

RMIT welcomes this opportunity to comment on the Higher Education Standards Panel's draft standards for course design and learning outcomes. RMIT supports the approach of the Panel in reviewing the threshold standards in cognate blocks, but suggests that the following principles should inform this and subsequent reviews:

- Threshold standards are not guides to improvement; they reflect the base level requirements for higher education providers. Therefore standards should be proportionate to this purpose, and risk-based.
- Threshold standards should reflect outcomes, rather than inputs and processes, and avoid ambiguity wherever possible.
- Any significant changes to standards must allow time for providers to plan for change, and take account of the significant cost of reporting that universities already face. Evidence must be readily measurable, and any additional reporting or evidence gathering requirements should be justified in terms of the standard's fitness for purpose.

## **Draft standards for course design and learning outcomes**

### **Format of the draft standards**

RMIT supports the proposed format of the course design and learning outcome standards.

Unfortunately in Australian higher education the term 'course of study' is now ambiguous. While the term is used consistently in the Higher Education Standards Panel's draft standards for course design and learning outcomes to mean 'program', some readers may understand 'course' to mean 'subject' or 'unit'. Definition of key terms may assist.

The draft course design (coursework) and learning outcomes (coursework) use 'encompasses' where they probably mean 'includes'. It is important that this be clarified, as it will inform evidence tests against the standard.

### **Concept of reference points**

RMIT notes the standards panel's statement that –

The use of reference points is seen as a mechanism that gives some guidance to providers and regulators while not being prescriptive or seeking to standardise a provider's approach to meeting the standards.

RMIT supports the concept of identified reference points guiding application of the standards. In particular it supports the panel's contention that the Australian Qualifications Framework (AQF) be adopted as a reference point to 'give some guidance . . . while not being prescriptive'. The AQF is an agreed national policy framework for defining and regulating qualifications in Australian education and training. As such, it will continue to inform the development and delivery of programs and be integral to the application of the standards. However, its removal from threshold standards for registration gives both providers and TEQSA greater flexibility in interpreting its application.

It will be important that providers understand the role and use of reference points. For this reason, there should be agreement between the Panel and TEQSA on how reference points are intended to be used, and this should be clearly communicated to providers.

RMIT notes the Standards Panel's statement that –

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*.

RMIT strongly supports the statement that the Australian Qualifications Framework informs expectations for student learning, since this allows for sensible interpretation of the Australian Qualifications framework, rather than literal application.

### Learning outcomes (coursework)

Paragraph 3 provides –

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

Arguably there are some professional or applied knowledge and skills in professions such as law and nursing which are neither disciplinary nor interdisciplinary knowledge and skills. Such professional knowledge and skills would not be included in –

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

Therefore, it would be useful to consider addition of the term *knowledge and skills relevant to professional practice* (or similar) in (a) above.

In paragraphs 2 and 10 the panel uses 'comparable' in a way that is consistent with much writing about higher education standards. However, the panel (and other writers) surely means 'similar' rather than capable of being compared.

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.

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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.

Also in relation to Par. 10, the standard seems to require periodic benchmarking. Has the Panel considered how providers will be required to undertake this activity and whether appropriate information is available across the sector?

RMIT would be happy to provide any further information. RMIT looks forward to the outcomes of this consultation and to the opportunity to contribute to further consultations.