



# TEC overview: Review of New Zealand College of Chinese Medicine

## New Zealand College of Chinese Medicine

New Zealand College of Chinese Medicine (NZCCM) is a Private Training Establishment (PTE) that provides certificates, diplomas and bachelor degrees in Traditional Chinese Medicine (Acupuncture, Chinese Medicine, Tuina, and Massage) for both domestic and international students.

NZCCM was established in 2003 with a main campus in Auckland. A second smaller campus, Lotus campus, is located in Hastings and was acquired in 2015, however NZCCM's Board of Directors has made the decision to close it as of January 2018.

## Why we initiated the review

NZCCM was identified for review based on routine analysis of the August 2016 single data return (SDR). We engaged Deloitte to undertake a review of two programmes delivered at NZCCM during 2016 and 2017.

The programmes reviewed were:

- › Bachelor of Health Science in Chinese Medicine (BoHSCM) (Level 7); and
- › New Zealand Diploma in Wellness and Relaxation Massage (DWARM) (Level 5).

## What we found and what we have done

Total BoHSCM learning hours in STEO did not match NZQA approved hours. NZCCM has approval to deliver less learning hours than those that are entered into STEO and currently being delivered.

It is recommended that NZCCM considers if it is comfortable that the learning hours in STEO reflects the level of learning that will continue to be provided or if it would be preferable to update STEO to reflect the lower level of approved hours.

## Financial review

In order to receive funding, all PTE's must demonstrate to us that they provide quality assured qualifications which are delivered through a financial viable entity. Financial viability is a standard for assessing PTE investment plans. Additional details on our requirements for PTE financial viability can be found [here](#).

Our review of NZCCM also included a pilot intensive review of their financial performance and position, above the analysis we routinely undertake. As this information is commercially sensitive, we have withheld it under section 9(2)(b)(ii) of the Official Information Act 1982.

## Our next steps

We have now completed this review and will continue to engage with NZCCM as part of our standard monitoring processes.

## About our monitoring function

The Tertiary Education Commission invests approximately \$2.9 billion every year into tertiary education and regularly monitors approximately 700 tertiary education organisations (TEOs) to ensure they are performing and meeting their funding agreements.

As the Government's key investor in tertiary education, our monitoring helps ensure TEOs are equipped to deliver services so New Zealanders can get the knowledge and skills they need for lifelong success. Tertiary education is a substantial commitment of time and resources for learners, taxpayers, and government, and they deserve full value for their investment.

We take a flexible and graduated approach to monitoring, working with TEOs to assist where necessary and making sure that when intervention is required, both the TEC and the TEO only need to invest as much time and effort as is necessary in the circumstances.

By using the extensive information and data we have available from across the education sector, we take a smarter approach to monitoring. This means we can identify issues early, provide relevant and timely support, and respond appropriately.

Our monitoring work goes beyond traditional compliance to working collaboratively with TEOs, informing and educating TEOs on their obligations and helping them perform to their absolute best.

You can read more about our monitoring framework [here](#).



**We ensure New Zealand's future success.**



**New Zealand College of Chinese  
Medicine**

Report for the Tertiary Education  
Commission

**Confidential**

November 13, 2017

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# 1. Executive Summary

## Background

- 1.1. New Zealand College of Chinese Medicine ("NZCCM") is a category two Private Tertiary Education Provider that provides a range of approved qualifications (including certificates, diplomas and bachelor degrees) in Traditional Chinese Medicine (Acupuncture/Chinese Medicine/Tuina and Massage) for both domestic and international students. NZCCM's programmes are developed internally and approved by the New Zealand Qualifications Authority (NZQA).
- 1.2. Established in 2003, the main campus is located in Auckland and its largest programme is the Bachelor of Health Science in Chinese Medicine. A second smaller campus, Lotus campus, is located in Hastings and was acquired (along with its qualifications) in 2015. The main programme delivery at the Lotus campus is the Diploma in Wellness and Relaxation Massage. Despite only recently acquiring the Lotus campus, NZCCM's Board of Directors has made the decision to close it as of January 2018, due to low student enrollment and high overhead costs. NZCCM advises that the Lotus programmes will be delivered from the main campus in Auckland beginning in February 2018.
- 1.3. TEC allocated funding to NZCCM totalling \$1.041 million in 2017 (exclusive of GST).

