

Regional Universities Network (RUN) Submission to the Coalition's Online Higher Education Working Group

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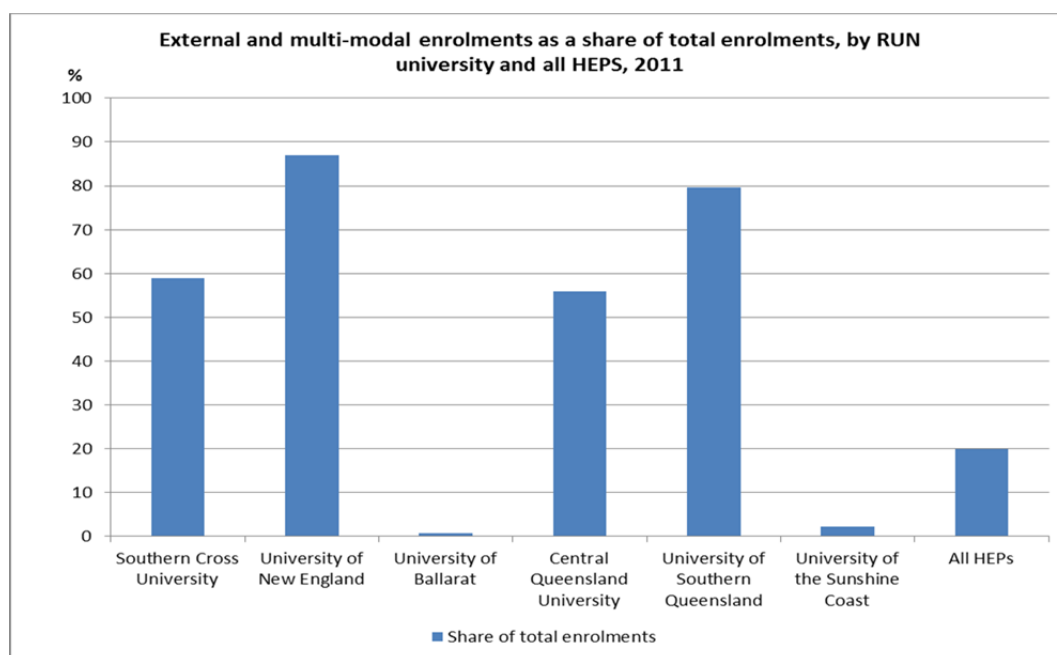
Introduction

RUN universities and online education

The six universities of the Regional Universities Network (RUN) (CQUniversity, Southern Cross University, University of Ballarat, University of New England, University of Southern Queensland, University of the Sunshine Coast) utilise online course delivery in a variety of ways. Some of the universities are world leaders and have decades of experience in the delivery of online learning and distance education. As a share of total enrolments, external and multi-modal students¹ comprise a majority of students at four RUN universities – the University of New England (UNE), the University of Southern Queensland (USQ), CQUniversity and Southern Cross University (SCU), compared with a sector wide average for all higher education providers of around 20 per cent – see Figure 1 below. External and multi-modal enrolments at UNE and USQ comprised at least 80 per cent of their institutions' total student enrolments in 2011.

