TEQSA and the Australian Qualifications Framework

Questions and answers
February, 2013
TEQSA AND THE AQF

What is TEQSA’s role in relation to the Australian Qualifications Framework?

TEQSA’s role is to regulate all higher education providers and ensure that providers and their courses meet the Threshold Standards. TEQSA applies the Threshold Standards in the context of three regulatory principles: regulatory necessity, reflecting risk and proportionate regulation (section 13, TEQSA Act, 2011). All regulatory activities must comply with these three principles.

The Qualification Standards, which are part of the Threshold Standards, include a requirement that all higher education awards at Levels 5 -10 of the Australian Qualifications Framework (AQF) must meet the corresponding specifications in the AQF. The AQF is the national policy that sets the specifications for regulated qualifications in Australia.

There is some flexibility in the formulations used in parts of the AQF and TEQSA will apply this flexibility on a case-by-case basis in line with the overall principles of the AQF. For example the volume of learning is given as ‘typically’ a certain duration. In assessing whether courses meet these volume of learning requirements, TEQSA will be most concerned with whether students are able to achieve the learning outcomes in a given course duration.

The AQF is developed and maintained by the Australian Qualifications Framework Council, not by TEQSA. The setting of specifications for higher education awards by the AQF Council has been clearly separated from the monitoring and enforcement functions carried out by TEQSA in the legislation.

Stakeholders who wish to suggest alterations to the AQF should direct their suggestions to the AQF Council. Stakeholders who wish to suggest alterations to the Higher Education Standards should direct these to the Higher Education Standards Panel.

What is the relationship between the AQF and the Qualification Standards?

The AQF is a national policy (approved by the relevant Council of Commonwealth, State and Territory Ministers) that consists of specifications for qualifications within a coherent framework. It also contains policies for issuing those qualifications, for student pathways, and for recording the qualifications and the organisations that issue them on national registers.

The Qualification Standards are a set of requirements, in the form of a legislative instrument, which are binding on Higher Education providers. TEQSA applies the Threshold Standards, including the Qualification Standards, when deciding whether to grant registration or renew a provider’s registration or to accredit courses.

The Qualification Standards, in turn, require providers to ensure that all their Higher Education awards that lead to AQF Qualifications meet the corresponding specifications in the AQF. Providers are also required to issue testamurs and records of results to graduates (and may also issue an Australian Higher Education Graduation Statement) that meet a number of specifications.
The Qualification Standards also require providers to provide for the recognition of prior learning, credit transfer and articulation, and contain specifications that these processes must meet.

**How will TEQSA assess whether higher education courses meet the Qualification Standards?**

TEQSA will assess courses against the Qualification Standards at the point of:

- provider re-registration
- course accreditation/re-accreditation (in the case of providers who do not have self-accrediting authority)
- as required if an issue arises.

At the point of re-registration of a provider with self-accrediting authority, TEQSA will not assess each and every course offered against the Qualification Standards, but will take a sampling approach. TEQSA will nominate 5 courses, across a range of qualification types and levels, and the provider will submit evidence that demonstrates compliance with the three sections of the Qualification Standards. However TEQSA will not be confined to consideration of these 5 courses only, and may require providers to submit information in relation to other courses.

Providers with self-accrediting authority should have an AQF compliance plan that provides for all their courses to be compliant by 1 January 2015. As new courses are accredited they should already be compliant.

In assessing whether higher education courses meet the Qualification Standards, TEQSA will observe the three regulatory principles: regulatory necessity, reflecting risk and proportionate regulation.

**How will TEQSA assess whether the learning outcomes of a course are at the appropriate AQF level?**

TEQSA will assess courses against the Qualification Standards at the point of:

- provider re-registration;
- course accreditation/re-accreditation (in the case of providers who do not have self-accrediting authority), and;
- as required if an issue arises.

TEQSA will systematically:

- compare the stated learning outcomes for a given course with the specified learning outcomes for the relevant AQF level and qualification type descriptor, and;
- assess whether the design of all the components of the course will support achievement of the learning outcomes.

TEQSA will call on external experts to assist in the review if required.

**How will TEQSA assess whether dual and joint awards meet the Qualification Standards?**

If TEQSA selects a dual or joint award for assessment (either as part of a re-registration, re-accreditation or otherwise), TEQSA will assess whether the design of all the components will
support coherent learning outcomes for the level and qualification type and will enable graduates to demonstrate them.

In the case of alliances with overseas providers, TEQSA will assess all the units in the course(s) that are required by the Australian provider for completion of the Australian award.

**How will TEQSA interact with professional bodies and registration boards when assessing the same course?**

In cases where both TEQSA and professional bodies are assessing the same course, there are benefits for all parties in collaborating. TEQSA is currently consulting with professional bodies and its approach is under development.

**How much flexibility do providers have in assigning titles to AQF awards?**

Section 1.1.2 of the Qualification Standards requires providers to use titles consistent with the AQF Qualifications Issuance Policy, which contains a table giving examples of qualification titles for each level (s 2.3). The AQF approach to titles is principle-based.

