



香港科技專上書院 (非牟利)

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16 November 2006

Hon Emily LAU Wai-hing, JP
Chairman of Finance Committee
Legislative Council Building
8 Jackson Road
Central
HONG KONG

Dear Madam Chairman,

Funding for the Qualifications Framework (QF)

To be able to benefit from government subsidy, non-government funded institutions have to have their programmes accredited by Hong Kong Council for Academic Accreditation (HKCAA). Half of the accreditation fee would be subsidized by EMB if the programme is successfully accredited. The programmes have to be re-validated in 3 to 4 years' time and no subsidy would be made by the Government. These non-government funded institutions have requested for government subsidy for re-validation of programmes repeatedly over the years (see attached).

Right now it came to our attention that EMB has provided a huge amount of funding to HKCAA in preparing for the launching of the Accreditation of Academic and Vocational Qualifications Bill, which has yet to be passed by the Bills Committee. With the public interest in the Bill, can the Finance Committee provide response to the following questions?

1. What is the total amount of funding given to HKCAA by the EMB for QF?
2. On what ground and justification is the money approved? What procedure of decision making has been gone through? Has the decision been made on the assumption of reduction in accreditation fee for the QF?
3. If it is because of the Qualifications Framework, why is the funding made when the draft Bill is being examined?

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4. As the Bills Committee is still discussing the fees charged for the services provided by the HKCAA, has this government funding been taken into consideration in the vetting of the fee schedule proposed by HKCAA to the Bills Committee?

5. Are all the fees charged by HKCAA required to be approved by the EMB with justifications from HKCAA? Will this approval be extended to the QF as well?

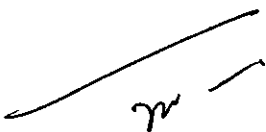
6. Has the Director of Audit been invited to examine whether the fees charged are commensurate with the HKCAA services provided?

7. It appears that the subsidized accreditation fees of government-subsidized programmes and non-government subsidized programmes under the Qualifications Framework will have different subvention schemes. If so, we are worried about the potential controversies similar to those for the Preschool Education Voucher Scheme, which has different funding schemes for non-profit making and private kindergartens, and the Grant And Loan Scheme, which supports the students of government and non-government funded programmes differently. We hope the same dispute can be avoided while the Bill is still being processed.

8. Finally, it is important that the Government can realize that the subsidy should be made to institutions/trainees/students rather than HKCAA, who has already accumulated a huge reserve from the expensive accreditation fees they have been charging educational institutions over the years.

Looking forward to receiving your response.

Yours sincerely,



Joy Shi
President



敬啟者：

本議會得悉立法會《學術及職業資歷評審條例草案》委員會將於本年十月三十一日就有關草案進行討論。

本議會會員亦於近日就有關係例草案進行討論，現提交本議會對此條例草案之意見如下：

- (一) 政府應資助非牟利院校支付不少於 50% 的課程評審費，(用作院校評審/院校重新評審/課程甄審/課程重新甄審/學科範疇評審)，其中應包括全日制課程及為在職人士而設的兼讀課程。原因是：
1. 保證課程質素乃政府責無旁貸的責任；
 2. 非牟利院校現時因沒有政府資助辦學，在自負盈虧的情況下，仍盡力提供優質的培訓課程，已感相當吃力，若再需要繳付昂貴的評審費用，將會百上加斤；
 3. 因大學及其校外部大部分課程可能會獲「豁免評審」，因此將來會參加受評審的，院校/培訓機構，會以民辦的中小型「非大學」機構為主。這些有心提供培訓的機構，財力上遠不如大學般充沛，若需要繳交昂貴費用去參加評審，可能會令這些機構退出培訓行列；
 4. 培訓機構固然可將課程評審費用轉嫁到學員身上，但若需要由接受教育者承擔評審費用似於理不合，同時究竟是只限於由第一屆修讀該課程的學員負擔該筆評審費用，還是以後凡修讀此課程者均需要承擔評審費亦難有定論。

(二) 學術評審局作為評審課程的機構，應訂定以下措施：

1. 增加透明度，提供清晰的指引與準則，清楚列出評審的範圍及程序，讓受評審的院校清楚知道需要達到怎樣的標準才能通過評審；
2. 作出服務承諾，對評審程序有清晰的指引及說明，在三個月內完成課程評審，並回覆有關欲開辦課程的機構；
3. 如有關學術機構欲申請開辦的課程未獲審批，學術評審局應提供清晰的指引及支援，說明有關申請在那方面未能達標，而這些要求應合情合理，顧及培訓機構所能做到的能力範圍；
4. 負責課程評審的委員會成員，應對有關的課程有相當的認識及與受評審的課程無利益衝突者。例如不宜由某個開辦副學士課程機構的負責人去評審另一機構欲開辦的副學士課程；又或是由未有任教副學士經驗的大學教授去評審副學士課程；
5. 議會應有代表參與學術評審局委員會，以反映獨立院校的意見，包括對評審機制提供意見，協助學評局制定合適的政策。該代表並且應該擁有投票權；
6. 對未獲審批的課程，應設立上訴機制供上訴，可由議會委派一位跟受評審課程沒有利益衝突的成員作上訴委員會成員，對有關課程再作評審；
7. 上訴過程所需費用應包括在原有評審費用內，不應再額外收費；
8. 教統局應監管學術評審局對課程評審的工作，是否公平合理，以祈對社會人士有所交代。

(三) 有關收費方面：

1. 現行之課程評審費用太昂貴，在《學術及職業資歷評審條例草案》通過後，應大幅遞減有關收費。
2. 在收費程序方面，如評審費獲政府資助 50%，在簽署合約提交評審時所繳付的 30% 的評審費用，應由培訓機構與政府各支付一半，在完成評審後，餘下的 70% 評審費用再由培訓機構與政府平均攤分及支付。

此致
《學術及職業資歷評審條例草案》委員會主席
譚耀宗議員

香港非牟利專上院校議會主席

崔康常

(崔康常)

二零零六年十月廿七日

副本送：《學術及職業資歷評審條例草案》各委員