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STRENGTHENING THE AUSTRALIAN QUALIFICATIONS FRAMEWORK: A RESPONSE

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Proposal 1

The objectives of the AQF are aligned with the policy goals which it is designed to underpin and support.

Question 1

What changes should be made to the existing statement of objectives of the AQF to reflect national education and training goals?

Answer 1

A prior question would deal with how the AQF objectives can be known, recognized, and acknowledged by self-accrediting institutions, and not just non-self-accrediting institutions!

The latter find ignorance among senior university staff at times; for instance,

- External Review Panels of various jurisdictions for accreditation or re-accreditation;
- Registrars and Deans of Universities who contact NSAI's when their graduates apply for post-graduate enrolments;
- AUQA Auditors who ask NSAI's "who accredited your degrees?"!

The MCEETYA National Protocols require institutions which offer Australian higher education qualifications comply with the AQF higher education titles and descriptors. Yet, according to Gavin Moodie ("Don't let Masters slip down", *The Australian* 19 November 2008):

* While Warrane College accepts responsibility for publishing these papers, the opinions expressed in these papers are those of the authors. Enquiries should be directed to the Master, Warrane College, UNSW, PO Box 123, Kensington, NSW 1465, Australia.

“All Australian universities extensively breach the Australian Qualifications Framework. That's not news, as universities mostly ignore the framework. But it demonstrates a systemic failure of quality assurance and the lack of national maintenance of standards in higher education. ... The Australian Universities Quality Agency has consistently declined to assess the standard of Australian degrees or even the relative standards of the Australian higher education system, although this is one of its objects. However, the agency claims to assess universities' compliance with the national protocols for higher education approval processes, including compliance with the AQF. Some of its reports occasionally comment on a university's compliance with the AQF ... [this] contrasts with the approach of state and territory higher education accrediting bodies, which are much more vigilant and consistent in applying the AQF. The state bodies accredit non self-accrediting higher education institutions, most of which are private ... which puts them at a clear disadvantage vis-a-vis the self-accrediting but non-complying universities.”

Having said that, the AQF objectives are actually very useful in practice for curriculum development in the NSAs both

- in level of content and
- in ensuring that attention is paid to the generic skills and attributes in appropriate subjects within a course.

Where the AQF objectives could be more useful on a cross-sectoral basis is in credit transfer. By cross-sectoral, we here mean transfer between either

- VET and HE, or
- NSAs and SAs.

Credit transfer has bedeviled tertiary education informally for many years, and formally for almost twenty years with attempts by the former AVCC to unravel the issues (one such being led by Professor Gus Guthrie in the early 90s). The AQF Proposal rightly draws attention to international developments, particularly the Bologna process, which are affecting institutions and individual students within Australia.

Our view would be that if it was only Australia that was affected, then let us continue to stumble on with a variety of interpretations of the actual meanings of credit points, but with post-secondary education becoming more global with more than lip-service being paid to memoranda of understanding, it is now important that there should be more genuine opportunities for mobility within Australia.

In this regard too it would be useful if there were common parlance among the jurisdictions within Australia not only for the meaning of “credit points”, but also for such other common terms as “subject”, “course”, “award”, and even “registration”. This is not try to impose uniformity on universities which prize their autonomy, but a recognition of the increasing mobility of students within the post-secondary environment in Australia.

Proposal 2

The AQF is redesigned as a framework of qualifications based on a taxonomy of learning outcomes and explicit reference levels with a measurement of the volume of learning

Proposal 2a

A learning outcomes classification or taxonomy is developed as the basis for the qualifications descriptors in the AQF.

Question 2

Should an explicit taxonomy of learning outcomes be used consistently to describe all qualifications in the AQF?

Answer 2

For NSAI's the more explicit the taxonomy the better, because an explicit taxonomy enables them to be more confident of the

- standards of performance of their students, and
- levels of achievement of their awards,

This is so because NSAI's often

- have nested undergraduate awards (HE Diploma, Associate Degree, Bachelor Degree), and
- admit VET Diplomates from
 - their own courses if dual sector and/or
 - TAFE Institutes or other VET providers, especially with the recent rapid increase of articulation arrangements in connection with FEE-HELP for VET.

Pertinent to this question are also

- potential development of TEQSA, and
- the currently circulating AUQA discussion paper, "Setting and Monitoring Academic Standards for Australian Higher Education".

Question 3

If an explicit taxonomy of learning outcomes is used, will students and employers be better served by Option A or Option B?

Proposal 2b

AQF qualifications are organised within the AQF by an explicit reference levels-based structure.

Answer 3

We would prefer Option A because it is difficult in practice to distinguish, let alone separate, the recognition of generic skills from their context within a subject or course. Furthermore, given the rather limited view of competences at the VET level arising from the Competency Based Assessment processes associated with the Training Package movement, one could question why the post-Herbartian triad of "knowledge/Skills/Attitudes" has been changed, since the generic skills are very dependent on the attitudes of the teachers and the ambience of the institution.

