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QCEC response to ACER Queensland Review of Senior Assessment and Tertiary Entrance Processes.

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Introduction

Queensland Catholic Education Commission (QCEC) is the peak strategic body with state-wide responsibilities for Catholic schools in Queensland. These schools are administered by five diocesan schooling authorities (Brisbane, Cairns, Rockhampton, Toowoomba and Townsville) that operate 263 schools, and 17 Religious Institutes that operate a further 33 schools. QCEC has delegated roles in relation to liaising with State and Federal Governments, negotiating and distributing government funds to Catholic schools and facilitating collaboration between Catholic schooling authorities to determine planning.

Queensland Catholic Education Commission (QCEC) provides this response to *ACER Queensland Review of Senior Assessment and Tertiary Entrance Processes* on behalf of 22 Catholic schooling authorities which operate Catholic schools in Queensland, educating a total of 142,000 students; and specifically on behalf of the 99 Catholic secondary schools, their students, staff, communities and families on whom issues of senior assessment and tertiary entrance processes particularly impact. A cohort of over 10,000 students completes Year 12 in Catholic schools each year. The issue of senior assessment and tertiary entrance processes is one of significant importance to QCEC and Catholic schooling authorities.

Some Catholic schooling authorities may choose to provide individual responses to the review, in addition to this response which has been formed in collaboration across all Catholic schooling authorities using a taskforce of representatives.

Fundamental to Catholic education is a belief in the uniqueness and worth of each person and value of the whole person. There is also a concern for the common good. In questions of assessment and tertiary entrance processes, this can translate into some broad principles:

- Learning should foster the holistic formation and well-being of the individual student[1][2] and not be unnecessarily circumscribed by assessment requirements
- Teaching, assessment and tertiary entrance processes should recognise the different needs of students and be equitable in providing access and pathways appropriate to needs of different students
- Equity, fairness and appropriate discernment in providing access to post school pathways serves not just the individual's needs but the common good in supporting productivity, social justice and just and sustainable use of higher education resources.

These principles underpin QCEC responses to questions of senior assessment and tertiary entrance processes.

QCEC welcomes this Review of Senior Assessment and Tertiary Entrance Processes. The review is timely and necessary: the current processes have been in place for a considerable time; some elements are no longer well understood by the education and broader community; there is some evidence that processes are not consistently applied as originally intended; pathways through senior schooling and pathways into tertiary education have expanded; and processes for tertiary entrance have changed significantly in the intervening time from a limited supply driven system to a demand driven system in many courses[3].

QCEC notes the opportunity now to carefully consider assessment and tertiary entrance processes appropriate to the current context of education[4]. QCEC is also mindful of multiple elements that must be considered in parallel with any related decisions. Appropriate resourcing will be essential to the success of any changed system; the multiple pathways through senior schooling will need to be accommodated appropriately; any system needs to be sustainable and able to be implemented in practical terms; assessment and tertiary entrance processes must not detract excessive time or resourcing from other areas of education and cannot be resourced at the expense of the schooling sectors. The processes must equitably accommodate the capacity to discern which students are best fitted to benefit from low-supply, high-demand courses.

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[1] The Melbourne Declaration identifies this broader purpose of education: *The curriculum will enable students to develop knowledge in the disciplines of English, mathematics, science, languages, humanities and the arts; to understand the spiritual, moral and aesthetic dimensions of life; and open up new ways of thinking. It will also support the development of deep knowledge within a discipline, which provides the foundation for inter-disciplinary approaches to innovation and complex problem-solving.* (2008:13).

[2] Queensland Catholic schools and Curriculum (Treston, 2008): *Curriculum forms the whole person ….; Curriculum prepares students for global responsibilities in the context of a catholic understanding of justice, peace and ecological understanding.*

[3] Grattan Institute, 2012:56 highlights that response to demand varies across courses and universities. For elite health courses such as medicine and dentistry, demand greatly exceeds supply due to restrictions on clinical training places as well as constraints in the higher education system. Supply in these areas is not expanded in response to demand from students.

[4] QCEC notes that the Terms of Reference for this Review include (4) "*the inclusiveness of the system for all students completing Year 12…..*". There is very little in the Focus Questions posed that is inclusive of students outside of the current OP system.