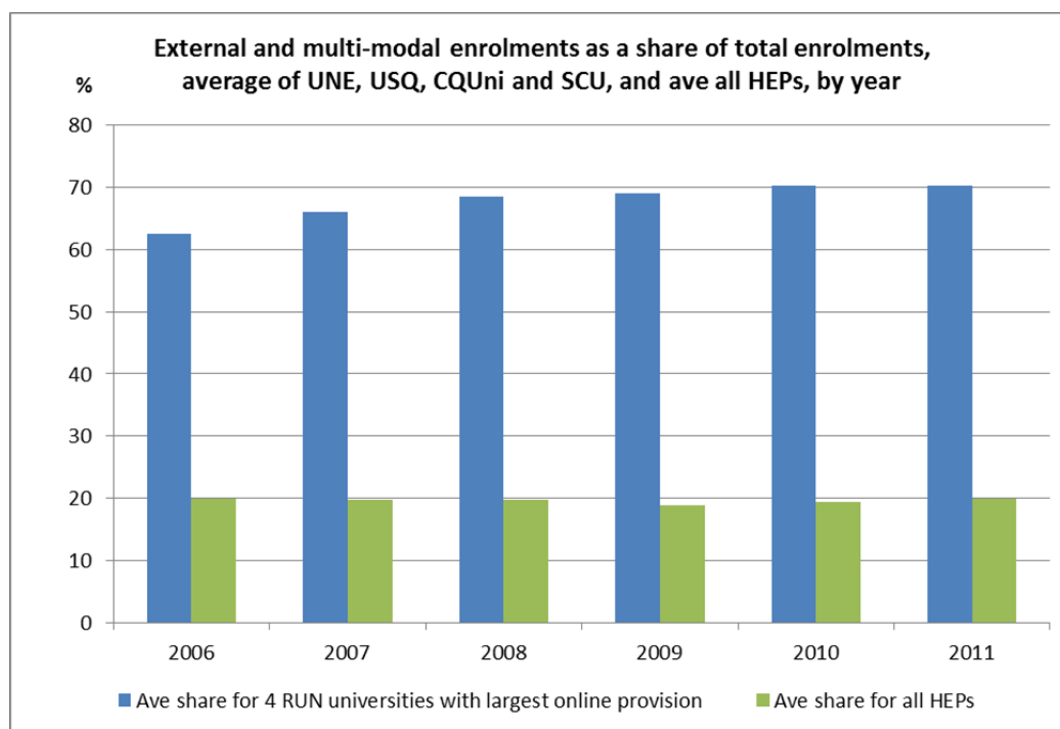
In recent years, the share of external and multi-modal students at UNE, USQ, CQUniversity and SCU has increased, whereas the share sector wide share has been relatively stable – see Figure 2.

Figure 1:



¹ Internal mode of attendance is undertaken at an on-shore or off-shore campus and includes classroom based attendance. External mode of attendance is undertaken at on-shore or off-shore and includes electronic based, on line and correspondence attendance. Multi-modal mode of attendance is a combination of both internal and external.

Figure 2



By contrast, the share of external and multi-modal enrolments at the University of Ballarat and University of the Sunshine Coast is around 1-2 per cent - these universities service the needs of their students and regional communities through a primary focus on face to face learning complemented to a lesser extent with online support.

The range of learning methods delivered by RUN universities indicates that there isn't a "one-size-fits-all" approach to the delivery method of education - online learning is one part of a diverse range of delivery methods which are needed to successfully engage a wide range of students in the age of mass higher education.

Massive Open Online Courses (MOOCs), online provision and going forward

There is currently enormous attention around the world being paid to the issue of online higher education delivery, largely driven by intense focus on Massive Open Online Courses (MOOCs). Every few days, new articles or reports are published on this global phenomenon and on the impact they may have on the future of higher education. The long term future of MOOCs is not clear – they may ultimately be seen to be a fad or they may, as their promoters argue, transform higher education around the world. A recent article published in the Financial Times² has adopted a position that is neither driven by hype nor disregards the underpinning galvanising momentum of MOOCs:

“While MOOCs are unlikely to prove a silver bullet for students or universities, combining their efficiencies and scalability with the credibility of a traditional university education is compelling for both.....

² MOOCs are no panacea by Karan Khemka published in the Financial Times, 11 March 2013 Accessed 20 March from FT.Com

Once the frenzy around MOOCs dissipates, they will have an impact on the delivery of higher education, but through incremental change rather than massive disruption”.

If this assessment proves correct, the challenge for RUN members, and Australian universities more broadly, will be to build on their traditional strengths in online provision, to respond to rapidly evolving consumer demands and technological developments, and to deliver an educational experience of the highest quality. To maintain their competitive edge and succeed in these ambitions, universities will require appropriate support from government.

RUN universities are already taking the initiative to respond to these challenges. UNE, for example, is revitalising its online offerings, launching UNEOpen to provide access and opportunity on an international and highly competitive basis, and researching ways to provide quality educational experiences (SMARTFarm, SMARTHome, and Quickstart to name just three).

Key messages

RUN universities have identified the following key messages for the committee’s consideration.

