



Sub-bachelor courses: consultation paper for feedback

Policy

The demand driven funding system will be expanded to include Commonwealth supported places (CSPs) in approved sub-bachelor level diploma, advanced diploma and associate degree courses at Table A universities from 1 January 2018.

Purpose

This policy is intended to:

- correct inequitable central allocation of places to give students more choice and allow providers to respond to local demand
- focus public subsidy of sub-bachelor places
- improve undergraduate attrition rates over time, and
- improve job-readiness of graduates.

The Australian Government has announced that Commonwealth support will be aligned with courses that fully articulate into a related bachelor program, and have been developed with a focus on industry needs.

In addition Commonwealth support will be restricted to students who do not hold an existing higher education qualification.

This paper is intended to inform the development of legislative and administrative guidelines, and the design of an annual process for course approval.

Background

Under current arrangements, the Government decides how many students can receive a subsidy to study a sub-bachelor course at each university. In 2016, although public universities estimated they required a total of 21,795 sub-bachelor places, only 19,046 sub-bachelor places (including enabling courses) were delivered. This is inefficient because some universities are significantly under-enrolled, while others are over-enrolled, and like students would be able to gain a CSP to study a sub-bachelor course at one institution but not at another.

This also means that students have a financial incentive to enrol in a bachelor-level course, regardless of their workforce ambitions or level of academic preparedness.

The enabling legislation introduces a new power for the Minister to make a legislative instrument listing Approved sub-bachelor courses and restricts access to CSPs to those courses. The Bill also provides for universities to enrol domestic students as full-fee paying students in non-approved sub-bachelor courses, and ineligible students in any sub-bachelor course as full-fee paying students.

Students enrolled prior to 1 January 2018 will be able to continue to study in a CSP regardless of the course's status or whether they have prior qualifications. Universities will be asked to notify the department of the number of grandfathered students.

Legislative basis for allowing full fee-paying domestic students in sub-bachelor courses

Table A providers must, under Section 36-30 of HESA, enrol domestic students as Commonwealth supported students in undergraduate courses, unless they are prohibited under section 36-15 or 36-10. The draft Bill sets out under section 36-15 that providers may not enrol students as Commonwealth supported students in sub-bachelor courses unless the course is approved, and under section 36-10 that they may not enrol students as Commonwealth supported students in sub-bachelor courses if the student has obtained a prior higher education qualification.

Issues for feedback

1. Criteria for course eligibility

Chapter 6 of the draft Commonwealth Grant Scheme Guidelines (CGS Guidelines) set out the criteria for eligible sub-bachelor courses. It is proposed that further detail and guidance, resulting from this consultation process, will be provided in the Administrative Information for Providers. Feedback is sought on the draft criteria and additional guidance below.

Proposed addition to CGS Guidelines:

The Minister may approve a sub-bachelor course under clause 1 of Schedule 1 of the Act if a *provider* demonstrates, to the satisfaction of the Minister or his delegate, that a sub-bachelor course meets all of the following requirements:

- (a) Fully articulates into a related bachelor degree program(s);
- (b) Meets current industry skills needs or identified future skills needs.

Additional guidance:

Full articulation requirement:

- All credits achieved in the sub-bachelor course must be recognised in the related bachelor degree/s.
- This means that a student completing a one-year diploma should be capable of entering the second year of the bachelor degree, and a student completing a two-year associate degree should be capable of entering the third year of the bachelor degree.

Industry skills needs requirement:

This requirement may be demonstrated by, but not limited to:

- for a professional course, the sub-bachelor course (or the related bachelor course/s into which it articulates) is accredited by the appropriate professional body or association; or
- the course was developed in consultation with industry or employers, with documented evidence of employer support for the course; or
- the course includes substantive work-integrated learning or work experience in industry components; or
- the course has demonstrated excellent employment outcomes for students over time; or
- the course relates to emerging industries or occupations, where related industries are not yet mature but are strategically important for the economy. Initially this will include science, technology, engineering, and mathematics courses; or
- the course addresses local or regional skills shortages.

2. Student eligibility

Students with prior higher education completions (except enabling courses) will not be eligible for Commonwealth supported places in sub-bachelor courses.

- The department will assist universities to determine student eligibility. Universities will be able to send a list of prospective student CHESSNs to the department where a script will be run and a report returned to the university.
- Warning messages will prompt on data entry to HEIMS if an incoming student record has any prior completions.

