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Andrew Hall
Responsible Officer, AQA
Argyle House,
29-31 Euston Road,
London
NW1 2SD

Office of Qualifications
and Examinations Regulation
Spring Place
Coventry Business Park
Herald Avenue
Coventry CV5 6UB

Telephone 0300 303 3344
Textphone 0300 303 3345
public.enquiries@ofqual.gov.uk
www.gov.uk/ofqual

Dear Andrew,

Awarding reformed AS qualifications

Thank you for your letter of 5th August in which you summarise the way in which you ran your awards for the reformed AS qualifications in summer 2016. Your letter provides helpful clarity on AQA's interpretation of the Principles set out in Appendix 3 of the Summer 2016 Data Exchange Procedures (see annex). As we explained on 1st August, and despite the issues set out in this letter, we had no concerns about the outcome of any of the AQA awards for the reformed AS qualifications. However, as we discussed when we met on 9th August, we believe you have misinterpreted the effect of those Principles.

There are two related factors that led to these Principles.

- First, we considered that the expected changes in entry for reformed AS qualifications might lead to statistical predictions based on prior attainment at GCSE being less reliable than usual for reformed AS qualifications in summer 2016.
- Second, we considered that despite this possibility, statistical predictions would provide the best estimate of where subject grade boundaries would lie, particularly because awarders would find it more difficult than usual to make fine judgements between marks on papers that were unfamiliar to them.

It was therefore imperative that the risk that the predictions were less reliable was effectively managed.

We consulted affected exam boards about our proposals for the Summer 2016 Data Exchange Procedures, including the Principles. In the discussions at the Standards and Technical Issues Group (STIG) and at the Maintenance of Standards meeting on 25th May there was agreement that, for the reasons set out above, awarders should be asked to judge whether examples of students' work at the grade boundaries indicated by the subject-level statistical predictions were acceptable examples of work at that grade, rather than asking awarders to make fine judgements between two different adjacent marks.

The Principles reflected this discussion in the requirement (at paragraph 3) that awarders would be tasked with determining whether the subject-level statistically recommended boundaries were acceptable at each key grade. We specified that, in making that determination, awarders would be required to use their professional judgement and the archive material available to the exam board.

We did not specify, as you suggest in your letter, that awarders were not entitled to have regard to student work in assessing the question 'based on the evidence you have seen, is the subject-level statistically recommended boundary acceptable?'. We anticipated that exam boards would allow awarders to consider examples of student work as part of the evidence to enable them to judge whether the grade boundary marks suggested by the statistics were acceptable. Indeed, we agree with your point that it would be "perverse not to allow awarders access to candidates' work to inform their decision about the acceptability of a statistical recommendation for the subject as a whole". Rather, the Principles prohibited the setting of grade boundaries on the basis of fine judgements between examples of work within a few marks of each other.

As we explained when we spoke to you and your colleagues on 1st August following the Maintenance of Standards meeting, our aim, in setting the Principles, was to make sure all exam boards were operating consistently in the new AS awards. In your letter you refer to the Principles as prescribing the detail of your procedures. We do not agree with this description. The Principles set out an approach which exam boards were required to follow, to allow Ofqual to meet its objective to align standards between exam boards in a subject. It was for each exam board to determine the detail of its own procedure in accordance with that approach. As set out above, we consulted all affected exam boards before setting the Principles.

I do hope this makes clear the rationale behind the Principles for awarding new AS, and our intention in including them in the summer 2016 Data Exchange Procedures.

We will be reviewing our approach ahead of the summer 2017 series which sees first awards of new GCSEs and A levels in 2017, as well as first awards of new AS subjects in phase two reform. As part of that review we will want to discuss with all exam boards their interpretation of the Principles.

Yours sincerely

M. L. Meadows

Dr Michelle Meadows
Executive Director – Strategy, Risk and Research, Ofqual

Annex

Appendix 3

Principles for using statistical and judgemental evidence when awarding reformed AS qualifications in summer 2016 in England

1. Prior to summer awarding, awarders should be briefed on the risks to awarding posed by the introduction of reformed AS specifications – primarily, that the change in entry may result in statistical predictions being less robust than usual. Awarders should also be briefed that, even bearing that in mind, in these first awards the statistical evidence provides the best estimate of where the subject grade boundaries should lie. However, awarding organisations will be relying on their awarding committees to identify instances where the proposed boundary marks suggested by the statistics are not acceptable.
2. Predictions will be used to generate statistically recommended boundaries at subject level for the reformed AS specifications. The statistical evidence will be common across awarding bodies and will provide a common starting point for script scrutiny.
3. Awarders will be tasked with using their professional judgement and the archive material available to determine whether the subject-level statistically recommended boundaries are acceptable at each key grade. In doing this, awarding organisations may pose the following question to their awarders, ‘based on the evidence you have seen, is the subject-level statistically recommended boundary acceptable?’
4. Where awarders are content that the subject-level statistically recommended boundary is acceptable, that boundary should be confirmed, since the limits of judgement suggest that awarders are not able to differentiate between subject-level standards within a few marks of one another¹. However, if the awarders are not content with the balance of outcomes across the components (or entry options), they may adjust the component boundaries while keeping the subject-level boundaries at the statistically recommended positions.²

¹ See Ofqual (2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/451321/2015-08-05-summer-series-gcse-as-and-a-level-grade-standards.pdf.

² However, the awarders must be made aware that, where the assessment pattern has changed, carrying forward judgemental standards at component level will not necessarily maintain standards at subject level.

5. Where awarders are not content that a subject-level statistically recommended boundary is acceptable, additional script scrutiny will be required³. It is suggested that, on each component, awarding organisations increase the range for scrutiny incrementally away from the statistically recommended boundary, in the direction suggested by the awarders. This will ensure a common approach across awarding organisations. Sufficient work should be provided until the awarders are content that their final recommended subject boundary is acceptable.
6. Standard reporting tolerances will be applied to subject outcomes in the reformed AS specifications. However, awarders should identify instances where the statistical evidence does not reflect an acceptable subject standard.
7. In all cases, a detailed Chair's report will be expected to support the outcomes of the award. This should consider the statistical and judgemental evidence that has guided awarders to their decisions. Where the statistical evidence does not align with the judgemental evidence (and the subject outcomes therefore fall outside of tolerance), a detailed report covering the statistical and judgemental evidence must be provided to Ofqual providing evidence of why this is the case.
8. Ofqual will consider the outcomes of awards based on the statistical and judgemental evidence provided. Where subject outcomes differ from the statistical predictions but in different directions or of a different magnitude for each awarding organisation, this evidence will be particularly important. Such instances could be indicative of a shift in entry for one board but not others and might therefore be entirely legitimate. Further investigation of entry trends and the profile of entrants would be necessary to confirm this.

³ This refers to instances where awarders are concerned that the *overall standard* for the qualification is not reflected by the statistically recommended boundaries. If awarders wish to re-balance component outcomes within a qualification (but keep the same overall outcomes), then additional scrutiny of appropriate ranges of scripts will similarly be necessary.