University of Melbourne Feedback on Higher Education Standards Panel (HESP) Draft Standards

Overview

Many thanks to the Panel for the opportunity to comment on these Draft Standards for Learning Outcomes and Course Design, which we see as a vast improvement on the existing standards covering these two domains of higher education. The clarity of these Draft Standards means that we have only minor suggestions for further improvement.

Our two key points of feedback are that:

- We think some further reduction in the number of standards is possible and desirable without loss of effectiveness.

- We value the introduction of Reference Points, but we suggest that the status of Reference Points could and should be clarified further. This clarification could take several different forms, for instance:
  - It could be made clear that the Panel has not endorsed any specific Reference Points and that Reference Points are provided as “codes or frameworks that may be of relevance to providers in considering how they achieve and demonstrate compliance with required standards but are not themselves sets of standards”; or
  - The Panel could undertake a process of consultation and review in order to develop and maintain a list of approved Reference Points.

We do not have a strong view on how this should be resolved, but we are concerned that the current list of Reference Points is vague and can be seen as referring to statements that may not yet exist and that need not go through any review process apart from adoption by some unspecified “disciplinary or professional” body.

Responses to formal consultation questions

Q1: Yes, though we think they could be fewer in number as proposed in detailed comments below.
Q2: Yes, with the additional clarification noted above (and please also see the comments below).
Q3: No.
Q4: Yes, though we think they could be fewer in number as proposed in detailed comments below.
Q5: Please see detailed comments below.
Q6: Yes, though we think they could be fewer in number as proposed in detailed comments below.
Q7: Please see detailed comments below.

Detailed comments on Draft Standards for Learning Outcomes (Coursework)

Standard 1: We suggest that this is revised to include reference to “units” of study as well:
“The learning outcomes to be achieved on completion of a course or unit of study are specified for that course or unit.”

Standard 2: The standard currently reflects three ideas:
- Consistent with the qualification awarded (implicit reference to the qualification standards and applicable Reference Points such as the AQF)
- Comparable with learning outcomes for courses of study leading to the same or similar qualification (this is ambiguous given the two meanings of ‘comparable’: ‘capable of comparison’ or ‘similar’. The latter is presumably intended but suggests a need for homogeneity, and is therefore not necessarily appropriate to a set of standards)
Informed by international comparators.

We suggest:

“The learning outcomes for each course of study are consistent with the qualification awarded, and are informed by national and international comparators”

because:

- It retains the idea of some minimum requirements through implicit reference to the qualification standards and applicable Reference Points such as AQF.
- It recognises the importance of both national and international comparators, which is important for a future in which university and professional accreditation will increasingly need to be recognised across national borders.

**Standard 3:** We suggest:

- 3a reads: “specific disciplinary and/or interdisciplinary knowledge and skills that characterise the domain of study”
- 3c refers to “the application of knowledge and skills – including communication skills” since this includes disciplinary and interdisciplinary knowledge and skills as well as generic skills because:
  - This makes 3a consistent with 3b-3d
  - “domain” is broader than “field” and therefore more appropriate for general courses of study (e.g. BA, BSc, BCom)
  - Application of disciplinary and/or interdisciplinary knowledge and skills is also important.

The result would be:

“The learning outcomes for each course of study are informed by:

a. Specific disciplinary and/or interdisciplinary knowledge and skills that characterise the domain of study
b. The generic skills and attributes required of graduates
c. The application of knowledge and skills – including communication skills – in the context of the domain of study
d. The requirements of employment related to the domain of study.”

**Standard 4:** We question the need for this, as we see it as one of several possible ways of contributing to the demonstration of the acquisition of course level learning outcomes. We suggest deleting this and revising standard 6 as proposed below.

**Standard 5:** We suggest:

“The specified learning outcomes for each course of study are publically accessible” since this covers staff and students and can be understood as referring to the current version of the course.

**Standard 6:** We suggest:

“The assessment of student learning, whether at the level of unit or course of study, encompasses the specified learning objectives for that unit or course of study.”

This avoids the suggestion that all course-level learning outcomes need to be assessed for each unit of study (which we see as implausible).

**Standard 7:** While this is important and appropriate, we see it as covered by the broader requirement for review of course design (which includes learning outcomes) specified in the current Course Design Standard 7. We therefore suggest deleting this standard.

