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Dear Professor Robson,

Call for Comment (Number 1, March 2013)
Draft Standards for Course Design and Learning Outcomes – Discussion Paper

Thank you for this opportunity to comment on the proposed approach to revising the format and style of the Threshold Standards and specifically on the first two sample revisions recently released by the Higher Education Standards Panel (HESP).¹

Background about the Australian Business Deans Council and academic standards

This response is from the Australian Business Deans Council (ABDC). The ABDC comprises member deans from 41 Australian university business schools or faculties. Together we have direct responsibility for a third of Australian university students.

The ABDC is intimately engaged in leading the academic standards agenda across business higher education in Australia. The ABDC is seeking to do this using a collaborative and robust approach. The ABDC has sourced additional funding from professional bodies for a number of related standards projects and appointed Associate Professor Mark Freeman as the ABDC Scholar to continue the work begun under the Australian Learning and Teaching Council (ALTC) *Learning and Teaching Academic Standards* (LTAS) project when he was ALTC Discipline Scholar (Business, Management and Economics).

Our work around academic standards reflects international best practice as proposed by a large group of international assessment experts.²

¹ In this response we distinguish between legislated standards (e.g. Threshold Standards) and other standards (e.g. professional standards) by capitalising the former.

² Price, M., O'Donovan, B., Rust, C. & Carroll, J (2008), 'Assessment standards: a manifesto for change', *Brookes eJournal of Learning and Teaching*, Vol.2, No. 3. (Online December 2008) Available at:

http://beilt.brookes.ac.uk/article/assessment_standards_a_manifesto_for_change

Assessment is largely dependent upon professional judgement and confidence in such judgement requires the establishment of appropriate forums for the development and sharing of standards within and between disciplinary and professional communities (Tenet 6)

Within business higher education, the development of discipline standards started with the discipline of Accounting under the LTAS project (2009-2010), progressed then to Marketing on our own initiative (2011-2012), and now Economics (2012-2013) is underway with support from an Office for Learning and Teaching (OLT) Senior National Fellowship.³ Each of these initiatives has been highly collaborative in nature, involving representatives of employers and practitioners, peak and professional bodies as well as a large range of providers.⁴

In terms of developing learning standards in other business disciplines, the Tourism, Hospitality and Events discipline is commencing the process and the ABDC will commence the development of Finance learning standards in 2013.

The assessment of learning outcomes benchmarked against the Accounting learning standards was supported first by a seeding grant from the ABDC in 2011 with matched funds from two professional accounting bodies. Further funding was sourced from the Office for Learning and Teaching (OLT) (<http://achievementmatters.com.au/>). The assessment of Marketing learning outcomes benchmarked against the relevant learning standards has been following a similar approach with initial efforts devoted to sourcing funding from related professional bodies. We believe the approach undertaken has particular merit and is of national significance because it is efficient, robust and inclusive and supports quality improvement.⁵

General comments about HESP and the review of the Higher Education Standards Framework

We wish to convey our strong support for the constructive and consultative approach undertaken by the HESP to date. Specifically we support the:

³ The OLT Senior National Fellowship was awarded to Professor Ross Guest from Griffith University.

⁴ For example, the development of Accounting learning standards engaged over 2,100 participants nationally, representing 38 Australian universities, 21 private and other providers, and 20 other key stakeholders including professional and peak bodies.

⁵ Efficient because it: relies on peer review activities appended on the annual disciplinary conference; benchmarks against previously agreed discipline standards; uses small samples; incorporates technology to automate data collection, aggregation and publication. Robust because it: mirrors accepted research processes (double blind external peer review); relies on judgements of academic peers following calibration activities involving practitioners and actual tasks and sample student work; reduces possible biases by using random (not stratified) samples of student achievement. Inclusive because it: engages 17 higher education providers including a TAFE and a private provider; seeks providers to nominate the task (but not the student work) used for evidencing achievement. Supports quality improvement because it: involves calibration and consensus reaching activities built around actual tasks and sample student work; involves participation by several reviewers from each provider; captures reviewer feedback for future reflection and action.

- Provision of multiple forms of dissemination (i.e. listserv, website and regular Communiqués) used to inform the sector about the work of the HESP.
- Broad consultation and engagement at key higher education events across the sector. We are particularly grateful for HESP participation in an ABDC sponsored event.⁶
- Structure of the approach to consultation on the Higher Education Standards Framework. It is helpful to seek feedback on two specific and important standard examples and to accompany that by a discussion paper with specific questions.

However, we do acknowledge that there are several limitations to the current consultation.

- a) Our comments may be limited by the sample provided. Other related aspects (e.g. Qualifications Standards) are not covered and this vacuum may limit the validity of our responses.
- b) There is no glossary of terms. This would have assisted in clarifying several aspects and potentially reduced our response (e.g. learning outcomes versus learning standards).

