



**Griffith University response to the Australian
Universities Quality Agency Discussion Paper**

***Setting and Monitoring Academic Standards for
Australian Higher Education***

June 2009

Preamble

There is no doubt that the notion of academic achievement standards¹ is a critically important issue and one that warrants close scrutiny, informed debate and action within and across disciplines, and universities, among institutional groups (such as the IRUA²), and across the sector. It is important that the higher education sector be proactive in this matter to ensure that Australian higher education is recognised internationally for the fact that it has a robust, sustainable and cost-effective system or complementary set of systems in place for setting and monitoring standards of academic achievement among its students.

The challenge for the sector is to address the need for accountability through valid and reliable assessment at the local course and program level, while at the same time respecting academic autonomy and expertise, disciplinary differences and the mandate for institutional distinctiveness in a student demand-driven system. To embark on the ambitious and long-term goals and strategies in this Paper in anything other than a staged approach, that takes account of the need to balance 'bottom-up' local capacity-building strategies with national 'top-down' imperatives, would be a costly mistake. This response acknowledges the critical importance of setting and monitoring standards and, importantly, being seen to do so across the sector. At the same time, it cautions against pursuing a single system-wide, one-size-fits-all strategy; arguing rather for a range of complementary approaches that:

- respect existing accreditation and standards setting activities in the professions;
- build capacity at the disciplinary and institutional level; and
- focus first on piloting and evaluating a range of institution-based and contextualised strategies for calibrating standards and validating assessment processes before considering sector-wide national standards statement (p.15).

This response follows the suggested format, commenting on i. the general argument of the Paper; ii the definition of academic achievement standards; iii. the proposed approach; iv. the balance between a disciplinary emphasis and generic outcomes; and v. suggestions for alternative approaches.

The General Argument

The Paper quite rightly draws attention to the importance for institutions, and the Australian higher education sector as a whole, of being able to demonstrate reliable and valid means of assessing student work, of setting and monitoring academic standards, and of publicly demonstrating that appropriate measures are in place in this regard.

However, the intent and clarity of the Paper's argument are not sufficiently well articulated. On the one hand the Paper argues that: 'statements of discipline-specific academic achievement ... would be central elements in monitoring academic standards'; on the other hand: 'all of these statements will be necessarily general'. The intention of such activities is not clearly communicated and appears somewhat contradictory. The value of 'general statements' of standards imposed across the sector must be questioned. Good practice in articulation of assessment standards dictates that the more general and generic standards descriptions become, the less useful they are for achieving the goals of 'greater confidence' and a 'clearer picture' of the meaning of final achievement grades (p.3). These two desired qualities of discipline-specificity and generality appear to be logically incompatible. Even if the Paper were to clarify its intention to develop generic standards descriptions that could be differentially implemented in disciplinary contexts, there are serious reservations about the proposed national, sector-wide focus of this activity, as outlined below.

¹ Note: Similar to the Discussion Paper, this response focuses on academic achievement standards, though the value of broader terms such as 'standards' and 'academic standards' is acknowledged. For the purposes of this paper, 'standards' is to be understood as referring to 'academic achievement standards'.

² Innovative Research Universities Australia

The logic of the argument presented in the opening section of the Paper (p.4) is questionable. It is true that 'high-quality teaching is vital' and that 'high achievement' and learner stimulation are key goals in Australian higher education. However the logical connection between these and the argument in favour of a 'national structure for academic standards' (p.6) is dubious. Both issues are important, but the implied causal connections between them are not justified.

Similarly, to claim that the creation of a 'national structure for academic standards' (p.6) will 'result in a significant improvement to academic work' (p.3) and that it will 'empower academics by providing a transparent structure for their work' (p.14) is not substantiated. Moreover, the many potential outcomes of the proposed national system for monitoring academic standards (e.g., academics and employers with 'greater confidence' (p.3), and students with 'a clearer picture of what their final reported achievement signifies' (p.3)) presuppose a successful, robust and fully functioning system that has not yet been piloted at all. We all share the hope of achieving these goals, but it would be important to trial a range of strategies at disciplinary, institutional and national levels to determine which combination of approaches might most effectively achieve such outcomes for students, academics and employers alike.

