Application Guide for Self-Accrediting Authority

Version 3.4 (Published 19 September 2022)

Purpose

This guide sets out the basic process for applying for self-accrediting authority (SAA) and provides contextual information about the scope of TEQSA's assessment and the evidence TEQSA may require.

The purpose of the framework for SAA is to enable TEQSA to assess the extent to which a provider is capable of consistently meeting the requirements for course accreditation without approval or intervention from TEQSA.

What is self-accrediting authority?

A provider with SAA is permitted to accredit some or all of its courses of study.

There are two types of SAA that TEQSA can authorise:

- **Unlimited SAA**: A provider can accredit all current and future higher education courses of study in any level or field of education.

- **Limited SAA**: A provider can accredit one or more higher education courses of study, or current and future higher education courses of study in a specific combination of levels or fields of education.

The fields of education are set out in the Australian Standard Classification of Education and the levels are described in the Australian Qualifications Framework.

The scope of SAA refers to the type of SAA being sought: **limited** or **unlimited**.

For applications for limited SAA the scope specifies the courses of study to be covered by SAA or the combination of AQF levels and/or fields of education the applicant seeks to be covered by SAA.

A provider with existing limited SAA can apply to TEQSA to extend the scope of its SAA to self-accredit additional courses of study, AQF levels or fields of education, or they can apply for unlimited SAA.

Criteria

Applications for SAA are considered under Part 3, Division 5 of the *Tertiary Education Standards and Quality Act 2011* (TEQSA Act). Under Section 41 of the TEQSA Act a provider can apply to be authorised to self-accredit one or more courses of study.

The TEQSA Act requires that providers make an SAA application using the form approved by TEQSA, provide any information and documents TEQSA requests, and pay the relevant fee.

TEQSA is required to have regard to the *Higher Education Standards Framework (Threshold Standards) 2021* (HES Framework). Specifically, Part B2 sets out the criteria that applicants seeking SAA must demonstrate.

All applicants must meet Parts B2.1-B2.4, and those seeking **unlimited** SAA must also demonstrate they satisfy the criteria at Part B2.5.

Our regulatory approach

In exercising a power under the TEQSA Act, TEQSA must comply with the basic principles for regulation set out in Part 2 of the TEQSA Act. These are:

a)   the principle of regulatory necessity;

b)   the principle of reflecting risk;

c)   the principle of proportionate regulation.

TEQSA exercises discretion in its assessments for individual providers, taking into account:

- the circumstances and regulatory standing of the provider
- our analysis of the provider's risk profile
- the maturity and effectiveness of the provider's internal quality assurance and monitoring processes.

We describe our approach to quality assurance and regulation in more detail on the TEQSA website.

Applying for self-accrediting authority

A Provider can at any time apply for limited or unlimited SAA or to vary the scope of an existing limited SAA.

TEQSA encourages providers who are considering making an SAA application to submit their application concurrently with their re-registration application. Significant parts of the evidence provided in a renewal of registration application, particularly those parts relating to academic governance and quality assurance processes, are relevant to the SAA criteria. As such, submitting the SAA and registration applications concurrently may reduce the time spent preparing these applications.

TEQSA recognises that it may not always be practical for providers to lodge an SAA application at the same time as their re-registration application. In these instances providers may choose to lodge a standalone SAA application and, in assessing such an application, we will seek to avoid duplicate requests for evidence where we are able to rely on information already before us.

Before engaging with TEQSA we strongly encourage providers to familiarise themselves with the relevant criteria (HES Framework and TEQSA Act) as part of any considerations about whether and when to apply for SAA. TEQSA also provides a detailed contextual overview of each domain in Part A of the 2021 HES Framework that may assist. TEQSA provides resources and guidance on related topics on its website, including academic governance, monitoring, review and improvement and the use of independent expert advice as part of a higher education provider's internal quality assurance processes.

TEQSA encourages all providers to closely consider their own regulatory history and track record as a higher education provider when deciding the optimal timing for their SAA application, including the extent to which they would be able demonstrate sufficiently mature academic governance and self-assurance processes and outcomes required in Part B2 of the HES Framework.