## Scope

- 1.4. TEC engaged Deloitte to undertake a review of two specific programmes at NZCCM for the years 2016 and 2017. This comprised:
  - a) Bachelor of Health Science in Chinese Medicine ("**BoHSCM**") (Level 7); and
  - b) New Zealand Diploma in Wellness and Relaxation Massage ("**DWARM**") (Level 5).
- 1.5. Specifically, we were instructed to include the following in the scope of the review:
  - a) Ensuring that programmes are taught in accordance with, and comply with, the learning hours and weeks entered into STEO and therefore meet the TEC funding requirements;
  - b) Ensuring programmes are delivered in accordance with learning hours approved by NZQA;
  - c) Assessing NZCCM's financial performance and position; and
  - d) Other specific areas relating to NZCCM, particularly students enrolled at NZCCM and other providers, students repeating qualifications from a different provider, students consuming more than 1.5 EFTS per year and reasons for significant changes in SAC EFTS.

## Key findings

- 1.6. TEC bases its funding decisions on the information that is entered in STEO. Total BoHSCM STEO learning hours did not match NZQA approved hours. The difference was 1.66 self-delivery learning hours per week, which totals 240 hours over the 144 week programme. The higher level of learning hours that is recorded in

STEO is currently being delivered. We recommend that NZCCM consider if this level of delivery will continue or if STEO should be updated to reflect the lower level of approved learning hours.

- 1.7. Our assessment of learning hours delivered to students as compared to STEO approved requirements was 103.3% for the BoHSCM programme and 104.9% for the DWARM programme. Both programmes are delivered in the classroom and in a clinic setting with assessment, assignment and homework requirements. Learning requirements are reported consistently between programme documents, tutor interviews and student interviews. Students from the BoHSCM reported that a significant amount of self-directed study was required in order to be successful in the course.
- 1.8. Analytics completed prior to this review highlighted four areas that required specific examination. Our review of these areas did not identify any additional concerns about NZCCM's delivery of learning hours or the funding provided to NZCCM. We set out our detailed findings in relation to these areas in section four.

9(2)(b)(ii)

## 2. Introduction

### Background

- 2.1 New Zealand College of Chinese Medicine Limited ('**NZCCM**') was established in 2003 and is a category two Private Tertiary Education Provider ("PTE") as defined under the Education Act 1989. NZCCM is accredited and approved by the New Zealand Qualifications Authority ('**NZQA**').
- 2.2 The College is run by Mr Stephen Xu, CEO and Dr Jessica Li Feng, Principal.
- 2.3 The CEO and Principal are the shareholders of NZCCM and report to a board of directors who include the CEO and Principal and five independent directors of various professional backgrounds (i.e. a Vice Chancellor at AUT, the Principal for South Central College of Natural Medicine, the Chair of South Pacific Board Trust, and a leading position for a Health department). The Board is responsible for oversight of policies and decisions related to the school.
- 2.4 NZCCM delivers approved qualifications in eight disciplines related to Chinese Medicine, being:
  - Bachelor of Health Science;
  - New Zealand Diploma in Wellness and Relaxation Massage (Level 5);
  - Diploma in Naturopathy;
  - Diploma in Naturopathy and Herbal Medicine;
  - New Zealand Certificate in English Language;
  - Diploma in Tui Na (Level 7);
  - Certificate in Foundation Studies for Health Maintenance - Traditional Chinese Medicine;
  - Diploma in Chinese Health Studies.
- 2.5 The main NZCCM campus is located on Great South Road in Greenlane, Auckland. The primary programme delivered by the main campus is the Bachelor of Health Science.
- 2.6 A second smaller campus in Hastings was acquired in 2015, called the Lotus campus. The main course offering at the Lotus campus is the Diploma in Wellness and Relaxation Massage. Both campuses run on the same semester schedule and have a student intake in February and July.
- 2.7 NZCCM purchased Lotus in 2015 and worked with TEC and NZQA to update the programmes to ensure that the qualifications matched learning outcomes. Low enrolments at the Lotus campus has resulted in a Board decision to close the Lotus campus as of January 2018. NZCCM intend to continue delivering the programmes from the main campus in Auckland, beginning in February 2018.
- 2.8 NZCCM's student base is primarily mature students and is made up of a combination of NZ residents and approximately 10% international students. All courses are delivered in English and students must pass an English requirement prior to enrolling. Marketing to attract students is done through newspapers, the



Chinese Medicine professional community, career fairs and publicity received from providing services to underprivileged communities. Upon graduation, in order to maintain their qualifications, students must maintain professional development hours. These hours are also facilitated through the NZCCM.

**Programmes selected by TEC**

2.9 TEC engaged Deloitte to undertake a review of the delivery of two programmes at NZCCM in 2016 and 2017:

- Bachelor of Health Science in Chinese Medicine (Acupuncture and Herbal Medicine) (Level 7) ("BoHSCM"); and
- New Zealand Diploma in Wellness and Relaxation Massage (Level 5) ("DWARM").