While it is no doubt beyond the scope of the Discussion Paper little attention is paid to the cost-benefit issues of implementing the proposed system. It would be important to consider these in future discussions. The Paper refers to the 'opportunity cost of Australia making no further progress in this area'. Yet, between one extreme of taking no action, and the other of embarking on a 'national structure for academic standards' (p.6) such as the one proposed in this Paper, there should be a middle ground which:

- represents a more moderated and parsimonious approach;
- takes into account lessons learned from the past;
There is no reference, for example, to Academic Standards Panels of the 1980s-90s nor the Discipline Reviews carried out by the AVCC in the 1990s. The possibility of following the UK external examiner system was debated in 1990s and early 2000s yet none of this debate seems to be acknowledged (see p.13). and
- is informed by a thorough analysis of existing structures for developing and implementing statements and exemplars of discipline-specific and generic standards of achievement, with a view to determining how the goals of this Paper might be achieved through adaptation of existing accreditation processes and institutional practices in the first instance.

The Definition of Academic Achievement Standards

It is pleasing to see attention drawn to the need for a shared definition of 'academic standards' in Australian higher education. This will be an important first step in progressing the activity at the institutional and sectoral level. While there is some merit to the argument that 'an academic standard ... stands somewhat apart from particular assessment tasks and student responses', one cannot proceed without taking account of the range and types of assessment tasks and their capacity to elicit the learning commensurate with nominated standards in a discipline.

The argument commences with a discussion of the nature of academic achievement standards and later moves to a consideration of how one measures academic achievement through assessment tasks at the local level. While this makes sense on paper, it becomes problematic at the level of implementation. There is a strong argument in favour of examining standards and types of assessment tasks conjointly. There is also merit in considering strategies for ensuring consistency in the interpretation and implementation of standards. In other words, built into any system for setting and implementing standards must be a process

of periodic review of the standards, as well as regular monitoring of how these are being interpreted and operationalised through assessment tasks. These steps are critical before one can consider the collecting and communication of standards-related data.

A level of performance or achievement cannot be defined without also defining the task to assess that performance. In other words, the definition of standards and level-setting needs to be done in the context of disciplinary knowledges, epistemologies and approaches to assessment. Take, for instance, the performing arts. At the Griffith University Conservatorium of Music, it is common for assessment to be made by a panel or jury of experts, so the standards are not developed unilaterally; they are the result of some degree of consensus. However, as one discipline expert has noted: 'what is excellent in an opera graduate will be quite different from what we look for in popular music, so arriving at appropriate general descriptors even at a discipline level could be difficult'. This would suggest that starting with smaller scale, local-level activities already under way to establish academic standards would be a more manageable and capacity building approach, than trying to establish national uniformity.

The notion of a 'level' and 'standard' are conflated in the Paper. The definition of a 'standard' as a 'level of achievement of students, on graduation or at other stages' (p.16) needs to be further elaborated. A standard consists of a qualitative description of features of a performance as well as the levels of performance at which those features may manifest themselves. A standard is therefore both the level of performance as well as the features, qualities and criteria comprising that level. It is not a consideration of level alone. However, throughout the Paper, the notions of 'academic achievement' and 'standard of academic achievement' are conflated. The opening section (p.4) identifies the need for 'robust strategies for demonstrating students' academic achievement'. In the context of this Paper, one would expect that it is the 'standards of academic achievement' that are of greatest interest. This may be intended as short-hand, but in a discussion such as this, precision of language and expression is important.

The Paper confuses the notion of standards with volume or amount of material learned by stating: 'academic achievement standards ... refer to how much, intellectually and professionally, students have learned or acquired...' (p.7). This is not an accurate reflection of the notion of standards which reflect the standard reached rather than the amount learned. Seemingly minor examples such as this highlight the value in ensuring that language about standards is used with care and that there are shared understandings across the sector and within institutions. The Paper does the sector a service in this regard by raising the importance of such matters. This is an important first step. Additional proposals are included in the final section of this response.