Responses to Discussion Paper questions

Question 1: Support for format of the Standards

We broadly support the proposed format of the Standards. We acknowledge that the format is clearer with overlap and duplications reduced. As well as removing some of the previous complexity, the smaller set is also simpler, therefore reducing the apparent burden. We believe the clear distinction between Standards and Reference Points is useful and will enhance clarity.

Question 2: Inclusion of Reference Points

We support the inclusion of Reference Points as proposed and defined, namely that Reference Points are not standards' statements in themselves but offer guidance to providers to consider how they achieve and demonstrate compliance with required Standards.

We support the notion that Reference Points include the standards statements developed and maintained by peak national bodies and agencies, and importantly, external to the HESP. We believe that this includes standards statements developed and maintained by professional and academic associations, disciplinary communities and deans councils, and government agencies and councils. This is consistent with the HESP having the mandate, following effective consultation with the higher education sector, to provide the Minister for Tertiary Education with advice on making or varying Higher Education Standards. While the deliberations and standards of other bodies are an important ingredient in the overall standards agenda, we believe they should remain recognised as Reference Points. As it is intended that the Standards will be legislated and compliance required to

⁶ Professor David Siddle attended the ABDC working party developing discipline learning standards in economics (15 February 2013).

be a registered Australian higher education provider, it follows that there should be no risk that these Standards can be changed by other bodies - only the HESP has that delegated responsibility for advising the Minister on making or varying Standards. If other peak bodies and agencies were specifically enshrined in the Standards through legislation, then the responsibility for making or varying Standards would be effectively outsourced to them. In the samples provided there is only one example of this apparent outsourcing, namely to the Australian Qualifications Framework Council.⁷

Second, we support the notion that only important external statements or advice should be specifically included as Reference Points. Those standards statements or advice that might be used by only a minority should be excluded as Reference Points at this time.

Finally, we note that given the less definitive nature of Reference Points, there may be a need for further clarification by the HESP over time as Reference Points become dated. Dating may occur as Reference Points are operationalised by the Tertiary Education Quality and Standards Agency (TEQSA). We draw on experience with other standards setting boards such as the Australian Accounting Standards Board (AASB) and financial reporting to illustrate the need for updating. Compliance with accounting standards is a legal requirement for publicly accountable entities in Australia and hence the accounting standards and their interpretations have legal status. However, from time to time the AASB will consider a request for an interpretation of a standard and will not issue an interpretation (which has legal status) but in so doing will provide comments as to why they believe an interpretation is unnecessary. As the legal status of such comments is unclear there is a potential for greater uncertainty for accountants. Therefore, to avoid the same uncertainty that may arise from a TEQSA comment on a Reference Point or even the lack of necessity for an interpretation of a Reference Point, we encourage the HESP to be vigilant in providing further advice to the Minister to reduce any possible uncertainty that may arise from time to time.

Question 3: Suggestions to the general format

We support the predominantly narrative style rather than a list of points.

We believe it is particularly helpful to use different numbering systems for the Standards (with Hindu-Arabic numerals) to distinguish them from Reference Points (with Roman numerals).

We have three general suggestions to the format of the Standards that we believe will assist providers and further clarify the distinction between Reference Points as indicative options rather than definitive and equivalent to Standards.

- a) In the Standards, we recommend deleting any explicit reference to a standards statement developed by another body and/or replace it with one developed by the

⁷ We propose a specific recommendation below to Standard 4 of Course Design (Coursework).

HESP. For example, in Standard 4 of Course Design (Coursework) we recommend deleting ‘and informed by the Australian Qualifications Framework.’ The HESP should then be at liberty to develop Qualifications Standards, appropriately informed by the substantial and valuable work of the Australian Qualifications Framework (AQF) Council.

- b) In Reference Points, for consistency we recommend removing the term ‘where applicable’ as they are by definition merely for guidance. For example, Reference Point (ii) and (iii) in Learning Outcomes do not apply to all disciplines but only one of these has the words ‘where applicable.’
- c) Where relevant we recommend the HESP consider using the phrase ‘field of learning’ rather than ‘field of study.’

Question 4: Support for proposed Course Design (Coursework) Standards

We broadly support the proposed Course Design (Coursework) Standards. It is most helpful to distinguish them from Course Design (Research Training) Standards and from Learning Outcomes (Coursework).

Question 5: Suggestions to Course Design (Coursework) Standards

We offer the following suggestions for improvement.