Organisation of this Response

This response has been organised broadly around the focus questions posed by ACER Reviewers. It should be noted that across Catholic schooling authorities and Catholic schools there is some diversity of opinion in response to some of the focus questions. This is reflected as appropriate both within the body of the QCEC response and in footnotes where individual exceptions are noted. However, there is a very high level of consistency in overall response to most questions.

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1. School-based assessment

We have suggested that school-based assessment be preserved. What is your response to this suggestion? What value do you place on school-based assessment in general, and teacher-devised assessments in particular? What would you do specifically to enhance the validity and reliability of teacher-devised assessments?

1.1. Catholic schooling authorities value school-based assessment and express strong overarching support for its preservation. This support is generally unqualified, "*School-based assessment __must__ be preserved as an essential feature of any 'new' system*", and at its most moderate is expressed as "*there has to be some element of school-based assessment*".

1.2. This review does provide a welcome opportunity however to enhance the validity, reliability and credibility of school-based assessment, to improve consistency in assessment load and size across schools and subjects and to increase comparability across schools of student standards of achievement.

1.3. School based assessment enables the flexibility to cater for a diversity of learning needs, to assess students across a broader range of conditions and to provide better quality feedback to students. The capacity of teacher-devised assessment to be contextually based, to engage students with their local setting and to provide more flexible arrangements for student assessment is a significant benefit of school based assessment, as is the capacity to assess the significant practical skills that are essential in some subjects but unable to be demonstrated appropriately through external assessment. In devising school-based assessment, teachers are engaging in the full range of their professional responsibilities – planning, teaching and assessing.

1.4. There is clear contention that teachers can effectively design assessment instruments which will challenge and properly test students according to a set syllabus, that they know their students best and are qualified and experienced to make professional judgments on their progress. However, there is also inherent recognition of the skills required for teachers to

form high quality assessment items[5]. It is recognised that these skills are enhanced by the collaboration and learning opportunities engendered through school-based assessment processes.

1.5. The need for quality professional development in the area of assessment is clearly identified. In short, the support for school-based assessment is balanced by an accompanying recognition that support is required to do it well: the validity and reliability of teacher-devised school-based assessments could be supported and improved through enhancements to the current system. There is strong endorsement for the provision of effective professional learning for teachers to enhance their skills in developing high quality assessment items and reaching consistent and reliable judgments on standards of achievement.

1.6. The need is identified for further professional learning and support around
- design features of valid and reliable teacher-devised assessment
- writing of assessment items and adjusting assessment to accommodate diversity of student need
- use of annotated real student samples of work at various levels of achievement to inform teacher judgment
- provision of advice on request about the quality and appropriateness of assessment items prior to use
- approval of assessment items as part of the process of approving subject work programs
- provision of a bank of exemplar questions able to be referenced by teachers in preparing quality assessment items.

There is also an identified need for equity of access to professional development for regional areas.

1.7. School-based assessment is valued and supported by Catholic schooling authorities but professional development and support for teachers in devising assessment and using school-based assessment is essential to enhance its validity and reliability.

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[5] For example, one school highlighted the skill required in devising quality, unseen assessment to test higher order skills in some subjects (e.g. Maths C and Physics) noting, "teacher devised assessment is only as good as the experience, talent and dedication of the teacher".

> **2. External assessment**
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> We have suggested that an externally set and marked assessment be used in some or all Authority subjects and that this assessment contribute up to 50% of a student's result in a subject. What is your response to this suggestion? What do you see as the advantages and disadvantages of including an External Assessment?

2.1   The notion of some form of external assessment in subjects is supported in-principle although caution is expressed in responding to this proposal simply because there is so little detail elaborated around possibilities. Far greater information and understanding is required before QCEC could provide beyond in-principle commitment to this proposal: greater detail is essential. How, when and where external assessment might happen, when the assessment might be appropriately timed, how much it would count, what would be assessed and how the results would be used are commonly raised issues. It is unclear as to how the percentage of external assessment set in each subject would be determined and there is concern that those subjects more suited to external assessment could become privileged above other subjects. The potential for external assessment to change the nature of the subject over time is raised as a concern, as are the implications and flow on effects of differing percentages of external assessment in different subjects.

2.2   Further detail is required as to how results of external assessment would be used and reported. This point is stressed repeatedly throughout this response.

