

TEQSA & HEPP-QN MEETING

Wednesday 1 July 2020
1:30 – 2:45pm AEST
Virtual meeting

UPDATED QUESTIONS & RESPONSES

COVID-19 CHALLENGES & FUTURE DIRECTIONS – HEPP-QN QUESTION BANK

HEPP-QN welcomes the Joint Statement between TEQSA and the peak bodies noting the following principles:

- accreditation flexibility and maintaining course quality
- maintaining quality during changed teaching and learning
- supporting online assessments while maintaining rigour
- mitigating a reduced availability of professional placements
- flexibility on (re-)registration/accreditation of professionals
- maintaining international accords for professionals' mobility.

1. Will TEQSA please clarify if there will be further updates on this Statement?

TEQSA undertook a lot of work with various industry professional bodies in the initial stage of COVID-19 to ensure that they could be as flexible as possible in considering issues around professional placements. TEQSA now has a watching brief on industry professional accreditation and has been pleased with the approaches taken by industry professional bodies. It is not anticipated that any further updates to the statement will be made at this time.

2. COVID-19 would most likely have adverse impacts on Provider Risk Ratings. What adjustments, if any, would TEQSA be making to the TEQSA Risk Indicators?

The TEQSA provider risk assessment cycle will commence in the final quarter of 2020. TEQSA recognises that given the COVID-19 disruption the standard performance measures utilised in our risk assessment process will be impacted. TEQSA's risk assessment process will continue to feature a report describing student performance, staff profile and financial indicators similar to previous years, but for 2020, TEQSA will not risk rate these indicators in the same way.

Throughout 2020 TEQSA has been closely monitoring the financial position of providers to ascertain the short-term impact of COVID-19. The risk assessment later this year will focus on three key measures:

- 1) Recent regulatory performance and compliance history
- 2) Risk history
- 3) Financial viability

The process will incorporate a provider response, which will enable providers to contextualise their initial risk assessment and provide any further information to describe how the highlighted risks are being managed – the provider response will be used to finalise the risk assessment. This dialog between TEQSA and providers through the

course of a risk assessment was highlighted in our consultation with the sector last year as a critical part of the process by providers. We will be providing further information to the sector prior to commencing the risk cycle to detail our approach.

3. Not all (components of) courses are suited to online delivery (WIL, practical components). Providers have to make adjustments, such as deferment of specific practical subjects, that could affect course duration and completion rates. What is TEQSA's advice/expectation in this context?

The focus of course design must be that it is designed to enable achievement of expected learning outcomes regardless of place or mode of study (Standard 3.1.4).

If the WIL or practical components of the course are not suited to online delivery, and those components in their current form are necessary to enable students to achieve the expected learning outcomes then the provider must consider what alternatives exist and implement alternative arrangements. Such arrangements may include simulated WIL or adjusting the structure of the course such that practical components are undertaken at a different stages within the course of study.

When making changes to the delivery, duration or learning outcomes of a course of study providers should consult TEQSA's material change policy and guidance on material changes to determine if notification to TEQSA is required.

4. What progress has been made on TEQSA and ASQA sharing information for dual sector providers to avoid duplication and to streamline processes?

TEQSA and ASQA have established a joint working group, which meets regularly to share information and to oversee the coordination of work related to dual sector providers. A dual sector dashboard has been developed by the working group which is updated monthly to ensure relevant information held by the two agencies is exchanged and updated regularly and a substantial amount of work has occurred to ensure joint regulatory activities (such as CRICOS renewals) are conducted to remove duplication where possible and in a coordinated manner.

5. What advice would TEQSA give NSAI Academic Boards in the light of major course changes to understand where the line has been crossed, from a course being continuously improved to now being a new course?

Non-self-accrediting institutions do not have delegated authority to accredit courses of study. When changes to course outcomes or standards are determined and approved by a Non-SAA provider it must notify TEQSA via material change. A material change notification does not require TEQSA's approval, rather should the change notification give rise to material concern that requires further investigation, TEQSA will request that information or assurance from the provider.

TEQSA notes that governing bodies must reflect on the necessary changes and make informed decisions on how they can ensure student learning outcomes are achieved. Such changes should be subject to the appropriate internal approval processes and relevant considerations and outcomes documented.

