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TASMANIAN QUALIFICATIONS AUTHORITY

4 July 2012

Mr Robert Randall
Acting Chief Executive Officer
Australian Curriculum, Assessment and Reporting Authority
Level 10
255 Pitt Street
SYDNEY NSW 2000

Dear Mr Randall

Thank you for your letter of May 15 requesting a coordinated response to the draft senior secondary Australian curriculum in the areas of English, mathematics, science and history.

This request was considered by the Authority at its meeting on June 6 2012. The Authority approved provision of a response that included both the general matters discussed at its meeting and a consolidated statement of subject-specific issues identified by Tasmanian senior secondary teachers during a program of workshops and consultations in May 2012. These focused on the content and achievement standards specifications for English, mathematics and science. A summary of the subject-area specific comments appears in attachment A. Several issues recur across different subjects and subject areas – these are discussed below and in attachment B.

The Authority noted that it will play a critical role in any implementation in Tasmania of the Australian senior secondary curriculum. It will be responsible for accrediting courses that include the content and achievement standards provided by ACARA. In particular, the Authority will be responsible for devising and implementing the assessment, reporting, certification and quality assurance elements of these courses. Schools and colleges are responsible for implementing the courses accredited by the Authority.

In its discussion, the Authority recognised that its role in relation to any future implementation of the content and achievement standards developed by ACARA requires the Authority to accredit courses only where it can ensure adequate assessment and certification. The Authority therefore identified three issues relevant to this role that recur across the drafts released by ACARA. These issues are outlined in attachment B. The importance of these issues is that, to the extent that the final versions are similar to the current drafts, they

- are likely to make it more challenging to achieve consistency of interpretation and standards across jurisdictions (and across years)
- require the Authority to make substantial additional provision of accredited courses in the areas of English, mathematics and science to meet the needs of senior secondary students.

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The Authority also noted that ACARA does not yet seem to have any clear mechanism (policy and procedure) for dealing with changes to its specifications of content and achievement standards after they have been formally approved. Such changes will include fixing up typographical errors, making minor corrections, providing clarifications, revising standards specifications in the light of experience or making major changes. It would be good practice for ACARA to have developed and adopted a mechanism for managing these matters before the drafts are submitted for formal approval.

Yours faithfully

Dr Reg Allen
Chief Executive Officer

Attachment A: summary of subject area specific issues identified from comments, consultations and workshops

(note that general issues appearing in the covering letter and attachment B were also identified during consultations and workshops)

Subject area	Comments relevant to feedback to ACARA
English	1. At this time, we do not need Literature Units 1 2 - a course based on English Units 1 2 will provide a pathway to Literature Units 3 4 2. The English courses are frameworks without sufficient specificity – we will need to add detail to make it 'teachable' 3. There are no text lists nor adequate guidelines / rules to assist in determining a text list 4. We need courses that will develop students' skills in everyday reading and writing, where students have entered post-year 10 without these skills – the ACARA courses do not meet these needs 5. Current specialist TQA course in English Writing has a place in the future – its content is not subsumed by ACARA English or Literature 6. EAL/D unit 3 4 is more demanding than current ESL course 7. EAL/D Bridging unit 1 2 is below the lowest standard of complexity/difficulty required for a course to be recognised as 'senior secondary' studies 8. Achievement standards can be unpacked into a set of criteria and standards and a rule for deciding an overall result from the profile of achievement on these criteria
Mathematics	1. ACARA courses do not meet the needs of post-year 10 learners who require courses developing basic 'everyday adult mathematics' 2. ACARA courses assume success in relevant year 10 maths, especially year 10 A for Mathematical Methods 1 2 3. At this time, we do not need a course based on Specialised mathematics units 1 2 4. Essential mathematics units 3 4 does not seem to fill a need 5. Achievement standards can be unpacked into a set of criteria and standards and a rule for deciding an overall result from the profile of achievement on these criteria There will be a PD need in the area of 'networks' for teachers of General Mathematics
Science	1. There are real differences in nature and purpose of current Tasmanian environmental science course (about the environment and sustainability) and the ACARA Earth and Environmental Science (earth sciences). We will have a re-named course with the nature and purpose of the current environmental science course. 2. Human biology elements are not present in ACARA Biology 3 4 3. We have recognised the requirement for science courses for