2.10 NZCCM had 144.49 EFTS funded by TEC in 2016, and 98.88 in 2017. TEC selected two of NZCCM’s eight programmes currently being funded by TEC for us to review.

Table 1 – Programme overview (in scope of review)

Programme	Content Overview	Programme Details <sup>1</sup>	EFTS Delivered in 2017 <sup>2</sup>	SAC Funding 2017 <sup>3</sup> (% of total SAC funding)
Bachelor of Health Science (Chinese Medicine) (Level 7)	A four-year degree covering acupuncture, Chinese medicine and Chinese herbal medicine. Students learn a range of techniques to manage, advise and contribute to the care of patients.	Credits: 480 Teaching weeks: 144 EFTS: 4 Total Learning Hours: 5,040	73.625  (74% of all EFTS)	\$864,690.00  (83% of total SAC funding)
New Zealand Diploma in Wellness and Relaxation Massage (Level 5)	A one-year diploma producing graduates that are equipped with the skills to perform wellness and relaxation massage therapies and gain the knowledge to run a practice.	Credits: 120 Teaching weeks: 36 EFTS: 1 Total Learning Hours: 1,202	17.75  (18% of all EFTS)	\$59,492.80  (5.7% of total SAC funding)
<b>Total programmes in scope of review</b>			<b>91.375</b> <b>(92%)</b>	<b>\$924,182.80</b> <b>(88.7%)</b>

1 - Source: TEC prepared excel work paper: 'Enrolment data 2016-17 Sample NSNs as at 16 May 2017 - "7282 all enrolments" - STEO  
 2 - Source: TEC prepared excel work paper: 'Enrolment data 2016-17 Sample NSNs as at 16 May 2017 - "7282 all enrolments" - 7282 all enrolments  
 3 - Source: TEC prepared excel work paper: "7282-SAC L3Plus PTEs Mix of Provision 2 Year 2017-385 - Excel" - Report

2.11 BoHSCM is a qualification that covers Acupuncture, Chinese medicine and Chinese Herbal medicine. It requires full-time study over a period of four years and includes courses covering levels 5 through 7 (i.e. 1<sup>st</sup> year courses are Level 5, 2<sup>nd</sup> year courses are level 6, 3<sup>rd</sup> & 4<sup>th</sup> year courses are level 7). The programme is taught through a combination of in class learning and monitored clinical practicum. Students who complete the course are intended to be able to exercise a range of capabilities that enable them to practice

within New Zealand's healthcare and regulatory contexts. Students who apply to the programme were described by the tutors and school management as generally being mature students who can be viewed as competent and ethical healthcare providers. All students must go through an interview process to ensure that the student's goals are in line with NZCCM's programme goals and show a minimum of university entrance and English language requirements. Students enter the programme in either February or July intakes and complete the study with the same students throughout the four years. The curriculum and timetable are set by NZCCM.<sup>1</sup>

- 2.12 DWARM is a one year qualification that provides the foundation for students to be able to perform wellness and relaxation massage. It is currently only delivered from the Hawkes Bay campus. The aim is that upon completion students can demonstrate knowledge of human functioning and apply that knowledge to a wellness and relaxation massage therapy practice. The course is taught in a classroom setting with clinical application of the techniques. Students enter the programme in either February or July intakes and complete the study with all the same students throughout the year. The curriculum and timetable are set by NZCCM. Students were described by tutors as generally mature students (many being mothers who are looking to go back to work in a new vocation). The classroom sizes are small with anywhere from eight to fifteen students attending the programme at one time. NZCCM did not have a July 2017 intake as the Lotus campus is due to be closed by NZCCM at the end of December 2017.

## Methodology

- 2.13 The methodology that we have used to assess the delivery of learning hours to students is conservative and relies on the highest estimates of learning hours that were provided in programme documents (including timetables), tutor interviews and student interviews. This is consistent with other reviews that we have undertaken for TEC.
- 2.14 We initially reviewed the relevant versions of the approved programme documents and any changes that altered the learning hours during the timeframe of our review. We then reconciled the learning hours that have been entered into STEO by NZCCM against the learning hours that were recorded in the latest version of the programme documents. This analysis is set out in Section 3 of this report.
- 2.15 We then investigated how the programmes were actually delivered by the provider to students during the relevant timeframe. The findings of this analysis were then used to determine whether NZCCM has delivered the funded learning hours to students. We note that TEC relies on the hours that are recorded in STEO when it makes its decision to fund programmes and we compared actual delivery to the STEO database. This is also set out in Section 3 of this report.
- 2.16 Our methodology establishes the highest number of learning hours that were delivered to students. This is because the learning hours that are actually undertaken by students will vary depending on their background, desired academic achievement and personal ability to study. In these instances, our assessment of the learning hours that were delivered is conservative (i.e. is an assessment of the highest number of learning hours delivered to students) because:
- Timetable and document review – during our reviews we may encounter cohorts on programmes that receive a varying number of tutorials. For these students, our assessment relies on the students that had the highest number of timetabled days;

