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Via email: AQHE@deewr.gov.au

RMIT response to discussion papers on measuring higher education performance

Dear Dr Taylor

Please find attached RMIT University’s submission to the Government’s three discussion papers, *Development of Performance Measurement Instruments in Higher Education, Review of the Australian Graduate Survey (AGS) and Assessment of Generic Skills* as part of the Advancing Quality in Higher Education (AQHE) agenda. Additionally, RMIT’s response is informed by the *Report on the Development of University Experience Survey (UES)*.

Given that the papers all relate to the AQHE agenda, the attached submission provides RMIT’s overarching position. Where relevant, we have also provided further detail and answered particular questions from each discussion paper in the appendices.

If you have any further queries regarding this submission please contact Robert Webster, Executive Director, Policy and Planning Group at robert.webster@rmit.edu.au or on 03 9925 9703.

Yours sincerely

[Signature]

Professor Gill Palmer
Acting Vice-Chancellor and President
RMIT’s response to discussion papers on measuring higher education performance

RMIT University welcomes the opportunity to comment on the Commonwealth Government’s three discussion papers, which propose to introduce the University Experience Survey (UES) and a version of the Collegiate Learning Assessment (CLA) and to review the Australian Graduate Survey. Additionally, RMIT’s response is informed by the UES report.

RMIT is committed to quality higher education and acknowledges that Government has a responsibility to monitor the outcomes of its public investment in higher education. However, quality above a minimum threshold is the clear domain of providers as it relates directly to their operations and freedom to differentiate and compete. In a deregulated market, providers must be free to monitor and to develop their operations aligned to their selected strategic objectives. Consequently Government should seek to minimise and focus regulatory intervention only where it is manifestly in the public interest. This overarching principle is consistent with the Government’s broad objectives for the higher education sector and supports the Government’s response to the Bradley Review.

It is difficult to see a clear rationale for the introduction of further expensive monitoring, particularly when:

- pilot outcomes for the UES suggests results are equivocal at best and, at worst, misleading.\(^1\)
- the OECD project to assess international use of the CLA is also only in the early stages.\(^2\)

This submission identifies key issues with the Government’s approach, provides a set of principles to guide reform and proposes an approach which better leverages current effort. Further detail is in the appendices.

Principles for the development of performance measurement instruments in higher education

The Government’s proposed principles deal with operational and administrative matters that do not provide adequate strategic or policy context for the development of performance measurement instruments. RMIT believes that this important endeavour needs to be guided by clear principles that refer to public policy objectives. RMIT has developed a draft set of higher order principles, outlined below, for consideration by Government and the sector. These principles should augment those proposed in the discussion papers to better guide the Government’s role in, and development of, measurement instruments. Importantly our proposed principles directly address the objectives of measurement (see Appendix 1 for more detail) rather than operational and administrative matters.

RMIT’s proposed principles are;

- **Relevance** – information gathered should be linked to public policy objectives and/or support required monitoring of publicly funded activities.
- **Diversity and autonomy** - arrangements should complement and support institutional diversity and autonomy.

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1 For example, the pilot found that the institution a student attends only explains a very small percentage of the results: UES Report, p87.

2 Depending on the results of the feasibility study, it is not anticipated that a full-scale launch could occur until 2016. OECD, AHELO, [http://www.oecd.org/document/19/0,3746,en_2649_35861297_42295683_1_1_1_1,00.html](http://www.oecd.org/document/19/0,3746,en_2649_35861297_42295683_1_1_1_1,00.html) accessed 20 February 2012.
• Efficiency – arrangements should be operationally efficient to implement and should avoid duplication.
• Effectiveness – arrangements should enhance the evidence base and should support informed decisions by government, students and education providers.
• Purposeful – the end use of data and subsequent analysis should be clearly stated 'up front' and approaches altered in collaboration with the sector should any changes to either measurement or use be foreshadowed

This last principle is of particular importance to the sector as the focus of proposed measurement has shifted from its initial intent of driving performance based funding to informing institutional improvement (and thus potentially duplicating institutional activity) and informing student choice. Whilst each of these purposes is legitimate they can not necessarily all be driven from the same data set. This needs to be considered and adjustments made accordingly.

