

Some comments on the AUQA Discussion Paper “Setting and Monitoring Academic Standards for Australian Higher Education”

Emeritus Professor John Dearn

Visiting Fellow

The Centre for Academic Development and Educational Methods

The Australian National University

AUQA is to be congratulated on putting forward this Discussion Paper on the critical issue of the standards of student academic achievement in Australian higher education. However, as discussed below, the Discussion Paper either fails to clarify or does not fully explore some important ideas. It is though, a useful contribution and will hopefully stimulate further work on the development of an effective system of reporting student academic achievement.

The Discussion Paper raises three key questions:

First, is it desirable to impose uniform academic achievement standards (grades) across the sector for identical programs i.e. a particular grade designation denotes the same level of student academic achievement irrespective of the institution?

Second, is it appropriate to compare the same standards (grades) across different programs and disciplines and make inferences about the levels of student academic achievement in different programs and disciplines?

Third, would it be feasible to introduce system-wide moderation processes for all programs and institutions that would be required for any national system of uniform standards of student academic achievement?

My own view is that the answer to each of three questions is no and this position informs my specific comments on the Discussion Paper as detailed below. There is a clear need for Australian higher education to have in place a system for quality assurance with respect to the standards of student academic achievement. However, it would seem that such a system could be created without the need to report to a national uniform standards approach which would sit uncomfortably with the characteristics of higher education which are based on a particular approach to knowledge creation and research.

1. A curious aspect of the paper is its failure embrace the concept of “learning outcomes” i.e. what students are expected to have learned on completion of a program as opposed to what they have been taught or actually learned (academic achievement). Even though the concept of learning outcomes is explicitly stated in Recommendation 23 of the Review into Higher Education referred to on page 6, it is dismissed in the Discussion Paper on page 7 in parenthesis with no explanation.
2. The recognition of learning outcomes is absolutely essential to the process of using standards to describe different levels of student academic achievement. Judgements that are made about student academic achievement in a program can only be made with respect to the specific learning outcomes established for that particular program and it is inappropriate to compare levels of student academic achievement in programs with different learning outcomes either within or between different disciplines or fields of

study. If it is considered desirable to compare the levels of academic achievement of students in different programs or institutions then those programs must have both identical learning outcomes and identical assessment tasks.

3. What the learning outcomes should be for any particular program is a separate issue, though somewhat confusingly, is touched on in the paper. For example, on page 4 it is stated "...institutions need to demonstrate that their graduates have the capabilities that are required for successful engagement in today's complex world". For the purposes of the Discussion Paper, this is not the key issue. Rather, the issue is that institutions need to make explicit the learning outcomes of their different programs and the standards that are used to describe different levels of student achievement with respect to those learning outcomes. In addition, institutions need to demonstrate that they have in place assessment processes that ensure that grades they assign to students do validly reflect the agreed academic standards.
4. The process of establishing any form of national comparison of standards of student academic achievement can be separated into four different steps. First, for a specific academic program learning outcomes need to be established and for these standards (grades) need to be developed for different levels of student achievement with respect to those learning outcomes, Second, moderation processes need to be put in place to ensure that the standards (grades) are applied reliably. Third, the academic achievements of students in different programs (e.g. in different institutions) can be compared if (a) the curriculum is identical (b) the learning outcomes are identical (c) the assessment tasks used to measure student performance with respect to these learning outcomes are identical and (d) the standards (grades) used to judge student academic achievement are identical. Fourth, moderations processes need to be put in place to ensure the standards are being applied reliably across different institutions.
5. These four steps required for any national system of standards for student academic achievement are all open for audit for quality assurance through the presentation and examination of appropriate evidence e.g. curricula, learning outcomes, assessment tasks, grade descriptors, moderation processes and exemplars of student work judged to be a different levels of achievement. However, any comparison of levels of student academic achievement in different programs is inappropriate if the curricula, learning outcomes and assessment tasks of the programs are not identical. There would be a strong view that such uniformity and standardisation of curricula and assessment is fundamentally antithetical to the nature of higher education with its focus of knowledge creation and research. It should be noted that when uniformity of curricula and assessment is appropriate, as is the case for certain professional areas, then national approaches to academic achievement are established. The issue here, though, is whether this approach should be imposed on all programs, in all disciplines and across all institutions.
6. Any agreement to have a uniform system-wide set of standards for student academic achievement raises the issue of whose standards. It is unlikely that any institution would wish to lower its standards of student academic achievement which immediately raises the issue of the implications of imposing the same unrealistically high levels of academic achievement on all students in the sector in term of equity and social inclusion. While this approach might be suitable for some programs (e.g. the minimum standards of academic achievement required to practice medicine) it is surely both undesirable and untenable for all students and all programs.

7. Throughout the Discussion Paper there appears to be confusion between the concept of academic standards and the concept of level of student academic achievement. This is seen even in the title of the Discussion Paper. One can and should monitor academic standards to see whether they are set appropriately, for example in relation to international standards, but these standards are normally relatively stable and only revised occasionally. What needs to be monitored is not the academic standards but the levels of student academic achievement *against* these standards. I presume this is what is meant by the title.
8. Confusion between academic standards and academic achievement is seen throughout the paper. For example, on page 8 it is stated:

As an example, consider the sentence: 'There is concern in the academic community that standards are falling and seriously damaging the institution's reputation'. Here, the word 'standards' refers to observed average levels of performance, which are apparently showing a downward trend. This type of 'standard' is simply the average or perceived general level of achievement. It is not a standard as defined above.

