



Griffith University is pleased to provide feedback to the Higher Education Standards Panel on the *Draft Standards for Course Design and Learning Outcomes* and the University welcomes the Higher Education Standards Panel's approach to the review of the format and the content of the Threshold Standards.

Format of the draft standards

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

Yes, Griffith University is broadly supportive of the revision of the threshold standards to provide a consistent format, reduce duplication and to provide an organising framework underpinning the standards. Further specific comments about the format are provided below.

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

While Griffith University supports the broad concept of providing reference points as guidance for institutions in responding to the standards, in their current form they are limited in scope and inconsistent in availability and format across disciplines. The reference points that institutions would need to use to address the standards are broader than those provided. Institutions may also make use of external moderation *processes* that are currently being evaluated by a number of national projects investigating robust mechanisms to compare academic standards across institutions. Each block of standards may benefit from a section of explanatory notes which would evolve over time to guide institutions in how to respond to each set of standards and also include reference points and processes that might be useful. In the Course Design (Course work) standards, the Australian Quality Framework (AQF) is included in both Course Design standard 4 and also as a reference point, which may lead to misinterpretation of the intended nature and use of reference points.

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

We would support the development of standards that are consistent in format, clear, specific, observable and measurable as to whether they have been reached or not. Some of the current standards do not meet these criteria.

In terms of consistency, it is noted that the standards are variably concerned with the existence of *processes* to assure quality (eg the existence of regular review of courses) as opposed to standards that require the Provider to demonstrate evidence of the existence of particular aspects of quality or course content. For some standards, ensuring processes are in place may be preferable to the latter. For example, *Course Design standard 5*, it would be difficult to provide evidence at the course level that all three sub-criteria were met. It may be better to adjust the wording to state that 'the Provider utilises defined processes to ensure that the content of each course of study.....'. This would be more feasible than documenting the content of each course offered at the institution.

Course Design (Coursework)

Q4. Do you broadly support the proposed standards for Course design? If not, why?

Yes. Further comments are provided under Question 5.

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

Course Design (Coursework) Standards	Comment
1. The provider utilises processes for designing and assuring the quality of the design of each course of study and the qualifications to which it leads.	No additional comment.
2. Processes for course design are approved and overseen by the provider's peak academic governing body.	<p>This standard could overlap with Course Design standard 7 and the two could be combined into one: <i>The peak academic governing body of the provider oversees the design and periodic (at least every 5 years) review and improvement of courses</i>.</p> <p>It would also be helpful to clarify that the academic governing body is referring to the university's Academic Board, and not the governing Council.</p>
3. Course design encompasses the rationale for the course of study, course structure, modes of delivery, learning outcomes, methods of assessment, entry requirements and pathways, programmed student workload, articulation arrangements, exit pathways, pathways to further study and any compulsory requirements for completion and that these features of all courses of study are documented and publically accessible in a current version.	<p>This standard specifically mentions methods of assessment yet does not mention the range and type of learning activities nor, more importantly, the <i>alignment</i> of the learning activities, assessment and desired outcomes. Method of assessment for a course may be difficult to compile given the range of electives and unique combinations of units/subjects that comprise some degrees. It may be useful to request information on the course structure (ie units/subjects) and then a <i>process</i> to ensure that content and assessment methods for each unit are publically available.</p>
4. The nature and scope of the course and the expectations for student learning are consistent with the qualification to be awarded and informed by the <i>Australian Qualifications Framework</i> .	<p>This standard could be combined with Standards 1, for example: 'The provider utilises processes for designing and assuring the quality of the design, nature and scope of each course of study and the qualifications to which it leads, informed by the <i>Australian Qualifications Framework</i>.'</p> <p>The AQF appears in the standard and in the reference points (see comment about this above).</p>
5. The content of each course of study: a. is drawn from current knowledge and scholarship in relevant academic disciplines	<p>It will be an unnecessarily burdensome task to provide evidence at the course level that all three sub-criteria have been met for each course offered at the institution. It may be more appropriate to adjust the wording to state that</p>

