

Universities Australia Submission to Higher Education Standards Panel Call for Comment on Draft Standards for Course Design and Learning Outcomes

22 April 2013

Universities Australia (UA) thanks the Higher Education Standards Panel (HESP) for the opportunity to comment on the first two sets of draft Threshold Standards (on Course Design and Learning Outcomes). This submission has been approved by our Standing Group on Quality and Regulation. This submission is broken into three sections, on the overall structure and format of the draft Standards, and on the two distinct sets of standards provided.

HESP's Call for Comment indicated that the intention is for the draft Standards to be released in blocks of standards in cognate areas. In principle this is supported. However, we have noted several times in this submission to the absence at this point of any indication about the HESP's plans vis-à-vis the Australian Qualifications Framework and the revised "Qualification Standards". In our view this is unfortunate since they both very clearly impact on course design and learning outcomes.

If it is possible, UA suggests that HESP release its overall "roadmap" of what it expects the complete revised Standards to cover, and the interactions they will have. This would assist the sector in responding to each block of cognate standards as they are released.

Format of the Draft Standards

Questions asked by HESP:

1. Do you broadly support the proposed format for the standards? If not, why?
2. Do you support the inclusion of Reference Points as proposed? If not, why?
3. Do you wish to make any suggestions in relation to the format of the standards?

Universities Australia wishes to make the following comments to answer these questions.

Organising Framework

HESP proposes to organise the overall set of Standards in a framework that is broken down into nine distinct areas (Entity, Representation, HE Functions etc.).

UA agrees that a framework is necessary to ensure that duplication and repetition is kept to a minimum or eliminated entirely. However, the proposed framework will certainly encounter areas of university operation that could easily fall into two or more areas of the framework. Given the interconnectedness of university operations this problem will be encountered regardless of the precise form the framework takes. While the structure of the Standards is of less overall importance than their content, a clear structure will facilitate their use both by institutions and the regulator. UA suggests that the HESP develop and distribute a set of protocols that will be used to determine how to catalogue the Standards in cases of multiple possibilities. It may be useful for the final, complete set of Standards to include an index and (for digital versions) hyperlinks. HESP may also wish to investigate whether there is any common thread in

internal institutional reporting channels. If so, there may be efficiencies to be gained by cataloguing the Standards by their expected reporting processes.

UA strongly recommends that, to avoid confusion, each individual standard will only feature once in the complete set, and that all efforts are made to avoid including multiple standards that themselves overlap and could be combined (for examples of this, see below). HESP should endeavour to ensure that the revised set of Standards is smaller than the transitional set.

UA approves of the use of taxonomic headings suggested by HESP.

Format

UA notes that HESP has deliberately chosen a narrative style for the draft standards rather than a set of points. While this format allows for more information and detail to be included within a standard, HESP must be very careful that the standards are written in a precise way that allows for no ambiguity of message or intent. See our comments on Learning Outcomes Standard 7 for an example of what could be seen as ambiguity.

It would be most unfortunate if HESP were required to release a series of corrections, explanations or clarifications once the Standards are in full operation and regulated by the Tertiary Education Quality and Standards Agency.

We wish to emphasise, however, that some slight ambiguity in form is far preferable than a completely inflexible and prescriptive list of demands. It is appreciated that this balance will be hard to achieve, and we are certainly happy to provide any assistance to HESP in this area.

Reference Points

The concept of reference points is a useful one. They will serve to guide institutions' adherence to the Standards without tying them down to specific paths of activity.

However, the Standards must be careful to ensure that the Reference Points are not actually referred to within the Standards themselves (as with the AQF's reference in the draft Course Design Standards). We note the current definition used by HESP notes that *Reference Points are not themselves Higher Education Standards*, and so should not appear within them. In cases where they could do so, HESP must decide whether the item in question is essential or merely an indicative exemplar, and give the item the status of either Reference Point or Standard. Again, the issue is one of avoiding ambiguity of message or intent.

The use of Reference Points must also be future-proofed. That is, the Reference Points should not be allowed to ossify and become immovable benchmarks still in use even if they become superseded by other material or practice. Notice should be taken of university processes and these included as Reference Points where appropriate. For instance, the Learning Outcome standards feature no reference point of inter-institutional peer review or benchmarking, which is becoming increasingly common.

HESP may wish to consider whether it wants to make the Reference Points a formal "HESP-approved" list, or define them more loosely as a list of indicative guides that providers are free to use or ignore, or add others to as they find appropriate for their operations.

