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Higher Education Standards Panel Executive  
GPO Box 1672  
Melbourne VIC 3001

### The Australian National University response to the Higher Education Standards Panel (HESP) call for comment (number 1, March 2013)

#### HESP's approach to redrafting Standards

The Australian National University welcomes the opportunity to make comments on the approach taken by the Higher Education Standards Panel (HESP) to formulating new Threshold Standards, and on the draft standards for course design and learning outcomes circulated in March.

As a provider who is currently undertaking TEQSA re-registration we welcome that the standards will become more consistent. The inconsistency of the current standards made the re-registration process far more burdensome than desired. ANU believes that the main principle for the drafting of all threshold standards should be based on the ability and ease to provide clear evidence related to the standard.

#### Course Design Standards

The draft Standard for Course Design is, in general, sound and appropriate. We do not have any particular suggestions to make about the content of the draft Standard.

#### Learning Outcomes Standards

The major concern with this draft Standard is that it assumes a simple relationship between courses and units that does not reflect actual practice at large universities with broad and heterogeneous course offerings that allow students to put together varied and flexible courses of study that meet their needs and interests. A given course of study may be associated with a large number and range of units. More importantly, a given unit of study may form part of several different courses.

In particular, we are concerned that the requirement in paragraph 4 to link learning outcomes of a course of study and its component units – while reasonable in itself – may be implemented in a bureaucratic way that imposes a significant additional administrative burden on universities.

We have similar concerns about the requirements for assessment specified in paragraph 6. Furthermore, it does not seem reasonable to require in all cases that assessment of student learning at the unit level 'encompasses all specified learning outcomes for each course of study' of which it can be a part.

#### Conclusion

Thank you once again for the opportunity to provide comments. We would be happy to discuss the draft standards for Course Design and Learning Outcomes, and the general approach to redrafting Standards, further. Please do not hesitate to contact in the first instance Professor Marnie Hughes-Warrington, Deputy Vice-Chancellor (Academic) at

Yours sincerely

Margaret Harding  
Acting Vice-Chancellor