2.3   QCEC notes in-principle agreement to some externally set and marked assessment. More layers of assessment are not needed, and there is certainly no need for additional overarching external tests of key capabilities, but some advantages of external assessment in subjects are recognised:
   - external assessment could increase credibility of the assessment process, ensuring a greater degree of consistency across the state
   - transparency of processes many be improved: parents, teachers and students may understand more clearly how their result is determined if it is purely on their marks rather than a scaling based system
   - final outcome may be more 'just' and not 'more demanding' of students who, many feel, may be already over assessed in the current system
   - some element of external assessment may enable a move away from the current QCS Test to avoid what would be, effectively, a 'third tier' of assessment

2.4   After a very significant time in Queensland without external assessment in subjects and with knowledge of both the flaws of previous external assessment and the fact that the education world has moved on significantly, the disadvantages of external assessment are readily identified by Catholic schooling authorities:

- External assessment has significant potential to impact on teaching and student learning, narrowing the process and content with a potential 'teach to the test' mentality[6]
- External assessment is unable to adequately capture various skills across a subject and unable to be tailored to local contexts or to the needs of individual students, with particular disadvantage identified for some groups including Indigenous students
- External assessment does not allow for feedback that informs teaching practices
- There is potential for a "privileging" of those subjects that have external assessment and a rank ordering of senior subjects that could lead to a polarising of senior education
- The cost and resourcing of external assessment, including costs of security, invigilators and markers is significantly higher.

QCEC would be eager to ensure that the costs associated with setting and marking external assessment was not resourced at the expense of building teacher capacity or at the expense of individual students. It is assumed that QCAA would have responsibility for setting and marking external assessment in which case it would be essential that QCAA was properly resourced by government to undertake this additional task; it could not be carried out at the expense of their other roles.

2.5 These disadvantages of external assessment may be tempered to some extent by the proposal to combine in some way the results of both internal and external assessment. The crucial questions then become those around how the two sets of results are melded, how decisions will be made where the outcomes of internal and external assessment are clearly inconsistent and whether one set of results will be prioritised over the other (in which case, one set becomes almost redundant). QCEC seeks far greater clarification in relation to these issues.

2.6 The crucial question of how the internal and external results would be joined (or melded) to create an overall grade is raised repeatedly throughout this response. Virtually no information is provided by the reviewers in this regard and the issue is fundamental to this proposal. Some concern has been raised over the potential of using external assessment for statistical moderation of internal assessment results. In giving in-principle support to some external assessment component, QCEC reiterates the importance of knowing how external and internal assessment would be combined in forming a final overall result.

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[6] The parallel risk of an "exam preparation industry" is identified by some Catholic schooling authorities as an issue but countered by others who contend such a preparation industry is afoot in relation to QCS Test.

3. Moderation
We have suggested that, for school-based assessment, current moderation processes be strengthened. What do you see as the advantages of the consensus model of moderation that is currently operating? Do you agree that current moderation processes need to be strengthened and, if so, what specifically would you change?

3.1   There is very strong endorsement of the suggestion that, for school-based assessment, current moderation processes should be strengthened.

3.2   The concept of moderation is very highly supported by Catholic schooling authorities but the practice in many instances appears to fall well short of the intentions; some individual schools expressed particular concern about the current enactment of the panel system[7]. Two themes keep reoccurring in relation to the model of moderation currently operating: the lack of resourcing to adequately maintain it and the absence of appropriate professional learning opportunities to sustain the model by ensuring all teachers understand the intentions of the model and are able to apply the theory consistently.

3.3   There is consistent praise of the moderation panel system for the professional development opportunity it provides to teachers; for the capacity it builds among teachers to develop high-quality assessment instruments and discern achievement standards of students. Teachers appreciate the collaboration, sharing and professional dialogue that can be engendered in the system operating at its best but the work is happening largely on the back of the goodwill and generosity of teachers. While the economic benefits of the system are cited in its support, significant problems have emerged from trying to run the system on the cheap, without adequate resourcing or support of those teachers who make it work. The lack of consistent professional training may have led to the development of some undesirable practices and reinforced some myths being applied forcefully in some individual panels.

