

# Higher Education Standards Panel

Call for Comment No 1 by 16 April 2013

## Draft Standards for Course Design and Learning Outcomes

Submitted by Adelle Evans, Director Chartered Accountants Program on behalf of the Institute of Chartered Accountants Australia (TEQSA Higher Education Provider ID: 12024)

Thank you for the opportunity to provide comments on proposed revisions to the current higher education Threshold Standards. Set out below are our responses to the questions outlined in the Call for Comment No 1.

### ***Proposed Format***

#### **1. Do you broadly support the proposed format for the standards?**

Yes, we broadly support the proposed format for the higher education standards. In particular, we support the simple, relatively consistent format for all topic areas and the use of labels for all points for ease of reference.

However, as noted below, we feel there is still an element of repetition across the two proposed standards. And whilst we recognise that this may not be entirely avoidable given the difficulty of capturing all relevant aspects of higher education in a comprehensive organising structure, we support minimal repetition. Minimal repetition will not only produce clear, simple standards, it will also reduce the work involved in maintaining the standards and reducing the risk of error or misalignment where changes are made in the future.

#### **2. Do you support the inclusion of Reference Points as proposed?**

Yes, we support the inclusion of reference points. We believe these points can provide useful guidance in interpreting and achieving the standards.

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

In respect to reference points, we suggest the inclusion of further details regarding the source of reference, for example, a website url or short example or explanation would provide additional assistance and clarification regarding the reference.

We note that in some cases the reference points will be specific frameworks or similar, developed and maintained by peak national bodies, as indicated in the Discussion Paper preceding the proposed Standards. In these cases, a reference to the organisation and/or a website would be sufficient.

However, at times the reference may be more general, for example in the proposed Learning Outcomes (Coursework) Standards, reference point (iii) relates to 'professional accreditation'. An example, or a brief explanation in these cases would provide more assistance.

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

#### **4. Do you broadly support the proposed standards for Course Design?**

Yes, we broadly support the proposed standards regarding course design.

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

No, we have no suggestions in relation to specific content of this proposed standard.

### ***Learning Outcomes***

#### **6. Do you broadly support the proposed standards for Learning Outcomes?**

Yes, we broadly support the proposed standards in relation to learning outcomes (and the inclusion of their assessment).

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

Although we do not entirely agree with the separation of learning outcomes from course design, we acknowledge the rationale provided in the Discussion Paper. However, when these areas are addressed separately it is difficult to avoid overlap due to the significant interrelatedness of the two. And we note some repetition of standards that has resulted for this reason and suggest considering some small adjustments to the proposed standards accordingly.

Based on the proposed organising framework (Communiqué No. 4) it would appear as though the standards for course design in this context relate to the process of designing a course (HE function), whilst the substance of the course is largely covered in the proposed Learning Outcomes standards (in relation to the student/educational experience). On this analysis, we note the following areas of overlap in the two proposed standards and suggested adjustments:

- a. Public access – Standard 5 repeats the need to make learning outcomes, “publically accessible in a current version”. This is covered in the course design standard 3, and we suggest more appropriately in terms of HE functions (process) rather than education experience although it impacts both. Accordingly, we suggest deleting this requirement from Learning outcomes standard 5.
  
- b. Periodic review - Standard 7 in both the Learning Outcome and Course Design standards refer to the need for periodic review. We suggest there is no need to repeat this point. Additionally, we suggest it is most appropriate in the course design standards for the reasons noted in (a) above. Accordingly, we suggest removing Learning Outcome Standard 7.