

OFFICE OF THE VICE-CHANCELLOR

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Dr David Woodhouse
Executive Director
Australian universities Quality Agency
Level 10 123 Lonsdale Street
MELBOURNE, VICTORIA 3000

Dear Dr Woodhouse

The University of Western Australia (UWA) welcomes the opportunity to comment on the Australian Universities Quality Agency's discussion paper, 'Setting and Monitoring Standards for Australian Higher Education' (May 2009).

After extensive reflection and discussion within the Executive and in consultation with a range of experts at the University, I must at the outset make clear that we are neither clear about the rationale underlying the proposal, nor confident about the value of the approaches proposed within it.

In respect of the first point, considerable coverage has been given elsewhere to the significance of our international education contribution to Australia's overseas earnings and of the need to maintain the reputation of 'Brand Australia' in that market. This is an area touched upon in the paper. To that extent, defining minimum requirements for graduation at different levels of university degree is desirable, and would be met in some measure by a more fully-elaborated Australian Qualifications Framework (currently under review). Defining such a minimum could, we believe, be achieved relatively simply and inexpensively. Moreover, an approach designed to define such a minimum would ensure quality whilst not intruding unnecessarily upon the differentiated missions and approaches which are strongly characteristic of Australian higher education.

The further assumption in the paper, that there is generalised anxiety within Australia concerning the academic standard of its university graduates and of performance within particular disciplines, is not at all borne out in our experience. We believe that any sense of malaise has been overstated in the document.

The University of Western Australia has recently undertaken extensive consultation with industry, the community and academic staff internally as well as nationally and internationally, in the context of a major review of its course structures. The results of that consultation indicate comprehensively that there is currently, as well as historically, a high degree of confidence in the levels of achievement among our graduates.

In respect of the second point, our confidence in the particular approaches advocated in the paper, we note that they are similar to those which inform initiatives as the OECD's AHELO project, whose underlying assumptions we have previously questioned

In brief, our objections are threefold:

1. The emphasis within the paper upon intra-disciplinary consideration of standards on a national basis in our view is cumbersome, and would be excessively costly in respect of both time and resources. While generating exemplars of acceptable standards within a discipline may yield some interesting results, the systems of calibration, comparability, and monitoring envisaged would entail significant investment and would point towards regimes of national testing, structures for consultation, and protocols for reporting. In terms of final benefit, the paper itself identifies obvious limitations in any outcomes that might be achieved using these new approaches: for example, statements of learning outcomes 'will be necessarily general'. Given these and other methodological limitations, the proposal's implementation cost would be excessive.
2. The University is not at all confident in the psychometrics of 'value added' as a strategy. Serious concerns have been raised since the 1980s about the concept of 'value added' and its measurement to indicate improvement of skills over time as undertaken by major testing houses in the United States of America and elsewhere.
3. The paper is framed without apparent reference to some key critical literature concerning the approaches suggested, and in particular, of 'value added' measurements (for example, Banta, Pike and Koretz). While the paper rightly asserts that 'calculating the net growth in achievement that is due to university is not straightforward' (p. 17), this critical literature examines the utility of value added measures based on forty years of standardised test data. As such, it provides important insights into what may and may not be adduced from such measurement, and constitutes a significant contribution to this area of debate and discussion. As such, its inclusion would have made the paper's considerations more comprehensive.

For these reasons, the University of Western Australia is not generally supportive of the approaches outlined here.

Yours sincerely

Alan Robson
Vice-Chancellor