1. “Online” education is a diverse and complex catch-all term that encompasses a wide range of activities, pedagogies and technologies. MOOCs lie at one end of a spectrum that also includes online activities integrated into largely face-to-face offerings, individual units/subjects that are offered online for credit; and courses or programs of study offered online for study. There is no one model for online delivery that will fit the mission of all institutions. For example, SCU’s experience is that converged or flexible delivery options offer students the best opportunities by collapsing the divisions between on-campus and on-line enrolments. The intention is to strengthen the pedagogies that are most effective in particular circumstances and provide best value to students. This approach also provides greater equity of learning opportunities to students irrespective of location.

The nature of the different online delivery models needs to be understood. Trends in one area, such as MOOCs may or may not be relevant to trends in other online learning. In essence, the transition from traditional pedagogy to online pedagogy requires new knowledge, skills, strategies and work cultures. New players cannot necessarily expect to be successful. Encouraging partnerships between universities with strong IP and established online providers is suggested as a way forward.

2. Higher education is undergoing a major transition as a result of digital technologies. The fundamental literacies of the academic profession have shifted from the physical to the digital. In addition to the digitisation of the creation and distribution of teaching materials and the research task, the delivery medium is rapidly shifting from the physical to the virtual. This requires a complex re-visioning of the teaching task and the development, articulation and recognition of a new or changed suite of skills and attributes in the teacher. For Australia to excel we need to support this transition. The technologies will change but the core literacies for excellence in any future digital virtual environment will persist. This is where investment will be critical.

There is a great deal of innovation in teaching and learning across Australian HE providers; Australia is not being left behind. All universities have technology infrastructure that supports online and blended learning and are active, to a greater or lesser extent, in moving into the virtual space. Australian universities are very actively involved in exploring, extending, improving and innovating in online delivery. However, the pressure on universities’ base funding can make it difficult for individual institutions to invest in the human and

infrastructure priorities needed to ensure Australian universities are able to act as world leaders in online learning.

3. The provision of high quality online education is not a cheap option: Online delivery is not just about transferring material previously delivered face-to-face to a website. To achieve enhanced quality of learning, effective student engagement and geographical reach requires significant input of resources for academic development, infrastructure, content development and marketing. Students with little experience of higher education, particularly those from low SES backgrounds, first in family, second chance learners, etc, may require higher cost, more intensive support models to achieve successful outcomes. Experience in Australia and elsewhere (eg Jaggars and Bailey, 2013)³ reveals that without such support, there is a high risk of student attrition. Successful low cost, low support models do exist but these are best suited to highly motivated, mature-age independent learners, such as professionals upgrading their skills. Indeed, not all students necessarily have the maturity or sufficient academic grounding (particularly in the early years of higher education) to succeed in courses that are fully online.

UNE estimates that the cost of developing online subjects is about \$20,000-\$30,000 per subject if it is to be done properly. Therefore, for a range of subjects (e.g. 300), the cost is in the order of \$6-9 million. Course material needs to be renewed every 4-5 years.

4. Online programs need to be underpinned by ongoing support for the development of courseware and IP: If current courseware and the associated intellectual property used to generate such resources are made freely available online, the issue as to how the next generation of courseware is to be developed remains unresolved. That is, there remains uncertainty as to whether a funding model for MOOCs can be developed that supports the reinvigoration of courseware and IP into the future.

5. Good teaching needs to be informed by good scholarship and research. Alan Tudge MP in an article in November 2012 suggested that online learning should facilitate the lowering of the regulatory barrier for the best overseas universities to operate courses in Australia. It was also suggested that we should remove the necessity that a university must do research as well as teach.

RUN is strongly of the view that regulatory barriers for overseas universities operating in Australia should not be lowered, and that research must remain a key part of being a university. An approach that is “too open door” to overseas or private providers could lead to quality issues and collateral brand damage. It could also lead to a substantial dilution of the market – despite the purported aim of attempting to help the Australian sector develop its own market.

Without doing research, regional universities wouldn't be able to fulfil their mission – research attracts quality academics, builds institutional quality and capacity, including in teaching and learning, is essential for the training of research students, creates a pool of professionals, and supports and contributes to regional industries and commercial activities. It builds inter-regional, national and international knowledge and information networks. The impact of regional universities on the regions is significant. It contributes to regional productivity and innovation.

