

**Draft Standards for Course Design and Learning Outcomes – Consultation  
University of the Sunshine Coast Submission April 2013**

We welcome the opportunity to comment on the proposed format and content of the draft standards being developed by the Higher Education Standards Panel as part of their review of the current Threshold Standards. The University of the Sunshine Coast's responses to the consultation questions are set out in the table below, which is preceded by some general comments on the proposed approach to the draft standards.

The University believes that several of the standards may be open to subjective interpretation, with the possibility of some interpretations made by providers or TEQSA being contested:

- There seems to be need for greater clarity of meaning in several standards; for example, the meaning or intent of statements such as “informed by the Australian Qualifications Framework” and “informed by international comparators”.
- There may also be need for the terminology used in both sets of draft standards to be sensitive to the distinction between successful completion of the learning outcomes as specified for a course and the learning outcomes achieved by individual students, that is the difference between ‘skills acquired’ and learning outcomes.

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?

No. While understanding that some providers might find the inclusion of reference points in the standards documents useful, we are concerned that it would not be a responsibility of the HESP to ensure that these would be updated as changes were made to them by the relevant bodies. Also, TEQSA currently provide an application guide to accompany applications for registration and re-registration. These guides, which are updated by TEQSA, detail the required evidence and suggested evidence for demonstrating that a provider meets a particular standard. This documentation would appear to provide sufficient reference points.

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

While supporting the proposed format, in that it is definitely clearer and easier to use, we would suggest that in the final format of the standards that it would be useful to have an explanatory statement or rationale at the beginning of each cognate area of what the standards are meant to assure and achieve.

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

Q5. Do you wish to make any suggestions in relation to the specific content of the standards?  
Yes. See Attachment A.

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

Q7. Do you wish to make any suggestions in relation to the specific content of the standards?  
Yes. See Attachment B.

No.	Proposed Standard	Comment
1	The provider utilises defined processes for designing and assuring the quality of the design of each course of study and the qualifications to which it leads.	<p>There is potential for confusion arising from the conflation of course design and assuring the quality of that course design on the one hand and, on the other, the design and quality assurance of qualifications. Ensuring the quality of qualifications would appear to be covered by standard 4. For this reason we suggest the following:</p> <p><i>The provider has developed and utilises defined policies and processes for course design that include mechanisms for assuring the quality of course design.</i></p> <p>This standard may be better placed as standard 2. The requirements for the current standard 2 need to be in place before the requirements for this one can be met.</p>
2	Processes for course design are approved and overseen by the provider's peak academic governing body.	<p>The following wording is suggested to strengthen the relationship between course design and academic governance.</p> <p><i>Policies and processes for course design are approved and monitored by the provider's peak academic governing body.</i></p> <p>As mentioned above this would perhaps sit better as standard 1.</p>
3	Course design encompasses the rationale for the course of study, course structure, modes of delivery, learning outcomes, methods of assessment, entry requirements and pathways, programmed student workload, articulation arrangements, exit pathways, pathways to further study and any compulsory requirements for completion and that these features of all courses of study are documented and publically accessible in a current version.	This would sit better as standard 4.
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 <i>Australian Qualifications Framework</i> .	<p>'Nature' does not seem to capture an appropriate meaning in this standard. We would suggest:</p> <p><i>The 'level' or 'type' and scope...</i></p> <p>Following on from our comment above to remove 'qualifications' from standard 1, we would move this to standard 3.</p>
5	The content of each course of study: a. is drawn from current knowledge and scholarship in relevant academic disciplines b. includes study of the underlying theoretical and conceptual frameworks of	<p>The move to combine two current course accreditation standards (S1.3 and S1.4) into one leads to some repetition within the standard. To overcome this, we suggest:</p> <p><i>a. is drawn from current knowledge, scholarship and research in relevant</i></p>

	the academic disciplines and the field of study, and c. encompasses relevant emerging concepts that are informed by recent scholarship, current research findings and advances in practice (where practice is applicable to the field of study).	<i>academic disciplines, and recent advances in practice (where practice is applicable to the field of study), and b. includes study of the underlying theoretical and conceptual frameworks of the academic disciplines and the field of study.</i>
6	Each course of study is designed to enable equivalent student learning outcomes regardless of a student's place or mode of study.	In relation to course design, the only meaning that USC can attach to "equivalent" learning outcomes is "the same" learning outcomes. We suggest replacing "equivalent" with "the same".
7	The peak academic governing body of the provider oversees periodic (at least every 5 years) review and improvement of the design of each course of study.	No comment.

No.	Proposed Standard	Comment
1	The learning outcomes to be achieved on completion of a course of study are specified for each course of study.	No comment.
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.	There appears to be a repetition of the intent of the standard, and so we suggest removing 'consistent with the qualification awarded'. This would make the preferred wording: <i>The learning outcomes for each course of study 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.</i>
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 b. the generic skills and attributes required of graduates c. the application of generic skills and attributes in the context of the field of study including the communication skills required, and d. the requirements of employment related to the field of study.	This standard could be open to contestable interpretations (refer to general comments made earlier). Also, references to graduate attributes appear to be repetitive and to include unnecessary detail. We suggest rewording this as: <i>The learning outcomes for each course of study are informed by: a. the specific disciplinary and/or interdisciplinary knowledge and skills that characterise the field of study and level of qualification b. generic skills and attributes, and their demonstration by application in the context of the field of study, and c. any requirements of employment related to the field of study.</i>
4	The relationship between the overall learning outcomes for each course of study and the learning outcomes for units that contribute to the course of study is demonstrable.	The word 'overall' appears to be unnecessary.
5	The specified learning outcomes for each course of study are available to the staff and students who are involved and are publically accessible in a current version.	No comment.
6	The assessment of student learning, whether at unit level, course level, or in combination, encompasses all specified learning outcomes for each course of study.	No comment.
7	Learning outcomes for each course of study and the methods for assessment of those outcomes are informed by periodic reviews (at least every 5 years), which take account of external reference points that are relevant to the course of study.	No comment.

8	Methods of assessment are consistent with the types of learning outcomes being assessed and are capable of validly and reliably confirming that specified learning outcomes are achieved.	No comment.
9	The grades awarded to students reflect the level of their attainment.	No comment.
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.	No comment.