

Productivity Commission Review of the National School Reform Agreement

ACARA Response to the Interim Report

November 2022

ACARA RESPONSE TO THE INTERIM REPORT

Dear Commissioners,

This submission represents the response by the Australian Curriculum, Assessment and Reporting Authority (ACARA) to the Commission's Interim Report of the Review of the National School Reform Agreement (NSRA).

Specifically it responds to the findings and recommendations of Chapter 7 of the Interim Report on the national Measurement Framework for Schooling in Australia (MFSA), for which ACARA is responsible. It also responds to the related requests for further information included in that chapter of the Interim Report.

The overarching theme of ACARA's response is that the MFSA - as the key instrument for reporting on progress towards the national goals for schooling expressed in the Mparntwe Declaration - should not be "driven" by the NSRA. Rather the MFSA should inform the choice of measures that are targeted for specific focus in a future NSRA. We also recommend that the Annual National Report on Schooling in Australia (ANR) be tabled in Parliament each year and be characterised as "Australia's School Education Report Card". It could include a special section that calls out progress on NSRA initiatives and targets. We caution against making any recommendation that measures should be reported on a national or jurisdictional basis where there is no agreement as to the appropriate measure.

As outlined in ACARA's initial submission to the Review, we are considering consulting with stakeholders on a revised structure for the MFSA, based around three tiers, similar to the Health Performance Framework: social determinants of educational outcomes; system performance; and outcomes.

I am happy to meet with you to discuss the ACARA response.

Yours sincerely,

David de Carvalho
Chief Executive Officer
Australian Curriculum, Assessment and Reporting Authority

4 November 2022

Chapter 7: The National Measurement Framework

Draft finding	
<p>The Measurement Framework for Schooling in Australia is not appropriate for measuring progress on National School Reform Agreement outcomes</p> <p>While reliable, and largely relevant, the Measurement Framework for Schooling in Australia is not a complete means of reporting progress on National School Reform Agreement outcomes. The visibility of Governments' progress against agreement outcomes is further diminished by the absence of a standalone report and the reliance on the broader <i>National Report on Schooling in Australia</i> and ACARA dashboard for performance reporting.</p>	<p>ACARA's response:</p> <p>The purpose of a revised MFSA will need to be made very clear. Currently, it provides the basis for ministers to report on the performance of schooling, in accordance with the goals in the Alice Springs (Mparntwe) Education Declaration. It was not developed to measure progress of the current NSRA - albeit there is overlap in high level goals/outcomes relating to participation, achievement, and attainment. There will need to be closer alignment of performance reporting on the Declaration and the NSRA – with clarity as to what KPMs will be used for what.</p> <p>The current NSRA refers to outcomes, sub-outcomes, targets and national policy initiatives. If the MFSA is intended to be both a measure of performance against the Mparntwe Declaration and against a revised NSRA, then this needs to be made clear. A further consideration is that while there is no time limit on the Mparntwe Declaration for the achievement of any specific targets, the NSRA is a four-year agreement only. However, outcomes and sub outcomes relating to 'lowering' or 'increasing' proportion of students, based on collected data as reported in the Annual National Report on Schooling in Australian (ANR), have no timeframes such as would be expressed in the form, “reduce the proportion of students in the bottom to achievement bands by X percent by [year].”</p> <p>The NSRA does refer to the following targets: Australia considered to be a high quality and high equity schooling system by international standards by 2025; lift the Year 12 (or equivalent) or Certificate III attainment rate to 90 per cent by 2020; and at least halve the gap for Aboriginal and Torres Strait Islander students in Year 12 or equivalent attainment rates by 2020, from the 2006 baseline. However it is not clear how progress towards these targets was measured and reported.</p> <p>National Policy Initiatives in the NSRA refer to key strategic initiatives that, at the time, were thought to be the best means to achieve outcomes, enablers in the system. A revised MFSA should not report on progress against these, but progress could be reported in the Annual National Report on Schooling, which should be tabled in federal parliament.</p> <p>ACARA suggests that the MFSA be reframed as primarily a vehicle for measuring and reporting progress towards the goals of the Mparntwe Declaration through a number of key performance indicators relating to both system performance (inputs/outputs) and student</p>

Draft finding	
	<p>performance (outcomes/sub-outcomes). Subject to agreement by Education Minister, the NSRA could then be framed as the vehicle for agreeing (a) specific time-limited targets associated with those indicators and (b) reform activities that will contribute to achieving those targets. In other words, first decide what you want to measure, then agree the targets for each measure and how you are going to achieve them by when. Settle the MFSA first, then the NSRA such that it is the means of achieving the ends identified in the MFSA. Then the ANR becomes the “Education Report Card”, tabled in Parliament that reports on the key indicators in the MFSA, as well as progress towards NSRA targets and initiatives.</p>

