## New Program Evaluation

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### What is the New Program Evaluation, and why is it required?

A new program evaluation is a required part of an application for a Class A program submitted by a **designated or interim designated institution, or by an applicant for a designation certificate**. It may also be required, at the registrar’s discretion, for any other new program or program change requiring approval. It provides the registrar with insight into various aspects of the program, related resources, and delivery, from the point of view of an independent person who has expert knowledge of the field of study and careers for which it is intended to prepare the student.

### Why is a Program Evaluation required for a program in a regulated field?

The Private Training Institutions Branch administers the *Private Training Act* and associated regulations, which focus on consumer (student) protection. Other regulators such as health colleges and Transport Canada have their own mandates, which focus primarily on public safety. As such, other regulators’ reviews of programs rarely cover all the areas that the PTIB registrar is required to consider in deciding whether to approve a program of instruction. Therefore, a third-party evaluation is required to ensure the PTIB registrar has the required input on all aspects of the program specified in the Private Training Regulation from a person with appropriate education and experience in the program’s subject matter and related occupation(s).

### Why is a Program Evaluation required for a program in a regulated field?

The registrar may waive the requirement for a program evaluation or elements of that evaluation. However, **generally, applications** for Class A programs at Designated and Interim Designated institutions **will continue to require a full program evaluation**.

Registrar approval is required **in advance** to waive the requirement for a program evaluation or elements of a program evaluation. Decisions will be made on a program-by-program basis.

The registrar will consider the following criteria in determining whether to waive the requirement for a program evaluation or elements of a program evaluation for the purposes of a new program application:

* Whether a regulator/program approval body has conducted an evaluation that includes a review of curriculum, curriculum delivery and any specialized equipment or resources used in program delivery.
	+ The registrar may request a copy of a regulator/program approval body’s evaluation if it is available, or an institution may request that the registrar waive the requirement for a program evaluation by submitting a copy of a regulator/program approval body’s evaluation, if available, and any correspondence related to the resolution of issues identified in that evaluation.
* Whether the new program application is for a variation of an already existing approved program
	+ Whether a program evaluation was provided with the initial application (this applies when a new application is being considered for a variation of an already approved program), and if so, the length of time since the original application
	+ Whether there have been changes to the program since initial approval (this applies when a new application is being considered for a variation of an already approved program)
* Whether the program is being moved from one certified institution to another and the institutions share a common owner
* Whether the new program is the same as an existing program at the applicant institution, with a work experience component added/removed
* The compliance history of the institution
* Any other information the registrar considers relevant

A new program will not be exempt from the requirement for a program evaluation simply because it consists entirely of courses that are also part of other already-approved programs.

Institution requests for a Program Evaluation (PE) to be waived must be submitted to PTI@gov.bc.ca **prior to submission of the new program application. The availability of this process does not change the expectation that applications are submitted complete with all required supporting documentation.** Once the decision is received the application may be completed with all required elements, and submitted to PTIB.

Any questions about evaluation requirements should be directed to PTIB **before** the program application is submitted.

### Who does the evaluation?

The Program Evaluator must have expertise in an occupation directly relevant to the program. It’s best if he or she also has experience in adult education, preferably curriculum design and/or teaching.

The Program Evaluator (or ‘PE’) must also have no conflict of interest that could affect their assessment of the program: they must not be a related party to the institution, and must receive no benefit from the institution other than the payment for the evaluation.

### How does an institution find/choose an evaluator?

Institutions may find potential evaluators through professional associations, business networking, regulators, other institutions (public or private), members of their program advisory committee, etc. Also, the PTIB website provides a list of people with subject matter expertise in a variety of fields (see links at end of this guide): an appropriate PE may often be found on this list. Institutions may contact them directly to see whether they wish to take on an evaluation.

In choosing a prospective program evaluator, ask him or her for a formal CV or résumé, and take time to confirm the elements of their background that are relevant to the program you want them to evaluate: education/credentials, occupational experience, possible conflicts of interest or other relationship to the institution (e.g. work for another entity under the same ownership). The institution contracts with and pays the evaluator: be sure to establish terms in advance.

**Regardless of how the evaluator is found (including if they are on the PTIB list), they should always be confirmed as appropriate for the program by PTIB before the evaluation is done.** This confirmation will be based on both the evaluator’s background and the details of the program(s) to be evaluated, and applies only to the specified program(s).

