



James Cook University
Submission to the Higher Education Standards Panel on the Higher
Education Standards Framework

James Cook University (JCU) is grateful for the opportunity to comment on the draft standards for course design and learning outcomes developed by the Higher Education Standards Panel (HESP) as part of the review of the Higher Education Standards Framework. JCU acknowledges and is appreciative of the constructive and consultative approach that the HESP has adopted to date.

JCU is broadly supportive of the submission made by the Innovative Research Universities.

In addition JCU makes the following comments. JCU has used the framework as set out in the HESP Call for Comment Discussion Paper March 2013 to guide its response.

For further information please contact:

Director Standards, Lisa Westcott _____

*Feedback on the **proposed format** (e.g. style, clarity, pitch) for the revised standards (including the use of reference points), as represented by the two standards examples given, is invited by the Panel. It would be helpful if feedback could be framed around the following questions:*

Q1. Do you broadly support the proposed format for the standards? If not, why?

JCU broadly supports the proposed format for the standards and thanks the HESP for its review of the standards and the proposed draft format, which is a considerable improvement in terms of clarity and reduction of overlap and duplication. It is suggested that a glossary of terms be provided to aid interpretation in the final version (e.g., re “interdisciplinary” to be compared with transdisciplinary and multidisciplinary; re “attributes”). It is also suggested that, wherever possible, consistent language/phraseology is used both across the individual standards and between them.

Q2. Do you support the inclusion of Reference Points as proposed? If not, why?

JCU strongly supports and endorses the inclusion and use of Reference Points as proposed in the draft standards. It is critical for institutions to be able to point to some principled basis on which their course learning outcomes have been developed. JCU supports the use of the AQF as an important Reference Point, rather than a standard in its own right. The AQF and the Discipline Scholar work are important in this regard, as are the requirements of professional accreditation bodies and international comparators. The development of the Standards Statements through the Discipline Scholar work involved achieving consensus across the broad disciplinary communities for their articulation (e.g., academics, students, graduates, practicing profession, professional regulators, various professional associations/bodies) and explicitly took into account the requirements of the AQF, professional accreditation requirements and comparative international benchmarks statements as appropriate to each of the various disciplines. Most if not all have been endorsed by at least the relevant Deans Council and a number also by professional bodies. They represent authoritative documents and meet the requirements of '...significant codes or frameworks... developed and maintained by peak national bodies and agencies' as identified by the panel in its current definition of Reference Points (at p. 2 of the Discussion Paper). It is noted that a number of other disciplines have continued this work in their own contexts and have articulated their own consensus statements around what students should know, understand and be able to do as a result of learning in the discipline.

Another possible authoritative Reference Point might be the 'international comparators' that are mentioned in Learning Outcomes (Coursework) standard 2. This could easily be incorporated by the addition in the definition of Reference Points 'peak national **and international** bodies and agencies'.

Q3. Do you wish to make any suggestions in relation to the format of the standards?

James Cook University supports the changes made in relation to the format of the standards. The proposed format is clear, concise and appropriately sequenced. The clearly numbered, narrative style is welcomed.

It is suggested that the HESP might consider avoiding the incorporation or explicit reference to any standards statement developed by another body in the new standards. For example, in standard 4 of Course Design (Coursework), there is a reference to the Australian Qualifications Framework (AQF), which is probably best deleted (i.e., delete “and informed by the Australian Qualifications Framework”). It is not beyond consideration that the HESP at some point might seek to develop its own Qualifications Standards, appropriately informed by the substantial and valuable work of the AQF Council.

Feedback on the proposed draft standards for Course Design (Coursework) is invited by the Panel. It would be helpful if feedback could be framed around the following questions:

Q4. Do you broadly support the proposed standards for Course design? If not, why?

JCU is of the view that the proposed draft generally represents a clear set of standards in relation to Course Design (Coursework). Presumably the naming of this standard anticipates a Course Design (Research Higher Degree) Standard.

Q5. Do you wish to make any suggestions in relation to the specific content of the standards?

1. The provider utilises defined processes for designing and assuring the quality of the design of each course of study and the qualifications to which it leads.

This standard is clear.

2. Processes for course design are approved and overseen by the provider's peak academic governing body.

This standard is clear.

3. Course design encompasses the rationale for the course of study, course structure, modes of delivery, learning outcomes, methods of assessment, entry requirements and pathways, programmed student workload, articulation arrangements, exit pathways, pathways to further study and any compulsory requirements for completion and that these features of all courses of study are documented and publically accessible in a current version.

JCU suggests that the word 'course' be added into standard 3 to precede the words 'learning outcomes'. The phrase 'any compulsory requirements for completion' is unclear. Would this require a detailed overview of all subjects that a student would be required to complete to attain the degree, attendance requirements, work placements specifications, manual dexterity requirements or perhaps the inherent requirements for degrees that have been developed in the disability context (e.g., http://www.uws.edu.au/ir/inherent_requirements/bachelor_of_nursing_inherent_requirements)?

Would English language and numeracy proficiency also be included here in this part of the standards? 'Programmed student workload' is also a difficult phrase. Does this refer to student contact hours, and if the course is online, is this an estimate of time required to complete tasks? The latter can be difficult to articulate.