Providers considering or planning to apply for SAA should have close regard to the following:

- regulatory track record for course accreditation (particularly recent assessments)

- the nature of any conditions currently imposed on registration, or on courses of study, or voluntary undertakings in effect.

- past findings made by TEQSA's Compliance and Investigations team and the nature of any active compliance investigations being undertaken by TEQSA or another regulatory agency or professional accreditation body.

- TEQSA's assessment of the risks for students and financial position for the institution.

When assessing an SAA application TEQSA's analysis of a provider's regulatory history looks beyond the final outcomes of our regulatory assessments. For instance TEQSA may, in approving an application for registration or accreditation of a course of study without imposing conditions, also make observations and recommendations identifying concerns or areas for improvement that directly relate to the effectiveness of the provider's academic governance and quality assurance mechanisms.

Similarly, an independent expert review, submitted by a provider or obtained by TEQSA as part of a regulatory assessment, may make findings, observations and recommendations that are relevant to our assessment.

TEQSA will also have regard to instances where a provider has withdrawn a course accreditation application after having been put on notice that TEQSA is considering an adverse assessment.

TEQSA is assessing the extent to which a provider would be able to meet the requirements for course accreditation without our intervention. As such our confidence in a provider's self-assurance mechanisms is directly informed by the calibre of course accreditation applications that have been submitted by that provider. One of the best ways a higher education provider can demonstrate to TEQSA it has highly effective and robust institutional

quality assurance and improvement mechanisms in its course design and review processes is through the submission of high quality course accreditation applications that require limited or no intervention by TEQSA to meet the HES Framework Standards.

TEQSA's assessment of an SAA application will have close regard to a provider's own internal course reviews that inform accreditation/reaccreditation decisions within their institution. TEQSA needs to be satisfied that the provider's mechanism for course approval involve rigorous scrutiny of courses by credible and experienced observers, that the findings of such scrutiny are considered thoroughly, and that the oversight mechanism is sufficiently independent of those who are involved in delivery of the courses of study.

TEQSA's confidence in a provider's academic quality assurance systems is informed by the provider's ability to demonstrate continuous improvement through on-going, reflective feedback and evaluation cycles. These may be informed by internal reviews, external referencing, feedback from students and staff, and observations and recommendations made by external experts or by TEQSA. We expect that a provider with a culture of continuous improvement and academic quality assurance processes can demonstrate that findings or recommendations of this nature have been considered and acted on by its governing boards, and that business improvements are documented and embedded in its operations.

We encourage providers who are considering making an application for SAA to contact us as early as possible. TEQSA staff can provide guidance that may assist in the preparation of an SAA application, and the optimal timing for that application. We hope to engage with providers considering an SAA application at least six months before the intended submission date.

What evidence should be provided?

The scope of TEQSA's assessment and evidence requirements may vary significantly between applications, according to a range of matters, including;

- the scope of the SAA application
- whether there are other concurrent applications, and the nature of the evidence being provided with those applications,
- the risk profile and regulatory history of the provider.

TEQSA will provide each SAA applicant with a tailored set of evidence requirements. By way of general guidance for providers considering making an SAA application, TEQSA provides the following as indicative guidance about the scope of the assessment and the nature of evidence a provider may use to demonstrate its claims.

Evidence common to all SAA applications

TEQSA expects that most of the evidence submitted in support of an SAA application will be artefacts of internal decision making, such as reports and minutes, that are produced during the normal course of a provider's business and demonstrate mature academic oversight and internal monitoring of its higher education activities.

The key element to all SAA applications is a written submission (no more than fifteen pages) demonstrating how the applicant meets Standards 2.1, 2.2, 2.3 and 2.4 of Part B of the HES Framework. Meritorious applications will demonstrate that cyclical course review and improvement activities are effective features systematically embedded in the provider's operations across all courses of study (not just for those courses within the scope of the SAA application).

The submission should reference and synthesise into the submission the reports and other forms of documentary evidence provided in support of the application. Evidence relevant to the SAA criteria that has previously been provided to TEQSA should be cross-referenced, but does not need to be provided again.