**To have an evaluator confirmed send a copy of the program outline and the PE’s formal, up-to-date CV/résumé (including for those who are on the PTIB list)**, with a request for confirmation that the evaluator will be accepted for the program, to PTI@gov.bc.ca.

If an evaluator is not accepted PTIB staff will explain why or may request more information. In most cases a decision on a proposed evaluator can be provided within 5 business days. *Keep the confirmation email for your records: it may be requested when the program is reviewed.*

When PTIB confirms a PE appears appropriate it is based solely on information provided in the CV, and is not an endorsement of the person’s work or abilities. It is not a guarantee the evaluation report itself will be accepted. PTIB does not interview PEs nor conduct reference checks. Institutions are cautioned to do their own review of the person’s credentials, work experience and abilities to ensure a good ‘fit’.

### Is a Program Evaluator (PE) the same as a Subject Matter Expert (SME)?

Not exactly. A PE is someone who has been contracted by an institution to evaluate a *specific* program, while an SME is someone who has been contracted by PTIB to participate in inspections or designation reviews involving programs in their area of expertise. However, a PE needs the same type of qualifications as a Subject Matter Expert: in-depth subject-matter knowledge and experience, and unrelated to the institution.

### What does the PTIB review in relation to a proposed Program Evaluator?

In deciding whether an evaluator meets the minimum standards in the PTR, PTIB staff first look at the program outline for the program the PE is to review, specifically at the career occupation(s) for which the program is intended to prepare students (and to what level), whether the program is in a regulated field, the learning objectives, admission requirements and list of courses.

Then we look at the proposed PE’s CV or résumé: do they have a credential in the field of the program, or one that is very closely related? Do they have experience in an occupation the program will prepare students for? Is their experience current and, if applicable, specific to Canada/BC? Does their background at very least meet minimum requirements in the PTR for an instructor in the program? If the program is in a regulated field, does the proposed PE meet the regulator’s requirements for practice in the field? If the program is to be offered by distance delivery, do they have experience and/or education relating to this?

These requirements are intended to ensure the PE has full and current knowledge of the occupation for which the program is intended to prepare students including, if applicable, regulation and legal scope of practice. Ideally, the PE will also have some background in adult education, to better equip him/her to assess the program design, materials, etc.

**If the program combines two distinct areas of study**, does the proposed PE have adequate breadth of expertise to cover them both? If not, a second PE may be required; each could provide a separate report, or both could collaborate on one report. (See also #9, below.)

**If the evaluator is on PTIB’s SME list**, **we still need a copy of the person’s current CV**. While we have a CV on file it may not show details specifically relevant to your program area, and it may not show recent experience relevant to your program area.

### Who may *not* be a Program Evaluator?

The PTIB will not accept an evaluator who:

* Works for the applicant institution, or for a related company
* Was involved in developing the curriculum to be used in the program, or in developing another program on which this one is based
* Would for any other reason have a conflict between their duty to evaluate the program impartially and their own self-interest, financial or otherwise
* Does not have current occupational experience directly relevant to the program. E.g. a Paralegal program must be evaluated by someone with experience as a paralegal, not as a lawyer.

### What must the evaluation cover?

The *Private Training Regulation* s.13 (2) (b) lists what a program evaluation must cover. A report template is provided on the PTIB website ([*Forms, Templates and Resources*](https://www.privatetraininginstitutions.gov.bc.ca/form-library)), and via a link at the end of this Guide. Always download a new copy of the report template for each review, as it is revised periodically.

### What if the program combines two or more subject areas?

For minor components that are outside the PE’s area of expertise, the PE should be able to speak to whether they are an appropriate part of a program in this field or, if an unusual addition, how they add to the student’s education and preparation for work in the field.

For major components in differing subject areas, more than one PE may be required. They should work together to demonstrate that each major subject area of the program is covered appropriately, and the combination is also appropriate.

### Can the same report be submitted with more than one application?

Only under very specific circumstances. The same report may be submitted with programs or program elements that are the same: e.g. new applications for a program in versions with and without co-op could have the same basic report, with additional information provided for the version with co-op addressing the work experience questions and how the co-op contributes overall to the program. Or if two institutions are under the same management and are applying for identical programs at the same time, the same report may be submitted with both. In this case any differences in the details of delivery relating to facilities etc., and site visits to each, must be accounted for in the evaluator’s report.

