

A coherent national tertiary education system

Response to 2 Commonwealth issues papers

This submission seeks to develop a coherent tertiary education system in response to 2 issues papers recently released by the Australian Government:

Building university diversity: future approval and accreditation processes for Australian higher education (2 March);

Building better foundations for higher education in Australia: a discussion about re-aligning Commonwealth-State responsibilities (31 March)

While these issues papers raise different issues and involve different Government areas of interest and processes, they are closely related at the institutional level. By considering them together Griffith University seeks to avoid the risk that the different processes will result in policies that may be internally consistent but which have inconsistent affects on institutions. As will be argued below, policy for higher education should be considered with policy for tertiary education, so this submission also responds to:

Skilling Australia - new directions for vocational education and training (18 February).

Ministerial council on tertiary education

Griffith agrees with the Department of Education, Science and Training that ‘Many major emerging issues, such as workforce planning, skills shortages and articulation between the tertiary sectors, could be more readily addressed through better coordination and link()s between vocational education and training [and] higher education . . .’ (*Skilling Australia*, page 7). Griffith agrees with the Commonwealth that this is because ‘a growing number of institutions now offer both vocational and higher education qualifications’ (*Skilling Australia*, p 24; *Building better foundations*, p 20). Griffith is strongly committed to work integrated learning and many of its programs – not just explicitly vocational programs – include internships. However, vocational and higher education serve not only employment but also several other purposes such as science, innovation, regional services and human services. Including employment and only employment in a tertiary education ministerial council risks diverting tertiary education from its other roles.

Those who support greater integration of vocational and higher education would obviously support an integrated ministerial council. However, those who believe that the sectors should remain separate in policy, orientation, financing, programs and institutionally should also support a combined ministerial council because although decisions in each sector are made separately they often affect the other sector. While the Ministerial Council on Education, Employment, Training and Youth Affairs is constituted to consider the inter sectoral implications of decisions in each sector, it does not consider these in sufficient detail because it is dominated by the politically more important issues of school education. The result is that inter sectoral issues are settled in the Australian qualifications framework advisory board and that decisions on qualifications become proxies for contests over shares of prospective students and funding. This compromises decisions on the qualifications framework and neither keeps the sectors separate nor integrates them coherently.

Australian qualifications framework advisory board

Griffith does not support the Department of Education, Science and Training's view that the Australian qualifications framework should remain the responsibility of the Ministerial Council for Education, Employment, Training and Youth Affairs (*Skilling Australia*, page 7). The Australian qualifications framework now contains 17 qualifications (AQFAB, 2005), only 1 of which is in the schools sector. The Ministerial council on tertiary education could readily consult the Ministerial Council for Education, Employment, Training and Youth Affairs should any issue concerning the school qualification arise.

National protocols for higher education approval processes

Teaching, scholarship and research have been core roles of Australian universities since the 1960s and should be retained in the criteria for recognition as a university in *National protocols for higher education approval processes*. The recent development of a number of practices breaching the protocols is an argument for their better enforcement, which is addressed below, not for the weakening of the criteria to suit the weakest performer.

Non university higher education providers hope to gain additional income from the status of designation as a university without incurring the cost of engaging in research. Yet Australian universities have high status because they conduct research, and removing the research requirement will lower Australian universities' status and thus the benefit gained from university designation. This is clear from the US where the weaker and inconsistent criteria for designation as a university has reduced the significance of designation as a university and thus institutions seek designation as a doctoral university (McCormick, 2000). If research is removed from the requirements for designation as a university non research providers will find that university designation would not give them the status they seek whereupon they will seek designation as research universities, thus undermining the Government's policy of concentrating research in fewer institutions or bodies.

Community engagement is now widely accepted as a core activity of universities in Australia and overseas. Thus in the US the Carnegie Foundation for the Advancement of Teaching (2005) is developing a new classification of higher education institutions by community engagement. This should be recognised by adding to paragraph 2.14 of the *National protocols for higher education approval processes* specifying the criteria for recognition as a university –

- promotion of partnerships with the university’s regional, professional and other communities in their teaching, scholarship and research.

‘Thin universities’ and the maturity of Australian higher education

Some have argued that the *National protocols* are restrictive in not allowing for the recognition of ‘thin universities’. An institution may be ‘thin’ in its:

- range of activities (say, not engaging strongly in research or community engagement);
- range of fields of education (say, restricted to business);
- levels of education (say, restricted to diplomas and baccalaureates);
- student profile (say, not having strong equity programs).