If these principles are not adopted, RMIT is concerned that the current, hasty approach will:
  • add new survey instruments which are not directly or explicitly linked to public policy objectives, which do not obviate the need for existing collections and duplicate existing measures.
  • adversely affect both the validity of institutions' internal student feedback results as response rates fall and the capacity to customise feedback mechanisms to support institutional strategic decision making.

**Leveraging current effort**

Consistent with these principles and recognising the need to evidence efficient and effective public expenditure and achievement of public policy, we propose a model based on current and tested measures.

RMIT notes that the Government can already monitor the outcomes of public investment in higher education through a variety of existing measures (see fig. 1 below).

**Fig. 1: Current instruments matched to policy objectives and funded activities**

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Access</th>
<th>Participation</th>
<th>Progress rate</th>
<th>Retention</th>
<th>Completion</th>
<th>Employment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>• Graduate Destination Survey</td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>• Beyond Graduation Survey</td>
</tr>
</tbody>
</table>

Whilst it is acknowledged that these measures may not be perfect, they address the majority of the settings articulated in Bradley and the Government's subsequent response. The significant investment required to develop, test and administer what will undoubtedly be a highly contested set of new measures would be better diverted to improving existing measures to both minimise the impact of surveying students and to leverage the appreciable historical investment in current instruments.

In the short-term, this means that the Government should postpone arrangements for the UES and the CLA, in favour of an assessment of possible improvements to existing measures against public policy objectives. Where shortcomings are found and a compelling case for reform is agreed with all stakeholders, then current measures and approaches should be refined. If any further action is required, RMIT believes that a more holistic approach should be taken, which recognises the broader performance and standards framework and which also allows for more detailed stakeholder consultation. This approach would also maximise both the returns on previous investment and the effectiveness of any future investment and enable the Government to ensure the framework includes non-university providers to better match the Government's broader objectives for higher education and to meet principles of competitive neutrality.
Next steps

However performance measurement progresses, government and institutions will need to agree on:

- the instrument/s
- the sampling methodology
- how data will be analysed
- how/where data will be reported or published
- How data will be used.

The current round of consultation does not address these issues in their entirety and, unless they are fully understood and resolved the risk to government goals, institutions and the sector remains high.

Institutions will also clearly need access to all raw and disaggregated data relating to their performance. Similarly, regardless of the deployment model adopted for current or future instruments, given Government wishes to support continuous improvement, institutions must have access to data relating to providers across the sector to support benchmarking purposes. Government must also ensure that sufficient lead time is provided to enable institutions (and Government) to appropriately change internal policy and planning processes to support changed arrangements. As the Government is proposing an ambitious timeline for reform, arrangements must be confirmed as soon as possible.
Appendix 1

Additional Principles: rationale

1. Relevance

*Information gathered should be linked to public policy objectives and/or relate to publicly funded activities*

As part of the Commonwealth Government higher education policy agenda, RMIT notes that the critical principle should be whether proposed new arrangements are appropriately linked to public policy objectives and/or whether they are necessary for Government to monitor its investment in the higher education system.

Achieving government policy objectives directed at increasing Australia’s productivity and monitoring government investment in higher education, will not be measured by the introduction of the two new measures. While they may be part of the ‘quality’ agenda, quality—above a certain threshold—is the domain of institutions as it relates directly to their operations. Similarly, RMIT believes that these government objectives can be measured through access, participation and attainment indicators as these measure the contribution of higher education towards Australia’s future workforce, socio economic engagement and the strength and capacity of the system funded by that investment.

Specifically, those outcomes can already be monitored by Government through existing reporting frameworks and are also supported by:

- labour market outcomes evidenced through mechanisms such as the AGS
- measures to indicate student progress through the system including attrition and progress rates
- other quality controls, including the developing role of Tertiary Education and Quality Standards Agency (TEQSA) and the new standards framework
- the uncapping of undergraduate places, as this will further strengthen the goal for providers to support their students, given funding follows the student.

As the Government can already monitor progress towards policy objectives and the outcomes of its investment, RMIT believes that the Government should target any reform only at those areas which focus on the efficacy of the public investment in terms of access, completions and labour market outcomes and only where a compelling rationale has been identified.