The key formulation is: “AQF qualifications will have titles that unambiguously identify each qualification type, level and field of study/discipline”.

Further guidance is given, especially: "While it is common to list the qualification title before the field of study/discipline, the reverse order may be used. The field of study may be expressed broadly or explicitly and may also include sub-categories."

TEQSA will assess proposed course titles against the principles of the AQF Qualifications Issuance Policy. TEQSA will also observe the three regulatory principles in this assessment: regulatory necessity, reflecting risk and proportionate regulation.

**How much flexibility do providers have in granting credit?**

Providers must be able to demonstrate that all courses meet the requirements of Provider Course Accreditation Standard 3.3: “Credit for previous studies or skills (including articulation, recognition of prior learning and credit arrangements) is consistent with the Qualification Standards and preserves the integrity of the higher education award to which it applies.”

The Qualification Standards (Section 3) set the key principle that credit for previous studies or learning should be maximised, subject to preserving the integrity of learning outcomes and/or discipline requirements of the award.

Negotiations with another provider for a formal credit agreement should set the level of credit granted according to the comparability of the individual courses of study, with respect to the:

- learning outcomes
- volume of learning
- program of study, including content, and
- learning and assessment approaches.

The AQF Qualifications Pathways Policy gives indicative benchmarks for the minimum amount of credit that can be granted, describing these as 'the basis of negotiations' when reaching agreements with another provider, but these benchmarks are not incorporated within the
Qualification Standards. They represent a point of reference, but TEQSA will above all assess whether the principles of the Qualification Standards have been met.

Note also that the AQF benchmarks refer to ‘linked’ courses, which are either courses within a nested set offered by the same provider, or comparable courses (on the basis as detailed above) that are linked through a formal agreement with another provider. Less credit should be awarded for completion of courses that are not fully comparable with the parts of the course students are being exempted from.

TEQSA may require evidence from a provider that allocations of credit are academically defensible and that they preserve the integrity of qualification outcomes and discipline requirements. In deciding whether to seek evidence TEQSA will observe the three regulatory principles: regulatory necessity, reflecting risk and proportionate regulation.

**Do integrated or embedded four-year Bachelor Degrees meet the AQF criteria for Level 8?**

TEQSA will assess any individual course that is designated as an honours course or equivalent against the criteria for Level 8 Bachelor Honours Degree in the AQF.

TEQSA will take this approach also in the case where an honours degree is awarded on the basis of achieving a specified grade level. Although there may be a requirement to achieve a certain grade for awarding honours, this cannot be the only criteria. The course for honours students must meet the criteria for Level 8 Bachelor Honours Degree in the AQF, including the research components.

The Australian Council of Engineering Deans put a case to the AQF Council that integrated four-year engineering Bachelor Degrees aimed at entry to the engineering professions fully meet the criteria for Level 8 in the AQF, on the grounds that the advanced cognitive, technical and communication skills and skills to critically evaluate and transform information required in Level 8 are built into the accreditation standards of Engineers Australia, as well as the ability to conduct ‘investigations of complex problems using research-based knowledge and research methods’.

It is not TEQSA’s role to revisit the consultations that took place in the period when the current AQF was being formed, or to take a position about engineering Bachelor Degrees in general. TEQSA will assess honours courses on a case-by-case basis and in considering whether to take any action, will have regard to the three regulatory principles: regulatory necessity, reflecting risk and proportionate regulation.

**Can undergraduate units be included within a Graduate Diploma?**

The three-year ‘Pass’ Bachelor Degree has been set at level 7, whereas the Graduate Diploma is at Level 8, the same level as the Bachelor Honours Degree.

Both the Bachelor Honours Degree and the Graduate Diploma criteria include the development of ‘advanced’ knowledge, whereas this is not required for a Bachelor Degree.

It is doubtful whether advanced knowledge at Level 8 could be developed within a one-year Graduate Diploma if it made significant use of units from a Level 7 Bachelor Degree without adaptation. It is more likely that units from an Honours year (following a Bachelor Degree) could
be suitable for use within a Graduate Diploma, but this would be assessed on a case-by-case basis. In the case of a four-year Bachelor Degree with embedded honours, the honours component would presumably be developed within particular units, which might be suitable for use within a Graduate Diploma.

For any given Graduate Diploma, TEQSA will assess whether the course as a whole meets the criteria for Graduate Diploma and whether the course enables students to achieve the learning outcomes.

How much research should there be in Masters Degree (Coursework) courses?

While the formulations in the AQF 2013 differ somewhat from the previous edition of the AQF, there is also continuity in the expectation that Masters Degree (Coursework) courses will contain a research dimension.

The current specifications for the knowledge component of the Masters Degree (Coursework) include that all graduates must attain ‘knowledge of research principles and methods applicable to a field of work or learning’ (refer table of descriptors). In the ‘Application of knowledge and skills’ section, graduates are required to be able ‘to plan and execute a substantial research-based project, capstone experience and/or piece of scholarship’.

The AQF goes on to require accrediting authorities (such as TEQSA) to ensure that ‘The Masters Degree (Coursework) is designed so that graduates will have undertaken a program of structured learning with some independent research and project work or practice-related learning.’

