

Feedback on the DESE consultation paper: *Foundation Program Standards: positioning for quality, success and competitiveness.*

Part A: Questions submitted to providers via a response form.

1. What are your overall comments on the paper, including the possible amendments?

The paper provides an accurate summary of the current and historical context of Foundation Studies programs in the Australian international education sector. It identifies the key areas of the original 2010 standards that require review and updating, and the general approach of the discussion paper is in line with the feedback provided to the department in 2019 by IEAA and English Australia as a result of surveying provider views on the standards.

2. Is the minimum age requirement of 17 years of age to commence a Foundation Program, or 16 years of age with prior approval by TEQSA, appropriate?

IEAA believes that the minimum age requirements are appropriate. With Foundation programs requiring 9 – 12 months for completion, and Universities specifying 18 years of age as the minimum age for commencement of tertiary studies, having 17 years of age as the usual minimum is in line. As some Universities will accept students of 17 years of age, then the 16 years of age with prior approval, is also in line, under the condition that Under 18 management processes are in place, such as guardianship requirements, working with children checks and the completion of CAAW agreements.

3. Is there a need for 'extended' Foundation Programs? If so, how should the Standards apply to them?

IEAA's understanding that this is an option needed by some providers, but not the majority. The option of an extended program, in which a student undertakes additional study prior to the main program, allows students with weaker English or academic skills to have a pathway in to Foundation programs and subsequently, tertiary studies. It is suggested that the standards provide some guidelines on how the additional component of the Foundation program would be delivered and assessed, to ensure students transitioning into the standard program are adequately prepared. A minimum IELTS or equivalent language score for admission should be specified, for example at IELTS 5.0 minimum, which would be 0.5 IELTS overall band score lower than entry into the standard program. It is suggested that there is no need for re-testing of students on conclusion of 'extended' component of a packaged course as Standard programs embodies testing regimes to ensure alignment to Year 12 and meet university requirements as reflected in the Foundation Standards.

4. Should the Foundation Program Standards also regulate courses under 26 weeks? If not, should providers be able to register these courses on CRICOS as 'non-award'?

IEAA believes that courses of less than 26 weeks would not sufficiently prepare Year 12 age students for tertiary studies and should not fall with the guidelines for Foundation Programs, or as an equivalency for Year 12 studies. Should stand alone shorter courses be able to be registered on CRICOS as non-award, then they should have a different description and status.

5. Should online learning be a part of Foundation Programs?

- i. If so, how should this be specified?
- ii. What limits should be in place (such as course percentage or hours per week)?
- iii. How would consideration be given to the younger cohorts in Foundation Programs?

In line with recent trends in teaching and learning across all sectors, there was a strong desire from providers to be able to utilise online learning more fully than the standards allow. This has been accelerated with the impact of the coronavirus pandemic, and the wide-spread introduction of learning in multiple modes to allow learners in multiple locations, and different time zones, to be able to access course materials equitably.

Prescribing specific time amounts may be unwieldy, and what might be more appropriate would be to require a certain amount of either face to face or synchronous online learning, and potentially also the ability access course learning content, including recorded classes, asynchronously. What is most important is the quality and breadth of learning resource, including the resource invested in their development, and the ability to access them equitably, rather than a specified amount of face-to-face learning.

It is suggested that younger cohorts in Foundation program would be equally well equipped to manage and succeed utilising online learning, as this is now an integral part of learning in other contexts, including high school.

6. Is the distinction between streamlined and general programs required?

- i. Should there be specified key learning areas, or more flexibility to deliver units designed to meet student needs/pathway course needs, with only the English language component as compulsory?

It is suggested that there is a definite need for streamlined and general versions of Foundation Year program design to ensure providers can meet partnering university pathway requirements.

Our understanding is that providers would prefer flexibility to ensure that their program content and identified learning areas meet learner needs for their subsequent studies, within parameters such as a requirement for an English language component. A guideline to seek University partner input on program study plans and subject selection for particular disciplines may be a way of ensuring program content is optimally relevant for students.

Part B: Other changes suggested in the consultation paper.

Ensuring appropriate English language requirements

- We believe providers would support the inclusion of a requirement that “Formal measures must be in place to ensure assessment outcomes for the academic English program are comparable to other criteria used for admission to the tertiary education course of study, or for admission to other similar courses of study.” This is similar to the requirements for students exiting ELICOS program into further study.

- We don't believe that providers would support an increase the minimum IELTS score for 'extended programs' from 5.0 to 5.5, as this would substantially reduce potential market share and undermine the rationale for extended Foundation programs.
- Our understanding is that providers believe the current minimum IELTS score for standard programs is appropriate, and as stated above for extended programs, raising the this would substantially reduce potential market share and undermine the rationale for Foundation programs.

Academic preparedness

- Although providers are broadly supportive of consulting with partner universities on student outcomes from Foundation programs and guidance on pre-requisite knowledge, they may not be supportive of a requirement of a written agreement from the university that the offered curriculum adequately prepares the student for higher education programs, as this may be perceived as increasing the bureaucratic burden and Universities may not necessarily have the capacity to direct comment on Year 12 subject content tailored for international students.
- Providers are likely to be supportive of including assessment of overall university readiness, as this is one of the key learning outcomes of Foundation programs, and also likely to be supportive of a requirement for explicit attention and focus on critical thinking and academic rigour and integrity, which are likely to be key elements of current programs.

Quality assurance and student support

Providers are keen to ensure that the standards do reflect current innovations in digital approaches to teaching and learning, assessment and student support, and are thus like to be supportive of requirements to:

- Ensure access to digital and physical resources and support services.
- Require student progress reports to be available in an online format.
- Replace references to "exams" with "significant formal assessment".
- Require that exams should not form more than 40% of the overall assessment weighting.

Consistency within the ESOS legislative framework

- With a small but not insignificant number of Under 18 students undertaking Foundation programs, providers are likely to be highly supportive of the creation of a new standard addressing the care and protection of Foundation students under 18 years of age, and for requirements for providers to follow the relevant child protection legislation in their state or territory jurisdiction and/or comply with any relevant Commonwealth child safety requirements.
- As previously discussed, providers are likely to support standards around the minimum amount of teaching and learning to be delivered, however a requirement to specify Foundation Programs must be a minimum of 20 hours per week may need clarification about modes of learning and whether the distinction between online and face to face is relevant.
- Providers would likely be supportive of requirements to ensure teaching staff are up to date with developments in their field, including professional development for teaching staff which includes teaching students from non-English speaking backgrounds.