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<sup>1</sup> <http://chinesemedicine.ac.nz/programme/bhsc/>

- Student interviews – the student interviews are a useful source of evidence to determine how the delivery was structured, and how much time the students spent undertaking self-directed study. We reduce the risk that our assessment of the self-directed study is understated by only relying on the highest estimates that were provided by students (usually averaging the three highest responses);
- Tutor interviews – if the tutor interviews indicate that the students’ responses may have significantly understated the learning hours received, we consider if it is appropriate to adjust our assessment upwards.

## Scope of this report

2.17 The review of the BoHSCM and DWARM programmes from 2016 to 2017 specifically included:

- Ensuring that programmes are taught in accordance with, and comply with, the learning hours and weeks entered into STEO and therefore meet the TEC funding requirements;
- Ensuring programmes are delivered in accordance with learning hours approved by NZQA;
- Assessing NZCCM’s financial performance and position; and
- Other specific areas relating to NZCCM, particularly students enrolled at NZCCM and other providers, students repeating qualifications from a different provider, students consuming more than 1.5 EFTS per year and reasons for significant changes in SAC EFTS.

2.18 We provided our draft report to TEC on 26 October 2017. This was provided to NZCCM for comment.

## Limitations

2.19 The terms of this engagement and the scope of the work we have undertaken do not comprise an audit or a review engagement, and the assurances associated with those reviews are not given. Our work did not constitute an assurance engagement in accordance with the requirements of the Chartered Accountants Australia and New Zealand, and was not designed to provide assurance accordingly under International or New Zealand Standards on Auditing or Assurance such as ISAE 3000. Accordingly, no assurance opinion or conclusion has been provided.

2.20 We are not qualified to provide any interpretation of the quality of the education provided that is the focus of this review.

2.21 The financial and other information contained in this report have been provided by NZCCM, current NZCCM staff, TEC, NZQA and various NZCCM students. Our review was based on enquiries, analytical review, interviews and the exercise of judgement.

2.22 Our assessments are based on observations from our review undertaken in the time allocated. Assessments made by our team are matched against our expectations and good practice guidelines.

2.23 Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. Our procedures were not designed to detect all weaknesses in control procedures as they were not performed continuously throughout the period and the tests performed are on a sample basis.

- 2.24 Any projection of the evaluation of the control procedures to future periods is subject to the risk that the systems may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.
- 2.25 The matters raised in this report are only those which came to our attention during the course of performing our procedures and are not necessarily a comprehensive statement of all the weaknesses that exist or improvements that might be made. We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud. Accordingly, our report should not be relied on to identify all weaknesses that may exist in the systems and procedures under examination, or potential instances of non-compliance that may exist.
- 2.26 This report has been prepared for distribution to TEC. We disclaim any assumption of responsibility for any reliance on this report to any other persons or users, or for any purpose other than that for which it was prepared.
- 2.27 Suggestions for improvement should be assessed by management for their full commercial impact before they are implemented.

# 3. Compliance and Delivery of Learning Hours

3.1 In this section we set out our findings on whether:

- The programmes were approved by NZQA; and
- The programme learning hours and weeks entered by NZCCM into the TEC database "STEO" have been delivered by NZCCM in practice.

## Programme approval by NZQA

3.2 We have set out in Table 2 below the required hours of delivery under the NZQA programme approval documents and the hours that were submitted by NZCCM into the TEC database ("STEO") relevant to the review period. The data entered into STEO is the basis for the education provider funding decisions.

Table 2 - Required Hours of Delivery recorded in STEO (TEC) and the NZQA Curriculum Documents

Programme	STEO (TEC) <sup>1</sup>	R0482 (NZQA) <sup>2</sup>	Does STEO reconcile?
Bachelor of Health Science (Chinese Medicine) (L7) PC7282	Duration: 4 years / 144 weeks Teaching: 20 hrs/wk Self-Directed: 15 hrs/wk <b>Total Learning Hours: 5,040</b>	Duration: 4 years / 144 weeks Teaching: 20 hrs/wk Self-Directed: 13.34 hrs/wk <b>Total Learning Hours: 4,800</b>	<b>X</b> Total hours do not reconcile between NZQA and STEO
New Zealand Diploma in Wellness and Relaxation Massage (L5) NZ2740	Duration: 36 weeks Teaching: 20 hrs/wk Self-Directed: 13.4 hrs/wk <b>Total Learning Hours: 1202</b>	Duration: 36 weeks Teaching: 20 hrs/wk Self-Directed: 13.35 hrs/wk <b>Total Learning Hours: 1,200</b>	✓ Total hours reconcile between NZQA and STEO