- a) Standard 3: it would be useful to insert the word ‘course’ before ‘learning outcomes’ to ensure that there is no misunderstanding of the latter as limited to unit of study learning outcomes.
- b) Standard 4: As noted previously, if Reference Points are only meant to be indicative not definitive, it is preferable to replace any explicit reference to a standards statement developed by another body. We recommend deleting ‘and informed by the Australian Qualifications Framework.’
- c) Standard 5: To reflect more common usage, we recommend the stem be replaced by ‘The curriculum of each course of study.’
- d) Standard 5a: As some relevant knowledge exists in practice (e.g. accountants need to know about the Australian Competition and Consumer Commission; Australian Taxation Office) and is beyond the academic discipline, we recommend including ‘and practice’ after ‘relevant academic disciplines.’
- e) Standard 5b and 5c: We recommend replacing ‘field of study’ with ‘field of learning.’
- f) Standard 5c: As the word ‘relevant’ precedes each type of advance, we recommend deleting ‘(where practice is applicable to the field of study)’ because it is redundant.
- g) Standard 6: We note that this mirrors Paragraph 1.9 in Chapter 3 of the Higher Education Standards Framework (Threshold Standards) Act. However, it could be interpreted that a provider is obligated to offer each course of study in multiple modes – full time, part time, fully online, blended, on campus, intensive etc. – when this may not be appropriate. We recommend the addition of a qualifier so it becomes: ‘if offered in

multiple places or modes, each course of study is designed to enable equivalent student learning outcomes to be achieved regardless of a student's place or mode of study.'

- h) Reference Point i: We recommend removing the date and begin the sentence with 'Current version of the...'

Question 6: Support for proposed Learning Outcomes (Coursework) Standards

We recognise that it is particularly helpful to distinguish these outcomes from Learning Outcomes (Research Training) Standards and Course Design (Coursework) Standards.

With one exception, we broadly support the proposed Learning Outcomes (Coursework) Standards. The exception relates to the possible confusion if there is no distinction between the learning outcomes, defined as 'what students know, understand and can do as a result of learning,' compared with that required to be awarded a qualification. In the same course, students may attain or achieve different learning outcomes. However achieved learning outcomes must meet or exceed prescribed standards to be awarded a qualification. These learning standards reflect an explicit or minimum level of attainment in defined areas of knowledge and skills. While learning outcomes may differ between students undertaking a course leading to a recognised qualification, learning standards should be the same for all students in the same course. This is consistent with the better distinction made in the DEEWR (2011) discussion paper:⁸

Learning standards are best viewed as outcome standards. Learning standards describe the nature and levels of student attainment—what students and graduates know and can do....the explicit levels of attainment required of and achieved by students and graduates, individually and collectively, in defined areas of knowledge and skills.

Such a distinction is also more consistent with the academic literature around the definition of a standard as a:

A definite level of excellence or attainment or a definite degree of any quality viewed as a prescribed object of endeavour or as the recognised measure of what is adequate for some purpose so established by authority, custom, or consensus.⁹

Levels of learning achieved beyond the standard are highly desirable but not necessary to meet the qualification requirements. Outcomes achieved well in excess of the standard may receive various merit labels from institutions. Achieved outcomes may even vary by provider niche. However, students must be required to achieve the course learning standards in order to graduate. Apart from

⁸ Department of Employment, Education and Workplace Relations (2011) "Towards a framework for teaching and learning standards in Australian higher education and the role of TEQSA" Available online: <http://www.hestandards.gov.au/sites/default/files/TeachingLearningDiscussionPaper.pdf>

⁹ Sadler, D. R. (1987) Specifying and promulgating achievement standards, *Oxford Review of Education*, 13, 191–209.

calling the latter ‘learning standards,’ there are various options for distinguishing these from learning outcomes attained. This includes: ‘threshold learning outcomes,’ ‘required learning outcomes,’ ‘benchmark learning outcomes’ or ‘learning objectives.’ We recommend this distinction and adding this and other key terms into a glossary.

Adding this distinction will reduce potential confusion. For example, Standard 8 would not need the ‘specified’ qualifier for learning outcomes if the term ‘learning standards’ had been used.