2. Diversity and Autonomy

*Arrangements should complement and support institutional diversity and autonomy*

Arrangements should clearly complement the Government’s public policy objectives (see Figure 1 in the body of the submission) to promote greater diversity within the tertiary sector and be consistent with the objectives of Mission-based Compacts. However, the introduction of the UES and the CLA is likely to require institutions to drop and/or rationalise internal measures, which would reduce the capacity of providers to gather information matched to their unique objectives. This could also affect important internal collections which gather information relevant to other activities, beyond those that are government-funded.

For example, RMIT provides services across the full tertiary range, from certificate to postgraduate research programs and gathers feedback from all students throughout their studies, adapting measures from the AGS including the Overall Satisfaction Index. These measures have been embedded in our policy and planning processes for many years and we have significant time series data to track our progress. This information is critical to inform projects linked to our Strategic Plan, to underpin our

4 This rationalisation could take the form of dropping particular questionnaire items or changing from a census to a sample approach.
annual program review process and to support our achievement of Government goals. New measures which cause us to drop or rationalise internal measures reduce our capacity to gather that information. This is also likely to:

- require wholesale changes to institutional policy and planning processes and could hinder continuous improvement activity
- push providers to shift their focus onto the activities being measured, reducing diversity.

Additional information available through new measures is no substitute for internal measures which are tailored to the specific aspects of the student experience we seek to deliver. Proposed supplementary measures to augment the basic survey would be insufficient to address the gap. Similarly, regardless of the administrative model adopted, providers must still be able to access all raw and disaggregated data relating to their activities and to access data relating to providers across the sector to support benchmarking and continuous improvement.

3. Efficiency

Arrangements should be operationally efficient to implement and avoid duplication

Changing surveying processes and introducing new measures has significant expense for both Government and institutions and can take institutional resources away from other core university activities. New measures also take significant time to develop, pilot and embed into policy and planning processes, with years needed before longitudinal results can be known and for time series data to be built. For these reasons, it is imperative that any new measures represent an efficient and effective approach.

Proposed arrangements would duplicate existing measures without a clear rationale or strategy. Specifically, the UES substantially duplicates measures already monitored through the Course Experience Questionnaire (CEQ) of the AGS. Issues identified in the Review of the AGS paper substantially go to administration, rather than content. As the CEQ has longitudinal data from 1992, it would be better to confirm if the CEQ addresses identified policy needs prior to new instruments being introduced.

Proposed arrangements would also pre-empt international efforts, with the OECD AHELO project still in the feasibility phase. If Australia implements a CLA now, it risks having to re-introduce another instrument once AHELO is finalised. Alternatively, Australia risks getting left behind and unable to benchmark globally if it retains its version of the CLA.

4. Effectiveness

Arrangements should enhance the evidence base and support informed decisions.

Any measurement instrument used should be ‘valid’ i.e. the instrument truly measures that which it was intended to measure and be fit for purpose. While it can be used to support differing purposes (see below), there are issues with many of the varying purposes identified in the papers. It would therefore be premature for Government to introduce these new tools until those issues are resolved.

Measuring learning outcomes and the student experience: The Government has identified issues about the capacity of tools similar to the CLA or the UES to discriminate between the performance of institutions. For example, 2001 findings by the Commonwealth cited in the AGS paper show that institutions explain somewhere between 1 per cent and 13 of the variation in learning outcomes, as measured by graduate destinations and satisfaction. The UES Report also noted that the institution a student attends only explains a very small percentage of the student satisfaction scores. Discussion in

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5 Commonwealth, Assessing Generic Skills, p18.
4 Found to be around 6% of their engagement, 1% of their teaching and support, and 0.8% of their educational development: UES Report, p87.
the Report also indicates that the UES is unlikely to find differences between institutions that are statistically significant, which could therefore be misleading.

**Allocating performance funding:** The original purpose of the UES was to support the allocation of performance-based funds for continuous quality improvement. However, performance based funds are no longer available which raises questions about whether the instrument is suitable for its new purpose.

**Informing student choice:** The Government notes that these measures could or should be published to inform student choice through the *MyUniversity* website. However, given the lack of institutional variation and statistical significance, there is a risk that publishing data relating to student experience or learning outcomes could actually mislead students, by focusing their attention on small variances which do not represent meaningful differences between institutions, especially when student choice may be focussed at the discipline or program level.