³ Jaggars, S S and Bailey, T *Online students need more face-to-face time*, not less in *The Conversation* 15 March 2013 Retrieved 15 March 2013 from <http://theconversation.edu.au/online-students-need-more-face-to-face-time-not-less-12631>

6. Regional Australians – as far as possible – deserve the same level of access to higher education as those living in the city: Within Australia, online education expands greatly the range of opportunities available to students in urban and regional areas. However, maintaining a physical presence in regional Australia is critical to enhancing opportunities for people living outside of the capital cities. Regional Australians should not be treated as second class citizens in terms of the higher education opportunities provided to them. This gets to the core of the role of universities as teaching, learning and research institutions; particularly how regional issues inform our courses and research activity. Regional universities must continue to deliver education in a range of modes, including online, face-to-face and a combination of those modes, to suit the diverse needs of our students.

Addressing the Terms of Reference

1. Assess the trends in online learning both in Australia and internationally and how this might unfold over the next decade.

Generally speaking, the trend toward greater access to, uptake of and integration of the use of online learning into higher education will continue. Beyond this, predicting the future of online learning is extremely difficult if not impossible. The *NMC Horizon Report for Higher Education 2012*, for example, put together by experts and leading thinkers around the world, failed to predict the rise of MOOCs. This oversight was addressed in the Horizon Report produced for the following year (Johnson et al. 2013). The authors also identify their views of future trends and the timelines for the adoption of new technologies. These include:

- Within a period of 1 year or less – the adoption of MOOCs and tablet computing;
- Within a period of 2-3 years – the adoption of games and gamification, learning analytics; and
- Within a period of 4-5 years - the adoption of 3D printing, wearable technology.

The Australian Horizon report has articulated that the future of higher education is dependent on the effective identification and implementation of appropriate technologies. The 2013 Australian Horizon report, to be released at the upcoming The Higher Education Technology Agenda (THETA) conference in Hobart on April 9, 2013, will present the next chapter in this dialogue and future predictions.

Drawing on the available research, RUN members consider that:

- It is virtually inevitable that more learning and teaching will take place in an online environment;
- Technologies experience 'hype cycles' and there is no certainty about which technologies will 'stick';
- Predicting the future of online learning is extremely difficult and there are risks associated both with investment and in not investing;
- Long term planning is proving increasingly problematic and agility in planning cycles is essential. Three to five year plans are no longer appropriate – rolling, responsive planning models are more appropriate. Policy frameworks and funding priorities need to take account of this; and
- Growth of 'just in time' and 'on demand' learning can be expected.

2. Assess the benefits of online learning for Australian students and the Australian economy, including the potential:

- a. **Impact on cost, flexibility, customisation and quality.**
- b. **Benefits of enhanced choice, including from global players.**
- c. **Impact on workforce participation and democratisation of learning.**

a) **Impact on cost, flexibility, customisation and quality.**

The potential benefits of online learning are equivalent to those of offline learning and depend on the context, resources, model and circumstances of the particular instance of the learning. It is hard to generalise about the impact of online learning because it has so many facets and meanings, including the type of online learning being provided. For example, if the focus is on free MOOCs:

- The **cost to the student** is nil while the **cost to the providing institution** can be substantial. UNE estimates that the cost of developing online subjects is about \$20,000-\$30,000 per subject if it is to be done properly. Therefore, for a range of subjects (e.g. 300), the cost is in the order of \$6-9 million. Course material needs to be renewed every 4-5 years;
- The **flexibility** depends on the definition of the term. Does it mean asynchronous? Does it mean able to be started and completed at any time? Does it mean it must be started and completed at set times but can be undertaken at any pace and/or in any order?;
- The **customisation** also depends on the model underpinning the MOOC (xMOOCs are very different from cMOOCs for example – see Daniels (2012)⁴) although the potential for significant customisation in online learning exists; and
- The **quality** will depend on a whole range of factors, some of which are related to the online nature of the offering and some of which are ubiquitous quality matters.

Alternatively, if the online learning takes place as part of a course/program of study, the impact on cost, flexibility, customization and quality will depend on different aspects of the particular circumstances in which the online learning is occurring.