Recognition of one kind of thinness may easily be confused with other kinds of thinness, thus reducing the informativeness of the term ‘university’. Australian higher education isn’t sufficiently well developed to support such ambiguity. Universities have been established in Australia for only 150 years, half the history of universities in the US and one sixth of the European history of universities. Non university higher education providers are even more recent in Australia. While there are probably about 100 private non-university higher education providers (the problems of the inadequate data on private providers are discussed below), the most recent and only systematic study estimated that they enrolled only 3.4% of total higher education student load (Watson 2000, p vii). It would be perverse to confuse prospective students’ understanding of universities for the sake of such a small part of higher education.

Federal tertiary education accreditation and quality assurance body

Griffith agrees that the States and Territories separately have not administered the *National protocols for higher education approval processes* as consistently as is highly desirable and that therefore the protocols should be administered by the States and Territories jointly with the Commonwealth. Griffith therefore supports the proposal for a body established jointly by the Australian, State and Territory Governments (*Building better foundations*, page 20). Unfortunately neither the Commonwealth nor its consultant credit Professor Glyn Davis as the originator of the proposal notwithstanding that his presentations of the proposal in October (Davis, 2004a) and November (Davis, 2004b) 2004 were widely published at the time and continue to be cited.

Such a body should fill an important gap in assuring that Australian universities ‘set standards for [their] qualifications which are equivalent to Australian and international standards’ as the first do point of the criteria for recognition as a university provide (Moodie, 2004). Griffith supports the Commonwealth’s suggestion that the new federal body ‘be delegated certain Commonwealth roles such as the approval of higher education providers to access Commonwealth funding under the *Higher Education Support Act 2003* and the registration of providers under the *Education Services for Overseas Students Act 2000* (*Building better foundations*, page 20).

While Griffith also supports the Commonwealth’s suggestion that the body ‘would subsume the functions of AUQA’ (*Building better foundations*, page 20), it should be noted that this confounds the maintenance of standards (does the provider meet standards established by government?) with audits of quality (does the body meet the goals it sets itself?). The Australian Universities Quality Agency explicitly does not aim to examine universities’ standards. Its audits are ‘a systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives’ (Australian Universities Quality Agency (AUQA 2002, p. 17), quoting from the Australian/New Zealand Standard, 1994. This may require AUQA to adjust its processes over time.

Griffith believes there is merit in the suggestion that the federal body should be responsible for national quality assurance in vocational education as well as higher education (*Skilling Australia*, page 24). However, States may not wish to relinquish their separate responsibility for accrediting vocational education immediately, and the federal body may initially be responsible for quality assurance in both vocational and higher education, but for accreditation in higher education only. Alternatively, the federal body could be made formally responsible for both accreditation and quality assurance in both vocational and higher education, but agree to delegate vocational education accreditation to the jurisdictions that wish to retain this responsibility.

Categorise institutions by a matrix of characteristics

The Carnegie Foundation for the Advancement of Teaching classifies institutions thus –

TABLE 1: ENROLMENTS IN US COLLEGES BY CARNEGIE CLASSIFICATION, FALL 2000

Institution by Carnegie classification	No. of institutions	Enrolments	% 4-year	% all
Doctoral/research universities—extensive	152	3,181,349	36	21
Doctoral/research universities—intensive	110	1,126,340	13	7
Master’s colleges and universities I	650	2,995,654	34	20
Master’s colleges and universities II		279,955	3	2
Baccalaureate colleges—liberal arts	647	358,143	4	2
Baccalaureate colleges—general		509,934	6	3
Baccalaureate/associate’s colleges		120,300	1	1
Other 4-year institutions	805	181,911	2	1
Sub total 4-year institutions		8,753,586	100	57
Associate’s colleges	1,833	5,895,669		39
Other 2-year institutions		147,026		3
Total	4,197	15,312,289		100

Source: U.S. Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System (IPEDS), ‘Fall Enrolment’ surveys (table prepared May 2002)

The Carnegie Foundation (McCormick, 2000) found that even its taxonomy of 11 institutional types is widely interpreted as a status hierarchy and thus provides ‘strong incentives for institutions to conform to particular models of institutional activity, and indeed to particular *indicators* of activity’ (emphasis in original). McCormick adds that ‘It is especially ironic in light of the recommendations made by the Carnegie Commission in one of the first reports to use the classification . . . to preserve or increase institutional diversity and resist homogenization. Indeed, the Commission discouraged expansion of “research-type universities granting the Ph.D.” – the very model that many institutions emulate in response to the interpretation of the classification as a status hierarchy.’ The Carnegie Foundation is therefore planning to replace its ‘present single scheme with a series of classifications that will recognize many dimensions of institutional commonality and difference’.

It is highly likely that the Commonwealth’s proposal for a simpler tripartite division of universities into teaching intensive universities, primarily undergraduate and postgraduate coursework universities and research intensive universities (*Building university diversity*, paragraph 4.27) would be widely understood as a ranking on 3 grades since it is based on only one criterion, research intensity. If Australia is to categorise universities, it would be far preferable to follow the Carnegie Foundation’s lead in adopting a multifaceted classification system by a matrix of characteristics (say teaching, research, and equity and community engagement) at a range of levels (say extensive and intensive, specialist, and less extensive and intensive).

