

Murdoch University

Response to HESP consultation on Draft Standards for Course Design and Learning Outcomes

Murdoch University (Murdoch) is grateful for the opportunity to provide a response to the Higher Education Standard Panel's Call for Comment (Number 1, March 2013) on the first set of new draft Threshold Standards.

Q1. Do you broadly support the proposed format for the standards?

Yes, Murdoch is pleased to see that the work of the Higher Education Standards panel has resulted in a clearer and cleaner structure for the standards:

- headings that cannot be mistaken as standards statements;
- a more precise numbering of standards and their parts;
- fewer complex, multi-faceted standards that, for the most part, have avoided "outliers", and
- a more direct style that has removed words like "appropriate" and "adequate" which simply beg the question.

We are also pleased to see that the intent of the new standards statements is to reduce overlap and duplication, and in that spirit have pointed to some overlap and duplication within and between the two sets of draft standards attached for comment, which could be usefully removed.

Q2. Do you support the inclusion of Reference Points as proposed?

We are not opposed to the *concept* of identifying reference points and agree that providers might find these useful in preparing Applications for Registration and Renewal of Registration, however, the Reference points as defined are problematic for a range of reasons:

1. Using as Reference Points "significant codes or frameworks" sanctioned by HESP is simply to reinvent the concept of "non-threshold" standards under another title. It is fine to say that they are not themselves standards, however, what will the regulator conclude if a provider chooses not to reference any of the Reference Points or their practices differ to the Reference Points?
2. While we have a view that many of the products of peak national bodies and agencies are very helpful, we also recognize that some of them arise in contexts that are not (or have not become) relevant to regulation per se. An example is the discipline standards work of the ALTC/OLT, which arose during the formative period for both the strengthening of the AQF and the design of the new regulatory structure. This was very useful and helpful work, but at a tangent to what eventuated in relation to threshold standards. Our view is that it is best to leave such work in the realm of informative, perhaps good, practice and therefore would see it as outside the scope of what are necessarily *minimum* threshold standards.
3. We accept that HESP will not develop or maintain the items listed as Reference Points, however in exercising its judgment over what to include or exclude, there is a risk that divergent and potentially inconsistent reference points will be listed – the potential for this is clear from recent experience, as peak and professional bodies (Engineering, Law, Business) have sought to "interpret" the AQF to "fit" or "recreate" their past practice. Under the draft standards the potential for conflict is exacerbated by listing (i.e. equating) the AQF and the requirements for professional

accreditation as Reference Points for the set of *Course Design (Coursework) Standards*.

4. There is a particular problem with the treatment of the AQF as a “mere” Reference Point, (or indeed with any code or framework where the standards explicitly require compliance): not all Reference Points are equal. On the status of the AQF, we agree with Richard James’s observation that the AQF is a *framework* and not itself a set of standards, however, we would argue that a requirement to *comply with a framework is “a standard”*. Unless HESP is intending to remove the current requirement (Qualification Standard 1.1) that higher education providers ensure their awards “lead to” awards at AQF levels and “meet the corresponding specifications” (i.e. comply with the AQF), then it is confusing to also include the AQF amongst the Reference Points. We do not yet have a draft of the “qualification” set of standards (under Educational Experience in the organising framework), so it is difficult to know whether or not HESP intends to remove the AQF from the Threshold Standards, but if it *is* contemplating such a bold move, we believe the implications to be so extensive that an explicit consultation with the sector is merited.

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

We would support a reconceptualisation of the concept of Reference Points: two things are missing from the current Threshold standards:

- any notion of “where the threshold lies” and
- clarity around the type of evidence being sought (is this standard seeking evidence of input, output, outcome, or process?).

Both the regulator and the sector would benefit from guidance around these two issues. We accept that the first of these probably has to emerge from a community of practice and a set of regulatory rulings, but on the whole we would find Reference Points more helpful if they provided an indication of the nature of the threshold, the kind of evidence that might be useful for that set of standards, or otherwise assist the provider and regulator to interpret HESP’s intent.

Q4. Do you broadly support the proposed standards for Course Design?

Yes

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

Yes, as follows:

Course Design (Coursework) Standard 3:

1. What is the meaning of “publically accessible” (in a current version) in this standard?
2. *If the meaning of “publically accessible” includes members of the public/prospective students etc, then the inclusion of “methods of assessment” in this standard is potentially problematic (as it is in the equivalent existing standard) because:*
 - assessment is generally applied at the level of the unit rather than the course of study (even though *Learning Outcomes Standard 6* allows that it may be both or mixed),
 - assessment methods can vary greatly between units, so it would be excessive and/or meaningless to collate these up to the level of the course of study, and

- beyond the question of level, the type of information required for the public provision of “methods of assessment” is left open to interpretation. This goes to the basic problem mentioned in our response to Q3; where does the threshold lie *for the purposes of regulation*? We, for example, would interpret “methods of assessment” to mean “high level information on the types of assessment in each unit”, but elsewhere in regulatory arrangements other conventions apply (e.g. ESOS only requires the PRISMS entry to identify when there is a compulsory work-based component in a course).

With respect to our comments in response to Q1, “Methods of assessment” are an outlier in this multifaceted standard statement – and somewhat different to the other things included in the list. Consideration should be given to the *reason* for the inclusion of assessment methods in this standard: *which* details about assessment matter to prospective students? What is the regulatory driver for including methods of assessment, and what level of detail is it proportionate to require providers to make publically available. We suggest “methods of assessment” be more tightly specified or removed from this standard.