In this example it is likely that it is indeed the standards that are perceived to be falling. The standard in this case is the level of achievement that is considered appropriate for a Pass (or higher grade). If it were simply a drop in levels of achievement over time then the proportion of students who failed to achieve the Pass standard would increase. The academic community concern referred to would appear to be not that the institution is damaging its reputation by failing an increasing percentage of students but rather that that students are continuing to be judged as having attained a Pass level of achievement despite the fact that the levels of achievement are falling and hence the standards for Pass level have indeed changed.

9. The title of the paper refers to "academic standards" but the paper states "the focus is specifically on academic achievement standards". However, the decision to focus on academic achievement blurs a very important issue. Academic standards can include achievement standards, pedagogical standards, assessment standards, curriculum standards and learning resource standards. It needs to be acknowledged that there is an important tension between pedagogical standards and achievement standards. The highest standards of pedagogy hold that the level of expected student academic achievement should be matched to the background and current level of knowledge of the particular students. Expecting an inappropriately high level of academic achievement for a group of students would not be regarded as good teaching practice and would not be judged as meeting a high standard of pedagogy. Thus, if one focused not on student academic achievement but on teaching as the focus of academic standards one would make very different assessment of academic quality.
10. There are some very curious statements in the paper. For example, at the bottom of page 4 it is stated "Research suggests that institutions cannot report how well their students are .. performing...". I am not aware of anything that prevents institutions from doing this, so should this statement be read as "institutions do not" or "institutions do not know how to" or "there is no common system for institutions reporting"? It is quite unclear what is being argued.
11. Student academic achievement can only be measured against what is expected of them in a particular unit of study. However, units of study are not equivalent in most cases either within or across institutions. Even in the case, for example, of a standard first year

undergraduate biology unit of study, there are often three different versions of this unit - one appropriate for science majors, one appropriate for professional courses (e.g. nursing or landscape design) and one for arts students studying a general science unit as part of their degree. The expected levels of student achievement would be different for each form of the unit, given the background of the students, and hence different standards would have to be created for each type of offering. There are clearly some units of study that are codified and standardised across institutions such as the Priestly Eleven subjects in Law. However, these are an exception and many units of study in higher education are idiosyncratic and unique not only to the institution but often to the particular academic teaching the unit. This poses a challenge to any attempt to create a uniform system-wide standard for level of achievement simply because the expected level of achievement both in terms of content knowledge and cognitive development are not identical and hence the associated academic achievement standards would be different.

12. There is confusion in the paper between the creation of appropriate standards and the assessment of academic achievement against these standards. It is stated on page 7 that “Grades ... provide the standard currency for representing academic achievement..” and it then goes on to talk about whether grades are “trustworthy” or have “integrity”. It is stated that if grades were indeed trustworthy and had integrity “the scene would be set for working towards comparability of grades across courses and, to a considerable extent, across programs”. The issue of making academic judgments of student academic achievement against a set of standards (grades) is a very important issue but must not be confused with the issue of comparing trustworthy grades across different programs. It is not clear what the comparison of a trustworthy distinction level of achievement in a first year chemistry unit and a trustworthy distinction level of achievement in a third year graphic design level unit of study would tell you. The two Distinction grades measure student achievement against whatever the expected levels of academic achievement that were agreed to for those particular units of study.
13. The Discussion Paper makes it clear that the aim is to address academic achievement standards at a system-wide level and it is stated on page 9 that “.. a national process will be required to achieve this, operating within and across disciplines, and across institutions.”. This raises one of the central issues behind the Discussion Paper. A key implication is that there will be a standard national curriculum for higher education and standard uniform standards of student academic achievement across institutions. While this currently happens in various professional degree programs such as law or engineering, it is not clear it desirable, let alone feasible, to implement this for all courses and units in all disciplines and all institutions. It needs to be argued why it is not desirable for different units, course and institutions too have different standards of academic achievement reflecting the different backgrounds and interests of students provided evidence on academic achievement is made available for audit. Such evidence would include curriculum materials, assessment materials, expected learning outcomes, grade descriptions and examples of student work. Any claims made by the institution with respect to their academic achievement standards related to national or international comparisons would have to be supported by evidence of appropriate benchmarking.

In summary, the Discussion Paper rightly identifies the importance for higher education institutions to communicate and provide evidence about what their students have actually learned in different units and courses or, more indirectly, the standards that were used to judge levels of academic achievement. However, the approach taken in the Discussion Paper

is one of a system-wide approach based on inter-institution comparison using standardised “objective” measures. This in turn would require standardised curricula and assessment across the sector if comparisons are to be valid and raises the key issue of whether this is desirable.

A key characteristic of higher education is that it encompasses a diversity of educational approaches and curricula reflecting not only different institutional missions and student communities but also the individual interests and expertise of individual academic staff. Imposing standardised national curricula, assessment and academic achievement standards on all institutions risks stifling the very creativity, personal development, diversity and knowledge creation that is the hallmark of higher education. In addition, the compliance costs of the proposed system would be great and probably unsustainable. A greater focus on articulating and communicating learning outcomes and aligning these with curricula, pedagogy and assessment together with more systemic moderation and benchmarking would address the important concerns raised in the paper without the costs and potentially negative consequences that the proposal seems to imply.

John Dearn

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