Teaching

To be categorised as either an extensive and intensive teaching institution or as a specialist teaching institution the institution should meet the requirements of the learning and teaching performance fund in their fields of education. To qualify as an intensive teaching institution it should meet specified depth requirements, which might include minimum amounts of student load at a range of levels, say from bachelor to coursework masters. To qualify as an extensive teaching institution it should meet specified breadth requirements, which might include minimum amounts of student load in a minimum number of broad fields of education. Institutions that did not meet the breadth requirements of designation as an extensive teaching institution would be categorised as a specialist teaching institution.

Research

Designations of institutions as extensive and intensive research institutions or as specialist research institutions would also have breadth and depth requirements and these should be based on the assessments of the research quality framework. This classification therefore can’t be structured and implemented until after the research quality framework is implemented. However, if the Australian research quality framework were similar to the UK research assessment exercise, research intensity would be determined by the proportion of staff in units with high research ratings and an extensive research intensive institution would be one that had a high proportion of staff in highly rated units in a minimum number of broad discipline areas.

Equity and community engagement

Extensive quantitative data are readily available on institutional student equity (James *et al*, 2004; DEST, 2005) and the department already assesses institutions' equity performance in its analysis of student outcome indicators (DEST, 2004) and to allocate grants under the higher education equity program. An institution could be categorised as an intensive equity institution if it met minimum performance levels for an equity group and it could be categorised as an extensive and intensive equity institution if it met minimum performance levels for a minimum number of equity groups.

The requirements for designation as an institution which has extensive, intensive or specialised community engagement should be informed by the Carnegie Foundation's classification of institutions by community engagement. But it might include factors such as: community engagement is included as a top level goal in the institution's top level plan, there is an institution-wide community engagement plan, each major academic organisational unit (eg faculty) has a community engagement plan., each minor academic organisational unit (department) has a community engagement plan, the institution earmarks a minimum amount of its resources to community engagement, the institution collects and reports community engagement activities systematically each year and community engagement or a cognate is included explicitly in academic promotion criteria.

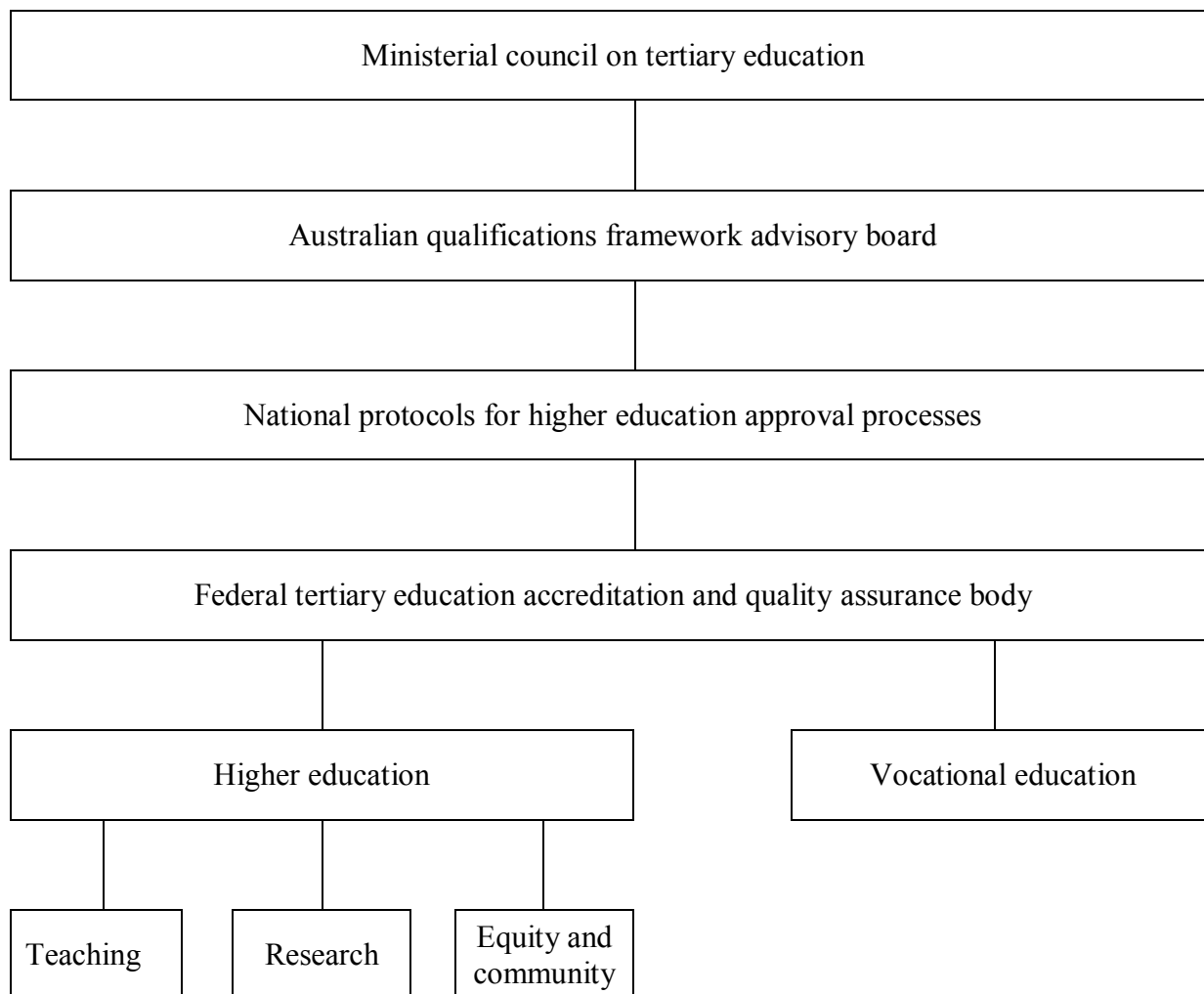
Thus, Rockefeller University would probably be accredited as teaching less extensive and intensive, research intensive, and community engagement less extensive and intensive. Thames Valley University may be accredited as teaching extensive and intensive, research less extensive and intensive, and community engagement specialist. And perhaps Portland State University may be accredited as teaching specialist, research specialist, and community engagement extensive and intensive. This would generate a matrix categorisation thus –