Draft recommendation 7.1	
The performance reporting framework of the next agreement	ACARA’s response:
In the next intergovernmental school reform agreement, Australian, State and Territory Governments should:	
<p>a. commit to public reporting on each outcome by jurisdiction for students with disability, Aboriginal and Torres Strait Islander students and students in regional, rural and remote areas</p>	<p>Outcomes could also be reported by sex and whether students are from a non-English speaking background as is currently done in the NAPLAN National Report. However, reporting by students with disability is problematic. It should be noted that the Australian Government Department of Education (AGDoE) set up a working group in 2021 to tackle the issue of reporting by the NCCD attributes. However, there are logistical problems that present major challenges to reporting all KPMs by all disaggregations.</p>
<p>b. add new sub-outcome measures for learning gain, post-school outcomes and the measure of student wellbeing proposed in draft recommendation 4.1</p>	<p>Agree, noting that, subject to further consultation with National Assessment Data and Reporting (NADAR) Advisory Group:</p> <ul style="list-style-type: none"> • Learning gain would be reported at the national and jurisdictional level and by priority cohorts as the increase in NAPLAN scale points between the most recent assessment and the one undertaken two years previously. For each domain there would be three measures of gain, from Year 3 to Year 5, from Year 5 to Year 7, and from Year 7 to Year 9. • Reporting on post-school outcomes would be based on existing ABS data relating

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The performance reporting framework of the next agreement	ACARA's response:
	<p>to 15-24 year-olds in education/training/employment, not a new data collection mechanism</p> <ul style="list-style-type: none"> • Student well-being should only be reported at the national level, but there is unlikely to be agreement on a single instrument, given jurisdictions use various, non-comparable instruments. The NAP Sample assessments could be expanded to include a common approach to capturing information about student well-being through the addition of free-text survey questions. Such questions could also cover issues such as classroom discipline and student engagement.
c. update the NAPLAN sub-outcome measure to use proficiency standards rather than learning bands.	Agree.

Information request 7.1 - Standalone reporting against the National School Reform Agreement

Would a standalone report on progress against the National School Reform Agreement outcomes and sub-outcomes (separate to the National Report on Schooling in Australia) improve the accountability of Governments to the community?

ACARA suggests that the Annual National Report on Schooling (ANR) be the equivalent of Australia's "Education Report Card" whereby all Ministers report to the Australian people, through the federal parliament, on how they have collectively exercised their stewardship of schooling in Australia. The ANR would include, and highlight, those MSFA indicators that have been especially targeted for improvement under the new NSRA, and report on progress in delivering the national policy initiatives and related activities. A stand-alone report would not be necessary.

Draft recommendation 7.2	
Review of the Measurement Framework for Schooling in Australia	ACARA's response:
ACARA's next review of the Measurement Framework for Schooling in Australia should:	This suggests that ACARA should only complete the task of reviewing the MFSA once the next NSRA is finalised. However, ACARA suggests the order should be reversed, namely that the NSRA should be considered as the vehicle for achieving the goals of the Mparntwe Declaration specified through specific KPMs in the MFSA. First decide what indicators are relevant for policy purposes and which ones you want to improve (MFSA), then decide what targets to set for each one and how you are going to do that (NSRA).
a. create a performance indicator framework aligned to National School Reform Agreement outcomes and sub-outcomes to which Key Performance Measures are mapped	<p>The outcomes and sub-outcomes should be agreed as part of settling the MFSA (what outcomes do we want the NSRA to shift? Put those in the MFSA); and then the NSRA would agree associated targets, sub-targets and activities to deliver those outcomes and sub-outcomes. That is, align the targets and activities in the NSRA to the outcomes in the MFSA.</p> <p>This raises the issue of what kinds of outcomes and sub-outcomes should be included in the new MFSA. Is it only ones that can be measured with existing data sources, or are additional data collections envisaged?</p> <p>The kinds of outcomes and associated measures should be broadened beyond the existing suite (which itself could be rationalised) of mainly academic outcomes related to</p>

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Review of the Measurement Framework for Schooling in Australia	ACARA's response:
	performance on national and international assessments. For example, a new MFSA could also include measures of student wellbeing (noting the current lack of a single national approach to this issue as identified in the interim report), classroom environment, and engagement, about which information could be gathered through surveys attached to national assessments.
b. consider the inclusion of system performance Key Performance Measures relating to the teaching workforce	<p>These measures could include both quantitative and qualitative measures and be presented as part of the “system performance” tier of a restructured MSFA. Subject to effective data collection processes being put in place through the National Teaching Workforce Data Collection, a range of “system performance” or input and output measures could be included (as opposed to outcomes), such as student-teacher ratios, number of HALTS, number of new graduates entering the system, number of teachers leaving full-time employment, number of secondary teachers teaching outside their specialty. Whilst some of these measures are reported in the National Report on Schooling in Australia (ANR), continued discussion with AITSL regarding the best measures is required.</p> <p>A range of other “system performance” (input/output) measures could be considered as well (subject to appropriate data collection), for example: teacher wellbeing and job satisfaction; average hours of face-to-face teaching per teacher; main areas of professional development undertaken towards professional accreditation requirements; number of “hits” on the Australian Curriculum website (as a proxy for teacher engagement with the AC). Existing KPMs on attendance would be presented in the “system performance” tier, as opposed to the third “outcomes” tier.</p>
c. consider the inclusion of additional contextual information relating to influences on learning based on Australian Early Development Census data and information on English language proficiency	<p>Agree with respect to the AEDC.</p> <p>Work done by ACARA on the English Language Proficiency (ELP) framework in 2018-2019 highlighted that a consistent measure of ELP could not be achieved using the existing tools in place and a common measure across states/territories necessitated a revised collection. It should be noted however, that like the NCCD, the linkage between ELP and most KPMs would be difficult to achieve.</p> <p>More broadly, such measures could be part of the first “tier” of a restructured MFSA that</p>

