



11 April 2013

Higher Education Standards Panel Executive
Melbourne VIC 3001

To whom it may concern

Australian Pharmacy Council

Draft Standards for Course Design and Learning Outcomes
Consultation Response April 2013

Call for Comments:

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?

The APC supports the proposed format of the standards.

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

The inclusion of Reference Points currently proposed within the standards appears to confuse the issue of potential evidence versus complementary codes or guidelines. Where the evidence evaluated by a peak body or professional accreditation organisation may be used to evidence compliance with the HE Standards, the Reference Points appear to offer little guidance as to what TEQSA would consider appropriate or sufficient. With the exception of the standard *Learning Outcome (Coursework) point ii*, the Reference Points appear to require the education provider to cross reference professional accreditation requirements and TEQSA requirements and supply suitable evidence based on that analysis. Given that there has been, to date, minimal harmonisation of standards for higher education requirements and professional accreditation requirements, this could provide a discrepancy in the quality of evidence provided to TEQSA.

A more practical solution would be to provide Evidence Examples which would be suitable to TEQSA, and allow higher education providers to streamline evidence where TEQSA requirements and professional accreditation requirements intersect.



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

As above, implementation of the proposed standards would be supported by the inclusion of Evidence Examples, rather than Reference Points.

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?*

The APC broadly supports the proposed standards for Course Design.

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

The APC wishes to propose that Standard 3 include a requirement for Course Design to encompass any professional accreditation requirements for that course, as professional requirements are often compulsory for the course design and student progression.

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?*

The APC broadly supports the proposed standard for Learning Outcomes (Coursework).

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

The APC wishes to propose an amendment to Standard 3 with the addition of *a point e: any professional accreditation requirement*.

We look forward to hearing the results of the submissions. Please do not hesitate to contact me if you require further information or clarification.

Kind regards

Bronwyn Clark
Chief Executive Officer