At a later stage, the Paper refers to measurement of standards (p.14) which does not make sense. It also introduces the notion of 'standardised expectations' (p.13). It is unclear how this relates to the issue of standards of academic achievement. Introducing the issue of expectations at this point is problematic and confusing.

Overall, there is some concern regarding the sometimes loose use of terminology and apparently limited attention to meaning and definition of terms that are key to the argument at hand. Terms needing further clarification and consistency of use include: 'academic achievement', 'levels of achievement', 'learning outcomes', and 'desired areas of academic achievement'.

The Proposed Approach

There is merit in the Paper's emphasis on the importance of institutional engagement with and ownership of the processes of setting and monitoring standards. Reference to such

stakeholders as Deans (Learning and Teaching), Academic Boards, Learning and Teaching Committees, along with discipline groups and councils of Deans, reflects well the importance of engaging these groups. However the Paper does not sufficiently acknowledge the long-range targets and staged processes that will be necessary to achieve the stated goals of such an endeavour. These processes – their benefits and limitations – need to be more thoroughly articulated if a sector-wide approach to standards setting and monitoring is to be considered.

There is no doubt that there would be considerable merit in explicating ‘shared’ and ‘collegial understandings’ (p.8) of standards among disciplinary communities. However this is a long way from a ‘systematic national process for developing academic standards’ (p.10) which appears to be an ‘all-or-nothing’ approach to agreeing on ‘national statements of desired academic achievement’ that will be measured, monitored and reported (p.9, 11). The former is a valuable goal that would assist in building institutional capacity while fostering collegial and collaborative activities within and across disciplines nationally. The latter may be achieved in time, but there is little evidence that the proposed framework will do so.

The method proposed is far too complex, labour-intensive, time-consuming and cumbersome. Instead, a simpler, more staged approach is called for that draws on the best of such processes as the UK’s external examiner panel, the AVCC Academic Standards Panels, existing accreditation processes in the professions, along with further encouragement for institutional benchmarking such as is currently taking place.

The claim is made that ‘few if any statements of desired areas of academic achievement and levels of achievement currently exist’ (p.9). This is followed by the claim that ‘there have been few attempts to synthesise or to benchmark these across institutions’ (p.9). Before proceeding further, it will be important to substantiate the above claims and to acknowledge that they are two distinct activities. The veracity of the first claim is questionable, given the extensive work undertaken through accreditation processes such as those in the business, legal or nursing professions, for example. It will be important to review these processes through the lens of standards to ensure that any calibration of standards takes account of existing practices. There may also be merit in working closely with professional accreditation bodies to determine opportunities for further exploration and refinement of their understanding of and approach to setting and monitoring standards in their respective fields.

The synthesis, benchmarking and articulation of desired areas and levels of academic achievement is no doubt an area ripe for further activity, but this, too, should build on existing frameworks and activities within institutions and among benchmarking partners. This would seem a far more cost efficient ‘bottom-up’ strategy that uses existing resources, rather than a ‘top-down’ strategy that will be resource intensive which the sector as a whole is unlikely to be able to engage in and sustain.

The Paper outlines a possible development process but, once again, this process appears to leave out several existing initiatives including professional accreditation processes, and the work of such major national projects as the Australian Learning and Teaching Council Teaching Quality Indicators Project – in which at least two institutions, including Griffith, have specifically focussed on developing quality frameworks for assessment, moderation and standards. Projects such as this highlight the critical importance of Government funding to support local capacity-building in assessment, moderation and standards – something not adequately addressed in the Paper.

Also important is the need to build capacity in the setting and monitoring of academic achievement standards for activities beyond the institution, such as those in clinical settings and the like. The proposed approach tends to be narrowly focussed and fails to acknowledge the growing importance of work-integrated learning and associated assessment tasks. It will

be important for future work in this field to take account of the ways in which public and private sectors collaborate with institutions and professional bodies to address the issue of academic achievement standards in work-based settings.

