

## UTS submission to

### Higher Education Standards Panel Call for Comment Number 1, March 2013

UTS appreciates the opportunity to respond to the Higher Education Standards Panel Call for Comment Number 1, March 2013.

Broadly, UTS supports the approach to the revision of the standards and the work conducted to date by the Panel.

The single most difficult aspect of the proposed standards appears to be how the current Australian Qualifications Framework (AQF) is reflected in the standards while not a strict compliance requirement (on the assumption that its status as a Reference Point changes its regulatory compliance status).

UTS supports the recognition of a number of reference documents as contributory to the development and operation of courses without giving single regulatory weight to the AQF. However, making this transition is challenging given the fundamental role the AQF has played in the Australian context.

UTS urges clarity around the compliance status of the AQF to ensure that providers and TEQSA are able to interpret the standards consistently. UTS would not wish to see the AQF largely ignored by the sector but appreciates the flexibility for other Reference Points to contribute to the quality of qualifications.

A number of detailed comments are made below.

#### ***Proposed Format for the Revised Standards***

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

Yes.

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

Yes. However, the status of Reference Points in terms of compliance needs to be very clear for providers and TEQSA.

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

As for Q2.

### **Course Design (Coursework)**

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

UTS broadly supports the proposed Course Design (Coursework) standards.

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

*Standards 1 and 2:* These standards should refer to processes for “assuring the quality of the design...” only, not the design process itself. The course design process itself occurs in a wide variety of ways and central control of that process would not add any value to the outcome. Setting processes for assuring the quality of the design process outcome is appropriate.

*Standard 4:* The meaning of “consistent with” and “informed by” is not clear in relation to the Australian Qualifications Framework (AQF). If AQF compliance is required then that should be stated. If it is to be only a reference point (as it is listed) and compliance is not required this should be made clear.

*Standard 5:* This standard does not refer to the Learning Outcomes standards requirements, particularly Learning Outcomes (Coursework) standard 3 which impacts upon content by the inclusion of generic skills and attributes in particular. Course Design standard 5 and Learning Outcomes standard 3 in particular need to have a level of consistency.

*Standard 6:* UTS’s view is that there are valid reasons for having different learning outcomes, perhaps in their weighting at least, across course delivery types. It would be expected that a course conducted in work-based learning mode or with a significant component of exchange would validly deliver somewhat different learning outcomes. It appears that the intent of this standard is to ensure no students are disadvantaged, compared to other of the provider’s students, by the delivery mode of the course. UTS would prefer the standard to be worded in this way.

If this standard proceeds as worded it should be made clear that it refers to courses at a single provider, not that equivalence of learning outcomes is required across all providers.

### **Learning Outcomes (Coursework)**

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

UTS broadly supports the proposed Learning Outcomes (Coursework) standards.

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

*Standard 2:* UTS proposes that the second and third lines of this standard be omitted, that is, that the standard be “The learning outcomes for each course of study are consistent with the qualification awarded.” Even in this shortened form, there is an inferred reference to the AQF which needs to be clarified. The only document which fully describes the characteristics of the “qualification awarded” is the AQF. In application, if this means compliance with the AQF it needs to be clearly stated.

If taken literally, the proposed requirement to make learning outcomes comparable across all similar Australian (and perhaps international) courses will be largely unworkable, stifle innovation and restrict valid variation. For some courses, no doubt, learning outcomes are likely to be quite similar, particularly when externally accredited or professionally recognised. For a very large number of courses this would not be true. It would be unimaginable to have essentially a single set of learning outcomes for a Bachelor of Arts for example. If this section is meant to encourage alignment with the reference points then such clarification should be made.

The requirement for every course's learning outcomes to be informed by international comparators is unworkable; creating an enormous compliance burden on providers with very little evidence of major advantage to students studying in Australia. It is highly likely that providers will undertake benchmarking but for the standards to be so prescriptive is not useful.

*Standard 3:* From a compliance perspective the use of "informed by" is open to wide interpretation. The relationship of the AQF and this standard is again a key issue as the standard creates some but not full duplication of the current AQF requirements. Also see comments under Course Design standard 5.

As a minor point, the use of "mastery" in 3a suggests comprehensive knowledge and skills that will actually be at quite different levels for different qualifications.

*Standard 4:* We believe the wording of this standard could better reflect its intent (as we understand it); perhaps, "The learning outcomes of the units that constitute the course of study must combine to fully reflect the learning outcomes of the course."

*Standard 6:* If we understand the intent of this standard correctly, it may be better to state "Assessment, taken across all the component elements of the course, must assess all learning outcomes of the course."

*Standard 7:* We would suggest omitting "...are consistent with the types of learning outcomes being assessed..." as requiring the validity and reliability of the methods of assessment is sufficient.

*Standard 10:* UTS's view is that this standard will be impractical. There is a multitude of reasons why grading outcomes are different across providers. A simple comparative exercise will provide nothing useful in terms of whether an individual provider is teaching or marking appropriately. Moderation methods that include consideration of students' work and marking outcomes is appropriate but the proposed standard is too prescriptive in terms of process and does not provide any real value to providers in determining the quality of outcomes.

### **Provider's Contact Officer**

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