Notwithstanding concerns about models of provision and definition, clearly there are benefits from online provision. Its **flexibility** enables access to higher education for those for whom it would otherwise be difficult or impossible because of work or family commitments, distance, disability or health considerations. 'Anytime, anywhere learning' can enable more Australians to fit study into the rest of their lives. Based on the current demographics of Australia the mature age market is needed to fulfil the Bradley Review targets. Greater access to education is possible with potentially greater numbers and more diversity in student cohort through online delivery, which fits with the (current) widening participation agenda.

Converged or flexible delivery options may offer students the best opportunities by collapsing the divisions between on-campus and online enrolments. The intention is to strengthen the pedagogies that are most effective in particular circumstances and provide best value to students. This approach also provides greater equity of learning opportunities to students irrespective of location. These principles could underpin the policy development at a national level. In contrast, there seems to be a push to characterise MOOCs as getting a 'degree' on the cheap – in terms of effort, as much as cost. We have to be prepared to articulate

⁴ Daniels, J. (2012). *Making sense of MOOCs: Musings in a Maze of Myths, Paradox and Possibility*. Korea National Open University. Retrieved 8 March, 2012 from: <http://www.academicpartnerships.com/docs/default-document-library/moocs.pdf?sfvrsn=0>

the central values of a blended approach to education which includes structure, interaction (even if for short intense periods), as a vital ingredient to the kinds of citizens it helps to create.

There may be some potential to reduce individual **cost of access** to higher education through the use of online delivery but the cost will have to be borne by institutions in the first instance that will result in changing business models. Economies of scale are critical to quality where investment in high quality needs to be amortised against volume/throughput. Aggregation of student cohorts across regions, states and institutions can assist in the viability of particular programs. Specialised programs that may be specific to regional needs can be made more viable by aggregation, thus providing the potential for greater diversity in offerings and partnerships.

Further examples of the benefits and challenges of MOOCs are listed in the Appendix.

b) Benefits of enhanced choice, including from global players.

There is no doubt that having choice in content providers is a positive development for students/learners. That said, the real value for learning is in how this content is used, that is, how it is integrated into the learning experience, taught, learnt and assessed. This will depend on the skill and experience of the educators involved, on the intended learning outcomes. For example, exposure to content via listening to lectures versus deep engagement in transformative activities and experiences are very different learning outcomes.

The involvement of elite universities in MOOCs and their immense popularity has lent credibility to online learning generally and this may open educators up more to the idea of integrating online offerings into traditional ones and into award courses.

Access to international content can expose Australians (and the Australian culture and Australian economy) to global thinking and best practice leading to skill/expertise enhancement. Cultural awareness resulting from participation in international programs can enhance Australia's global competitiveness.

c) Impact on workforce participation and democratisation of learning.

As noted previously, online provision provides anytime, anywhere access for students who could not otherwise access higher education. Programs such as MOOCs provide the potential benefit to extend this **democratisation** process by providing students with access at no cost. However, without sound underpinning business models, this benefit will be dependent on altruism, philanthropy and leading universities continuing to give away their IP for free.

Students require access to the appropriate technologies to engage in online learning, such as MOOCs. There should be some caution about the apparent 'openness of MOOCs' because substantial data about the age and location of MOOC participants are not yet available. It is our understanding that while MOOC participants are distributed around the world, most appear to be over 30 and many come equipped with significant educational backgrounds; that is, they are already experienced, self-regulated learners rather than non-traditional students (eg low SES, Indigenous or mature-aged) wishing to embark on higher education learning.

Overly optimistic assumptions about the 'democratisation of learning' need to be contained, as cost remains a barrier for some potential students. A survey by SCU of students enrolled in units as part of a 2011 project into Converged Delivery, found that while the majority of respondents had access to the Internet (43% had

access to broadband Internet connections and 40% had access to wireless), there was still a small minority of students who either relied on dial up or satellite connections (3%), and another 3% who had no access to the Internet at home. Furthermore, some students had concerns about inadequate Internet connections at home, in particular the impact on download times for long or large media files and the increased cost of using personal download quotas.

Assessing and then credentialing online learning such as MOOCs will be a key factor in whether there will be positive impact on **workforce participation**. Another key factor will be the need for employers to increase their acceptance of 'alternative' forms of qualifications including badges, short courses and the like. This is happening in some fields (for example, IT) but not in many others.