1 - TEC "Enrolment data 2016-17 Sample NSN as at 16 May 2017 - "STEO"

2 - Sources: R0482 Programme Details (run on 15/03/17) Bachelor of Health Science in Chinese Medicine (Acupuncture and Herbal Medicine & R0482 Programme Details (run on 23/11/15) New Zealand Diploma in Wellness and Relaxation Massage & TEC "Enrolment data 2016-17 Sample NSN as at 16 May 2017 - "STEO"

3.3 Total BoHSCM STEO learning hours did not match NZQA approved hours. The difference in hours is related to self-directed learning hours with a difference of 1.66 hours per week. The weekly difference is not large, but over the course of 144 weeks, the resulting 240 hours is significant.

3.4 NZCCM has approval to deliver less learning hours than those that are entered into STEO. As set out in section four below, we found that the higher level of learning hours that are recorded in STEO are currently being delivered.

- 3.5 We point out that the NZQA programme approval documentation provided by NZCCM was approved 15 March 2017 for a Type 2 change application dated 12 December 2016 revising the structure of the programme, learning outcomes and regulations pertaining to entry and awarding the qualification. Earlier documentation dated 8 January 2015 (that also sets out approval of a Type 2 change) did not record any learning hours. NZCCM does not have any additional documentation showing the original approval of the learning hours.
- 3.6 It may be that the approved learning hours prior to those listed in the 15 March 2017 documentation was consistent with STEO (i.e. 15 hours per week of self-directed learning), which is the reason for the discrepancy.
- 3.7 We recommend that NZCCM considers if it is comfortable that the learning hours in STEO reflects the level of learning that will continue to be provided or if it would be preferable to update STEO to reflect the lower level of approved hours.
- 3.8 DWARM STEO and NZQA documentation differs by 0.01 hours per week for an overall difference of 2 hours over the 36 weeks of the programme. We do not consider this to be a significant difference.

#### Duration and learning hours analysis

- 3.9 We have been advised by TEC that an important part of the funding provided to Education Providers is based on the total learning hours delivered to the students (approximately 1,200 hours per year for a full time programme).
- 3.10 The learning hours for the programmes we reviewed are comprised of teaching hours (including clinical hours) and self-directed hours. Our review focussed on both of these components and relied on tutor and student interviews.
- 3.11 We have set out in Table 3 below the required learning hours that were recorded in STEO and then compared this to our assessment of NZCCM's delivery.

Table 3 - Assessment of NZCCM's delivery of learning hours

	BoHSCM	DWARM
EFTS delivered in 2016 and 2017 <sup>2</sup> (our review period)	173.03	28.625
Students attempted to contact via phone (% of students in review period)	34 (23.13%)	29 (96.7%)
Students successfully interviewed via phone (% of students in review period)	15 (10.20%)	8 (26.7%)
<b>(A) Learning hours recorded in STEO<sup>3</sup></b>		
Teaching hours per week (programme total)	20 (2,880)	20 (720)
Self-directed learning hours per week (programme total)	15 (2,160)	13.4 (482.4)
<b>Total learning hours required (STEO)</b>	<b>5,040</b>	<b>1,202.4</b>
<b>(B) Learning hours delivered (Based on Student Interviews)</b>		
Teaching hours per week (programme total)	20.73 (2,985)	16.61 (598)
Self-directed learning hours per week <sup>4</sup> (programme total)	15.42 (2,220)	18.45 (664)
<b>Total learning hours delivered</b>	<b>5,205</b>	<b>1,262</b>
<b>Assessment of learning hours delivered to students (as a % of hours recorded in STEO vs student interviews)</b>	<b>103.3%</b>	<b>104.9%</b>

### Our Assessment of the Learning Hours Delivered

3.12 Our assessment of the learning hours delivered in practice by NZCCM (in Table 3 above) compares STEO learning hours (the hours submitted to TEC by NZCCM) to the learning hours delivered by NZCCM, to provide an overall percentage of delivery for the programme. This assessment was based on student interviews, tutor interviews and other evidence provided by NZCCM.