3. Process for course approval

Feedback is sought on the annual process for approval of sub-bachelor courses. An outline of the draft process is provided below.

- Once the requirements are finalised, the Minister or his delegate will write to providers requesting a list of courses (including Course Code) that meet the eligibility requirements and which institutions wish to have approved. Institutions will also be asked to provide estimates of student load for each course in the list.
- The request will include a standard template (see proposed template attached) for providing information on course eligibility and guidance on the level of detail required to establish eligibility.
- The department will assess submissions against the requirements and request further information where required, before advising the Minister of the outcomes of the assessment.

Once the Minister or his delegate makes a decision on which courses are eligible, a list would be published and a legislative instrument would be made setting out the eligible courses at each university. The Bill before the Parliament provides for the Minister to make such an instrument under the definition of *Approved Sub-Bachelor Course* in Schedule 1.

4. Timing

- For 2018 it is proposed that course approval be finalised in November so as to allow institutions to reflect enrolment estimates in load estimates provided to the department.
- To allow for universities to reflect changes in estimate updates in April and October each year, it is then proposed that institutions are invited to apply for further course approvals in the following periods of each year:
 - 1 February to 15 March, and
 - 1 August to 15 September.

5. Post-implementation monitoring arrangements

Funding agreements will include an indicative number of EFTSL in sub-bachelor courses at each university, based on estimates provided as part of the approval process for each course outlined above. Estimates of load for each year will act as a reference point for monitoring the policy in operation.

If actual enrolments in a course materially exceed the notional load cap the department would undertake further investigation. In addition, if there are significant shifts in projected aggregate load estimates, the department may request these estimates broken down by each approved course to determine the reason for such shifts.

In addition, the Government will monitor articulation rates. It is expected that a substantial proportion of students undertaking approved sub-bachelor courses would articulate through the nominated pathways.

If it is found that the operation of the policy is not consistent with the policy intent, there may be changes to policy or compliance action. For example, if courses are:

- a) substantially replacing courses offered by vocational education and training providers, or
- b) not supporting articulation for students who continue studying at bachelor level

Then the Minister may withdraw approval and/or seek to amend the guidelines.

Next steps

The department would appreciate your feedback on the issues above by COB 13 October 2017. Please send feedback to HEReform@education.gov.au.

Attachment: Proposed course information template

APPLICATION FOR DEMAND DRIVEN SUB-BACHELOR COURSES FROM 2018

This form must be completed for each sub-bachelor course in which the institution wishes to offer demand driven Commonwealth supported places. The application should be completed and certified by an appropriately authorised person.

Please return completed form to [email address] by [date].

Course details

University name:			
Course name:			
Course Code: (HEIMS item E307)		Course of Study Type Code 310: (HEIMS item 310)	
Course type:	<input type="checkbox"/> Diploma <input type="checkbox"/> Associate Degree <input type="checkbox"/> Advanced Diploma		

Contact details

Contact for this application:			
Position:			
Phone:		Email:	

Please nominate a contact person to provide further information if required about the course during the assessment period.

Course description

Length of course:	EFTSL
Description of the course: Please summarise any educational prerequisites for entry to the course, the basic aims of the course and the broad areas the student must gain competency in to complete the course	

Confirm that you have documented that the course meets the following criteria and that you can produce the documentation if requested:

- The course fully articulates into related bachelor course/s
- The course meets current industry skills needs or identified future skills needs

Estimated full time student load (EFTSL) for the course

Year/s	2018	2019	2020	2021
EFTSL				

CRITERION 1: The course fully articulates into a related bachelor degree program(s)

Into which bachelor course/s does the course articulate?

CRITERION 2: The course meets current industry skills needs or identified future skills needs

Please select relevant options and provide more detail if requested.

- The course addresses a skill shortage or future skill need** *(for example consultation or collaboration with industry partners)*
- The course is delivered with engagement from industry** *(for example through work-integrated learning or work experience in industry units)*
- The course was developed with engagement with industry**
- The course has been accredited by a professional body**
- The course of study is in a science, technology, engineering or mathematics field of education**

Please provide any additional information below if requested

Certification by an authorised person

I verify that all of the information contained within this application is true and correct.

Name	
Position	
Signature	
Date	