Dear Mr Taylor

Advancing Quality in Higher Education initiative

The University of Sydney welcomes the opportunity to make a submission in response to the three discussion papers on the measurement of higher education performance, released for comment on 9 December 2011 by the then Minister for Education, Employment and Workplace Relations, the Hon Chris Evans. By providing an institutional perspective on some of the key issues as we see them, our comments are intended to complement the submissions made on our behalf by Universities Australia and the Group of Eight.

Our comments follow and build upon the feedback we have provided informally in relation to the design and development of the My University website, and formally through the following submissions concerning related policy processes:

- The TEQSA Qualification Standards - September 2011
- The TEQSA Teaching and Learning Standards - July 2011
- The TEQSA Provider Standards - June 2011
- The Base Funding Review - March 2011
- The Compact and Performance Funding Review - November 2010
- The ‘Strengthening the AQF’ exercise - August 2010
- The Developing an Indicator Framework for Higher Education Performance Funding - February 2010
- Measuring the Socio-economic Status of Higher Education Students - February 2010
The reform proposals

Our understanding is that the Government intends to introduce a new annual University Experience Survey (UES) nationally from 2012 onwards. The survey will cover undergraduate students only and it is intended that the results will be published on the My University website at a level of detail that will be determined following an assessment of the validity of the data. We further understand that the Government intends to develop and pilot a version of the Collegiate Learning Assessment (CLA) generic skills assessment instrument in 2012, with a view to implementing an Australian CLA nationally from 2013, and publishing the results on the My University website from that year onwards. As is the case with the UES results, decisions about how institutional CLA results will be reported publicly will be taken following completion of the trial. The Government is also reviewing the Australian Graduate Survey (AGS) to determine whether changes are needed to its design and administration to minimise duplication and maximise the coherence of the Australian higher education performance measurement framework. Institutions’ Course Experience Questionnaire (CEQ) Graduate Destination Survey (GDS) results are also to be made publicly available through the My University website from 2012.

Our key concerns

Our main concern about the current proposals is that we believe the return on the substantial investment that has been committed to the exercise is likely to be poor for both the Government and the sector. The creation of additional national survey data sets will, on its own, do little to improve quality. Unless the performance measurement proposals are accompanied by meaningful increases in levels of base funding per student and targeted funding to pursue enhancement strategies that respond to the data, it will be a very expensive measurement exercise that is likely to stifle creative teaching and curriculum development.

We also repeat the reservations we have expressed in previous submissions about the utility of standardised testing of the generic skills of students in a university context. We note Australia’s involvement in the OECD’s current pilot of the Collegiate Learning Assessment (CLA), and the Government’s desire to implement an Australian version of the CLA from 2013. We believe, however, that it would be premature to proceed with the development of such an instrument for Australia until the TEQSA Teaching and Learning Standards Framework has been set, and the sector (and critically the disciplines) have had the opportunity to consider the standards and the results of the OECD trial.

As we and others have pointed out in previous submissions, the CLA is not suited to the purpose for which it is proposed to be used in Australia. The question of the credibility and validity of measures of graduate learning outcomes must be considered. What is credible to employers, students, and
academic communities is authentic contextual assessment that is conducted over time. This equates to the need to use in-course, cumulative discipline-based assessment, coupled with rich and authentic capstone assessment that involves professions and other external stakeholders in setting assessment standards and processes. This has been the focus of much of the work that has emerged in the wake of the first round of discussions about discipline standards sponsored by the former Australian Learning and Teaching Council (ALTC). For example, with the Group of Eight Quality Verification System (QVS) pilot, a project is already underway in the sector which does seek to deliver comparative discipline-based assessment of final year student learning outcomes. The QVS has the potential to be expanded to include discipline-based assessment of generic skills.

We also have reservations that the way the data will be reported on the My University site will potentially lead to conformity and ‘teach to the test’ behaviour which in no way builds the diversity in the higher education sector – something that is a vital element of the Government’s vision for the sector. More consultation should be focused on how data will be reported.

