have expired.	<p>A check and update to this text has been made to:</p> <p><i>Adult Literacy and Numeracy Education, Delivery of Adult Education and Training, Design and Development of Adult Education and Training, Assessment of Learning.</i></p>
Appendix 6 Adult Education and Training and Generic	Part B last bullet point, reword as a recommendation.	<p>Wording change has been made to:</p> <ul style="list-style-type: none"> Staff involved in assessment are involved in ongoing professional development related to education, it is

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Education and Training		recommended that study towards the New Zealand Certificate in Assessment Practice (Level 4) [Ref: 2752] is undertaken.
Appendix 6 Adult Education and Training and Generic Education and Training	<p>Although the current structure encourages on-the-job training, online learning, and in-person education to suit the needs of learners and industries, it would be good to ensure flexible learning options are industry-aligned with training through apprenticeships, internships, or practicums that are shaped by specific industry requirements.</p> <p>I notice Toitū te Waioira has attempted a cultural responsiveness focus on delivery methods that respect and integrate Māori perspectives. Perhaps incorporating specific te ao Māori (the Māori worldview) into learning environments would open the door to less mainstream delivery and more 'Hauora' approaches to assessment and moderation.</p> <p>There is no stackable credential kōrero that creates pathways for learners. It would be good to have an option to achieve qualifications in smaller, incremental steps, making it easier to adapt to their schedule of learning and assessments. This may sit in the TEO policies and may need a look-see into the Consent to Assess process.</p> <p>Timing of programme delivery, assessment and moderation could be deemed as best practice to include workplace-friendly schedules. For example, training programmes are structured to accommodate workers' availability and industry engagement allowing for part-time or modular learning alongside employment.</p> <p>As always, I applaud the continuous mahi of Toitū te Waioira that promote lifelong learning, encouraging upskilling and reskilling at different career stages. However, there could be some response time adjustments that can adapt attainable delivery timelines to emerging workforce needs, ensuring the training and education</p>	<p>Qualification information will be provided to Ako Aotearoa, who are the qualification developers for the Adult Education and Tertiary Teaching qualifications.</p> <p>Please note that TEOs are able to develop Micro-credentials, please see Micro-credential listing, approval, and accreditation - NZQA for guidance.</p>

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	<p>pipeline keeps pace with our industry demands, which is relatively high. Making these adjustments can make vocational education more accessible, dynamic, and responsive. Now's good!</p>	
<p>Appendix 6 Adult Education and Training and Generic Education and Training</p>	<p>Section A - One glaring omission from this whole – no requirements for any form of qualification in teaching / training.</p> <p>Section B (Special resources required for assessing against standards) –</p> <p>I read this as assessors being required to hold 4098, 11552 & 11551 (as above – obsession first & foremost in assessment).</p> <p>Why then make an entry that staff are then required to undertake professional development “especially” towards NZ Cert in Assessment Practice (Level) 4 – which is a lower level qualification than 11552 & 11551? The 3 required assessment standards cover the ‘essentials’ of assessment needs for a trainer (conduct, design & moderate).</p>	<p>Appendix 6 - Section A</p> <p>Section A has been required to be removed from this appendix. The feedback from NZQA is that all programme related content sits with the programme endorsement process. The CMR must focus on consent to assess standards.</p> <p>Appendix 6 - Section B</p> <p>The content here is from the previous version of the CMR as handed over by NZQA when these domains were transferred to Toitū te Waiora in early 2025.</p> <p>The final bullet point in section D has been reworded as recommended by other CMR feedback.</p> <p>Staff involved in assessment are involved in ongoing professional development related to education, it is <i>recommended</i> that study toward the New Zealand Certificate in Assessment Practice (Level4) [Ref: 2752] is undertaken.</p> <p>This provides further flexibility for this requirement.</p>
<p>Appendix 6 Adult Education and Training and Generic Education and Training</p>	<p>We would like to add requirements for Deaf learners. Appendix six has requirements for Maori ākonga.</p> <p>We recommend adding the same requirements for Deaf ākonga. i.e. “Where Deaf people are the Ākonga, the applicant organisation</p>	<p>This section of Appendix 6 has been removed as programme related requirements are not to sit within the CMR document as advised by NZQA.</p> <p>The feedback provided will be forwarded to the qualifications team and the staff who work on programme endorsements.</p>

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	<p>must have policies and procedures for the development and evaluation of teaching programmes to ensure that:</p> <ul style="list-style-type: none"> • Deaf pedagogy is accommodated in terms of Deaf cultural teaching styles, language (i.e. delivery of course content in New Zealand Sign Language), worldview and spirituality. • The Deaf community is involved. • The teaching resources are culturally authentic and appropriate. • A holistic and integrated approach to programme design, delivery and assessment is used.” <p>Also, where there is a Deaf person who wants to attend training from any of the provider industries (not just in Adult Education settings), there must be a requirement to ensure there is full communication access for that person, for example, provision of NZSL interpreters.</p>	
Note		<p>Feedback received by email regarding appendix 1, was unable to be incorporated in this review. The feedback provided was a tracked change document on the old CMR and therefore did not correspond to the new template or changes in content.</p> <p>Fifteen other responses were not included as respondents did not recommend any changes or were satisfied with the current draft.</p>