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[7] Not all Catholic schooling authorities are equally praising of the moderation system. One Catholic school was frank in its position that **the Panel system is flawed**. "In theory, it is OK. However, the enactment is not good.   The problems include but are not limited to: inconsistency of judgement; power plays; inexperienced panel members; lack of training; the reality that the training is not effective; the guidelines for panels are not always clear and are not always adhered to; the panels are full of politics; the dispute resolution process is flawed."

Another school observed the need to re-design the moderation system: "*sometimes very subjective decisions are made ......personalities and biases can dominate in panels";* while a third school principal was the exception in stressing that "examples of systemised rorting and inconsistencies" need to be dealt with by changing the model, not strengthening moderation processes.

3.4 QCEC reinforces the point that the consensus model of moderation is highly valued as part of the Queensland system of school-based assessment but it must be resourced and supported adequately to produce optimum outcomes. The resourcing to support the system must be provided through additional funding to QCAA and should not detract from other elements of their work.

3.5 There is substantial scope for change and improvement in moderation processes and this review provides opportunity to strengthen the system. Significantly, in feedback for this response, there are few recommendations for radical change to the current processes but many recommendations for its enhancement.

3.6 Some of the recommendations in this regard require simple modifications to enhance panel processes:
- Increasing the very short time frames currently allocated for panel work
- Providing adequate pre-reading time for submissions
- Removing the restraints of the currently imposed bank of comments to enable panel chairs to provide more meaningful comment on submission
- Enabling a greater depth of discussion on panel day for each submission
- Providing more sample folios for review by panel
- Removing student and school identifiers from samples to improve objectivity for panel moderation
- Providing adequate remuneration and resourcing for the work done by panels

3.7 Recommendations for more substantial change include
- Reinstating Studies Authority "subject area specialists" or "subject assessment officers"
- Credentialing for members of panels
- Varying recommendations about panel composition, ranging from
  o every school should have a panel member or observer to
  o expert panels operating beyond their own region, or panels comprising representation from across the state to
  o a professional panel of moderators with a mix of classroom teachers
- Varying recommendations about chairing of panels
  o QCAA officers acting as District Panel Chairs
  o panel chairs crossing over between districts
  o State Panel Chairs being given greater power to make finer grained decisions in moving a student's achievement level.
- Using technology and digital submissions to gain greater cross state panel interaction and consistency.

3.8   It is clear that panel[8] composition and training is the most pressing issue to be addressed. The most consistent advice being provided to strengthen panels relates to professional development and training for panellists. It is noted that panel training (and professional development for classroom teachers) occurs formally at the start of each syllabus cycle, with training for classroom teachers in subsequent years often limited or non-existent and for panellists, left to the District Panel Chair (and therefore often informal and 'on-the-job').

3.9   None of these suggestions for strengthening the consensus moderation panel system address the more basic issue that there is currently operating in Queensland a two level system of entry to tertiary and further education: one via OP and one via Rank. While each pathway in schools includes school-based, teacher-devised assessment and each may include an external element of assessment via the QCS test, the parallel rigour in moderation processes is not evident in non-OP subjects. Strengthening panel moderation systems for "Authority" subjects may help to address the assessment needs and consistency of student achievement standards for part of the school population[9] but it will in not address the anomalies and potential gaming between two separate and unrelated processes and pathways[10].

3.10   The largest challenge for this review is to determine what system can be implemented in Queensland that will address the needs of students and society as a whole in a largely demand-driven tertiary entrance market, with limited "elite" pockets where demand well outstrips supply and where more refined selection processes are called for. There is little equity in building whole processes of schooling assessment and tertiary entrance around the needs of an increasingly limited group of students without consideration of broader needs.

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[8] It is recognised that moderation panels perform a twofold function: they enact consensus moderation processes and they provide valuable professional development for members of the panel. Only the first function is of direct relevance to this review but it must be noted limiting panel membership is likely to have unintended impacts on professional development and expertise of teachers in using the system most effectively.

[9] Queensland Catholic schools cater for a diversity of student needs and community contexts. In 2013, 68% of students in Catholic schools received an OP (and 80% of those OPs were between 1 and 15). On average however, over 30% of students were not eligible to enter pathways to tertiary and further education through the OP system under review. This proportion of "not eligible" students varied across schools between a low of 2% to a high of 80% in one school. It is difficult to see the needs of these students being reflected in any of the Focus Questions presented for response.