3.13 9(2)(a), provided listings of students enrolled in both the BoHSCM and the DWARM programmes in 2016 and 2017. We used these to carry out telephone interviews, to further understand the delivery of teaching and self-directed learning hours. Student listings provided and contacted were as follows:

<sup>2</sup> Source: TEC – Enrolment data 2016-17 Sample NSN as at 16 May 2017 – “7282 all enrolments” – all enrolments

<sup>3</sup> Source: TEC – Enrolment data 2016-17 Sample NSN as at 16 May 2017 – “7282 all enrolments” – STEO

<sup>4</sup> Based on the average of the highest three student estimates

- **BoHSCM:** Students who had enrolled in intakes starting February 2014 through July 2017. We attempted to call 34 students and successfully completed 15 interviews. These interviews were spread across students from all four years of the programme.
- **DWARM:** Students who had enrolled in intakes from February 2016, July 2016 and February 2017 (Lotus did not have an intake for July 2015 because of the transition to NZCCM). We attempted to call 29 students and successfully completed eight interviews. The interview completion rate for this programme was low as many of the students did not want to speak with us or could not be reached.<sup>5</sup> However, our student sample still represented 26.7% of the student population for this period.

### Teaching Hours

- 3.14 Our assessment of the teaching hours was based on the scheduled class times recorded in the timetables and programme documents and verified by the tutors. We compared this for reasonableness to the class hours that were recalled by the students. We note that the number of learning weeks reported by students in interviews was consistent with the number of weeks in STEO.
- 3.15 The assessed teaching hours were supported by information provided to us by NZCCM, which comprised:
- A class schedule (summary of class times by programme);
  - Course packs (provided an outline of the delivery and content of the course);
  - Course power point decks (a selection of presentations used to present information in class to students); and
  - Examples of assessments used to test students.
- 3.16 The interpretation of this programme material was also based on the tutor interviews which were completed prior to the student interviews taking place.
- 3.17 We held discussions with ten BoHSCM tutors and noted that many of the tutors had Masters or Doctorate degrees in their field and/or were medical practitioners with experience in Western medicine or Chinese medicine. Tutors teach from a pre-approved curriculum that has been developed by NZCCM, but have the ability to modify minor elements in the teachings to suit students. Students must attend 80% of the classes in order to pass. This is monitored by a class roll.
- 3.18 We held discussions with all three of the DWARM tutors. They were all tutors at the school under the previous management and indicated that the course materials used were developed by NZCCM which were a modified version of their previous teaching materials. Two of the tutors, who teach 95% of the DWARM programme, were massage professionals with their own practices.

### Clinical Hours

- 3.19 Both programmes contain an element of clinical practice hours that must be completed in order to obtain certification.
- 3.20 The BoHSCM programme is a four year programme, with clinical practice hours beginning in year one (when students practice techniques on class members) and progressing to year four (when students operate in a

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<sup>5</sup> All students that did not complete the interviews were called at least three times on different occasions



clinic open to the public, located in the school under tutor supervision). The Acupuncture and Chinese Medicine clinic is advertised as a teaching clinic and the patients are a combination of student referrals and the general public. The time that students are practicing in the clinic is included as class time, is part of a course curriculum and has required assessments and learning objectives.

- 3.21 Specifically, under the BoHSCM learning objectives, the clinical course is included in the timetable. Year three and four students practice at the clinic on patients as part of their 'clinical' course for an average of 10 hours per week. Tutors are present in the clinic and attend each visit with the more junior students and progress to providing oversight to the more senior students. Tutors discuss the patients' cases with the students and review clinical notes. Students use their knowledge from clinical in other classes, where they discuss treatment of patients based on their experiences. End of term assessments are based on patient cases from clinical experience.
- 3.22 DWARM also has a clinical practice component. Students in the second semester are required to recruit their own patients that they practice relaxation massage on. The massage is performed under the supervision of a tutor, during allocated class hours and the students' performance is assessed by both the tutor and the patient.
- 3.23 We are satisfied with NZCCM's inclusion of clinical hours within teaching hours because:
- Students must attend these clinical hours during the allocated time slot in the week;
  - A tutor is present at all times;
  - Tutors are available for consultation on specific patient records;
  - Tutors review the students' patient records;
  - There are clear NZQA learning outcomes and objectives that are then assessed; and
  - The students are not paid for their services, which further supports that this is learning specifically related to the programme, rather than paid external work experience that is not specifically relevant to the programme learning.

### **Self-Directed Learning Hours**

- 3.24 Our assessment of self-directed learning hours was primarily based on the weekly hours spent outside the clinic and classroom reported to us in the student interviews. We calculated the average of the three highest weekly hours advised by the students and multiplied this by the number of teaching weeks.
- 3.25 Students in the BoHSCM programme reported that they spent on average over 15 hours per week completing self-directed study. Both students and tutors had a clear understanding of the required self-directed learning hours per week and stated that students were advised of assessment, assignment requirements and expectations at the beginning of the programme which were also posted on NZCCM's internal portal. In addition, homework activities were communicated in class.
- 3.26 The reported DWARM homework requirements varied between the three tutor interviews. However overall, the tutors commented that they expected that students were performing reading in their own time, practicing massage techniques being learned in class, and would prepare for class ahead of time. These 'homework' requirements were not monitored other than through formal learning assessments and

assignments. Students reported a range of self-directed study time, although most indicated that self-study was required in order to be successful in the course.