There is merit in producing exemplars of discipline-specific learning at various levels as the Paper suggests, but one needs to guard against ending up with an assessment rubric that reduces learning to a set of components while losing sight of the whole. A balance needs to be struck but this is not acknowledged, nor a process for enabling such a balance to be achieved.

The Paper proposes testing its proposal with a 'small number of volunteer disciplines' (p.11). One possibility would be to start with a program or programs that generate the bulk of higher education graduates and have relatively well-defined outcomes and choose one key subject for monitoring. There would be considerable merit in trialling an agreed process at the national level, while also supporting individual or clusters of institutions to develop local expertise in the setting, monitoring and communication of academic achievement standards.

As the Paper indicates, there is no guarantee that it will be possible to develop a viable and useful national approach for specifying, implementing, communicating, monitoring and reviewing standards (see p.11). Moreover, the Paper makes no mention of the fact that statements of academic achievement will need to be regularly reviewed and updated. The proposed development process highlights the development and implementation of standards and associated statements, but the feasibility of a sustainable, rigorous mechanism for reviewing, maintaining and updating these statements is not explored. Thus it will be critical that any implementation plan arising from this and subsequent proposals be fully costed, developed in a staged manner, and reviewed with international input and advice.

One of the main gaps in the Paper is the lack of illustrative examples. For instance there is little evidence of examples of how the 'development of statements of learning outcomes' (p.10) might take place. This may lie beyond the scope of the Paper, nevertheless it will be important for a thorough scoping study to be undertaken to provide exemplars to inform further activity on the project.

The Paper acknowledges that 'there is also some concern that external and independent focus on academic achievement standards could be intrusive, potentially violating the principle of academic freedom and autonomy' (p.7). It would be important to ensure that this concern remained at the forefront of any discussion about a proposed national structure for academic achievement standards in Australian higher education. Similarly, the issues of 'standardised expectations' and 'monitoring of compliance' (p.13) raise real concerns which are not addressed at all in this Paper. Questions to be addressed include defining the meaning of 'standardised expectations' and explicating the notion of compliance and how it is monitored. The latter are included in a so-called 'light touch' level of implementation, but the content of the first dot point under 'implementing the assessment' (p. 13) somehow belies the 'lightness of touch'.

It is pleasing to see that the Paper acknowledges that the proposed approach will require 'diverse approaches' (p.13). In some disciplines, there is already widespread consensus on introductory textbooks for certain fields of study and this may well facilitate discipline-based discussions of standards and context-appropriate assessment tasks.

The Balance between a Disciplinary Emphasis and Generic Outcomes

The Paper argues for the importance of setting and monitoring academic achievement standards in both generic and discipline-specific areas. Both areas warrant attention but it would be unwise to try to address both simultaneously or in the same way. The sector – in

consultation with employers, government and the wider society – needs to develop a more nuanced and sophisticated understanding of the role of graduate attributes in university learning and their connection to disciplinary knowledge (Barrie, 2006; Bath, Smith, Stein & Swann, 2004). The complexity of this task is not acknowledged by the Paper. It is a necessary precursor to any discussion about the possibility of developing national statements about the achievement of generic graduate attributes.

Moreover, the argument about generic skills and graduate attributes needs to take account of the growing body of evidence that contends for the importance of embedding and assessing graduate attributes in disciplinary contexts (see for example Barrie, 2006; Bath et al., 2004; Leask, 2002). The paper makes no reference to such issues, nor does it canvas the idea that the expression of these higher order generic skills may vary considerably by discipline. It will be important to ensure that any further activities demonstrate a more informed consideration of how the sector might at once support the value of a common reporting strategy for such initiatives as the Australian Higher Education Graduation Statement, while at the same time respecting necessary institutional distinctiveness and differentiation.