TABLE 2: A MATRIX CATEGORISATION OF HIGHER EDUCATION INSTITUTIONS

	Teaching	Research	Community engagement
Extensive and intensive	Thames Valley	Rockefeller	Portland State
Specialist	Portland State	Portland State	Thames Valley
Less extensive and intensive	Rockefeller	Thames Valley	Rockefeller

These proposals would produce a coherent federal tertiary education policy, accreditation and quality assurance system with these parts –

TABLE 3: A COHERENT NATIONAL TERTIARY EDUCATION SYSTEM



Consistent and comprehensive reporting requirements

All universities and higher education institutions receiving Australian Government funds should be required to comply with the same finance, research expenditure, staff and student reporting requirements for 3 reasons.

Australia has benefited from having comprehensive and consistent data on higher education since the establishment of the Commonwealth tertiary Education Commission in 1976. In contrast, Australian technical and further education (1974-1992) and subsequently vocational education and training (1992 -) has been bedevilled by incomplete and inconsistent data. For example, the National Centre for Vocational Education Research data are incomplete in reporting vocational education and training students enrolled in programs funded by government only, and the national centre reports twice the number of vocational education and training students as the Australian Bureau of Statistics.

Omitting private universities and higher education providers from all or some data collections will mean that Australia will no longer have complete data on higher education, thus undermining considerably governments' capacity to monitor the outcomes from the system and undertake comprehensive reviews.

Secondly, as the Australian Vice-Chancellors' Committee has demonstrated, the Australian Government's reporting requirements impose a considerable administrative, organisational and financial load on universities. It would be unfair to expect public universities to compete with providers that do not bear this burden.

Thirdly, imposing the same reporting requirements on all universities and higher education institutions receiving Australian Government funds would discipline the Australian Government's reporting demands, which have become excessive.

Consistent student protection, privacy and freedom of information requirements

Australian public universities gain a high proportion of their revenue from non government sources, and this is likely to increase with fee-help. Conversely the Government has allocated public places and other subsidies to formally private universities, and all approved higher education providers have access to fee-help which is guaranteed and subsidised by the Australian Government. The institutional distinctions between public and private universities have therefore blurred. The student protections such as appeals to an ombuds office which are considered appropriate for public universities should apply similarly to private universities and higher education providers. Likewise the protections against potential administrative abuse of privacy and freedom of information legislation imposed on public universities should also apply to private universities and higher education providers.

General regulations: consistency by sector or by jurisdiction?

The Commonwealth argues that there should be national consistency in the general regulations applying to universities (*Building better foundations*, page 14), but of course this would introduce inconsistencies between the regulation of universities and other corporations within a jurisdiction. So a citizen of a State could have different privacy rights depending on whether they were a student of a university, a tafe institute, or a school. Likewise, different occupational health and safety regulations would apply to different corporations within a State or Territory. While there are advantages in national consistency in regulations specific to universities, universities are not so special that they warrant national consistency in general regulations that apply to them and thus be treated differently from other corporations in their jurisdiction.

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