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	<p>captures important data that could be broadly defined as “social determinants of education”, that is, factors that are “outside the school gate”. For example, given the high correlation between ICSEA scores and NAPLAN outcomes, some measure of the spread and distribution of ICSEA scores across Australian schools could be included. Increasing the proportion of schools clustered around the 1000 score on the ICSEA scale could be considered a proxy indicator for progress toward greater educational equity.</p> <p>Measures of parental engagement could also be included (as suggested by the Australian Parents Council, who represent mainly independent school parents), but this raises the question of how such information would be collected and reported. A discussion with the ABS on including a question on the Childhood Education and Care data collection or other surveys is appropriate.</p>
d. deliver improved reporting on outcomes for students from priority equity cohorts	<p>Figure 7.2 – Completeness of MFSA reporting by NSRA equity cohorts (Page 183) suggests that disaggregations of the KPMs by Indigenous status and Remoteness are “Not reported”. In fact, all KPMs are disaggregated by Indigenous status. However, some collections do not support disaggregation by Indigenous status within state/territory due to the volatility of estimates based on small sample sizes.</p> <p>Similarly, not all collections can be disaggregated by remoteness area due to sample size restrictions which is the purpose of using the ABS Census of Population and Housing data to supplement relevant KPMs.</p> <p>The review notes on page 182 that “Some of this data can be accessed elsewhere on the ACARA website but is not available via the KPM dashboard.” The KPM dashboard currently includes only disaggregations that can be achieved for all KPMs. However, ACARA notes this feedback and will re-structure the reporting to include data available from the subject matter pages into the dashboard to present a more complete picture in the future.</p>
e. be undertaken in consultation with students, teachers and communities	<p>Noting that development of such key performance measures requires a level of understanding of both data and its meaning, it is unlikely that student and community consultation will add value to the exercise. What would be of benefit is testing that the community understands the explanations of the measures. Consulting teachers, students</p>

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Review of the Measurement Framework for Schooling in Australia	ACARA's response:
	and parents on the kinds of survey questions that might be included as add-ons to national assessments could be beneficial.
f. document remaining gaps.	As noted by a number of the submissions quoted in the report, the MFSA was not intended as a comprehensive picture of schooling and the cost of capturing and availability of data as well as the practicality of defining sensible measures does limit the completeness. ACARA's reviews of the MFSA in the past have documented gaps and intended areas for investigation – an approach that will be replicated for the next review.
The <i>National Report on Schooling in Australia</i> should be tabled annually in Parliament.	Agree. As stated above in response to Information 7.1, ACARA suggests that the Annual National Report on Schooling be the equivalent of Australia's "Education Report Card" whereby all Ministers report to the Australian people, through the federal parliament, on how they have collectively exercised their stewardship of schooling in Australia. The ANR would include, and highlight, those MSFA indicators that have been especially targeted for improvement under the new NSRA, and report on progress in delivering the national policy initiatives and related activities. A stand-alone report would not be necessary.
ACARA should work towards filling reporting gaps by exploring the use of State and Territory Government data that are comparable over time, even if it is not nationally complete or comparable across jurisdictions. Well established State and Territory Government surveys of students, parents and carers, and teachers should be given due consideration.	<p>This is a departure from the agreed approach for the MFSA.</p> <p>P8 of the MFSA stipulates that the KPMS are "strategic measures which provide nationally comparable data on aspects of performance..."</p> <p>Whilst ministers have historically agreed to reporting data on My School particularly, that is incomplete, the introduction of inconsistent measures will likely lead to invalid jurisdictional comparisons that may do more harm than good in relation to plugging gaps.</p>

Information request 7.2 - Proposed sub-outcomes under the future agreement

Do the identified outcomes, and proposed additional and modified sub-outcomes, reflect the aspirations of all Australian students, including those from Aboriginal and Torres Strait Islander backgrounds, students with a disability, and students from other priority equity cohorts (including students from equity cohorts not explicitly identified in the current agreement, such as those in out-of-home care, or who speak English as an Additional Language or Dialect)?

As part of a new NSRA, Ministers could consider the inclusion of a set of time-limited targets for achieving progress on a small set of outcomes and sub-outcomes in a restructured MFSA, similar to what is done in the Closing the Gap agreement, and what is done in some jurisdictions with respect to NAPLAN achievement (eg, NSW “Premier’s Priorities” targets). However, this targeted set of outcomes and sub-outcomes could include a wider set of measurable outcomes that reflect the broader purposes of schooling. Measures on teacher wellbeing and perceptions of classroom discipline could be considered for inclusion as these are key contributors to learning, engagement and wellbeing outcomes.