### **Delivery within each of the Programmes**

#### **Bachelor of Health Science (Level 7)**

3.27 The BoHSC programme is a four year degree with students taking eight courses in years one and two; seven courses in year three and five courses in year four. There are 36 teaching weeks per year. The 36 weeks are made up of 30 in class teaching weeks, two exam study weeks and four exam weeks. The students are primarily based in the classroom for the first two years and progress to a combination of clinical and class time towards the end of the programme. The courses are assessed by a combination of pop quizzes, mid-year exams, written and oral assignments, and a final exam. Topics that students learn about within the programme include the History of Chinese Medicine, Biomedical Science, Points Location, Acupuncture Techniques, Chinese Medicine Theory, Herbal Medicine and Pathophysiology.

3.28 Overall the learning hours were delivered at 103.3% of the hours recorded in STEO. These are broken down to teaching and self-directed learning hours.

- We found that the teaching hour component was 104% delivered compared to STEO based on the programme timetable class hours (including exam hours) provided with NZCCM. These hours were confirmed by tutors and in our 15 student interviews.
- The self-directed learning hour component was 103% delivered compared to STEO. We used an average of the highest three student estimates for each of the four years. This was because students told us that the programme is very theory intensive in the first two years and requires a significant amount of self-directed study. Students in the first two years reported that the average amount of time spent was 25 hours and 15.67 hours, respectively. The last two years of the programme require less self-directed study as there is more time spent in the clinic. Students reported that the average amount of time spent on self-directed study in years three and four were 14 and 7, respectively. STEO records self-directed learning at 15 hours per week. All students interviewed stated that homework was set by the tutor, with additional hours being required for assignments and exams. The students indicated that there was a significant amount of self-study required in order to be successful in the programme.

3.29 The overall impression relayed by the students was that they thought the programme was worthwhile and they particularly respected the tutors that ran the programme.

#### **New Zealand Diploma in Wellness and Relaxation Massage (Level 5)**

3.30 The DWARM programme is a one year qualification with students taking four courses in each semester. The programme's 36 weeks are made up of 30 in class teaching weeks, two exam study weeks and four exam weeks. DWARM courses are assessed by pop quizzes, mid-year exams, multiple assignments, oral presentations, final exams and clinical experience and client ratings from clinical practice. Students who partake in the DWARM programme take courses like Massage, Biomedical Science, Anatomy, Points, Relaxation techniques and Reflexology.

3.31 Overall, the learning hours delivered were 104.9% of STEO required learning hours. These are broken down to teaching and self-directed learning hours.

- We found that the teaching hour component was 83% delivered compared to STEO. These hours are based on timetables of DWARM classes for the year which were confirmed by tutor and student interviews.
- The self-directed learning hour component was 138% delivered compared to STEO. The highest three student estimates were that 14, 17.5 and 28 hours of homework were carried out per week compared to the 13.4 hours per week required.

3.32 The duration of the programme described by the students was consistent with the 36 weeks in STEO. Some students indicated that the NZCCM year ran on the same schedule as the primary schools, which is consistent with a 36 week school year.

3.33 The overall impression we got from the students was that tutors made the course enjoyable and educational. A few students even mentioned that they were disappointed that the course was not going to continue because they would have to move to Auckland to further their study of massage through NZCCM, which was not feasible for them. Some students also commented that they had to buy their own oils and herbs when they originally understood that Lotus would be providing them as a part of the cost of the course.

## 4. Other findings

4.1 TEC requested that we include four areas of interest to explore relating to NZCCM. We set out our findings and commentary below relating to the following areas:

- Students enrolled at NZCCM and also with other providers;
- NZCCM students repeating a qualification from a different provider;
- Students consuming greater than 1.5 EFTS per year; and
- Reasons for significant changes in SAC EFTS.

### Students enrolled with other providers

4.2 Analytics completed prior to our review found 16 instances (or 9.1%) of students who were enrolled with NZCCM and with another provider at the same time. This could potentially indicate that the students are not actually completing their study at NZCCM. We reviewed the data underlying these students and discussed this with NZCCM.

