Australian Government
Tertiary Education Quality and Standards Agency

TEQSA

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Artificial intelligence request for information

Frequently asked questions

Purpose

1. Why is TEQSA issuing a request for information (RFI)?

The impact of increasingly sophisticated and readily available generative artificial intelligence (gen AI) tools on teaching, learning and assessment practices represents a significant risk to the integrity of Australian higher education awards.

TEQSA is keen to ensure all higher education institutions reflect meaningfully on the impact of gen AI and have appropriate mechanisms in place to provide assurance that students have attained the skills and knowledge reflected by their qualifications.

The responses to the RFI will give TEQSA insight into where the sector is well-positioned to address the risk of gen AI, and where additional support is needed. TEQSA intends to use the responses to the RFI to identify and share good practice approaches and case studies and develop resources to benefit the whole sector.

2. What are the benefits of action planning?

The request for an action plan aims to ensure institutions are thinking deeply about what gen AI tools mean for teaching, learning and assessment in their courses. The action plan should articulate how an institution will assure they have methods of assessment that ensure learning outcomes are met, even as gen AI tools continue to evolve.

3. How will TEQSA use the information gained from the RFI?

The responses to the RFI will enable TEQSA to share examples of good practice approaches being taken to seize the opportunities and mitigate the risks presented by gen AI, while also highlighting any areas of the sector where capability must be uplifted.

Timeframes and process

4. What date will the RFI be issued and when will submissions be due?

TEQSA will issue the RFI on Monday 3 June 2024. Submissions will be due 4 weeks later in early July.

5. How will I receive the RFI and how will I submit my institution's response?

A request will be created in the provider portal and submission will be via upload to the provider portal.

6. How long will it take TEQSA to analyse the information it receives from the RFI?

TEQSA anticipates that it will take 3 months to complete a comprehensive review of the information provided. Development of resources to support the sector will follow the review period.

7. Will there be any subsequent phases of this information request, following the July submission?

Following submission, TEQSA will analyse the information received. We expect institutions will be at differing stages of planning and implementation. Therefore, we will take the opportunity to identify innovative approaches and good practice case studies. With the provider's permission, we will use these examples to develop resources to benefit the whole sector.

8. What action will be taken if a provider does not meet the deadline?

TEQSA is committed to working with the sector and we expect the sector to work with us. It is a condition of registration that providers cooperate with TEQSA when the agency is undertaking a review of this kind.

If a provider does not submit an action plan on time, we will follow up to understand the barriers and encourage them to meet their obligations. If a provider continues to fail to submit an action plan, we would consider if it may be appropriate to make use of our regulatory tools, which may include a statutory request or a compliance investigation.

9. What actions will TEQSA take if it feels a plan is insufficient?

To maintain compliance with the Higher Education Standards Framework (2021) registered higher education providers should have in place effective quality assurance processes and systems, with appropriate governance oversight. To achieve this, we expect the development of action plans addressing emerging risks, such as this one, to be business as usual. Such plans should reflect the unique circumstances of each provider.

If a provider submits a plan that is insufficient or not achievable, we will follow-up with them to understand the barriers and encourage them to meet their obligations. If a provider continues to fail to submit an action plan, we would consider if it may be appropriate to use our regulatory tools, which may include a statutory request or a compliance investigation.

10. Will providers be reviewed based on their action plan?

TEQSA does not currently have a date or a project plan for reviewing progress on action plans, but it is possible that we may look at it in the future. As the key considerations outlines, we expect credible plans that are measurable and actionable and that providers can show progress against.

11. Are providers able to use gen AI to develop their action plan?

Yes, if you wish. Irrespective of how the plan is produced, your institution remains accountable for the plan.

12. How does this RFI intersect with upcoming TEQSA re-registration processes?

Since mid-2023, institutions engaging with TEQSA on the scope of their re-registration application have been asked to include information that provides assurance that the institution is identifying and managing risks associated with gen AI.

If your re-registration submission is due around or after the RFI you can request that the action plan submitted as part of your RFI is considered for this purpose during your re-registration assessment, or you may choose to provide an updated action plan or additional supplementary material as part of your re-registration submission.

13. Are there any special considerations for a new higher education provider who has commenced operations in the last six months? How does this submission impact the first-year review?

While there are no special considerations for individual providers, when reviewing submissions TEQSA will consider the maturity of the provider.