The submission and supporting evidence should include the following:

- a clear description of the academic governance framework for the design, delivery, accreditation, monitoring and quality assurance, and review and improvement across all courses of study, including:

  - Academic governance structure and processes

  - terms of reference for relevant committees and subcommittees

  - details and qualifications of academic leadership responsible for oversight and maintenance of standards.

  - Evidence of how governing boards identify and manage risk

  - summary (or flow chart) of academic governance processes for course approval and monitoring, review and approval (with reference to academic sub-committees, delegations, external referencing, oversight of any third-party delivery arrangements etc)

- evidence of ongoing and cyclical monitoring by the governing body of performance monitoring against the provider's organisational targets (including academic scholarship, teaching and learning, and student targets), including:

  - the most recent review reports to the governing body on performance monitoring against the provider's organisational targets; and

  - evidence demonstrating the consideration by relevant governing boards and, if relevant, evidence that actions arising have been developed and implemented.

- most recent report from a review conducted by an appropriately qualified and independent reviewer on the effectiveness of the governing body and academic governance processes.

  - accompanied by evidence demonstrating the consideration of the report by relevant governing boards and, if relevant, evidence that actions arising have been developed and implemented.

Limited SAA

TEQSA will request evidence demonstrating the applicant's effective implementation of policies and procedures for the development, approval, quality assurance, and review and improvement of courses of study. Providers should submit examples of relevant reports and actions associated with their course development and review cycles.

For the courses of study within the scope of the SAA application being made TEQSA will request evidence of major reviews showing the implementation of course review processes, including, but not limited to, the following:

- Evidence of a systematic approach to the collection and use of data to monitor performance and support continuous improvement. The analysis of course of study performance should include:

  – consideration of benchmarks across at least three cohorts of graduates for student progress; student outcomes, student satisfaction and student support.

  – overall student performance and outcomes by specific cohorts identified by the provider to be at risk

  – other stakeholder feedback eg. industry or professional accrediting bodies

  – benchmarking activities (eg. end of semester unit evaluations, external referencing and/or external reviews)

  – other evidence of the effectiveness of the course, including academic staff scholarly activity.

- Evidence of course amendments and improvements aligned to the most recent course of study review findings, including;

  – the consideration of course of study review reports by academic governance committees (e.g. faculty committees, academic board and relevant course and curriculum sub-committees), and

  – the implementation of outcomes and improvement strategies.

Unlimited SAA

The written submission for unlimited SAA should, in addition to demonstrating how the provider meet Standards 2.1, 2.2, 2.3 and 2.4 of Part B of the HES Framework, also address how they meet standard 2.5 of Part B of the HES Framework.

TEQSA notes that the nature of a decision to authorise unlimited SAA means the provider must give TEQSA confidence that it can consistently design and deliver high quality courses across the broad fields of education in which they are presently operating, *and* also design and deliver courses in additional broad fields of education and/or AQF levels.

The submission should detail how the application for unlimited SAA fits with their organisation's strategic plans, and describe how they would apply the principles of B2.5 to

meet the challenges of designing and delivering courses of study in fields and/or at AQF levels where they have limited or no existing expertise. If relevant, the submission should provide details demonstrating how they have already undertaken such processes.

The scope of the unlimited SAA application requires the applicant to demonstrate its academic processes across at least three (2 digit) fields of education. TEQSA will identify at least three courses of study across these fields of education and request evidence of the implementation of course review processes. For general guidance as to what evidence can be provided in this respect, please refer to the guidance given earlier with respect to the implementation of course review processes in limited SAA applications.

TEQSA encourages providers who do not currently have SAA to consider applying first for limited SAA. An applicant that can demonstrate a track record of having conducted cycles of course review and improvement across at least three fields of education, and under the auspice of limited SAA, will then be well placed to assure TEQSA they have sufficiently mature and advanced academic governance and institutional self-assurance processes for unlimited SAA.