<p>b. includes study of the underlying theoretical and conceptual frameworks of the academic disciplines and the field of study, and</p> <p>c. encompasses relevant emerging concepts that are informed by recent scholarship, current research findings and advances in practice (where practice is applicable to the field of study).</p>	<p>'the Provider utilises defined processes to ensure that the content of each course of study.....'.</p>
<p>6. Each course of study is designed to enable equivalent student learning outcomes regardless of a student's place or mode of study.</p>	<p>No additional comment.</p>
<p>7. The peak academic governing body of the provider oversees periodic (at least every 5 years) review and improvement of the design of each course of study.</p>	<p>This standard could be combined with standard 2 above as the processes of assuring the quality of course design and review are often linked.</p>
<p>Reference Points</p> <p>i. <i>Australian Qualifications Framework (January 2013).</i></p> <p>ii. The requirements for professional accreditation of the course of study and registration of graduates where applicable.</p>	<p>These reference points are very limited and exclude reference to the moderation processes between institutions to assure standards across courses in different institutions.</p>

Learning Outcomes (Coursework)

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

Yes, although there are opportunities to further streamline the standards. Comments on specific standards are shown below.

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

Learning Outcomes(Coursework) Standards	Comment
<p>1. The learning outcomes to be achieved on completion of a course of study are specified for each course of study.</p>	<p>No additional comment.</p>
<p>2. The learning outcomes for each course of study are consistent with the qualification awarded, are comparable with those for courses of study that lead to the same or a</p>	<p>This learning outcomes refers to 'international comparators' and thus infers the use of international reference points, however the reference points listed below are all Australian.</p>

similar qualification in Australia and are informed by international comparators.	Reference could be made to the AQF here.
<p>3. The learning outcomes for each course of study are informed by:</p> <ul style="list-style-type: none"> a. the mastery of specific disciplinary and/or interdisciplinary knowledge and skills that characterise the field of study b. the generic skills and attributes required of graduates c. the application of generic skills and attributes in the context of the field of study including the communication skills required, and d. the requirements of employment related to the field of study. 	No additional comment.
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.	No additional comment.
5. The specified learning outcomes for each course of study are available to the staff and students who are involved and are publically accessible in a current version.	This overlaps with and could be merged with Course Design standard 3 (publically available learning outcomes).
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.	This standard potentially overlaps with standard 8 below and could be merged.
7. 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), which take account of external reference points that are relevant to the course of study.	There are several projects currently evaluating robust methods for moderation of program-level inputs, standards and learning outcomes across institutions. These processes are excluded from the designated reference points listed yet are very relevant to this 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.	The wording of this statement could infer the necessity for each institution to measure the validity or reliability of all assessment methods. An alternative wording to address this use and to simplify the wording would be: 'Methods of assessment are aligned with, and make use of recognised good practice in validly and reliably confirming that specified learning outcomes have been achieved.' Note the use of 'aligned with' rather than 'consistent with'

<p>9. The grades awarded to students reflect the level of their attainment.</p>	<p>While the intent of this standard is clear and appropriate, it may infer a pre-designated relationship between levels of attainment and grades, that is, a pre-determined approach to standard setting.</p>
<p>10. The grading of students' achievement of learning outcomes for selected units within courses of study is referenced periodically (at least every 5 years) against the grading of students' achievement in comparable units or courses in other Australian institutions.</p>	<p>Again, the moderation projects currently underway provide methodologies that are directly relevant to this standard. We support the use of 'selected' units.</p> <p>This standard overlaps with 7 above and could be merged.</p>
<p>Reference Points</p> <ul style="list-style-type: none"> i. <i>Australian Qualifications Framework (January 2013).</i> ii. Learning outcomes statements developed for the field of study by Office for Learning and Teaching discipline communities or other disciplinary or professional bodies. iii. The requirements for professional accreditation of the course of study and registration of graduates where applicable. 	<p>We have previously commented on the limited nature of these reference points and the exclusion of methodologies such as internal and external moderation (separate to accreditation) as processes that institutions could use to address the standards above.</p>