3. Assess the challenges of online learning and how they could be overcome, including:

- a) The challenges to existing institutions and their preparedness to face them.**
- b) The maintenance of quality and standards.**
- c) The technological and infrastructure requirements of online courses.**

At one level, online learning processes are no different to on-campus learning: has the [lecturer] clearly thought carefully about the students as learners and has the content and delivery been designed to suit the learning environment and the needs of the students? Online learning that is substantially an extension of a face-to-face lecture, where the live teacher is replaced by a video, overlooks the principle that student learning should be at the centre of teaching practice and returns to a view of teaching as being the 'sage on the stage'.

All too often, the premises of good higher education practice are missing from online learning – that is, the importance of the learning context. Many Australian universities have adopted distance education programs to varying degrees and getting the learning context right as online learning expands remains. There should be no assumption that every (Australian) university will want to deliver extensive online learning offerings – a diversity of approaches should be encouraged.

Existing institutions are heavily invested in bricks and mortar. This will continue for the foreseeable future, as many students welcome the opportunity for face-to-face contact, even as they enjoy the flexibility of online learning. A key challenge for each institution is to find an appropriate balance between the physical and virtual. In the case of regional universities, they will seek to do this while not losing the advantages of being regionally engaged, regionally responsive and regionally respected.

Further examples of the benefits and challenges of MOOCs are listed in the Appendix.

a) The challenges to existing institutions and their preparedness to face them.

Key issues are

- **The preparedness of staff and students.** Training and preparation and ongoing professional development offered to tertiary teaching staff within institutions for their role as teachers often neglects a focus on the skills students and staff need to operate effectively in a digital learning

environment. To date, there has been minimal help available for teaching staff to assist them to develop their own, and their students', digital literacy (Johnson et al 2012⁵).

- Various dimensions of this problem include: a lack of peer-reviewed research evidence of the benefits to learning of online approaches and therefore little impetus to make changes; the work required to transform a traditional approach to an online or even blended one; a lack of skills to make this transformation; a lack of digital literacy; a lack of confidence to make this transformation; workload issues and the perception that these will intensify in an online setting; academic development issues associated with casualisation of the university workforce; time constraints and competing demands; a wide range of views on the role, importance and place of technology in teaching and learning; philosophical and other objections to online teaching and learning and its commodification; and a lack of reward and recognition for teaching generally and for the significant extra effort for online teaching specifically.
- That said, institutions are, generally speaking, committed to moving into online learning where there are benefits to student learning and it is economically viable to do so. The general underfunding of universities and their imperatives to provide community service and other benefits to society mean that they often do not have the resources necessary to overcome all of the challenges above.

These concerns might be address in part by:

- Emphasising the importance of professional development and training of academic staff to optimally work in an online teaching and learning environment. Also the research resources to support the scholarship and evidence underpinning online learning should be highlighted.
- Expanding the capacity for staff and students to use ICTs for learning – student digital literacy is likely to flow out of a technology-rich educational experience. 'Technology training and skill development for students is more important than new, more, or "better" technology.'

b) The maintenance of quality and standards.

Issues of assessment and authentication, in particular, go to the heart of academic quality and standard concerns. Specific concerns include:

- **Minimising plagiarism and collusion.** Authenticating students online to ensure the person taking the assessment is the one enrolled and they have done so without inappropriate assistance is difficult and in some cases impossible given the infrastructure and resources needed to do so adequately. Reliable methods of authenticating students have not yet been developed.
- Where **peer-assessments are undertaken online**, the same challenges that face educators in face-to-face environments in terms of ensuring students understand and fairly and consistently applied are heightened in an online environment where students do not meet each other. MOOC-based assessment models in particular are still immature and require caution.