3. Also, note overlap with *Learning Outcome Standard 5* (see Q7 below)

Course Design (Coursework) Standard 4:

1. As mentioned above in our response to Q2, the way the AQF has been included in this standard is problematic. To say that the nature, scope and expectations for courses are “consistent with” the qualification but “informed by” the AQF, appears to step back from the present qualification standard in which we are all expected to implement/comply with the new AQF by 1st January 2015 (except for any non-AQF qualifications we might choose to offer). There are significant implications to making such a change in the new draft standards.
2. If this is not HESP’s intent, then the inclusion of the AQF in both the standard and the reference point is correspondingly odd.
3. Finally, it may be that *Course Design (Coursework) Standard 4* and/or *Learning Outcomes Standard 3* may overlap with something in the yet to be released “qualification” set of standards (under Educational Experience in the organising framework) and if so, they would become redundant in these two sets.

Course Design (Coursework) Standard 7:

Note overlap with *Learning Outcome Standard 7* (see Q7 below)

Q6. Do you broadly support the proposed standards for Learning Outcomes?

We believe further work is required on the suite of standards for Learning Outcomes.

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

Yes, as follows:

Learning Outcomes Standard 2:

This standard is ill-conceived for several reasons, not least that in its current form it would require evidence of meeting multiple, potentially different, benchmarks for course learning outcomes (e.g. other HE providers; the AQF and international benchmarks - Bologna, North American or any other nation’s qualification types). There are several difficulties with doing this:

1. The standards operate as minimal threshold standards – which of the above is the threshold?
2. The Australian Qualifications Framework was designed so that benchmarking with, or leveling against, other national qualifications systems was possible. If courses of study have learning outcomes that meet those described for qualifications in the AQF that would be sufficient to ensure they can be benchmarked against both other institutions and internationally, without each institution also having to demonstrate alignment at each level.
3. If the intent is to ensure that all “similar” courses of study have “similar” learning outcomes then this is better achieved through other mechanisms in the Threshold standards: e.g. compliance with the AQF and a requirement for external course review (*Learning Outcomes Standard 7*), i.e. if these others are in place, is it *proportionate* to also require further benchmarking?
4. Finally, it raises a question as to whether, in this formulation of a standard, “similar” implies “same” knowledge, skills and application – i.e. it drives “standardization” rather than sets “a standard”, which is probably not HESP’s intention.

Our suggestion is that this standard is replaced with a standard (which may be better placed elsewhere) requiring that courses of study comply with the Australian Qualification Framework (nomenclature, learning outcomes, etc).

Learning Outcomes Standard 3b and 3c:

1. We note that this standard implicitly references the structure of the AQF.
2. We suggest that the standards avoid the language of “attributes” in respect of graduates. “Graduate attributes” was a previous version of what is rapidly becoming replaced by “Course Learning Outcomes” as a result of the impact of the current threshold standards. Graduate attributes as previously cast in the Sector were applied at the institutional level and contained both aspirational and more practical attributes of graduates. To regulate for aspiration is highly problematic; and to demonstrate, for example, the *application* of a “graduate attribute” like “possessing a global perspective” in the context of a specific course of study (e.g. mathematics) can take you into very difficult, or conversely, very trite terrain.
3. Our suggestion is that the standards consistently use the “newer” language of course learning outcomes: Knowledge, Skills and Application. Thus
 - 3b the generic skills required of graduates*
 - 3c the application of knowledge and generic skills in the context of...*

Learning Outcomes Standard 5:

This standard duplicates *Course Design (Coursework) Standard 3*. We suggest that it be deleted.

Learning Outcomes Standard 6:

1. This standard could be more clearly/directly worded:
 - “Student achievement of the specified learning outcomes for a course of study is assessed.”*
2. Note the overlap with *Learning Outcomes Standard 8* outlined below.

Learning Outcomes Standard 7:

1. The reference to external reference points in this standard, invoking as it does the designated “Reference Points” attached to the set of standards, contributes to the risk outlined above that the Reference Points will become *de facto* standards. What would a regulatory body do if a provider did not reference such points?
2. We suggest that it is preferable, and more in keeping with the *intent* of this standard, to make the adequacy of the review process the focus, i.e. revise the

standard as follows: *“Learning outcomes for each course of study and the methods of assessment of those outcomes are informed by periodic, **external and independent** reviews (at least every 5 years) ~~which take account of external reference points that are relevant to the course of study.~~”*

3. If the above revision is acceptable, then it is also important to note its similarity to *Course Design (Coursework) Standard 7* and *Learning Outcomes Standard 10*. In the interests of simplicity, and an overall reduction the number of standards, it may be desirable to bring these “review” items together in one place (potentially academic governance: approval and quality assurance) and as one standard.

Learning Outcomes Standard 8:

This standard significantly overlaps *Learning Outcomes Standard 6*. The object of both is to ensure learning outcomes are appropriately assessed. They could be rewritten so as to eliminate one or the other: *“Student achievement of the specified learning outcomes for a course of study is assessed using reliable assessment methods.”*

Learning Outcomes Standard 10:

As noted above in respect of *Learning Outcomes Standard 7*, in the interests of simplicity, and an overall reduction the number of standards, it may desirable to bring these “review” items together in one place (potentially academic governance: approval and quality assurance) and as one standard setting the minimum requirements for regular reviews of a course of study. For example, the formulation suggested above, could become:

*“Learning outcomes **for selected units** in each course of study, ~~and~~ the methods of assessment of those outcomes **and the grading of student achievement**, are informed by periodic, **external and independent** reviews (at least every 5 years) ~~which take account of external reference points that are relevant to the course of study.~~”*