TEQSA concludes that all Masters Degree (Coursework) graduates are required to have knowledge of research principles and methods, and to undertake some independent research, and that project work or practice-related learning are alternatives to each other, not alternatives to research.

How much flexibility is there in the volume of learning requirements for various types of Master Degrees?

TEQSA is well aware that developments in course delivery modes must be taken into account when assessing whether particular courses meet the volume of learning requirements. As online and blended delivery becomes more common, including asynchronous components, expressing volume of learning in relation to time duration becomes more reliant on equivalence. In assessing courses against the volume of learning requirements, TEQSA will be guided by the three regulatory principles: regulatory necessity, reflecting risk and proportionate regulation.

Providers will be able to demonstrate that the volume of learning of a course is equivalent to the requirements in many different forms. Providers will need to present an academically defensible argument that the specified learning outcomes can be achieved in a shorter timeframe, especially in the case of Masters (Coursework) Degrees, where the specifications require mastery of an advanced body of knowledge and research components. The volume of learning requirement is expressed in the AQF as being ‘the notional duration of all activities required for the achievement of the learning outcomes specified for a particular AQF qualification type’. The AQF provides for different volumes of learning for entry into a Masters Degree depending on
whether the student has graduated from a prior degree in ‘the same discipline’ or ‘a different discipline’. The question arises of how ‘same discipline’ will be defined.

Mechanical engineering is not the ‘same’ discipline as civil engineering, so TEQSA would start from the position that a shorter volume of learning would normally only apply to students with prior qualifications in the same detailed field of study. However, providers could make out a case that certain fields of study (in the humanities, for instance) had sufficient commonality that this rule could be relaxed. But the underlying principle must be observed: all students should start a course with a sufficient basis of prior knowledge and skills to achieve the course learning outcomes and the learning outcomes for the AQF level in the time available in the course. If students with no prior knowledge in the field need extra time in order to start the course on an equal footing with students who do have prior knowledge in the field, then this should be required.

Questions arise in relation to masters by coursework in business fields, including the MBA. It is common for substantial business experience to be one of the grounds for entry into the MBA, substituting to some extent for formal qualifications. Providers need to consider whether substantial business experience can also be regarded as equivalent to experience in the discipline in order to justify a shorter volume of learning (for example 1.5 years instead of 2 years).

In general TEQSA would not expect that the same recognition of prior learning would be used both for entry purposes and for credit exemptions from subjects in the course. Higher education providers will need to ensure that where RPL is used as a pathway to an MBA (or any other course of study) that the extent of that previous experience is appropriately defined if it is to be recognised as both an admission criteria as well as contributing to credit (and therefore a shorter volume of learning) within the course of study. The underlying principle, however, must still be observed: all students should start a course with a sufficient basis of prior knowledge and skills to achieve the course learning outcomes and the learning outcomes for the AQF level in the time available in the course. If students with no or little prior academic study in the field need extra time in order to start the course on an equal footing with students who do have prior study in the field, then this should be required.

Masters by coursework at Level 9 requires acquisition of ‘an advanced body of knowledge’ and ‘extended understanding of recent developments in a discipline and its professional practice’. A provider would need to be able to demonstrate that applicants with no academic background in a discipline would be able to achieve these AQF outcomes in 1.5 years.

The same considerations would apply in the case of Masters (Coursework) Degrees designed principally for professional conversion.

In such cases, it may be academically defensible to enrol students without prior experience in the academic discipline in a Level 8 qualification first, and allow them to articulate into the Masters (Coursework) Degree after demonstrating their ability to achieve academic learning outcomes.

**When will changes to courses to meet AQF specifications have consequences for CRICOS?**

Part C, Section 7 of the National Code states that the registration of a course on CRICOS must include the expected duration of the course and ‘the designated authority must take into
account the proposed course structure when determining the appropriate duration for registration on CRICOS’.

In accordance with the National Code, any changes to the registered duration of a course must be approved by TEQSA prior to the changes being made.

Whilst ELICOS and Foundation Programs are non AQF courses, TEQSA also has regulatory responsibility for CRICOS registration of Foundation Programs and ELICOS courses linked to higher education programs. TEQSA will assess these courses against the relevant standards under the ESOS Act:

- ELICOS Standards
- Foundation Standards

**What is TEQSA’s role in assessing courses for non-AQF qualifications and awards?**

Registered higher education providers may apply to TEQSA for accreditation of a non-AQF course where the award or qualification is *similar* to a qualification covered by level 5, 6, 7, 8, 9 or 10 of the AQF; other than an award offered or conferred for the completion of a vocational education and training course. In line with this, non-award short courses, for example, do not fall within TEQSA’s regulatory functions under the TEQSA Act as they would not be regarded as *similar*. TEQSA regulates relevant non-AQF qualifications or awards against the Higher Education Standards Framework.

Providers should observe sections 1.2 and 2.1.2 of the Qualification Standards when issuing non-AQF qualifications and awards and in particular note that the certification and documentation relating to these awards:

- must not use AQF nomenclature
- clearly distinguishes them from AQF awards.