Question 7: Suggestions to Learning Outcomes (Coursework) Standards

- a) Standard 1: We recommend adding ‘documented and publicly accessible in a current version’ to the end of the draft statement. The text recommended is consistent with that in Standard 3 of Course Design (Coursework) and makes it more complete and allows Standard 5 to be removed.
- b) Standard 2: We strongly support the inclusion of international comparators. We believe this is not fully reflected in the current Australian Qualifications Framework referred to in the current Qualification Standards. A notable example of this is the move internationally to a one year MBA. Australian providers need to be able to offer MBAs in less than the two year volume of learning currently stipulated for non-cognate degrees by recognising prior learning through relevant management experience and informal learning, while still ensuring students achieve appropriate Masters level learning standards.
- c) Standard 3b and 3c: We recommend removing ‘and attributes’ to reduce redundancy.
- d) Standard 3c: We recommend adding ‘interpersonal skills and’ before ‘communication.’ Too often communication is limited to one-way written or oral communication whereas this change would recognise this wider interpretation. This is particularly important because ‘interpersonal and communication skills’ receives the highest rating from graduate employers in every category (Graduate Careers, 2013).¹⁰
- e) Standard 5: We recommend deleting this standard if the phrase ‘documented and publicly accessible in a current version’ is added to the end of draft Standard 1.
- f) Standard 6: We recommend replacing this with ‘Student achievement of all course learning standards is assessed and required for graduation.’ We believe this is simpler.
- g) Standard 7: Consistent with our feedback to Question 6 above and the need to reduce potential confusion between learning outcomes achieved and learning standards required, we recommend replacing ‘Learning outcomes for each course’ with ‘Learning standards for each course.’ Without such a change, it could be interpreted as providers needing to benchmark achieved course learning outcomes every five years which is covered in Standard 10. Also we strongly support the inclusion of ‘at least’ before ‘every

¹⁰ See Tables 7 and 8 of Graduate Outlook, 2012. Report available online http://www.graduatecareers.com.au/wp-content/uploads/2013/02/GOS12_Report_FINAL1.pdf

five years' because of the rapid increase in knowledge and the pace of change of practice may otherwise result in outdated curriculum and methods of assessment.

- h) Standard 8: To reduce confusion, we recommend replacing 'specified' with 'required' if the term 'learning standards' is not adopted.
- i) Standard 9: To reduce potential confusion (with achievements other than those resulting from learning) and internal consistency (with Standard 8) we recommend replacing 'attainment' with 'learning achieved.'
- j) Standard 10:
 - o We strongly support the notion of external referencing of student achievement of learning.
 - o Also we strongly support the notion that external referencing should be 'at least every five years' given the pace of change in knowledge and practice is likely to result in revisions to curriculum and methods of assessment. Such external referencing is needed to affirm to all stakeholders that academic standards have been maintained despite these changes.
 - o However by specifying how quality assurance is undertaken, namely at the level of a unit of study, the proposed wording of Standard 10 unnecessarily imposes the form of quality assurance. Imposing a unit-level approach may discourage innovations that focus on required course learning outcomes. We believe it should be at the provider's discretion how they may evidence student achievement of required course learning outcomes. For example, a provider may choose to evidence achievement of several required learning outcomes via an integrative capstone assessment task, where the latter is part of one or more units of study. Limiting quality assurance of a course to an individual unit of study would discourage the development of more substantial integrative or capstone assessments.
 - o Consistent with Tenet 6 referenced earlier, we are concerned that quality assurance efforts are better placed in external assessors with recognised expertise achieved through participation in consensus and calibration forums. These forums acknowledge that assessment is largely dependent upon professional judgement. Confidence in such judgement depends on forums where academic standards can be established and shared. A dependence on referencing student grades in comparable Australian courses without such forums will not, on their own, ensure the maintenance of academics standards.
 - o Taking the above comments into account we recommend therefore that a different form of words be used, along the lines of 'Student achievement of course learning standards is referenced periodically (at least every 5 years) against the professional judgement of assessors of comparable courses in other Australian institutions and whose expertise has been established through appropriate professional development such as participation in consensus forums.'

- k) Missing Standards: We believe it is important that assessment of required course learning outcomes is undertaken by appropriately qualified staff. We recognise that this may be captured elsewhere in the proposed Higher Education Standards Framework not yet released but consider it important to raise in the context of Learning Outcomes (Coursework) Standards.
- l) Reference Point (ii): We strongly support the notion that disciplinary communities collaborate to develop learning standard statements. We acknowledge the important work undertaken by and through the Office for Learning and Teaching (and its predecessor the Australian Learning and Teaching Council). We recommend replacing 'or other disciplinary or professional bodies' with 'or by other disciplinary or professional communities and bodies.' These changes recognise that not all disciplinary or professional communities and bodies and their work on standards, come under the auspices of the Office for Learning and Teaching.
- m) Reference Point (iii): We note that while both Reference Points (ii) and (iii) do not apply universally to all disciplinary communities, only Reference Point (iii) includes a qualifier. To address the inconsistency we recommend that 'where applicable' is deleted in Reference Point (iii), or alternatively added to Reference Point (ii).
- n) Missing Reference Point: In recognition of the important of the globalisation of higher education reflected also in Standard 2, we recommend an additional Reference Point be added for international comparators.

Please do not hesitate to contact me or Associate Professor Mark Freeman
([I should you](#)) wish further clarification of any aspect in this response.

Kind regards

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President, Australian Business Deans Council
(and Pro Vice-Chancellor (Business), Griffith University)