[10] It is noted that schools currently direct significant resourcing (financial, human, time) to carrying out processes related, fundamentally, to university entrance. Some argue this to be an inefficient use of school resources given that, on average, only approximately 30% * of Year 12 graduates in any year enter directly into university. The dilemma then is one of how to cater equitably for the pathways of the other students in the school cohort. *This percentage varies across Catholic schools and is very much higher in many schools.

> **4. Finer scale for school assessments**
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> We have suggested that school assessments be reported on a 15-point scale based on five described and illustrated achievement levels (1 to 5, with 5 being the highest) within each of which teachers make finer-grained distinctions (+, 0, -). The process would recognise that teachers may arrive at a student's overall result by adding marks on different assessments and interpreting the resulting scores qualitatively by reference to the described achievement levels. What is your response to this suggestion? Do you believe teachers will be able to use their assessment evidence to make meaningful and comparable finer-grained distinctions of this kind?

4.1   The key issue in the above proposal is not with respect to reporting on a finer grained 15 point scale (teachers are very practised at that even if exit achievement standards do not enable it) but rather what the refined achievement standards will be used for and how the reliability and validity of the teacher allocated standards can be ensured if high stakes use is proposed.

4.2   Consultation indicates that the proposal for teachers to use a 15-point scale for school assessment is well supported and a good fit with current practice. The movements permitted between bands in current moderation panel processes are not dissimilar to movements that might be envisaged between, say A+ and A° so a well-functioning, strengthened moderation system could support consistency provided there is clear understanding of the criteria, standards and how these articulate into a 15 point scale.

4.3   Within the limited detail provided, the proposal implies that marks will be added to provide the student's overall result but it is not clear whether this refers to the overall result for a subject or across all subjects. Far greater elaboration is required. If an overall, end of school result is to be formed from these finer grained achievement levels, there is still significant work to progress around whether and how all subjects are treated equally in forming the overall result: does Maths A contribute in the same as Maths B? Do tertiary education providers select subjects that they will "count"?

4.4   It appears by default that there must be a secondary element to this proposal: that of an external assessment component (Focus Question 2). It may be possible to combine the results of an internal and external element of assessment but an understanding of how this might work in practice is essential before QCEC can make greater commitment. The caution that must be applied here is to ensure that an increased assessment load for students is not a consequence of a possible two systems of assessment operating in parallel. This concern over assessment overload is exacerbated by the proposal for key cross-curriculum capabilities to be tested and reported alongside subject results.

4.5   QCEC supports in-principle the proposal that school assessments be reported on a 15-point scale and seeks greater clarity on suggestions of adding marks on different assessments and

interpreting the resulting scores qualitatively by reference to the described achievement levels.

> **5. Cross-curriculum capabilities testing**
> We have suggested that a small number of capabilities essential to study and work beyond school, which we call key cross-curriculum capabilities (KCs), be tested and that KC test results be reported alongside subject results. What is your response to this suggestion? What do you see as the role, if any, of these test results in university entrance decisions?

5.1   There is no support across Catholic schooling authorities for a test of key cross-curriculum capabilities.

5.2   This adds an additional layer of assessment with no clear purpose or use.

> **6. Separation of responsibilities at the secondary–tertiary interface**
> We have suggested that the responsibilities of QCAA (formerly QSA) and the universities be separated so that QCAA's role is the certification of student achievement upon completion of Year 12 and the universities' role is to decide how this and other evidence is used in selection decisions (e.g. constructing rank orders of applicants, specifying pre-requisite subjects, giving greater weight to results in certain subjects). What is your response to this suggestion? What do you see as the advantages and disadvantages of a separation of responsibilities?

6.1   The proposal for the responsibilities of QCAA for certification of Year 12 student achievement to be separated from the universities' responsibilities for tertiary selection processes is strongly supported across Catholic schooling authorities, provided there is in place a fair and transparent process of tertiary entrance that is equitable for students across the state and gives due recognition to their capacities.