TEQSA does not expect providers to have fully implemented their plan at the time of submission in July 2024. Instead, we are asking providers to submit a realistic, actionable plan, with short, medium and long term timelines and appropriate levels of governance and oversight, that demonstrates they're engaging with the risk gen AI poses to course offerings and the integrity of awards.

The RFI will have little impact on a provider's first year review, assuming they maintain compliance with the [Higher Education Standards Framework (2021)](#).

Scope

14. Which providers will be required to respond to the RFI?

The RFI will be issued to all registered higher education providers. Non-higher education providers, including providers offering ELICOS courses only, will not be issued the RFI.

15. Is the scope of the RFI limited to academic integrity or is it broader?

The RFI will focus on the impact of gen AI on award integrity and providers' ability to ensure students are meeting their learning outcomes and as such have attained the skills and knowledge reflected by their qualifications (that is, that providers have mechanisms in place to assure academic and assessment integrity, and therefore award integrity).

The RFI will therefore ask all registered higher education providers to submit a credible institutional action plan, oversighted by appropriate governance mechanisms, to address the risk gen AI poses to award integrity.

16. What information should be included in the RFI?

TEQSA expects providers to submit a credible institutional action plan with short, medium and long term timelines and appropriate levels of governance and oversight. The plan should provide assurance that the institution is engaging with, and has a strategy to mitigate, the impact of gen AI on the integrity of their higher education awards.

Key considerations for developing your institutional action plan are available on our website.

The focus of this RFI is teaching, learning and assessment activities. However, we recognise providers may wish to consider these as part of a broader institutional strategy. Providers working on a holistic institutional plan, which includes assessment methods within the plan, are welcome to submit the broader plan and we will extract the relevant information.

17. Is there a guide or template to use for the RFI?

TEQSA appreciates the diversity of higher education providers in Australia and the variety in course offerings, assessment methods and modes of delivery. As it is each provider's responsibility under the Higher Education Standards Framework (2021) to ensure that risks to their higher education operations are being managed and mitigated effectively, TEQSA anticipates varied approaches from providers that reflects the contextualisation appropriate to each institution.

Key considerations for developing your institutional action plan are available on our website.

18. What timeline is appropriate for the action plan?

TEQSA recognises that timeframes will vary between providers, depending on factors such as the size of the institution and the number of courses offered.

As stated in our key considerations document, we expect action plans to have realistic timelines. We also acknowledge that providers will need to triage actions over the short, medium and long term, while also meeting their responsibilities under the Higher Education Standards Framework (2021), to ensure risks are being effectively managed and mitigated.

19. Should information on how we plan to mitigate risk in higher degree by research programs be included?

As stated in our key considerations document, TEQSA expects providers to consider the full breadth of courses they offer. As such, if your institution offers higher degree by research programs we expect to see the risk to assessment within these courses has been considered and reflected in your institution's action plan.

Last year, TEQSA held a five-part webinar series in conjunction with Deakin University's Centre for Research in Assessment and Digital Learning (CRADLE). The fourth webinar in this series considers the impact on research and research training.

20. How should providers with higher education and VET/TAFE programs approach their action plan?

Each provider will have their unique approach. If a dual-sector provider wishes to conceptualise the risk across their range of courses and deliver a plan which covers all their post-secondary offerings, then we welcome this approach and will extract the information relevant to their higher education courses.

21. Should we include past actions in our plan?

Yes. We recognise providers will be at different stages of this work and welcome details of your past experiences.

22. Would TEQSA welcome information on how providers are using gen AI to support teaching and learning, and in non-academic areas?

Yes, where providers are willing to share this information, we'd welcome it. While this RFI is focused on risk mitigation for teaching, learning and assessment, we're aware that there are many other considerations, including equity, ethics and privacy. Additionally, there is a need for students to develop into proficient users of this technology.

If you have good examples which may benefit the sector, please let us know and we can look to add them as a resource on our artificial Intelligence good practice hub.

23. Is TEQSA aware of gen AI being used for contract cheating, and will you share evidence of this through the RFI process?

TEQSA is aware of contract cheating firms using gen AI. We're also aware of students using gen AI to cheat. However, not all student use of gen AI is cheating. TEQSA acknowledges the need to develop student's skills and knowledge to become ethical and proficient users of this technology (more information on this is available in the paper *Assessment Reform for the Age of Artificial Intelligence*). Therefore, we wish to mitigate the risk gen AI poses to award integrity, while also enabling the opportunity to support students in developing valuable skills for the workplace.

