

Mr Dom English  
Higher Education Group  
Department of Education and Training  
C50MA7  
GPO Box 9880  
Canberra ACT 2601

**22 February 2019**

Dear Mr English,

Monash University welcomes the opportunity to provide a response to the questions posed in the *Reallocation of Commonwealth supported places (CSP) for enabling, sub-bachelor and postgraduate (designated) courses* discussion paper<sup>i</sup>. Monash supports the regular review and revision of institutional allocations of designated CSP and recognises improvements are needed to ensure that the allocation of places is aligned with areas of need, financially sustainable, and equitably allocated. Monash's summary feedback is provided below.

## ENABLING

Monash agrees that the current allocation across the sector requires review. The Commonwealth Government, through the National Aboriginal and Torres Strait Islander Education Policy, is seeking to achieve parity between Indigenous and non-Indigenous cohorts in relation to student enrolments, progress and completion rates. These priorities are echoed in Monash's Aboriginal and Torres Strait Islander Framework: 2019-2030, in which the University commits to achieving: Indigenous student participation at a rate commensurate with national population parity; and parity of retention and success rates. To facilitate the desired significant growth in Indigenous student numbers (an estimated additional 420 Indigenous students), Monash requires additional enabling places specifically for the Monash Indigenous Access Program (MIAP).

Monash supports:

- the proposed allocation criteria in principle and recommends the addition of a requirement which recognises the contribution of enabling pathway programs in addressing local equity access and participation needs;
- the weighting of two CSP allocation criteria only on an equal basis - student completions and transition to further study at tertiary level<sup>ii</sup> and demonstrated demand (utilisation of load allocations); and
- a 3 yearly cycle for the negotiation and reallocation of places in line with institutional commonwealth funding agreements.

## SUB-BACHELOR

Monash does not support the redistribution and re-allocation of sub-bachelor places, we believe our current allocation should be added to our non-designated Maximum Basic Grant Amount (MBGA) and indexed in line with CPI. This will simplify the administration of institutional allocations of CSP places (thus reducing the administrative burden for the Commonwealth) and provides institutions with the autonomy to manage their MBGA as they see fit, ensuring sub-bachelor places deliver for the needs of students, taxpayers and employers by directing students to the correct level of study appropriate for their needs, tailoring offerings to meet local population needs and individual institutional missions<sup>iii</sup>.

## POSTGRADUATE COURSEWORK

Monash recognises the need to ensure Commonwealth funding is aligned with areas of need, financially sustainable, and equitably allocated. In line with this we support the development of updated systems and processes (as proposed in the following table) which reduce the ambiguity and subjectivity<sup>iv</sup> of the CSP allocation and course approval process, and enables Universities to remain agile and responsive in this space.

### Monash Recommendation:

<b>Funding</b>	<p>Is to take the form of an <u>indexed</u> institutional MBGA providing institutions with the flexibility to manage their CSP allocations within approved courses. Therefore, funding should be decoupled from specific load and cluster level allocations.</p> <p>Future analysis of sector and institutional utilisation should focus upon use of the total funding envelope (MBGA) available rather than specific load and cluster allocations<sup>v</sup>.</p>
<b>Allocation of Places:</b>	<p>The allocation of places to an institution should be relative to the size of the institutions undergraduate student population. To ensure institutions are able to support the transition of their students to further study (CSP approved courses).</p> <p>Additionally, consideration should be given to local population:</p> <ul style="list-style-type: none"> <li>▪ Growth rates: the state of Victoria is currently underrepresented in CSP places in comparison to other States. As Victoria is forecast to have greater population growth to 2050<sup>vi</sup>, this will widen the gap further under the current system.</li> <li>▪ Catchments for particular campuses: which can be in areas of greater disadvantage and/or tailored to address the particular needs of their local population, e.g. Federation University's Berwick Campus,</li> </ul>

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Monash University's Peninsula campus. However presently, the location of a University's main campus is the determining factor in all allocations.

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**Frequency of reallocation and review:** Monash supports a 3 yearly cycle, in line with institutional Commonwealth funding agreements. This approach facilitates medium-term planning with confidence knowing CSP allocations and funding are set for the duration of the funding agreement.