6.2   There is agreement that QCAA should not be responsible for the rank ordering of students for the purpose of university entrance and their resources would be better focused on strong processes of support for assessment, moderation and certification. The strong push from tertiary education providers at the ACER Stakeholder Forum for access to ATAR scores[11] is noted and it is suggested that universities should be provided with results data and capacity for central calculation of ATARs appropriate to their needs to inform their selection

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[11] It is noted that ATAR scores are already prepared by QSA but not generally provided to students or Queensland tertiary institutions.

processes[12]. Enabling universities to conduct this piece of work centrally but separately could free QCAA resources to focus on supporting processes directed at schools. The separation could also be advantageous in enabling tertiary institutions to further extend their entrance processes to appropriately encompass interviews, auditions, folios of work or results relevant to specific courses to ensure "best fit" for student entry.

6.3   From a Catholic education perspective of both the common good and the unique value of each individual student, there is desire for equity, fairness and appropriate discernment in providing access to post school pathways suitable to the individual's needs and capacities but also serving the common good in supporting productivity, social justice and just and sustainable use of higher education resources.

6.4   The tertiary entrance process needs to be fair, transparent, clearly articulated, well understood and applied consistently state-wide. The need for equity and consistency would demand that at least some elements of the process be undertaken by a central agency to ensure no student (especially those from non-metropolitan areas) is disadvantaged. There is an underpinning assumption that student achievement results from school would inform tertiary entrance processes and a common agreed process for tertiary entrance would be overseen by a central body. Tertiary institutes could then add their individual facets to the process. The tertiary entrance process would need to be clearly communicated to students, parents and schools.

6.5   There would be no support for a tertiary entrance system where universities each set their own separate exams for entrance purposes. School assessment processes then become irrelevant to tertiary entry; there is no equity of process; there is potential for schools to follow university requirements alone and the backwash effects on schools and their broader student community could be enormous and negative.

6.6   QCEC reemphasises the tertiary entrance process needs to be fair, transparent, clearly articulated, well understood, applied consistently state-wide and clearly communicated to students, parents and schools.

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[12] Neither the diversity of ATAR calculations across the nation nor issues being raised about the effectiveness of ATARs in predicting results in tertiary education (e.g. Grattan Institute: Norton, 2012 cites evidence that ATARs are at best moderately predictive of future academic performance and below 80 have little predictive value for future grades) seem be a significant concern to these tertiary institutions. Given the lack of predictive value of success for this measure alone, beyond higher end scores, it might well be argued to be an ineffective use of scarce QCAA resources.

> **7. Scaling and the construction of rank orders**
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> We have suggested that it is the responsibility of universities to decide what evidence they will use to select students for entry into competitive courses and how that evidence will be used to rank applicants. We have also suggested that the construction of a single rank order (e.g. OP or ATAR) of all applicants to all courses in all universities no longer seems appropriate. It would be a decision of the universities whether or not they construct such a rank order. A consequence is that a scaling test (the QCS Test), schools' provision of SAIs, and QCAA scaling processes would no longer apply. What is your response to this suggestion? What are your predictions of effects on universities and schools/teachers?

7.1 There is reasonable endorsement of the proposal that scaling processes (QCS test, SAIs and scaling) no longer apply. Many consider this as an opportunity to get rid of a QCS Test that they consider flawed in nature and application. QCS Test preparation is observed in many schools as a "seventh Year 12 subject", placing an additional burden on already busy young people. If the purpose of the QCS Test is viewed as providing some sort of equating mechanism across different subjects and different schools (as well as providing an individual result in its own right) then other questions arise as to how this function will occur: will all senior subjects be considered equal? (unlikely and unrealistic); will tertiary institutes identify priority subjects? (that emerge somewhat like the old matriculation requirements); will the number of subjects at some point become constrained?

7.2 There is perception by some that the process of assigning SAIs is open to manipulation and subjective decision making; from this perspective the removal of this procedure would be considered advantageous.

7.3 The suggestion that QCAA scaling processes would no longer apply because the construction of a single rank order (e.g. OP or ATAR) no longer seems appropriate and it would be a decision of the universities whether or not they construct such a rank order, while supported, raises questions as to what processes, if any, might replace these elements. It is agreed that rank ordering of students should not be part of the role of QCAA. The removal of the current external element of assessment (QCS Test) would appear likely to be countered by an alternative element: the proposed external assessment in the subjects. Again it is unclear how a school assessment result and an external assessment result might be used in conjunction. Most importantly it is unclear what measures universities might turn to in order to make their tertiary entrance determinations.