We therefore note with approval the indication at the end of the Development of Performance Measurement Instruments in Higher Education discussion paper that participation by institutions in the proposed new performance instruments will be voluntary (p.21).

Enhancing quality in the demand-driven system
The discussion papers make much of the need for enhanced information about the quality of teaching and learning in Australian universities in a demand-driven operating environment. The papers suggest that in a context of greater choices for students they need to have access to better information to inform their study decisions. A key issue that the papers do not address, however, is that the shift to demand-driven funding has provided institutions with little incentive other than to grow their enrolments. Here we note that the Base Funding Review placed a high priority on increasing the average level of funding per student place to improve Australia’s international competitiveness, and in particular, on increasing funding in the many disciplines that are demonstrably underfunded. Moreover, the Review warned that under the student demand-driven system it is essential that funding aligns more closely with costs and, that if existing disparities are not resolved with some urgency, the demand-driven system will operate inefficiently and lead to unintended consequences. We support the Government’s efforts to strengthen the AQF, enhance the overall regulatory and quality assurance framework through the establishment of TEQSA, and improve the quality of the information that is available publicly about the performance of Australian universities. Nevertheless, if the underlying

policy objective is to improve the quality of university teaching and student learning outcomes, these ‘process’ reforms will not be sufficient to underpin meaningful improvements in the quality of provision. They must be accompanied by fundamental improvements to base funding.

Fitness for purpose
Achieving clarity from the outset about the underlying purpose for developing any new standardised survey or test for university students, or for adjusting existing instruments, will be critical to the success of this exercise. As Allison Morris concluded in her recent detailed review of standardised testing of school students undertaken for the OECD, ‘since the purpose of the test has an impact on subsequent test design and implementation decisions, it should be clearly established at the beginning’. Moreover, Morris cautioned against employing large-scale standardised tests that serve multiple purposes as this runs risks of reducing the utility of the test for any one of those purposes—even resulting in serious dysfunctions. Here we note with approval that the papers state that the first principle that will underpin the design of the proposed new instruments is ‘fitness for purpose’. Achieving agreement between the Government and the sector about the purpose of each new instrument from the outset will therefore be vital. As an underlying design principle, any new test instruments must meet the objective of improving student learning outcomes. In our view it is yet to be demonstrated how the introduction of the UES and CLA as proposed for Australia will achieve this outcome.

Moreover, we note that the original objective for the development of a new indicator framework for the Australian higher education system was to drive improvements in teaching quality and student learning outcomes by directly linking institutional performance to reward funding through the compact agreements. The Government has subsequently decided that it will not proceed with the student experience and quality of student learning outcomes elements of performance funding. We note, however, that the discussion papers suggest numerous possible purposes for the proposed new and refined indicators. These include: providing evidence that public investment in higher education is meeting economic, social and community needs; holding providers accountable for meeting required standards; assuring quality; encouraging continuous improvement; meeting employer needs; and informing student choice.

The emphasis in the three discussion papers, however, appears to be on the Government’s immediate desire to make comparative information about institutional performance publicly available through the My University website to inform student choice in a demand-driven funding environment for bachelor degrees. We cannot see how an integrated and robust standards-based performance measurement framework can be developed until after TEQSA’s teaching and learning standards have been finalised at the disciplinary level. We therefore recommend that the proposed development of new measures is either delayed until after the TEQSA standards setting process has been completed, or that it proceeds only on the basis that the single purpose of the exercise is to make meaningful information available to students and the general public through the My University website. A delay, pending clarity about the TEQSA standards framework, would improve the prospects of achieving the desired coherent outcome as emphasised in the papers. On the other hand, if the project must proceed due to time pressures, then providing clarity about the principal purpose, audience and uses for the data will maximise the prospects of successful design and implementation.