6. What expectations does TEQSA have of providers having to change mid-stream to different modes of delivery, and switching as required between f2f, the use of blended or mixed-mode delivery? What are TEQSA's expectations of 'equivalency' in this context?

TEQSA understands that providers have been forced to change delivery modes mid-stream and for institutions that have not previously delivered in that mode, it is a substantial undertaking. The question around equivalency is one that is best answered by each provider's academic board, including seeking whatever external advice is necessary to inform that decision.

The Standards (3.1.4) require that the course is designed to enable achievement of the learning outcomes regardless of the place of study or mode of delivery. So achievement of the learning outcomes and how the provider is satisfied that has occurred is the key question. If the change in delivery mode requires that elements of course delivery or assessment (for example a group presentation or an exam) is no longer, TEQSA would expect consideration of alternatives to reflect on the unit learning outcomes intended to be tested through that assessment and how the alternative arrangements serve that purpose.

Where work integrated learning components necessary for achievement of the learning outcomes are no longer possible, consideration may need to be given to simulated environments.

Note that TEQSA expects the relevant governing bodies to reflect on the necessary changes and make informed decisions on how you can ensure student learning outcomes are achieved.

7. If TEQSA can be confident of effective governance it would follow upon TEQSA being assured that the standards are being maintained. What would TEQSA's expectations be of appropriate governance in the light of COVID-19?

TEQSA considers that all providers meet the requirements of the Higher Education (Threshold) Standards at all times. TEQSA has published guidance notes on the standards, which apply to corporate and academic governance (<https://www.teqsa.gov.au/guidance-notes>) which describe the relevant standards and their intent and some examples of the types of things TEQSA would expect to see if we were to assess compliance with these standards.

Whilst TEQSA has announced a number of initiatives to streamline our regulatory approach and promote provider self-assurance, our expectation that providers continue to meet the Higher Education Standards framework has not changed.

8. Greater collaboration between TEQSA, providers, sectors, peak-bodies is required in the context of COVID-19. How does TEQSA intend to lead/facilitate greater collaboration that takes account of the distinct contexts of the diversity of providers in the sector?

TEQSA had been actively engaging with providers and their peak bodies on a regular basis over the COVID-19 period. The intention is to continue the fruitful discussions that have been occurring across our various stakeholders to ensure the sector responds to emerging issues and recovers from the pandemic as well as possible.

9. How is TEQSA up-skilling and using its Register of Experts during this time? Could Expert teams be commissioned to work collaboratively with providers to gain TEQSA's confidence that the various standards are being maintained even when flexibility is being exercised? Could this function as a substitute for referring everything to TEQSA for guidance or approval?

Prior to COVID-19, TEQSA was in the early stages of planning a professional development day for TEQSA Experts with a specific focus on governance, which was to coincide with the annual TEQSA Conference. Due to the current restrictions on social gatherings, this has had to be postponed until further notice, however, all experts will be advised when such events are scheduled to take place. Note that TEQSA is also considering a training program for quality managers in future. Further work in this area is progressing with the TEQSA Experts Advisory Group and the sector will be advised as appropriate.

TEQSA's approach to the use of experts will be evolving as the sector enhances its self-assurance capabilities going forward. TEQSA through its Experts Advisory Group is also considering how to expand the use of experts beyond the use of experts beyond course accreditation and registration assessments particularly in light of the creation of the Higher Education Academic Integrity Unit and other TEQSA quality enhancement activities, such as the development of online learning resources as they are developed.

10. Could TEQSA provide further details of the Higher Education Academic Integrity Unit?

The aim of the Integrity Unit is to work with and support higher education providers to ensure current and emerging threats to the integrity of higher education delivery and quality are being well managed. Areas of focus for the Higher Education Integrity Unit will change as circumstances require. TEQSA will identify priorities for its action in consultation with the sector, government and other stakeholders.

Once established, the Higher Education Integrity Unit will continue TEQSA's partnership approach, collaborating with higher education providers and other stakeholders to deliver a range of activities including data and intelligence analysis, provision of educational resources and establishing communities of practice. It is about assisting providers and ensuring that together we have the information and the tools to counter threats to the sector. TEQSA is still in the early stages of establishing this unit and will have further details later this year.