4. The nature and scope of the course and the expectations for student learning are consistent with the qualification to be awarded and informed by the Australian Qualifications Framework.

As indicated above, it is considered preferable that the AQF not be specifically incorporated in this standard, to enable the HESP the liberty to develop its own Qualification Standard over time. The AQF is an appropriate (indicative) Reference Point and should not be explicitly referred to in the standard.

5. The content of each course of study:

- a. is drawn from current knowledge and scholarship in relevant academic disciplines**
- b. includes study of the underlying theoretical and conceptual frameworks of the academic disciplines and the field of study, and**
- c. encompasses relevant emerging concepts that are informed by recent scholarship, current research findings and advances in practice (where practice is applicable to the field of study).**

Instead of the word “content” in the stem “The content of each course of study:”, JCU supports the use of either: ‘knowledge and skills’ from standard 3a of the Learning Outcomes (Coursework) standard or the language of the AQF, explicitly, ‘The knowledge, skills and application of knowledge and skills of each course of study:’. This is because “content” in some disciplinary contexts may imply a reference to knowledge only, which the following paras a., b., and c. may be interpreted as supporting.

6. Each course of study is designed to enable equivalent student learning outcomes regardless of a student’s place or mode of study.

This standard is clear.

7. The peak academic governing body of the provider oversees periodic (at least every 5 years) review and improvement of the design of each course of study.

This standard is clear. JCU supports cyclical course reviews at least every five-years.

Reference Points

- i. Australian Qualifications Framework (January 2013).**
- ii. The requirements for professional accreditation of the course of study and registration of graduates where applicable.**

Refer to comments made in relation to Question 2 above.

It may be preferable to omit the date “(January 2013)” from i. and provide instead something like ‘Current version of...’

Feedback on the proposed draft standards for Learning Outcomes (Coursework) is invited by the Panel. It would be helpful if feedback could be framed around the following questions:

Q6. Do you broadly support the proposed standards for Learning Outcomes? If not, why?

JCU is of the view that the proposed draft represents a clear set of standards in relation to Learning Outcomes (Coursework). Is it proposed to develop a standard on learning standards, in the sense of the minimum or threshold standard of achievement that would be required for a graduate to meet to be awarded the qualification?

Q7. Do you wish to make any suggestions in relation to the specific content of the standards?

1. The learning outcomes to be achieved on completion of a course of study are specified for each course of study.

This standard is clear. It is suggested that consideration be given to adding to the end of this standard the words “and the current version is publically available”. If this was done, then standard 5 could be omitted.

2. The learning outcomes for each course of study are consistent with the qualification awarded, are comparable with those for courses of study that lead to the same or a similar qualification in Australia, and are informed by international comparators.

This standard is clear. The inclusion of international comparators is strongly supported. See further the comment under Question 2 regarding this being identified as further, authoritative Reference Points.

3. The learning outcomes for each course of study are informed by:

a. the mastery of specific disciplinary and/or interdisciplinary knowledge and skills that characterise the field of study

b the generic skills and attributes required of graduates

c. the generic skills and attributes in the context of the field of study including the communication skills required, and

d. The requirements of employment related to the field of study

In relation to standard 3 JCU would like to ensure that there is no intention that there be an artificial separation requirement of learning outcomes into knowledge, skills, attributes and context domains. Rather, that the interpretation be that a single learning outcome might cross all domains. (see Spady, 1994).

It is noted that this is the first time the word “attributes” has been used. Its meaning in this context should be clarified in the Glossary suggested under Question 1.

It is not clear why communication skills have been singled out in c., though presumably this has been done to capture the issue of English Language Proficiency. It is arguable that other interpersonal skills are equally as valuable.

4. The relationship between the overall learning outcomes for each course of study and the learning outcomes for units that contribute to the course of study is demonstrable.

This standard is clear.

5. The specified learning outcomes for each course of study are available to the staff and students who are involved and are publically accessible in a current version.

This standard is clear. If the words suggested to be included in standard 1 above are adopted, this standard could be omitted.

6. The assessment of student learning, whether at unit level, course level, or in combination, encompasses all specified learning outcomes for each course of study.

This standard is clear. If it is desired to ensure that a threshold level of achievement is also attained, the words “to the required threshold/ minimum level of attainment” or similar, might be added.

7. Learning outcomes for each course of study and the methods for assessment of those outcomes are informed by periodic reviews (at least every 5 years), which take account of external reference points that are relevant to the course of study.

This standard is clear.

8. Methods of assessment are consistent with the types of learning outcomes being assessed and are capable of validly and reliably confirming that specified learning outcomes are achieved.

This standard is clear, though “specified” might be replaced with “required”.

9. The grades awarded to students reflect the level of their attainment.

This standard is clear, though the words “learning achieved” might be inserted instead of “attainment” for internal consistency with standard 8.

10. The grading of students’ achievement of learning outcomes for selected units within courses of study is referenced periodically (at least every 5 years) against the grading of students’ achievement in comparable units or courses in other Australian institutions.

This standard is clear.

Reference Points

i. Australian Qualifications Framework (January 2013).

ii. Learning outcomes statements developed for the field of study by Office for Learning and Teaching discipline communities or other disciplinary or professional bodies.

iii. The requirements for professional accreditation of the course of study and registration of graduates where applicable.

Refer to comments made in relation to Question 2 above.

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