TAFE NSW Higher Education Submission to:

The Higher Education Panel’s Call for Comment Number 1 Discussion Paper - March 2013 –
Draft Standards for Course Design and Learning Outcomes
**Draft Standards for Course Design and Learning Outcomes**  
Call for Comment (Number 1, March 2013)

Feedback on the proposed format (e.g. style, clarity, pitch) for the revised standards (including the use of reference points), as represented by the two standards examples given, is invited by the Panel. It would be helpful if feedback could be framed around the following questions:

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

Yes. TAFE NSW welcomes the proposed improvement to the framework for the standards, most notably in the area of format, style, eliminating duplication and clarity of required evidence. This will achieve greater understanding of the requirements by providers.

TAFE NSW endorses the approach of organising the standards “around the features of providers and what they do” and catering to a “diversity” of providers and a “variety in modes of delivery”.

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

TAFE NSW supports the inclusion of Reference Points to support and guide providers.

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

**Suggestions for the format of the standards:**

1. A glossary of definitions should be included to ensure consistent interpretation of terms. The TEQSA definition for *Course of Study*, for example is not clear, and Higher Education providers are inconsistent in their application of terms. For example, *Course of Study* – is this a *qualification* or is it a *unit of study*? The response to question 7 further elaborates this issue.

2. Although HESP is aiming for a predominantly narrative style, dot points could be used to enhance the readability when a number of points are provided. For example, *Course Design (Coursework)* Point 3.

**Suggestions on the Organising Framework:**

1. Enablers – replace ‘ detection of student at risk’ with ‘identification of student at risk’.

**Overall recommendation:**

The National Skills Standards Council is in the process of revising the standards for the Vocational Education and Training (VET) Sector. It is recommended that, where a similar standard exists in both the VET and Higher Education sectors, there should be an attempt to align terminology and intent.
Q4. Do you broadly support the proposed standards for Course design? If not, why?

Yes, the proposed Course Design standards are broadly supported.

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

Suggestions:

1. If TEQSA’s English language proficiency requirements are to be maintained then this should be through incorporation into the Course Design (Coursework) standard. TAFE NSW would like to see a Reference Point(s) to support evidence gathering.

2. Standard 4 – Replace ‘informed by the Australian Qualifications Framework’ with ‘consistent with the descriptors for qualification levels in Australian Qualifications Framework, particularly the Knowledge, Skills, and Application of knowledge and skills’.

3. Standard 6. – Reword to the following: ‘Each course of study is designed so that the learning outcomes can consistently be applied, regardless of the delivery mode or site.’

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

TAFE NSW broadly supports the proposed standards for Learning Outcomes.

However, greater clarity of definition / conceptualisation of the terms is required. See comments below, and in response above to Question 3.

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

Suggestions:

1. TEQSA’s English language proficiency requirements should be incorporated into Learning Outcomes (Coursework) standard.

2. It is suggested that explicit mention is included of benchmarking and moderation processes or requirements.

3. Standard 2: suggest rework so that the learning outcomes are ‘comparable in content, level, length and focus with those for courses of study that ……’. It should also include mention of the same AQF descriptors.

4. Standard 3 d. – suggested rewording: ‘the requirements of employment for the related field of study’.
5. **Standard 5** – suggest that the standard includes that learning outcomes should be provided upfront.

6. **Standard 6** – suggest reword ‘encompass’ to ‘accurately assess’, and also that the assessment requirements are provided to the student upfront.

7. **Standard 8** – suggest assessments ‘….are capable of validly, reliably and fairly confirming….’

8. **Standard 9** – grading should also be transparent and clear to the students and teachers/lecturers.

9. **Standard 10** – suggest explicit mention of ongoing validation and quality improvement processes would enhance this standard. It should also ensure that that grading in consistent across delivery locations of the provider.

10. Clarification of key terms in required across standards:

    **Standard 1**: The learning outcomes to be achieved on completion of a course of study are specified for each course of study.

    Are “learning outcomes” at the qualification / course level replacing “graduate attributes” as the new terminology? (Refer Course Design Standards 3 & 6)

    TAFE NSW would like to see clarity around how the term “learning outcomes” is conceptualised and used at the qualification, course, subject and/or unit level, and in discourse about assessment. Given the diversity of HEPs, some use “course” to mean “qualification”; others use “course” to mean “subject”, or “subject” to mean “unit” and vice versa – see below standard 4 for example.

    **Standard 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.

    We would like to see a consistent approach across documentation as to what to the use of the terms “unit” or “unit of study” refers to specifically.

    **Standard 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.

    **Standard 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.