Draft Standards on Course Design

Questions asked by HESP:

4. Do you broadly support the proposed standards for course design? If not, why?

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

UA broadly supports the content and scope of these standards, though with some detailed reservations.

We do note that there is nothing in these standards that speak to the question of ensuring that the course design process is adequately resourced. This point may be addressed in other standards as yet unseen, but if not, it could be included here.

Our comments against each of the 7 elements of this draft set of Standards are as follows:

1. and 2. These could be combined into one standard, along the lines of “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, with the processes approved and overseen by the provider’s peak academic governance body.”

3. Most of this standard is actually a definition of what Course Design encompasses. It may be appropriate for this term to instead be given a definition at the top of the set of standards, or within a glossary of the entire Standard framework (once completed). The standard could then be shortened to “*the elements of Course Design [as defined] for each course of study are documented and publically accessible.*”

We also note that “course of study” may be too broad a level for some of the elements in question. Method of assessment, for instance, is more appropriately targeted at the unit level (since varied between units), rather than the entire course that the units comprise.

4. See the previous comment about the use of Reference Points within the formal Standards. If the existing Qualification Standards are to be replicated in some way in the revised set, it would be best if this standard were altered to reflect consistency with the relevant “qualification standard” rather than to the AQF, and thus the AQF could remain a Reference Point only.

Given the proposed combination of draft standards 1 and 2, this standard is redundant and should be deleted.

5. On face value the draft standard suggest that universities would have to provide the “current knowledge and scholarship” for each course, in order to prove they are drawing from it. This would clearly be beyond expectations or ability, so it would be better for the Standard to reflect the process through which courses are kept academically valid and up-to-date.

6. The Learning Outcome Standard require any course to demonstrate achievement of learning outcomes. That requirement subsumes this one, and we therefore suggest it could be removed.

7. This is an acceptable standard, but we note that the content of the standard is duplicated in draft Learning Outcomes standard 7, and one or other should be deleted.

Draft Standards on Learning Outcomes

Questions asked by HESP:

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

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

UA broadly supports the draft Learning Outcome standards, noting some detailed issues below:

1. We support this standard as drafted.
2. This standard as drafted commits institutions to design courses that have to serve several, perhaps conflicting, masters. UA suggests that this standard limit itself to consistency with the Australian qualification awarded. If all institutions do this, then they will all inevitably be consistent between themselves. It is for the HESP to decide whether the “qualification standard” needs amendment to reflect international comparators, and not for Australian institutions, though it may be appropriate for International comparators to be provided as a Reference Point.

This standard could be simplified to read “the Learning Outcomes for each course of study are consistent with the qualification awarded.”

However, given that this standard should be limited to Australian qualifications (and thus the “qualification standard”), then it would duplicate standard 4 of the Course Design standards, and one or other should be deleted.

3. While appropriate as standards, these four points could perhaps be better placed in the overall framework as part of the “qualification standard” rather than the Learning Outcomes. They would then fall automatically under Learning Outcome Standard 2.
4. We support this standard but note, as with Course Design Standard 5, that the Standard as drafted could suggest that the learning outcomes of each unit and each course will need to be provided to the regulator. A focus on process rather than outcome may be better in this case.

5. This duplicates Course Design Standard 3, and one or other should be deleted.

6. Committing universities to assessing course of study outcomes at the unit level is not encouraged, particularly given that many units can be taken as part of a number of different courses of study, each with different learning outcomes.

This standard has clear connections with Learning Outcome standard 4, and should be adjacent to it.

This standard has overlaps with Learning Outcome standard 8, and they could be combined. For example: “*The specified learning outcomes for the course of study are assessed through valid and reliable methods during the course of study.*”

7. The use of the phrase “reference points” without capitalisation suggests that they are not intended to be the formal Reference Points attached to the Learning Outcome standards. If this is the case, the phrase should be reworded to avoid confusion. If they are intended to be the same items, then note our earlier statement regarding the use of Reference Points within the actual standards.

It may be useful to limit this standard to the following: “*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).*”

Note the overlap between this standard and Course Design Standard 7.

8. See our comments on Learning Outcome Standard 6.
9. UA strongly supports the wording of this standard in acknowledging the ability of institutions to determine their own grading systems.
10. We support this standard as written. While a case could be made for incorporating it with Learning Outcome Standard 7, we consider that the two standards are sufficiently different (referring respectively to “course of

study” vs. “select units” and “learning outcomes” vs. “grading of achievement of learning outcomes”) that they should be kept apart.

We particularly support the use in this standard of “select units”. This is a sensible acknowledgement of the logistic burdens that would follow the analysis of all courses all the time.