**In most cases a separate report is required for each program.** No matter how similar programs are, submission of reports that are largely or entirely the same seriously undermines our confidence in the validity of all of those reports. For the protection of all parties – the contracting institution, the evaluator, and prospective students - each evaluation report should very clearly reflect the program in the application for which it is submitted.

### What is the PTIB looking for in a Program Evaluation Report?

An evaluation report must meet the requirements of the *Private Training Regulation* s.13 (1) (o) and s.13 (2) (b) to provide information that under PTR s.14 (g) must be considered by the registrar in deciding whether to approve the program.

The report should be complete, thorough, and clear. It must include responses to each question that address the information and records the evaluator reviewed and on which his/her opinion is based and provide an explanation of the response (simply ‘yes’ or ‘no’ is not enough). The responses should also make it clear the PE reviewed the institution’s unique offering in its entirety. Program Evaluation Reports should not provide generic answers that could be used for other programs at other institutions.

### What if the facilities and/or equipment aren’t ready when the evaluator visits the site?

**A site visit is a required part of a program evaluation**. An institution should be ready to deliver a new program when they apply for it, but sometimes the facilities and/or equipment may not yet be fully prepared when the PE makes the site visit. If this is the case, the PE should explain in the report what is missing or remains to be done, and what explanation the institution has provided regarding their plans and projected timeline for completion. Both the institution and the PE should be prepared to provide additional information.

PTIB will follow up during review of the program application to see if the space is ready, and may ask the institution at that time to provide additional material such as photos, and possibly including an addendum to the evaluation report with the PE’s confirmation that the facilities/equipment are ready.

### The Program Evaluator made recommendations: what response is expected?

A thorough review usually produces at least one or two recommendations. The institution should provide PTIB with a response to PE recommendations along with the program application, explaining what changes (if any) are being made to the program as a result, and providing a rationale for any recommendations not followed.

### The Program Evaluation has been submitted: what happens next?

PTIB reviews the evaluation report. If we have further questions about any of the subjects covered by the report, any of the PE’s comments, and/or the report as a whole, we may ask for clarification from the institution, the program evaluator, or both.

If an evaluation report overall lacks sufficient explanation of the evaluator’s conclusions, does not clearly address specifics of the program, appears to have been modified after the PE signed it, and/or otherwise does not clearly reflect the program for which it was submitted, the registrar may require additional information or may, at her discretion, decline to accept it as meeting the requirement and require an entirely new report. The registrar may also deny the application and require the institution to start over.

### Common problems with New Program Evaluations

A report may not be accepted as fulfilling the requirements of the Private Training Regulation s.13 (1) (o) and/or 13 (2) if it was prepared by someone who is not appropriately qualified, or if it is poorly prepared and does not provide the registrar with adequate information.

Other problems with program evaluations may require clarification, further input from the evaluator, or an entirely new report. These include:

* Information about the program provided to the PE by the institution, e.g. in Part A of the report, does not match what is in the application form and/or the program outline.
* The program is substantively changed after the evaluation report is complete.
* The PE has not addressed all the questions in the report template.
* The institution has not responded to the evaluator’s recommendations.
* Content and/or characteristics of the report suggest it was not based on a full review of the program for which it was submitted.

*This is not meant to be an exhaustive list of requirements relating to this subject found in the Private Training Act, Private Training Regulation, and/or Fees and Student Tuition Protection Fund Regulation.
It is your responsibility to be aware of all regulatory requirements that apply to your business.*

* Guidelines for Subject Matter Experts and Program Evaluators: <https://www.privatetraininginstitutions.gov.bc.ca/sites/www.privatetraininginstitutions.gov.bc.ca/files/files/Guidelines%20for%20Subject%20Matter%20Experts%20and%20Program%20Evaluators.pdf>
* Program Evaluation Report Template: <https://www.privatetraininginstitutions.gov.bc.ca/sites/www.privatetraininginstitutions.gov.bc.ca/files/files/program-evaluation-report-template.docx>
* List of potential Subject Matter Experts and Program Evaluators: <https://www.privatetraininginstitutions.gov.bc.ca/institutions/subject-matter-experts>