The authors pre-empt the potential criticism that the development of national statements of learning outcomes ‘should not need and need not stifle diversity and differentiation’ (p.10), but their argument is unconvincing. If the statements are ‘necessarily general’, not reflecting ‘the highly specialised character of some programs’, of what use will they be in assuring key stakeholders, particularly employers, for example, of the quality and standards of Australian higher education? This argument needs to be more fully articulated.

Clearly, more informed debate needs to guide decision-making on statements of discipline-specific academic achievement and standards of achievement of generic attributes, qualities and outcomes. One important question to be raised as part of this debate is whether, indeed, two separate statements should be developed, or whether a more integrated approach might more accurately reflect the goals of embedding generic attributes into disciplinary contexts. All of these issues need to be explored as part of a more thorough treatment of this important subject.

The Paper makes much reference to standards in the disciplines but further discussion is needed of how these issues apply to cross/multi/trans-disciplinary study and to emerging fields of endeavour.

Alternative Proposals

This response has presented several alternative ways of addressing the important issues inherent in setting and moderating standards in Australian higher education. These are summarised and extended in point form below. Overall, a combination of approaches is favoured, including a possible national-level pilot process, along with strategic capacity building at institutional level which builds on existing processes (e.g., professional accreditation), respects the need to pursue distinctiveness and diversity, is informed by a more robust appreciation of the complex inter-relationships between discipline-based and generic skills and approaches to their assessment.

1. Before progressing any further, there would be merit in conducting a feasibility and scoping study that includes the relative costs to the institutions of engaging in activities such as those proposed in this Paper. A useful starting point would be a closer examination of professional accreditation processes to ensure optimal use is made of existing processes and infrastructure.
2. Develop strategies for ensuring that language about academic achievement standards, and standards more broadly, is used with care and that there are shared

understandings across the sector and within institutions. The Paper does the sector a service in this regard by mentioning the complexity of the language.

3. Initiate sector-wide professional development for representatives from every Australian university on the language and processes of standards setting and monitoring.
4. Initiate and fund a range of complementary institution-level and discipline-based projects to achieve the threefold goals of capacity-building at the local level; extending existing processes and infrastructure (such as those of current accreditation activities) to further explicate the 'what and how' of academic achievement standards in the discipline.
5. Ensure that attention to standards extends beyond the institution to encompass work-integrated learning (including clinical placements, internships and the like). This would need to involve government and non-government sectors and professional bodies and should build on existing ALTC projects (see below).
6. Build on and extend the outcomes of several existing ALTC projects (e.g., Teaching Quality Indicators project; Graduate Attributes Project (GAP), discipline-based projects and projects on assessment in the discipline – e.g., *Development of a standardised and valid approach to assessment of clinical competence in physiotherapy*) to ensure optimal use is made of existing disciplinary networks, resources and infrastructure.
7. Consult with institutional groups and benchmarking partners (e.g., IRUA, ATN) to explore options for addressing these issue more locally or across institutional groupings as part of the piloting process.
8. Consider monitoring the standards of graduates in a single profession (e.g., nursing or law) and in a single common subject to pilot the proposed initiative. If the process ultimately proves to be viable and useful, a large number of discipline clusters might be involved, but initially it would be prudent to test the proposal on a small number of volunteer disciplines (perhaps three or four) and then move to perhaps eight or ten that cover the range of disciplinary types. The initial studies would attempt to cover, by example, broad categories of disciplines, e.g., science/arts, professional/generic, that would in turn be broadly applicable to other, cognate disciplines.

As the introduction indicates, what is called for is 'strategies for demonstrating students' academic achievement'. This does not necessarily mean that effective work in monitoring and maintaining standards is not occurring across the sector. Perhaps more thought needs to go into the difference between these two issues. There may be much simpler and more economical approaches to achieving the same end. These need to be explored and articulated well before any national approach to standards is considered.

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This institutional response reflects an institution-wide consultation across all academic elements of the University through the Committee of Chairs of Assessment Boards, and Deans (Learning and Teaching). Advice from Dr Gavin Moodie and colleagues in the Griffith Institute for Higher Education is also gratefully acknowledged.

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