Where online resources from outside an institution are used for teaching and learning within an institution,

⁵ Johnson, L., Adams Becker, S., Cummins, M., Estrada, V., Freeman, A., and Ludgate, H. (2013). *NMC Horizon Report: 2013 Higher Education Edition*. Austin, Texas: The New Media Consortium. Retrieved 20 March 2013 from <http://www.nmc.org/publications/2013-horizon-report-higher-ed>

there are questions about the stability of platforms on which outside resources are found, maintenance of websites, availability of resources in the future and the like. Quality can be compromised if a teaching and learning activity or unit/subject is built around an external online resource that disappears or its quality diminishes and this is outside the control of the institution offering the learning. In relation to partnership arrangements, shared delivery and quality assurance across multiple providers requires careful management. It is noted that a recent survey of professors who have taught MOOC courses found that 72 per cent did not consider that students should get official credit for their studies⁶. While this reluctance may be overcome in time, it does indicate the need for caution, particularly when it comes to universities' commitment to protecting the quality and standards of their qualifications.

c) The technological and infrastructure requirements of online courses.

The challenges associated with technological and infrastructure requirements depend on the scale, depth and breadth of online courses and vary accordingly. Major challenges are:

- Accurate and timely **assessment of emerging technologies** in line with agreed pedagogical principles.
- The **significant costs of maintaining and upgrading systems** to accommodate these technologies. These costs are often underestimated and hidden and pose considerable challenges for universities.
- **Access to appropriate technologies.** Widespread online delivery assumes that all students (and academic staff, if it is to be assumed that they do not need to work at a physical campus location) have access to the appropriate technologies. Access to adequate connectivity can be a particular issue for students in regional or remote areas.
- Minimum technology environments and infrastructure represent large fixed costs, regardless of the size of the institution. If students are able to go to any University on a differentiated fee model, regional universities in particular will need to rearticulate their value proposition for students wanting to study online.

⁶ Ferenstein, G *72% Of Professors Who Teach Online Courses Don't Think Their Students Deserve Credit* <http://techcrunch.com/2013/03/22/72-of-professors-who-teach-online-courses-dont-think-their-students-deserve-credit/> Retrieved from Techcrunch.com on 26 March 2013

4. Assess what policy measures are required to capture the benefits for Australian students and the economy, including:

- a. How to deal with accreditation.**
- b. How to best assist Australian providers.**
- c. How to capture the opportunities that international institutions provide while fostering Australian ones.**
- d. What other regulatory changes are required to capture the benefits of the emerging environment**

a) How to deal with accreditation.

An open learning environment brings benefits and risks, and challenges for regulators to assess quality.

The Tertiary Education Quality and Standards Agency (TEQSA) will need to embrace the online environment in its regulatory activities. According to the TEQSA Chief Commissioner, Dr Carol Nichol, any online offering, including a MOOC, that is credited toward an Australian award will be scrutinised (2013). TEQSA will apply the AQF in such scrutiny, although AQF is still framed in a “bricks and mortar” mentality – volumes of learning is stated in years. There are also questions around the work readiness of “pure” online graduates – Work Integrated Learning and increased workplace participation needs to be addressed.

Open Universities Australia and similar providers have been obtaining accreditation for a number of years.

b) How to best assist Australian providers.

RUN makes the following recommendations to assist Australian higher education providers:

- View innovation and risk with a more positive mind-set (which is currently too risk-averse across many activities), even though some initiatives may fail;
- Ensure that any changes to the regulatory barrier for overseas institutions do not cause quality issues and lead to collateral brand damage;
- Consider creating a central repository of best practice of online learning with peer-reviewed evidence; and
- Provide appropriate resourcing to provide world-class online learning and meet the challenges outlined above.

c) How to capture the opportunities that international institutions provide while fostering Australian ones.

RUN makes the following recommendations to capture the opportunities that international institutions provide while fostering Australian ones:

- The international offerings would presumably be largely used within Australian awards, except where students choose to enrol in overseas institutions, thus capturing the opportunities and fostering Australian universities simultaneously;
- Encourage partnerships between Australian universities and quality overseas providers and initiating international benchmarking to ensure Australian education is world class;
- The Chaney review noted that the greater data capacity of the NBN would enable more intensive and immersive online interactions. This would provide a valuable tool for educational institutions to refine their online pedagogies, and to work with high quality international partners. In particular, the

review recommended that the provision of seeding initiatives for innovative online education delivery would be a vital incentive for education providers to invest in future delivery models;

- Open content and open educational resources allow Australian universities to take advantage of global resources and content; and
- From the specific perspective of RUN universities, exploit their collective strengths and provide appropriate support to develop expertise in niche areas (e.g. climate change) that is relevant and marketable into potential markets globally.

d) What other regulatory changes are required to capture the benefits of the emerging environment.

