

The Hon Dan Tehan MP
Minister for Education
Parliament House
Canberra ACT 2600

Dear Minister

Advice on Academic Credit Arrangements

In his March 2018 letters of appointment of the current Panel members, the then Minister for Education and Training requested that the Panel "consider whether credit transfer policies and the standards in higher education are adequately meeting the needs of students and institutions noting the Review of the Australian Qualification Framework" (AQF Review).

To support the Panel's consideration of these matters, the department commissioned PhillipsKPA Consultants to undertake background research, drawing together learnings from a range of sources including previous reports, a survey by the Ithaca Group for the AQF Review, preparatory analysis for that review by PhillipsKPA and consideration by the review.

The Panel has also taken account of commentary and recommendations from the AQF Review as these relate to credit management. The Panel had significant engagement with Professor Noonan throughout the conduct of the review, including on credit-related matters.

PhillipsKPA's report found that the current regulatory framework is largely adequate, and is capable of facilitating access to academic credit. However, it identified opportunities to provide greater consistency in the quality of credit assessment, including suggestions to:

- Reinforce the positive encouragement conveyed in the AQF Qualifications Pathways Policy to award credit where possible, subject to appropriate safeguards, through improved cross-referencing to the AQF policy in Higher Education Standards Framework (HESF) Standard 1.2;
- Revise the guidance and interpretive materials produced by TEQSA to ensure clarity and consistency with the AQF Qualifications Pathways Policy; and
- Improve the visibility of credit recognition information for students and prospective students through enhancement of HESF Standard 7.3

The report proposed a sector-wide focus on credit recognition, taking an approach similar to that used to improve the transparency of higher education admissions – for example with a sector-led working group. The Panel does not consider such an approach is warranted at this time, however, and would risk duplicating some of the work already undertaken in 2017 and 2018 by the Admissions Transparency Implementation Working Group.

In the Panel's view, it would be more effective and efficient to amend the HESF and TEQSA guidance, where necessary, in order to drive the modest improvements needed in sector application of credit recognition policies. The Panel acknowledges that amending the Standards to reference current AQF policy may be seen as pre-emptive when the AQF may well be revised over coming months in response to the AQF Review. Uncertainty around the timing or extent of such revisions, however, militates against holding off from addressing the problems identified by both the AQF Review and PhillipsKPA regarding interpretation of the intent of credit recognition policies.

Recommendations

Amendments to the Higher Education Standards Framework

The Panel recommends minor amendments be made to the Higher Education Standards Framework as set out at Attachment A:

Recommendation 1 Standard 1.2.1 should be amended to note the standard reflects the policy intent of the credit and recognition of prior learning framework within the Australian Qualifications Framework.

Recommendation 2 Standard 1.2.2 should be amended slightly to remove the word “only” to reduce perceptions of a bias towards not awarding academic credit that, in the Panel’s view, is unintentional but has had an influence on stakeholder interpretation of the intent of the Standard.

Recommendation 3 Standard 7.3.2 should be amended to include details or an explanation of how standards are assured in any articulation arrangements or credit agreements, in the list of information that an institution must make available

Review of TEQSA guidance materials

Recommendation 4 TEQSA should review and update its Guidance Note: Credit and Recognition of Prior Learning (RPL) to ensure it reflects the policy intent of the AQF Qualifications Pathways Policy and the updated Standards 1.2 and 7.3 outlined above.

Recommendation 5 TEQSA should give consideration to the development of additional guidance materials on academic credit and RPL to better support smaller providers with less mature approaches to assessing academic credit. This could include specific guidance on principles for the recognition of non-formal and informal learning, and on data collection and performance monitoring for credit recognition.

Recommendation 6 TEQSA should give consideration to the suggestions for amendments to other guidance products suggested in PhillipsKPA’s report Academic Credit Arrangements (Credit Recognition) Final report.

Awareness raising for prospective students of the availability of credit recognition

Recommendation 7 The department and TEQSA should give consideration to enhancing the availability of information for prospective students about the availability of credit recognition for all types of prior learning; and strategies course applicants can pursue to seek the recognition and awarding of academic credit. This could include but should not be limited to inclusion of information through online communication channels such as the Course Seeker and Study Assist websites and through tertiary admission centres.

I would welcome your indication of whether consultation on the recommended HESF amendments should proceed, with a view to incorporating them in the HESF refresh planned in response to the Provider Category Standards Review. I would also be happy to discuss these matters at your convenience, should you wish to do so.

Yours sincerely



Professor Emeritus Ian O’Connor AC
Chair, Higher Education Standards Panel
30 March 2020

Proposed amendments to the Higher Education Standards Framework**Standard 1.2 Credit and Recognition of Prior Learning**

1. Assessment of prior learning is undertaken for the purpose of granting credit for units of study within a course of study or toward the completion of a qualification, **consistent with the credit and recognition of prior learning framework within the Australian Qualifications Framework**. Such assessment is conducted according to institutional policies, the result is recorded and students receive timely written advice of the outcome.
2. Credit through recognition of prior learning is granted **only** if:
 - a. students granted such credit are not disadvantaged in achieving the expected learning outcomes for the course of study or qualification, and
 - b. the integrity of the course of study and the qualification are maintained.

Standard 7.3 Information Management

1. There is a repository of publicly-available current information about the higher education .
...
 - i. a list of all higher education courses of study that are offered, including indicative estimated annual enrolments
...
2. The list of all higher education courses of study within the repository of information includes:
 - a. the accreditation status of each course of study
 - b. the qualification(s) offered
 - c. whether the qualification is recognised in the Australian Qualifications Framework
 - d. confirmation of recognition of each course of study by the relevant professional body(ies) if such recognition is required for registration of graduates to practise
 - e. whether each course of study is authorised to be offered to international students studying on an Australian student visa, and
 - f. the duration of each course of study
 - g. **details or an explanation of how standards are assured in any articulation arrangements or credit agreements which the course may be subject to.**