The value of standardised testing of generic skills in a university context

University teaching and learning experts from the University of Sydney, The University of Queensland and RMIT University, are currently involved in the Assessing & Assuring Graduate Learning Outcomes (AAGLO) project funded by the former Australian Learning & Teaching Council (ALTC). The project has recently considered standardised generic testing as an approach to the assurance of student achievement and graduate outcomes, publishing a summary of its early findings in December 2011.5 We draw to the Government’s attention the expertise and work of this group and note that while the group acknowledges the potential benefits of standardised generic skills testing in a higher education context, particularly if pursued in a disciplinary context and integrated within curriculum and assessment processes, they also emphasised the limitations and potential undesirable consequences that could result from poor design, implementation and the inappropriate use of test results. We are therefore pleased to see that the discussion paper acknowledges the potential pitfalls as well as benefits of standardised generic skills testing.

We also note the AAGLO group’s finding that in the United States the level of correlation between student scores on tests of generic skills and entering SAT scores is so high that prior learning accounts for at least two thirds of the variance in institutional scores. Moreover, factors such as ‘age, gender, socio-economic status, race/ethnicity, college major, sampling error, measurement error, test anxiety and student motivation to perform account for a proportion of the remainder’. These findings

are consistent with the statement in the *Assessment of Generic Skills* discussion paper that once student ability at entry and demographic factors are taken into account, institutional impact on student learning accounts for somewhere between 1 and 13 per cent of the variation in student learning outcomes as measured by graduate destinations and satisfaction (p.18). Yet despite the acknowledged limitations and risks of unintended consequence resulting from the use of such tests, the discussion paper suggests that the impact of universities on student generic skills is significant enough to warrant the cost of introducing standardised generic testing and reporting from 2013 onwards.

**The University Experience Survey (UES) and Graduate Destination Survey (GDS)**

As we already have in place a comprehensive survey of our undergraduate students, the results of which are publicly available, and which allows us to undertake longitudinal studies of trends in performance down to the unit of study, we see little need at the institutional level for the introduction of a new survey of undergraduate students. One option which could be explored in the development of the UES would be to, rather than impose yet another survey with significant administration costs, give universities the opportunity to include items or scales from an agreed national set (UES) in their internal surveys - hence meeting both benchmarking and internal quality assurance needs. We are therefore pleased to see that this type of approach is raised as an option in the discussion paper (p.20). We would be pleased to provide the Government and the AQHE Reference Group with more information about our surveys and approach to quality assurance and improvement if that would assist with the development and efficient implementation the UES.

While the availability of trend data is part of what gives the CEQ its utility and fitness for purpose and it should be maintained, the cost of the current graduate population survey strategy is prohibitive, particularly for a large university like Sydney. We have sufficient national data to justify the use of a sample for the AGS and this would make the process far more manageable.

**Concluding recommendations**

For the reasons outlined above we make the following recommendations:

1. Ensure that any reforms to teaching and learning performance measurement are accompanied by meaningful improvements to levels of base funding as recommended by the Base Funding Review.
2. Clarify the purpose of the proposed new performance measures. Ensure that there is consensus that each measure is ‘fit for purpose’ and that the risk of perverse outcomes are minimised through appropriate design, implementation and commitments about how the resulting data will be used.
3. Ensure that if the UES is implemented, this is done by providing institutions with an optional module of nationally consistent questions, which they can add to their existing surveys of undergraduate students, or offer through a sample approach.

4. Delay further consideration of the development of an Australian CLA until after the TEQSA Teaching & Learning Standards have been set, and the outcomes of the OECD trial are known.

5. If the CLA is to be progressed during 2012 regardless of the lack of support, ensure that it is developed in a disciplinary context with sufficient funding, and has the support of each disciplinary community as well as major employers of graduates in each field.

6. Review the Go8 Quality Verification Pilot and consider providing funding from the AQHE initiative to expand the number of participating universities and disciplines and include appropriate assessments of generic skills discipline-by-discipline.

7. Ensure that the GDS is retained, but allow a graduate sample approach to reduce the financial and administrative burden for institutions.


We understand that in addition to the call for written submissions the Department of Innovation, Industry, Science, Research and Tertiary Education is conducting face to face consultations with stakeholders. We look forward to participating in those discussions and to working with the Government to develop and implement a university teaching and learning performance measurement framework that is capable of meeting the needs of the Australian Government, students, the professions, employers and the higher education sector.

Yours sincerely

Signature withheld for electronic distribution

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