7.4 While concerns are noted about an increasing tendency for scaling processes not to be applied consistently across all subject cohorts (particularly in relation to the growing number of small group cohorts) and the benefit removing the scaling (QCS) test to free-up time taken away from student learning and devoted to test preparation is observed, there is as yet no clarity about what is proposed to go forward in place of these processes. QCEC is would support the removal of current scaling processes used for forming a single ranking

but believes very serious consideration will need to be given to processes for validating student achievement results that could be used by tertiary institutions in informing their processes.

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8. Governance

These suggestions have implications for the work of the QCAA. Changes to QCAA's legislated functions would be necessary. A number of responsibilities would be removed (e.g. the calculation of the OP and FPs) and a number of responsibilities would be added (e.g. the development and marking of external assessments). This may have implications for capacity building within that Authority. What do you see as the implications of our suggestions for the QCAA?

These suggestions also have implications for the work of QTAC. As the agent of the universities, QTAC would be responsible for implementing universities' student selection policies. QTAC would receive Subject Results (on a finer scale than in the present system of senior assessment) and KCCC results from QCAA, and would use these (and other evidence as agreed) to produce rankings of applicants to competitive university courses. What do you see as the implications of our suggestions for the universities and QTAC?

8.1   QCEC agrees that the priority role for QCAA should be that of supporting schools with processes of assessment and certification. Catholic schooling authorities observe the severe resourcing constraints under which QCAA's predecessor, QSA has operated over recent years. It is unclear whether inadequate resourcing overall or inadequate allocation of resources to assessment and moderation processes led to some deterioration in practice, but adequate resourcing will be critical to the success of any changed practice in assessment and tertiary entrance processes. Change will need to be accompanied by appropriate resourcing to the responsible entities, it cannot come from drawing resourcing off other still required functions of QCAA. in relation to governance and role shifting proposals, care is also essential to ensure that the outcome is not a cost shifting exercise between the two entities, QCAA and QTAC.

8.2   QCEC is cautiously supportive of removing responsibility for calculation of OPs and FPs from QCAA and adding responsibility for development and marking of some form of external assessments. However, decisions related to governance are secondary decisions to be made only in consequence of determinations about assessment and tertiary entrance processes. Far greater detail is yet to be negotiated.

8.3   Similarly for the work of QTAC: it is premature to try to identify implications for the work of QTAC when there is no clarity of what results might be provided to them by QCAA, about the reliability and validity of those results or how they might be used in determining or informing tertiary entrance.

Conclusion

QCEC looks forward to continuing engagement in the Review of Senior Assessment and Tertiary Entrance Processes. QCEC has considered each of the Focus Questions and provided input in response to that format. There is a considerable degree of consensus represented in response across Catholic schooling authorities but there is also significant caution expressed over the lack of detail provided in many areas. However the QCEC position can be summed briefly in terms of support for various proposals. QCEC:

- **Strongly supports**
  - School based assessment being preserved
  - Consensus moderation processes being strengthened
  - Appropriate resourcing being provided to QCAA to support and strengthen the moderation process
  - The separation of QCAA's responsibility for certification of Year 12 student achievement from that of producing a rank ordering of students for tertiary entrance purposes
- **Supports**
  - The removal of QCAA scaling processes used to form a single rank
  - Finer scale reporting for school assessments
- **Supports in-principle**
  - Some possible external assessment in subjects but requires much greater detail of proposals for how this assessment might be effected and used in conjunction with internal assessment
- **Does not support**
  - Additional assessment in the form of a key cross curriculum capabilities test
- **Is unable to give a clear position because of lack of adequate detail**
  - Tertiary entrance processes managed by universities

In responding to the predetermined focus questions (and appreciating the structure thus provided for response), QCEC is highly conscious that there are significant areas left so far untouched in this review process. QCEC stresses that the review must ultimately accommodate the needs and pathways of ALL students who pass through our schools; it cannot be constrained only to those who enter university directly from school. QCEC now seeks the opportunity to expand this review's considerations in accordance with Item 4 in the Terms of Reference to the impacts of tertiary entrance processes outside of the OP system being used by Year 12 completers.

QCEC thanks for reviewers for the opportunity to engage and provide input to this point and would be delighted to provide clarifications of further comment to the reviewers.

Please contact Mandy Anderson, Director Education, Queensland Catholic Education Commission for further information or clarification on mandya@qcec.catholic.edu.au or 07 3336 9310.