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7 UES Report, p4, 6.
Specific responses to selected discussion paper questions

Paper 1: Development of Performance Measurement Instruments in Higher Education

Are there other principles that should guide the development of performance measurement?
Yes, RMIT identifies for higher order principles: refer page 2 of this submission.

Is it appropriate to use a student life cycle framework? Are there other aspects for inclusion?
In a deregulated environment, providers must be free to monitor their own activities and engage with their customers and develop their operations matched to their unique mission. The proposed student lifecycle approach could reduce the capacity of providers to internally monitor student satisfaction, engagement and experience and is beyond that required by Government to effectively monitor their investment. Similarly, RMIT is concerned that the lifecycle approach as articulated does not:

- consider the broader tertiary context, being limited to undergraduate students
- specify how middle year students will be monitored, which is critical for providers to give an informed response to the proposed arrangements
- recognise that there are existing controls and mechanisms to ensure that students in those middle years are receiving a quality experience.

What concerns arise from an independent deployment method? What are the other important issues associated with administration of survey instruments?
Third party surveying does raise privacy issues. RMIT would prefer that institutions are not required to disclose personal student information. If such an approach is adopted:

- Further detail would be required to enable providers and students to understand the full effects of the change and help shape questions/processes to minimise privacy concerns.
- Implementation timelines would need to factor in appropriate consultation time—especially with students and Privacy Commissioners—and lead time to enable institutions to change internal processes.
- Action should be in accord with all relevant legislation with appropriate sureties on on the use and sharing of that information.

It is critical that institutions have access to the full, disaggregated data set relevant to their business. This access would help our institutional planning processes and also better enable us to verify calculations made with that data for the purpose of informing student choice (e.g. via the MyUniversity website). It would also be critical to support continuous improvement. As part of that process, RMIT also notes that access to other institutional data must be provided for benchmarking purposes.

What are key considerations in choosing between a sample or census approach?
RMIT supports a census approach to new measures, as this would better enable institutions to access additional information relevant to their student cohort and help mitigate any potential effect through survey fatigue or the dropping of internal measures (although this information cannot replace the instruments developed by institutions uniquely tailored to their needs). However, if a sampling methodology is adopted, institutions must have the opportunity to comment on the proposed approach and work with the Government to minimise the survey burden. Institutions will also need time to try to complement that approach through internal processes (e.g. to avoid burdening the sample group again).

What are appropriate uses of the data collected from the new instruments?
Even if a census approach is taken, seeking to disaggregate that data to subject level and publish that information on the MyUniversity website could lead to data anomalies which would not support student choice. Meeting mandated response rates across all diverse programs (such as those with a small cohort) would be challenging. Therefore RMIT believes that the Government should maintain some
flexibility in their approach. It may be more appropriate for results to be published only once they pass a certain threshold. Again, further consultation on the approach and uses of data would be required.

**Paper 2: Review of the Australian Graduate Survey (AGS)**

**Will the GDS and CEQ adequately meet future needs for information?**

RMIT believes that any discussion of the ‘future needs’ of the system in a student driven environment should look beyond merely the GDS and the CEQ. Such a review could also focus on how the AGS could be expanded or changed to meet any identified other needs, rather than the current review focus on changed administrative arrangements or the other proposals to introduce new instruments.

**Would moving the AGS to a centralised administrative model improve confidence in results?**

Current arrangements, drawing on the expertise and experience of the GCA, are likely to promote more confidence in results than other proposed options. This is particularly so given the privacy concerns for external models (noted above) and as use of systems such as HEIMS to support such models raise issues such as whether that system (which is already complex and developed for other purposes) can be used.

**Paper 3: Assessment of Generic Skills**

**Which criteria should guide the inclusion of discipline specific assessments?**

As noted above, RMIT has concerns about the capacity of the CLA to reliably and validly measure student learning outcomes, particularly ahead of the outcomes of the OECD AHELO project. Given this, investing further resources into the development of discipline specific tests would be inefficient, until those issues are resolved. If such a process were to commence, it would be useful for the Government to provide more information regarding resourcing and implementation timings to inform consideration of the proposals.