TEQSA regularly shares information about new and emerging threats with the sector through our communications, including sector alerts, the website and our e-News.

Professional accreditation bodies

24. How would TEQSA like professional accreditation bodies to work with providers?

TEQSA understands the important role of professional accreditation bodies in mitigating the risk gen AI poses to the integrity of awards. As such, we're working to engage with professional accreditation bodies and held a webinar for them on Monday 25 March 2024.

At this webinar we advised professional accreditation bodies in attendance that we'll issue this RFI in June 2024 and that we anticipate the work may involve significant transformation for some courses. We asked professional accreditation bodies to support providers as they work to assure the integrity of their awards.

If you, or a professional accreditation body you're in contact with, have any questions please email us: integrityunit@teqsa.gov.au.

25. What actions could a provider take if we're unable to update course assessment due to professional accreditation body requirements?

The RFI will request an action plan - we don't expect this plan to be fully implemented at the time of submission in July 2024. Instead, we would like to see realistic timelines, and understand that actions may need to be triaged over the short, medium and long term. The plan should note where actions intersect with professional accreditation bodies and identify potential constraints and how these will be addressed.

26. What actions could providers take where legislative considerations make rapid transformation difficult?

The RFI seeks to provide assurance that higher education institutions are reflecting meaningfully on the impact gen AI poses to the integrity of their awards. We're asking providers to submit a realistic, actionable plan, with short, medium and long term timelines and appropriate levels of governance and oversight. We do not expect immediate transformation but rather a commitment to the necessary reforms with a realistic plan for implementation.

Next steps

27. Will TEQSA provide case studies and other resources to support the sector following the RFI?

Yes, this is one of our key objectives. We would like to ensure all providers are engaging with the risk of gen AI, while also identifying areas where the sector requires additional support. Where we identify providers are taking innovative or interesting approaches we will seek to develop case studies or resources (with the provider's permission) to share with the sector.

28. Will providers be able to update their action plan following their submission?

Yes. Gen AI technology is changing rapidly and we understand action plans will also need to change. When modifying your approach, we ask that providers continue to ensure their action plan is realistic and measurable, with the appropriate integrity and governance mechanisms in place.

While we don't expect providers to advise TEQSA each time they update their action plan, we ask that you share information and experiences which you feel would benefit the sector as a whole by emailing integrityunit@teqsa.gov.au.

29. Is TEQSA planning another RFI which goes beyond teaching, learning and assessment?

No, not at this stage. Our current focus is in maintaining trust on award integrity and we recognise the scale of the challenge that providers are meeting.

Support

30. Our institution does not have the resources to make all our current assessments secure against gen AI. How can we overcome this?

TEQSA recognises that providers may need to triage their actions – including changes to assessment regimes in different courses – over the short, medium and long term.

The RFI is intended to ensure all higher education institutions are reflecting meaningfully on the impact of gen AI and have a plan in place, which they're working to deliver, to ensure students have attained the skills and knowledge reflected by their qualifications.

31. What concessions will TEQSA make to ensure expectations are financially viable for smaller providers?

The impact of gen AI on the integrity of awards is a self-assurance issue for providers. Providers have a responsibility to ensure they're meeting their obligations under the Higher Education Standards Framework (Threshold Standards) 2021 including sections 1.4 (Learning outcomes and assessment) and 5.2 (Academic and research integrity).

32. Is funding to support the sector in mitigating the risk of gen AI being considered?

TEQSA is not a funding body and is unable to provide financial support to the sector. We are aware of some institutions who are considering how existing funding allocations for assessment could be redistributed. If TEQSA identifies good practice approaches to funding through the RFQ we will seek to share the case study with the sector, with the providers permission.

33. What resources are available to help providers respond to the RFI?

TEQSA has a dedicated RFI webpage, with a number of resources including:

- key considerations for this RFI
- a recording of our RFI webinar to providers
- the paper *Assessment Reform for the Age of Artificial Intelligence* (Assessment Reform Guiding Principles) to support the sector in considering the risks and opportunities of gen AI
- links to our five-part gen AI webinar series, held in conjunction with Deakin University's CRADLE
- TEQSA's Artificial intelligence hub

Questions

34. Where can I direct any inquiries?

Email integrityunit@teqsa.gov.au.

This document will be updated in response to additional queries that are received from the sector.