

Professor Mary O’Kane AC,
Chair, Australian Universities Accord Panel

Date: 25/08/2023

Dear Professor O’Kane,

Submission Regarding University College Category Intersecting with the Australian University Category Standards

Executive Summary

This submission is made in support of policy and legislation that will enable an Australian University and a University College to be registered without the requirement to meet world standards in research. In particular, the submission addresses the current disincentive for Greenfield applicants in the University College category to qualify for registration because of the requirement to put forward credible plans to fully comply with the Australian University category within 10 years from the commencement of teaching.

This requirement has the consequential effect of imposing an obligation to create realistic plans to undertake world class research within the specified time. Reform of the research intensity requirements which the Accord is open to considering, would address the disincentives for University Colleges, especially Greenfield applicants, as well as for any university which wishes to shift its strategic focus to greater intensity on teaching excellence and scholarship.

Submission

We are writing on behalf of New Medical Education Australia Pty Ltd (NewMed), an Australian company seeking to obtain registration with the Tertiary Education Quality and Standards Agency (TEQSA) as a University College and as a Greenfield applicant. If successful, and our degree program is accredited by the Australian Medical Council (AMC), NewMed will offer a four-year post graduate Doctor of Medicine degree for Australian students, especially those in rural and remote areas.

We are making this submission in response to statements in the Australian Universities Accord Interim Report (Interim Report) regarding future research requirements for universities. In particular, we refer to item ‘b’ under the heading “Structural change across the tertiary sector” which indicates that the Review could include:

“exploring revisions to the Provider Category Standards, to remove the requirement that all universities will carry out research. This should offer the system more flexibility and encourage institutions to diversify, innovate and specialise.”

While the review is principally directed towards universities, it is, we submit within the purview of the Review to consider the Product Category Standards more broadly, at least to the extent to which the University College standards intersect with standards governing an Australian University. To this end, we note the remarks set out in section 3.1.1.4 of the Interim Report.

“The 2019 changes to the Provider Category Standards (PCS) established clearer categorisation of institutions, creating a new University College category to reflect the specialist and high-quality contributions of these institutions, as well as new research requirements for universities.”

“The Review considers that the requirements of the PCS may be preventing institutions from developing stronger identities and diversity. The current research requirements of the University category will be challenging for some to continue to maintain. Additionally, categories may not reflect the aspiration of some universities which may want to build an identity and advantage as teaching-intensive, research-intensive, or education for the professions-focused. As Australia contemplates an evolving tertiary education system, serving a growing number of people, there is opportunity to consider these definitions and current activity requirements to reflect a wider mix of institutions.”

Presently, the Higher Education Standards Framework (Threshold Standards 2021) overseen by TEQSA differentiates between an existing institution wishing to be registered as a University College and a new entrant, such as NewMed, which must seek registration as a Greenfield applicant in the University College category. An existing institution has the option to proceed towards university status or remain as a University College on an ongoing basis. In the latter case, there is no obligation on the institution to pursue research intensively, possibly at all, and certainly not to aspire to world standard in the discipline areas in which it operates.

Part B1.2 of the Threshold Standards 2021 which define the requirements for a University College specify in section 11 that a higher education provider:

“is not required to position itself to apply for registration in the Australian University category but may elect to do so...”

In contrast, it is a requirement under Part B1.2 section 16 that a Greenfield applicant:

“has realistic and achievable plans to fully comply with the ‘Australian University’ category standard within 10 years from the commencement of teaching...”

This latter requirement imposes on a Greenfield applicant to the University College category significant and possible unattainable hurdles which existing providers seeking registration in this category don’t face. Secondly, it forces a Greenfield applicant to aspire to be an Australian University when its aspiration may be to establish a high-quality University College with an emphasis upon teaching excellence and scholarship in its chosen field/s. It may also, as is the case with NewMed, intend to be active in research.

The barriers to achieving world-standard research are explicitly recognised in the Interim Report at 3.1.1.4, cited above and in the Coaldrake Report (final report – Review of the Higher Education Provider Category Standards, October 2019). The latter, when considering whether the Australian University College Category should be retained, observed at page 14, in relation to the obstacles faced by institutions needing to achieve university standard research:

“It is a challenge for higher education providers to meet the increased research benchmarks required by the ‘Australian University College’ category. This is particularly the case considering there is an expectation that aspiring higher education providers demonstrate a research profile of achievement and performance that compares favourably against existing Australian universities.