Additional information requirements

Applicants will be asked to provide the following information in the online form:

- the contact person for this application
- the registered business name(s) under which the applicant intends to deliver the course(s) of study for which self-accrediting accreditation is sought
- the proposed scope of the SAA to be covered by the application (i.e., unlimited or limited SAA). Details to be provided by field of education and AQF award level if the scope is for limited SAA
- details about course delivery including whether any of the courses included in this application will:
  - be delivered in a language other than English (with additional information required for such courses using the TEQSA template for delivery details of course(s) delivered in LOTE)
  - be delivered in a country other than Australia
  - include any work integrated learning
  - be delivered by a third party or partner arrangement, or
  - have a major research component
- completed Confirmed Evidence Table for SAA
- completed TEQSA application declaration template.

Application process

Step 1 – Pre-application engagement with TEQSA

We recommend that providers engage with TEQSA as early as possible, either at the time that we begin to engage on preparations to lodge a re-registration application (typically 6 months before the applcation is due), or at least 6 months before the provider intends to submit a stand-alone SAA application.

Once TEQSA has discussed the scope and intent of the SAA application with the provider TEQSA will confirm in writing the scope of TEQSA's assessment of the provider's SAA application and preliminary evidence requirements.

Step 2 – Application submission

An application for SAA must be made through TEQSA's Provider Portal and include all evidence specified by TEQSA in its scoping letter. Please refer to our guidance note on file naming and size conventions.

After the application is submitted,TEQSA will send an invoice for the applicable fee. TEQSA will not commence assessment of an application until we receive payment.

Step 3 – Assessment of the application by TEQSA

The assessment of an application includes an evaluation of the evidence documents provided, as well as consideration of information held by TEQSA or obtained from a professional accreditation body or other government agency.

TEQSA may request further information or documentation to assist in evaluating the application. We may also engage independent experts to evaluate parts of the application. More information on use of experts can be found on our website.

TEQSA's analysis and evaluation will be presented to the TEQSA Commission with a recommended decision and supporting reasons.

In instances where the TEQSA Commission is proposing to make an adverse decision, we will provide a copy of the assessment report and relevant supporting documents to the applicant. The applicant will then have the opportunity to comment on the proposed decision and the reasons, as well as provide additional information and documentation. Adverse outcomes include:

- a proposal to grant SAA for a narrower scope than that applied for,
- a proposal to grant SAA and impose conditions on the registration of a provider,
- a proposal to reject an SAA application

Step 4 – Decision

The TEQSA Commission will consider the recommendations and reasons, taking into account the three basic principles of regulation of reflecting risk, regulatory necessity and proportionate regulation.

The TEQSA Commission may decide to authorise a provider to self-accredit its courses according to the scope of the application, or it may decide to reject the application. The

Commission also has discretion to grant SAA and impose conditions on the registration of a provider, or authorise a provider to self-accredit a narrower scope of courses than it has applied for.

Providers will be notified of the decision within 30 days of the decision being made. If an application is rejected, or where SAA is granted for a smaller scope than that applied for, the notice of decision will be accompanied by a statement of reasons.

A decision by the TEQSA Commission to refuse to authorise a provider to self-accredit one or more courses of study is a reviewable decision. This means that a provider can apply to the Administrative Appeals Tribunal for a merits review of the decision. More information about the review of TEQSA decisions can be found on our website.

TEQSA will publish a public report containing the decision and the reasons for the decision. This report is published on the National Register of Higher Education Providers. Refer to our website for more information about our approach to the publication of public reports.

How long does the application process take?

Each application for SAA is different and the duration of the process from application to decision will vary. TEQSA aims to finalise an application within 6-12 months.

Document history

Version #	Date	Key changes
1.0	October 2014	
2.0	1 May 2015	
3.0	18 April 2017	Updated for the HESF 2015 and made available as beta version for consultation.
3.1	3 May 2017	Updated to clarify Standards required and related evidence for Tables 2, 4 and 5.
3.2	24 August 2017	Update to approach for assigning of the online application form, in Stage 1.
3.3	18 March 2019	Updates to improve usability (e.g. numbering in Tables 2-5) and to clarify evidence requirements for applications made concurrent with an application for re-registration and also for extension of scope.
3.4	22 September 2022	Major update to reflect HESF 2021 and revised regulatory approach.