	students not university bound – ACARA science courses do not meet the needs of such students. We will therefore retain Life Science and Science of the Physical World. 4. Biology unit 1 2 does not form a coherent course, these are two independent, unrelated, units. 5. Having the same skills statements in achievement levels imply nothing is learned in the second year. 6. Marine and human biology don't seem to get sufficient recognition in ACARA courses. 7. Chemistry will required an emphasis on analytical instrumentation and techniques that are not part of the current course – implications for resources and professional development. 6. Achievement standards can be unpacked and details added as needed to create a set of criteria and standards and a rule for deciding an overall result from the profile of achievement on these criteria. The result will be a set of criteria and standards very like the ones in the current high-level science courses.

Attachment B: General issues relating to draft content and achievement standards in English, mathematics, science and history

1. Insufficient specificity

Sound assessment and certification relies on accredited courses avoiding ambiguity and uncertainty, setting boundaries – defining what is in and what is outside. If these boundaries are not set clearly, are not well-defined, or if difficult issues are unresolved, left open and vague, it is very hard to ensure consistency of implementation and application of consistent standards.

Some of the draft content and achievement standards provide clear specifications and resolve uncertainties well. Others, for example, in the English area, are more of a framework for making decisions about specifications. The inclusion of a wide range of electives, especially if they lack a clear and specified underlying construct create real difficulties in assessing and reporting against consistent standards. For example, the Modern History specifications allow for selection from a wide range of significant 'developments ...that have shaped the modern world'. At several critical points in these specifications, the omission of the definite article (for example, one outcome is '*understand key developments that have helped define the modern world ...*' rather than '*understand* the *key developments that have helped define the modern world...*') creates uncertainty about the content and the key construct underpinning what is to be studied and learned.

Agencies including these content and achievement specifications in accredited courses will, of course, be able to (and indeed be likely to find it essential to) add the required clarity and specificity, including setting text lists as needed. The diversity this will bring will not readily support consistency across agencies.

2. Same phrases to mean different standards

In principle, it is highly desirable that more demanding or different standards should be described with language that makes this clear.

In the draft science achievement standards, the descriptions of standards for skills are much the same across units and across subjects. This implies that, for example, the nature of data collection, design and evaluation of investigations as well as causal analysis is the same across biology and physics and that a student who completes two years of the study of physics will develop these skills to no higher standard than that expected at the end of the first year of study.

When we convert such standards into an assessment system we will have to add elements that make clear and explicit the differences between the standards expected of students. The workshops we ran on developing criteria and standards for English, mathematics, physics and chemistry shows us that this can be done. However, each agency implementing courses that include ACARA's content and achievement standards will also have to solve

these problems one way or another. This will not support (and may work against) consistency of standards and interpretation across agencies.

3. A mismatch between real students and the student for whom the content and standards appear to have been written (the 'implied' student)

The current drafts appear to have been written for a student who is reasonably 'academic', completes a full program of two-year courses over two years and has been well-prepared through successful completion of the F-10 Australian curriculum.

The real students for whom we must ensure we have appropriate accredited courses include some like this ideal type but also include students who are not 'academic', complete senior secondary studies over several years, often on a part-time basis, finish courses at the end of one year and enter new courses in their second year, and who do not bring with them thorough and consistent knowledge and skills from their Year 9 and 10 experiences.

ACARA's omission of content and achievement standards that meet these student needs in the areas of English, mathematics and science courses, unintentionally or not, implies a judgment about importance of the needs of these other students.

As students move around, within a state, across states and from overseas, they will seek to enter courses based on units 3 and 4 from the ACARA content and achievement standards. There are some instances in the current drafts where the assumed knowledge is more closely tied to completion of units 1 and 2 than may be necessary.