The difficulties are compounded when those seeking to enter the ‘Australian University College’ category (or indeed, any other university category) are precluded from accessing public research funding in order to help boost their research profiles. Although other sources of funding are available, it is difficult for a higher education provider to be “able to mount a credible bid for a university category, except in fields of education that do not require mobilising significant amounts of capital for research infrastructure”.¹ This is because university research is “typically not self-financing [and] public research funding is primarily awarded according to past research performance, which makes it hard for new universities to build research output”.² Therefore, the lack of access to research funding for providers in the current ‘Higher Education Provider’ category can make it challenging for providers to compete on the same scale or to the same quality as universities.”

Further, we refer to the Review of the Higher Education Provider Category Standards – Australian Government Response³ which supported the establishment of the current University College category. It stated in paras 2, 3 & 6:

“The Government supports promoting diversity within the higher education sector, rewarding providers that can demonstrate they are performing at the highest standard and providing an achievable pathway for providers to become an Australian university.

Titling the category, ‘University College’ will provide appropriate recognition for high performing providers, and the criteria in this category addresses the lack of utility provided in the current ‘Australian University College’ category. This proposed category recognises that many high performing providers may be more teaching focussed, rather than research intensive.”

“The category is intended to serve different purposes depending on the needs of individual providers. Some providers may wish to remain in this category indefinitely. Other providers, if it suits their mission, may use their time in the category to build capacity and move towards seeking registration in the ‘Australian University’ category. (emphasis added) The category is sufficiently broad to cater for different types of providers, including institutions with either specialised or comprehensive offerings, those with small or large student populations, or institutions with either a teaching or research focus.”

¹ Tertiary Education Quality and Standards Agency (TEQSA) submission to the PCS Review. (2018). p.14. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Tertiary-Education-Quality-and-Standards-Agency.pdf>.

² Norton, A., Cherastidham, I., and Mackey, W. (2018). *Mapping Australian Higher Education 2018*. Grattan Institute. p.13. Retrieved from: <https://grattan.edu.au/wp-content/uploads/2018/09/907-Mapping-Australian-higher-education-2018.pdf>.

³ Australian Government, Department of Education ‘Review of the Higher Education Provider Category Standards, Australian Government Response’, [Australian Government response for the Review of the Higher Education Provider Category Standards Review - Department of Education, Australian Government](#)

We request the Panel to consider whether the current requirement under the Threshold Standards for a Greenfield applicant in the University College category is appropriate having regard to the different standards applicable to an existing provider and a new entrant. It seems anomalous that the Greenfield application process is a legislated avenue, yet the standard to be met is to have realistic and credible plans to comply fully with the 'Australian University Category' within 10 years of the commencement of teaching. In turn, Part B1.3 of the Threshold Standards requires, according to sections 16 and 19(a), that a university undertake research and achieve world standard within the specified time.

Accordingly, this requirement might well prevent any Greenfield applicant from satisfying the criteria and becoming a TEQSA registered University College. If the option which is open to an existing institution under Part B1.2 section 12 not to pursue Australian University status were also open to a Greenfield applicant, the University College category rules would be internally consistent and consistent with the Government's response to the Coaldrake Report. It would also be consistent with the remarks and tenor of the Panel's Interim Report relating to teaching-focused or teaching-only universities.

It should also be noted that even without the requirement to aspire to world standard research within 10 years of the commencement of teaching, a Greenfield applicant necessarily faces very substantial barriers to entry. Academic and corporate governance each have to meet national benchmarks for quality as do the curriculum design and intended learning outcomes, among others. In our case, this also applies to meeting the demanding accreditation standards of the Australian Medical Council.

We are investing heavily in each of these areas and seek to offer an innovative, excellent, and contemporary degree in medicine. It will have an intense focus on teaching quality and providing an outstanding student experience. Research will form an important part of our institution's activities.

We hope that your Panel will give due consideration to this submission which would create a level playing field for both existing institutions as well as new entrants who, in either case seek to meet University College standards and where the focus is on excellence of teaching and scholarship while enabling research to be part of the applicant's mission without the aspiration of becoming an Australian University.

It would not diminish the quality of institutions in the University College Category should the suggested amendment be adopted. Indeed, it would recognise that a University College could achieve excellence according to its mission and intended specialisation/s and expand the number of high-quality providers, especially in areas of identified need.

High achieving University Colleges and Australian Universities which focus on excellence in teaching, scholarship, providing an outstanding student experience and graduate outcomes, will also contribute to addressing areas of student dissatisfaction reported in the QILT surveys.

We would be very happy to respond to any questions you may have.

Yours sincerely,

[Redacted signature]

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