**Standard 8:** We see this as important and appropriate.
Standard 9: We see this as appropriate.

Standard 10: Although we have had some feedback that this is too unclear to be useful, we believe it is important to make some reference to grading comparisons external to a provider. Perhaps the following would be clearer:

“The higher education provider can demonstrate the reliability of the grading of students’ achievement of learning outcomes through periodic (at least every five years) external review for selected units of study”.

Reference points: While learning outcomes statements developed by OLT discipline communities and other disciplinary and professional bodies are clearly of significant value, we do not believe that a legislative instrument should refer to current – and importantly, future – statements of learning outcomes that have not been subject to a careful and broadly consultative process, including formal scrutiny and recognition by the HESP itself. We therefore suggest either (a) clarifying the unendorsed status of Reference Points; or (b) establishing a process for endorsing specific Reference Points. We think this is important because there is otherwise nothing to prevent a professional or other body from developing and applying a set of educationally questionable set of statements and appealing to the standards as a judgment by HESP that the statements are “significant codes or frameworks” relevant to compliance with the standards. If HESP determines that a formal process of recognition is important, it may be helpful to develop a set of Reference Point principles against which any proposed set could be tested. [In this case, the work done by the Go8 on principles for accreditation as well as that of the UA Working Group on Accreditation would likely be useful.]

Detailed comments on Draft Standards for Course Design (Coursework) Standards

We suggest a preamble setting out what is meant by course design, for example:

“In these standards, course design refers to: the rationale for the course of study; course structure; models of delivery; learning outcomes; methods of assessment; entry requirements and pathways; articulation arrangements; exit pathways and pathways to further study; student workload; and any requirements for completion.”

Standards 1 and 2: We think standards 1 and 2 can be combined and simplified. In addition, since ‘academic board’ is referred to elsewhere in the standards, it could be referred to here. We suggest:

“The provider has a process for assuring the quality of the design of each course of study that is overseen by the provider’s academic board”

Standard 3: With the preamble, this could be simplified to:

“The design of each course of study is publicly accessible”.

Standard 4: We see this as redundant with Learning Outcomes Standard 2, and suggest that it be deleted.

Standard 5: We see this as important and appropriate, though we suggest referring to “domain” rather than “field” of study.

Standard 6: We see this as redundant given the Learning Outcomes standards, since any course must be able to demonstrate the achievement of learning outcomes by all students (regardless of mode of study). We suggest that it be deleted.

Standard 7: We suggest referring here to “academic board” as well:
“The provider’s academic board oversees periodic (at least every five years) review and improvement of the design of each course of study.”

Reference points: Please see earlier comments.

Appendix

If all of these suggestions were adopted, the proposed standards would read:

Learning Outcomes (Coursework)
1. The learning outcomes to be achieved on completion of a course or unit of study are specified for that course or unit.
2. The learning outcomes for each course of study are consistent with the qualification awarded, and are informed by national and international comparators.
3. The learning outcomes for each course of study are informed by:
   a. Specific disciplinary and/or interdisciplinary knowledge and skills that characterise the domain of study;
   b. The generic skills and attributes required of graduates;
   c. The application of knowledge and skills – including communication skills – in the context of the domain of study;
   d. The requirements of employment related to the domain of study.
4. The specified learning outcomes for each course of study are publically accessible.
5. The assessment of student learning, whether at the level of unit or course of study, encompasses the specified learning objectives for that unit or course of study.
6. 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.
7. The grades awarded to students reflect their level of attainment.
8. The higher education provider can demonstrate the reliability of the grading of students’ achievement of learning outcomes through periodic (at least every five years) external review for selected units of study.

Course Design (Coursework)
In these standards, course design refers to: the rationale for the course of study; course structure; models of delivery; learning outcomes; methods of assessment; entry requirements and pathways; articulation arrangements; exit pathways and pathways to further study; student workload; and any requirements for completion.
1. The provider has a process for assuring the quality of the design of each course of study that is overseen by the provider’s academic board.
2. The design of each course of study is publically accessible.
3. 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 the academic disciplines and the domain of study;
   c. Encompasses relevant emerging concepts that are informed by recent scholarship, current research findings and advances in practice (where practice is applicable to the domain of study).
4. The provider’s academic board oversees periodic (at least every five years) review and improvement of the design of each course of study.