Attitudes make the difference if genuine attempts are to be made to help students acquire generic skills, particularly if these skills and attributes are not formally measured or unless sophisticated assessment processes have been developed to recognise them.

Question 4

How could explicit level descriptors for each AQF level enhance Australian qualifications and their use?

Answer 4

In order to enhance Australian qualifications and their use, the issues which surround credit transfer need to be addressed. This is particularly so in a country like Australia where there are so many self-accrediting institutions and where only limited use is made of external examiners and institutional benchmarking (always, or nearly always, excepting those programs where professional bodies determine who can be licensed or registered to practice in a given field.

In practice, credit transfer can be confused with

- advanced standing,
- recognition of prior learning (RPL),
- recognition of prior experience (RPE).

The last, for example, can come into play in admission into Graduate Certificate programs in fields where there was not previously much opportunity, or need, for the acquisition of formal qualification in order to practice in that field. Computing was once such a field, design may be now.

The assessment of applications for RPL and RPE, like any form of assessment, must be

- faithful to the standards of the field, and
- fair to the student in that
 - making them repeat something that they already know is a waste of their time and money, but
 - giving them credit for something which they do not know at a sufficiently advanced level is doing them no favours because it can be setting them up for subsequent failure.

The extent of advanced standing, if any, can depend on whether the subject(s) in question is/are

- core or elective,
- from VET or HE.

With the latter there should be a difference in kind and not just extent, but the issue can be complicated when the skills base in a given subject is both deeper and broader at the VET level than the comparable HE subject. For example, some Typography modules at the VET level in graphic design diplomas can be more demanding in terms of knowledge and skills than their counterpart subjects in graphic design degrees.

The conceptual framework of the pertinent theory should provide a critical depth in the HE subjects, but it is not always obvious. The clarification and elaboration of these in an indicative format would make the AQF levels more useful.

Question 5

What number of explicit reference levels would best illustrate and encompass the increasing complexity of Australian qualifications?

Answer 5

Between Levels 5 and 6 should there be a clarification of

- Bachelor degrees with Honours and
- Honours Bachelor degrees and
- the distinction between them and Pass Bachelor degrees.

Again this has proved difficult on the few occasions that NSAI's have applied for government accreditation of Honours programs.

The same distinctions and clarifications might be needed between

- Coursework Masters programs, and
- Masters by Research degree,

and even among the academic expectations among

- Professional Doctorates (such as the EdD),
- Research Doctorates (such as the PhD), and
- Higher Doctorates (such as the DSc),

since these have different meanings in different countries. For instance, there is a big difference between the Doctor of Medicine degree in Australia Britain and the Doctor of Medicine in continental Europe and North America. Table 9 of the Proposal mentions only the PhD. Some of the salient issues in the then emerging professional and coursework doctorates were teased out by Trigwell *et al*¹ in 1997.

Internationally too there are some Masters degrees which are really equivalent to an Australian Honours degree at best; for instance, some of the new Masters degrees in England and Wales (and not just the traditional Oxbridge MA or the older Scottish MSc and its equivalent in New Zealand).

¹ K. Trigwell, A.G. Shannon, R. Maurizi, *Research-coursework Doctoral Programs in Australian Universities*. Canberra: Australian Government Publishing Service, 1997, [ISBN 0-642-12648].

Question 6

What is the best process to use for locating each qualification type in a levels-based structure?

Answer 6

This can only be at a level of principle since the autonomy of each discipline should be respected. These principles might cover what levels are expected at each level (as with HE Diploma, Associate Degree, Pass Degree) both in terms of the major and in terms of generic skills.

Proposal 2c

AQF qualifications are assigned a measure of the volume of learning based on the notional student learning time involved in achieving the qualification.

Question 7

Would a measurement of the volume of learning add value to AQF qualifications and support improved credit arrangements?

Answer 7

It is hard to see how this could be done meaningfully and consistently - which does not mean that it should not be attempted. The actual hours, as distinct from the nominal hours, vary not only with the level and complexity of the subject matter, but also with the ability of the students, and – dare we say it – with the skills of the teachers. Table 9 would need more teasing out to fine-tune Honours and the different types of Masters degrees, otherwise it is difficult to work out the meaning of the credit points of the PhD in relation to the Masters.

Question 8

What is the best process to use to determine the credit point value for each AQF qualification type?

Answer 8

There would seem to be anomalies in Table 9, particularly, but not only, in relation to Diplomas, Advanced Diplomas and Associate Degrees. The Associate Degree still seems to have varying life forms in different institutions despite the work that the AQF Council did previously; that is, it still seems to vary between being a “parachute qualification” at one extreme and two-thirds of a Bachelor Degree at the other extreme.

It may be more meaningful to have credit points for each column of Table 1 so that there is comparability within columns. Whether that can be translated into acceptable comparability between columns is a moot point.