



Guidance Note: *Changes in a Course of Study that may lead to Accreditation as a New Course*

Version 1.0 (6 March 2017)

Providers should note that Guidance Notes are intended to provide guidance only. They are not definitive or binding documents. Nor are they prescriptive. The definitive instruments for regulatory purposes remain the TEQSA Act and the Higher Education Standards Framework as amended from time to time.

Purpose of this note

TEQSA expects that courses of study will evolve over time as providers make improvements as part of their quality assurance processes and/or respond to changing circumstances in the educational and workplace environments. Some changes may be relatively minor, some may be more significant (see the Material Change Notification Policy available on the TEQSA website), while others may change the course so fundamentally that it amounts to a 'new' course. A 'new' course will need to be accredited as such, whether internally if the provider has authority to self-accredit the new course, or externally by TEQSA. In the case of accreditation by TEQSA, accreditation as a new course of study may arise as a result of:

- a provider's own initiative to replace a previously-accredited course of study with a new course of study, or
- TEQSA determining that the proposed changes to a course of study will change the course sufficiently to warrant accreditation of the course as a new course of study.

The aim of this note is to indicate some of the major factors that TEQSA may have regard to in reaching a decision on whether accreditation of a course can be renewed under its existing identity or whether it needs to be accredited as a new course of study.

Because of the variety of factors that may affect a determination by TEQSA, providers are advised to discuss proposed significant changes to a course of study with TEQSA. These discussions will help to resolve whether or not the proposed changes fundamentally change the nature of the course of study and/or likely expectations of it from students and the community, to the extent that TEQSA will require accreditation as a new course.



Factors that may affect TEQSA's determination

Many factors may influence TEQSA's decision making in particular circumstances. Some key factors that may lead to a requirement for accreditation as a new course are outlined below. Many of these are somewhat interdependent, e.g. changes to learning outcomes and course design, but for the purposes of this guidance note they are considered separately. The discussion largely follows the matters raised by the requirements of the *Higher Education Standards Framework (Threshold Standards) 2015* (HES Framework).

Representation of the course of study

From time to time, providers may wish to change the orientation of a course to match new or emerging opportunities, such as innovative employment opportunities or marked changes in technologies. This may cause a provider to structure the course differently and change the title. For example, a Bachelor of Science (BSc) may be recast as a BSc (Environmental Sciences) or BSc (Emerging Technologies). Where the new title of the course is likely to suggest to prospective students that the course may lead to markedly different employment prospects or opportunities for further study, TEQSA may form the view that the course should be accredited as a new course. This could also apply to broadening or narrowing a field of education, e.g. changing a Masters of Business Administration (MBA) to a more specialised course of study, e.g. to MBA (Health Management), or *vice versa*. TEQSA would also consider whether the new title, if not accredited as a new course, may cause confusion with existing courses or be misleading to the community and potentially affect the reputation of Australian higher education.

Level/type of qualification

Where a change to a course is proposed to lead to a different qualification at the same AQF level, e.g. Bachelor (Honours) degree to a Graduate Diploma at Level 8, or to one at a different level, from a Bachelor to a Masters Degree, the course will need to be accredited as a new course. This will also include postgraduate courses, e.g. Masters, Doctorate, that are proposed to change from coursework (or predominantly coursework) to a research degree (i.e. including at least two-thirds research work). A change to a research degree would also involve meeting the Research and Research Training Standards (Domain 4 of the HES Framework) if that has not already occurred.

Where a provider that offers a Diploma accredited as a vocational education and training (VET) course proposes to convert this to a higher education course, or to offer a Higher Education Diploma with the same title and content, the Higher Education Diploma will need to be accredited as a new course. Higher education providers should have regard in such cases to the over-riding requirement to deliver teaching and learning that engage with advanced knowledge and inquiry (HES Framework Category Criterion B1.1).

Learning outcomes

TEQSA expects the learning outcomes of courses to evolve with time, and such evolution is unlikely to have an impact on re-accreditation of a course. However, from time to time, marked changes may occur in expected learning outcomes, e.g. to provide training for a



different (broadened or specialised) scope of professional practice, such as a new major or course solely addressing forensic accounting instead of management accounting. In such cases TEQSA will consider accreditation as a new course in the interests of clarification and avoidance of confusion about what can be expected of graduates. Providers may well also see this as advantageous in proposing a new field of study.

Course duration/volume of learning

A marked change in the duration of a course of study or the volume of learning may lead to a need for accreditation as a new course. This may occur particularly if:

- there has been a marked reduction in the volume of learning without other corresponding changes to other factors, and/or
- a marked and unsubstantiated departure from the broad guidance of the AQF is proposed.