Universities can annually seek approval for new course offerings which align with the criteria specified below, which are to be accommodated within their already agreed three year institutional MBGA allocation. To facilitate agility and responsiveness to industry, student and community needs.

The above approach provides certainty for university funding, enabling the development and implementation of medium term plans which are hampered by current funding arrangement practices.

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**Criteria:** The approvals process for postgraduate coursework offerings should be based upon the following three criteria:

1. Community benefit: where the private benefits of postgraduate study may be more limited.
2. National significance: to meet emerging or workforce shortages.
3. Professional Requirements: as per the requirements of relevant professional registration bodies.

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**Approval Process:** An annual business case submission process is established by the Department which has clear submission deadlines to enable the Government to assess all applications in a systematic way. Ensuring approvals are consistent and equitable across institutions and thus determine an equitable and level playing field across the sector in terms of which courses are approved. In the event that an application is declined, clear explanation is provided as to how this decision was reached<sup>iv</sup>.

The timing of the approvals process and funding agreement negotiations will align with institutional planning needs – i.e. sufficient lead time will be provided to enable institutions to promote and utilise their indexed MBGA allocation. Therefore funding agreements will need to be negotiated further in advance of the current October-December notification timeline.

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Additionally, administrative burden could be further reduced for both the Government and institutions if the postgraduate CSP course approval and Study Assistance registration process were consolidated into one approval process. If a course is approved by the DoET it is automatically eligible for Study Assistance.

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**Benefits:**

- Increases the transparency of the process.
- Reduces subjectivity whilst improving consistency and rigor in CSP course approvals.
- Facilitates Institutional agility and responsiveness in their course offerings, given increased certainty over the medium term regarding funding.
- Streamlines the administrative and reporting burden for both parties<sup>vii</sup> for both CSP course approval and Study Assist registration.

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In closing, I would like to thank you for the opportunity to provide feedback on this matter. I would also like to express our concern with the disconnected nature of consultation papers released by the Government in recent months. These papers demonstrate a fragmented approach to Higher Education policy and sector engagement, they lack a common narrative which provides a holistic view of how these proposals will enhance higher education provision within Australia.

If you would like me to clarify any of these comments, please don't hesitate to contact me.

Yours sincerely,

Nicola Powell,

Director of University Planning & Statistics

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<sup>i</sup> <https://www.education.gov.au/consultation-paper-reallocation-commonwealth-supported-places-enabling-sub-bachelor-and-postgraduate>

<sup>ii</sup> Assumes the completion and transition to further study at tertiary level metric is this referring to the completion of the sub-bachelor and articulation into a Bachelor's degree.

<sup>iii</sup> In line with our preferred option as stated in our response to the *Performance-Based Funding (PBF) for the Commonwealth Grant Scheme* consultation paper.

<sup>iv</sup> For example, the Master of Data Science, CSP places are currently offered by the following institutions - [University of Queensland](#), [Latrobe University](#), [University of Southern Queensland](#), and [The University of Melbourne](#). However, Monash's application to offer CSP places in our equivalent course has been denied by the Department. It is unclear why Monash's application has been declined when others have been approved

<sup>v</sup> Institutions have been advised by the Department, for a number of years to ensure we remain within our 'total funding envelope' not our cluster level load allocations. This in addition to several years of policy uncertainty regarding future funding arrangements has resulted in distortions between funding agreement cluster allocations of load and actual utilisation – with load reallocated to higher/lower cost clusters thus increasing/decreasing the load available for the intuition to utilise when comparing to our funding agreement load allocation. The Departments analysis should have investigated the gap between each intuitions funding envelope and actual utilisation.

<sup>vi</sup> ABS.STAT Beta tool for population projections. Retrieval from <http://stat.data.abs.gov.au> - Population Projections by Region 2017-2066.

<sup>vii</sup> The existing approvals process can be lengthy, resulting in large delays between the request for the places and the opportunity to offer the course. Monash submitted a request in 2018 and waited 8 months to finally be advised it had been declined.