RUN recommends that a special taskforce be established within TEQSA that can move swiftly and make decisions about whether standards are being met in online learning.

5. Determine how Australia’s tertiary institutions can best capture the growing online international market, particularly in Asia. This would include:

- a. Assessing the size of the opportunity.**
- b. Determining how Australia can grow an online international market without compromising our on-shore market.**
- c. Determining what measures should be put in place to help capture the opportunities.**
- d. Identifying regulatory barriers that need to be addressed.**

Off-shore online provision should not be underestimated. Quality of service is the key to ensuring that Australia's international reputation as a quality provider is not undermined. The experience a few years ago with private providers in a poorly regulated VET market trying to exploit onshore international education and bringing Australia's reputation down through poor practice should not be overlooked.

a) Assessing the size of the opportunity.

b) Determining how Australia can grow an online international market without compromising our on-shore market.

At this time, online offerings may appeal to different international markets to those the on campus/in country market and the offshore market, provided that the requirements of the regulators are met (that is, that students studying offshore have an ‘equivalence’ of experience compared with their onshore counterparts).

Price comparability would need to be considered. Perhaps online options that international students could take from their own country should be slightly cheaper than in country options but not so much cheaper that those students who would have otherwise come to Australia for the wider experience choose the online option instead. Perceptions of quality may change with price changes – that is, cheaper online options may be perceived as of lower quality so the potential impacts of price variability on perceived status and quality would need to be market tested/researched.

c) Determining what measures should be put in place to help capture the opportunities.

The measures put in place to capture opportunities should be evidence-based as far as possible. To that end, the following would be advisable:

- Market research on potential impacts of expanding online offerings, particularly in Asia, should be undertaken prior to any decision-making;
- Small-scale experimentation or testing of online offerings should be closely monitored for patterns of enrolment, progression and completion;
- Qualitative research on the experiences of online learners, and where possible, how these experiences compare on offline experiences should be undertaken to determine strengths and weaknesses of current models and approaches;
- Identifying and articulating Australia's advantage or 'Brand Australia' in a competitive environment and articulating the values of a uniquely Australian education is important; and
- Universities will need to address the academic barriers to attracting international students to Australian online offerings – English language, plagiarism, assessment, cultural expectations about what constitutes a higher education qualification etc. Australian institutions may find it best to combine international online delivery with, for example, on-shore courses and / or off-shore face-to-face programs/parts of programs (that is, a similar concept to the converged or flexible delivery approach for domestic students). Ensuring appropriate levels of guarantees for the invigilation of on-line exams will be critical.

Issues include:

- Policy initiatives to promote an online international market should not compromise our current off-shore market as well as the on-shore market;

d) Identifying regulatory barriers that need to be addressed

- In order to capture the potential benefits, it will be important to ensure that reasonable risk taking is not 'punished' through TEQSA.
- Regulatory barriers – obtaining overseas accreditation can be problematic.

Appendix: Some of the benefits and challenges of MOOCs

Summary Benefits	Summary Challenges
<ul style="list-style-type: none"> • Learning and engagement is the choice of the learner • Timing of learning is the choice of the learner • All work, thoughts and instruction can be shared, critiqued and viewed by all participants. • Courses are free • Cost of engagement is a computer, an internet connection and time • Learners can expand experiences through learning with students from across the world and form all educational experiences • Language barriers may be less of an issue due to the availability of website translation. 	<ul style="list-style-type: none"> • The need for basic digital literacy. • A feeling of confusion and disorientation for students who are used to strict, syllabus directed, lecture courses. • The students' need for self-regulation of learning. • The inability of many courses to have authentic learning and assessment • The lack of social presence in courses • The increased likelihood of academic dishonesty, particularly with online examinations, due to a lack of regulation and supervision. • Technical difficulties associated with the complete reliance on computers and internet connectivity. • Difficulty in assessing complex learning of potentially tens of thousands of students whose intent may be to document learning to current or future employers or other higher education providers

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