A marked change in volume of learning would be expected to be accompanied by various other changes, such as changes to the:

- level or qualification type
- scope of the expected learning outcomes
- prerequisites or other aspects of academic preparedness
- course design, or
- delivery methods.

If these types of accompanying changes have not occurred, TEQSA would be concerned about the credibility of the proposed changes to the volume of learning. Where accompanying changes are being proposed to support a change in volume of learning, TEQSA will form a view on whether, in aggregate, they change the fundamental nature of the course to the extent that it amounts to a 'new' course.

Entry requirements

Changes to entry requirements may cause TEQSA to see the changes as a new course. This would occur where the changed entry requirements are likely to change the consequent type and level of learning experiences that flow from the change, e.g. a change from undergraduate entry to graduate entry, or new and substantial requirements for prerequisite professional or workplace experience that is expected to be advanced in the course of study. Changes in entry requirements that may require additional support, e.g. admitting an educationally disadvantaged cohort, but do not otherwise change the fundamental nature of the course or its outcomes, are less likely to require accreditation as a new course.

Course design/delivery

Providers are expected to change the design and delivery of courses over time as part of their internal monitoring and quality assurance. TEQSA will consider such changes as part of re-accreditation of a course of study. Provided that the changes do not markedly change the expected outcomes of the course for students or the community, TEQSA is unlikely to require accreditation as a new course of study. For example, progression to more emphasis on online learning is likely to be seen as part of a natural evolution in a provider's



educational management, provided the changes are accompanied by corresponding relevant changes to the provider's monitoring and quality assurance. Adopting a solely online mode of delivery would be a material change, but not necessarily change the course to such an extent that it would require accreditation as a new course.

However, where the design and delivery of a course is changed fundamentally and such changes to its design and delivery are claimed to engender markedly different graduate capabilities and/or a capacity to meet new community expectations, TEQSA may form the view that accreditation as a new course of study is warranted. For example, if a provider introduced an unprecedented predominance of 'best-practice' work-integrated learning, TEQSA may form the view that the interests of all parties may be better served by accreditation as a new course.

Research and research training

As mentioned above, offering a research degree(s) requires a provider to meet the standards of the HES Framework for *both* Research and Research Training. Changes to a course of study that are intended to convert it to a research degree will require accreditation as a new course of study.

Institutional quality assurance

If a provider proposes changes to a course of study that would require capabilities that have not been previously been demonstrated, TEQSA will need to consider accreditation as a new course. For example, a provider may wish to incorporate new fields of education into a course for which it has not previously demonstrated a capacity for sufficient academic leadership, staff expertise, learning resources or dedicated expertise in institutional quality assurance (e.g. in the academic board or equivalent) in that field to meet the requirements of the HES Framework *prima facie*. As discussed above, this would apply to new research degrees but it would apply in any area where the provider is proposing significant involvement in new fields of education or markedly different modes of delivery, e.g. adding significant STEM content to a humanities program.

Delivery partners

The HES Framework sets out specific requirements in relation to delivery with other parties. A proposal for a new delivery partner would require consideration by TEQSA at least as a material change, and, depending on the nature of the delivery arrangement and its likely impact on the design of course of study, may lead to accreditation as a new course. So too may a change of delivery partner, however TEQSA would take into account the provider's previous record of managing and quality assuring delivery partners.

International students

Providers may propose changes to a previously accredited course to meet the needs of one or more cohorts of international students (whether onshore or offshore). TEQSA will have regard to the matters discussed elsewhere in this guidance note in considering whether the course amounts to a 'new' course and warrants accreditation as such. TEQSA will also have regard to any potential impact on the reputation of Australian higher education.





Resources and references

TEQSA (2016), *Explanations of terms in Part A of the HES Framework 2015*, <<http://www.teqsa.gov.au/explanations-hes-framework-terms>>.

TEQSA (2016), *Material Change Notification Policy (HES Framework 2015)*, <<http://www.teqsa.gov.au/hesf-2015-specific-guidance-notes>>.

TEQSA welcomes the diversity of educational delivery across the sector and acknowledges that its Guidance Notes may not encompass all of the circumstances seen in the sector. TEQSA also recognises that the requirements of the HESF can be met in different ways according to the circumstances of the provider. Provided the requirements of the HESF are met, TEQSA will not prescribe how they are met. If in doubt, please consult your TEQSA case manager.

| Version # | Date | Key changes |
|-----------|--------------|--|
| 1.0 | 6 March 2017 | Made available as beta version for consultation. |