4.3 Students undergo an interview process prior to being accepted to NZCCM. During the enrolment process NZCCM asks students if they have studied elsewhere and the information is recorded on a standardised NZQA form; however they did comment that NZCCM has no control over students enrolled at other providers. NZCCM reviewed a sample of the intake forms from these students identified and noted that they did declare that they were taking courses at another institution on the NZQA forms.

4.4 We specifically reviewed the students listed as being enrolled with other providers and noted that:

- Six did not appear to be a conflict as the overlap was for a very small period of time, indicating that the course may have been a night or weekend course, or have had a slight overlap in start and end dates;
- Four students were enrolled in the DWARM programme;
- Two students were enrolled in the DoHSCM programme; and
- Four students were enrolled in other NZCCM programmes.

4.5 The fact that the students are not concentrated in one programme led us to the view that it is likely these were unique instances that are not reflective of a programme delivery issue.

### Students repeating qualifications from a different provider

4.6 Analytics completed prior to our review found 11 (6.2%) students were identified as repeating qualifications from a different provider at NZCCM.

4.7 All students identified were enrolled in the Diploma in Naturopathy and Herbal Medicine at the NZCCM Lotus campus. The data showed that these same students were repeating courses from Lotus Holistic Centre in the Diploma in Naturopathy programme.

- 4.8 NZCCM purchased Lotus Holistic Centre and its qualifications in 2015. The qualifications purchased were not compliant with NZQA requirements and had to be changed. Students who had enrolled in 2015 with Lotus Holistic Centre in 2015 had 120 credits cross credited to the new programme and started with the 'new' year 2 programme under NZCCM.
- 4.9 The data obtained to perform the analysis was from two different Single Data Returns ("SDR"s) (2015 and 2016). Therefore, the two different data sets showed the students under the original programme, run by Lotus Holistic Centre and then again under the new programme, run by NZCCM at the Lotus campus. The students were in fact, not repeating any courses.

### Student consuming greater than 1.5 EFTS per year

- 4.10 Analytics completed prior to our review found five students consuming greater than 1.5 EFTS in 2016. A programme with students able to consume this level of EFTS may be sized incorrectly or under-delivered. Our further review of those five students found that:
- Two students were enrolled in distance studies while being enrolled at the NZCCM Lotus campus (one was a DWARM student). One student completed the DWARM programme while doing a National Certificate in Seafood Maori and the other student withdrew from NZCCM; and
  - Three students were enrolled at NZCCM Lotus Campus in the Diploma in Naturopathy and Herbal Medicine programme. When we discussed this with NZCCM they indicated that the 1.5 EFTs enrolment must be as a result of the transfer of courses from Lotus Holistic Centre to NZCCM which shows that two years' worth of courses are reported in 2016 as the courses were transferred to the NZCCM new programme in 2016. Two of these students are due to complete the programme in December 2017 and one withdrew.
- 4.11 For the same reason as above, because the 2015 and 2016 information was obtained at two points in time it showed these three students under both qualifications when in fact they were only enrolled in NZCCM in 2016.

### Significant changes in SAC EFTS

- 4.12 Analytics completed prior to our review found that there was an increase of students receiving SAC funding from 2015 to 2016. The increase in SAC funded students between the two years was 34. This is equivalent to 36 EFTS. A detailed review of the data shows that the increase in students was across a range of programmes delivered by NZCCM. However, the largest concentration was in the three programmes taken on from Lotus, which had not previously been delivered by NZCCM. These three programmes accounted for 20.25 of the 36 EFTS. We do not consider that the increase in EFTS is indicative of inappropriate actions by NZCCM.

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# Appendix A – Key Sources of Information

## Key Sources of Information

Type	Details
Key Documents	<ul style="list-style-type: none"> <li>NZCCM SDR data in relation to enrolments and completions</li> <li>STEO records from TEC for each programme</li> <li>NZQA programme approval and R0482 documents for each programme</li> <li>Tutor list for each programme</li> <li>Student contact details for each programme within sample</li> <li>Sample assessments, workbooks, student handbook and other programme documents</li> <li>Timetables for each Programme</li> <li>2015 and 2016 Annual Financial Reports</li> <li>NZCCM internal Statements of Financial Performance and Position as at July 2017</li> <li>TEC Funding Approval Documents</li> </ul>
NZCCM Personnel	<ul style="list-style-type: none"> <li>Stephen Xu (Chief Executive Officer and shareholder)</li> <li>Jessica Li Feng ( NZCCM Director/Principal/Tutor and shareholder)</li> <li>9(2)(a) [REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> </ul>
Other	<ul style="list-style-type: none"> <li>A selection of students were interviewed across programmes</li> <li>We were provided with information, documents, and analysis by various TEC personnel</li> <li>Deloitte’s Tableau analysis performed for TEC prior to our review</li> </ul>



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