Dear Professor Robson,

Re: Draft Standards for Course Design (Coursework) and Learning Outcomes (Coursework)

I write in response to the call for comment on proposed revisions to the current Higher Education Standards Framework Threshold Standards: Draft Standards for Course Design and Learning Outcomes, published on the Higher Education Standards Panel (HESP) website on 5 March.

The University of Adelaide supports the approach taken with the proposed revisions to the draft standards. We also endorse the Group of Eight's response to the draft standards. Please find our response to the specific questions in the discussion paper below.

Proposed format

Q1. Do you broadly support the proposed format for the standards? If not, why?
The University of Adelaide commends the presentation of the Course Design and Learning Outcomes as single pages which form a coherent whole. This presentation is an improvement both in terms of the simplicity and coherence of the standards.

Q2. Do you support the inclusion of Reference Points as proposed? If not, why?
Yes, the inclusion of Reference Points provides context to the standards whilst recognising that Higher Education Providers could elect not to use them if there was a cogent case not to do so.

Course Design (Coursework)

Q4. Do you broadly support the proposed standards for Course Design? If not, why?
The University of Adelaide 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 meaning of "programmed student workload" in Standard 3 is unclear and this could be clarified.

Reference to the Australian Qualification Framework (AQF) is included in both the standards and as a Reference Point. This seems an unnecessary duplication which has the potential to cause confusion about the status of the AQF. It would be preferable to only have the AQF as a Reference...
Point which will necessitate rewriting Standard 4. In addition, it is suggested in Standard 4 that the wording "expectations for student learning" be replaced by "stated learning outcomes" as the former leaves doubt as to whose expectations will be met; students, the University, TEQSA, AQF or all stakeholders.

The addition of Standard 7 is supported by the University of Adelaide as it provides clarity on responsibility and timeframes related to periodic review.

Learning Outcomes (Coursework)

Q6. Do you broadly support the proposed standards for Learning Outcomes? If not, why? The University of Adelaide broadly supports the proposed standards for Learning Outcomes.

Q7. Do you wish to make any suggestions in relation to the specific content of the standards? Consideration should be given to including Reference Points for English Language Proficiency and Academic Literacy Skills that can assist with the interpretation of the "communication skills required" included in Standard 3c.

It is unclear in Standard 4 if curriculum mapping is implied by the requirement to demonstrate a relationship between the course learning outcomes and those of the units.

From the current wording in Standard 6 it is unclear whether the assessment of student learning can be determined at either the unit level or the course level or has to be demonstrated at both levels. It should be noted that not all units will include all of the learning outcomes of the course of study. In practice units can be taken as part of different courses of study and this needs to be taken into account.

For Standard 8, it is unclear whether there is scope for moderation (either internal or external) in relation to methods of assessment. The University of Adelaide proposes there is a need for this consideration given the strong linkage with academic integrity.

Furthermore, it is unclear what the intention of Standard 9 is. It could be interpreted in quite a simplistic way as testing that the level of attainment was accurately reflected by the grade or alternatively testing the comparability of grades across the institution. As not all providers will have the opportunity to test the comparability of grades across disciplines in the institution, it would be fair to assume that the first interpretation is intended, but this should be clarified.

The University of Adelaide strongly supports the direction the HESP is taking with the revised standards and we look forward to continued input to ensure that the revised Threshold Standards are more effective, easier to understand and fitter for purpose.

Yours sincerely

PROFESSOR PASCALE QUESTER
Deputy Vice-Chancellor and Vice-President (Academic)