

Submission on the reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses

University of the Sunshine Coast

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Introductory Comments and Context

USC welcomes the opportunity to provide input to the consultation on the reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses.

USC is strongly regionally focussed, and proactively plans its suite of sub-bachelor / bachelor / postgraduate offerings to suit the needs and aspirations of the community, as well as address (geographic) areas of disadvantage in the catchment. One outcome of this, as is reflected in the data in the Consultation Paper, is that USC has ended up delivering several hundred sub-bachelor student places without Commonwealth supported funding as it has taken responsibility for areas with long-standing disadvantage. USC regularly reviews the nature and structure of offerings with the view of providing the best pathways for residents into a rapidly changing world of work. Consultation provided here picks up this theme.

USC is the major Higher Education provider for a 400km stretch of South East Queensland, from northern Brisbane to the Fraser Coast. Demography and geography is varied, including areas that could be classified as outer-metropolitan, regional and rural. Two areas (Moreton Bay North and Wide Bay) have the lowest rates of degree attainment amongst young adults in the country (13% and 14% of persons aged 25 to 34 have a bachelor degree, respectively, as compared to the national average of 35%). In the case of Moreton Bay North, which at most is only 55 km away from the Brisbane CBD, in addition to having the worst degree attainment statistics in the country, youth unemployment is also high (16.9%, as compared to 13.4% overall in Queensland and 10.3% in Brisbane North), and has grown 2.4 percentage points in the last 12 months. If young people are not studying and have higher-than-average unemployment rates, then a reasonable conclusion is that the pathways and support for young people to transition from secondary school to the contemporary world of work can and must be improved. Enabling and sub-bachelor courses are potentially key ingredients in this improvement.

With the above context, what follows is feedback organised under the headings of 2.3 – 2.5 and 3 in the Consultation Paper.

Consultation Issues – enabling places

The Consultation Paper puts forward the broad principle for reallocating enabling course CSPs as “*places will be allocated to universities that achieve high standards of academic preparation and strong student outcomes*”. The focus appears to be quality curriculum and delivery that leads to a student who is competent to study at the university level. However, if enabling courses are to serve as a preparation tool, particularly for students with socio-economic or education disadvantage (as is the case in the USC catchment), there is more to success than simple academics. For example:

- *Aspiration raising* (“universities actually accept people like me”). Having at least part of the study undertaken on a university campus, and attaining a certificate from a university, makes a difference. USC market research indicates that 83% of residents view a credential from a university as more valuable than a similar one issued from a non-university.

- *Access and travel time.* Market research suggests that traveling more than 30 minutes greatly reduces attendance.
- *Qualification and course.* The most important driver of potential student behaviour is the desire to study a specific course. Enabling courses at universities allow for seamless transition into the desired course of study.
- *Demonstrable local disadvantage.* According to the census results, USC works in some of the most educationally disadvantaged areas in the country. Being able to use enabling courses proactively, without being impeded by funding caps, makes them a valuable component in local (bespoke) initiatives to address disadvantage.

It is the view of USC that these aspects of success such as engagement in enabling and subsequent tertiary study be somehow included in the reallocation criteria.

In terms of the criteria proposed in the consultation paper:

- *Student progress:* While this is important, some caution must be exercised when moving away from a metropolitan setting. It is known, through market research and experience, that many students “take a break” between semesters, years, courses, etc, for “personal reasons” – work, family demands, financial considerations, etc. This is particularly true in regional and remote settings and with a disadvantaged demographic, is one reason why attrition figures for institutions based outside of metropolitan settings are artificially inflated. Moving from a one-year assessment period to a two-year assessment period (or longer) will provide a more realistic determination of progress. It is also worth noting that in some regional / remote settings, an enabling certificate itself is of value in gaining employment, and further study is not required for the qualification recipient to better engage with the economy. **USC suggestion: 10-20% weighting, and movement to a two-year assessment window, at least for non-metropolitan students.**
- *Existing utilisation of places:* Matching demand with places is obviously important. The situation for USC is somewhat unique, in that campuses were acquired or established (Fraser Coast from USQ, Caboolture from QUT, Gympie via SAF/EIF) with the understanding that discussions around load, particularly enabling course CSPs, would occur during future Funding Agreement discussions – this did not happen owing to policy circumstances. As a result, USC has offered enabling courses at these campuses to the extent it can without Commonwealth financial support. With the opening of a new campus at Moreton Bay in 2020, USC has asked the Department if an arrangement can be struck to allow some Bachelor load to be used for enabling course delivery for a short period of time; the outcome of this request is unknown at present. However, in all locations mentioned, demand (and need) exceeds current load, even with the provision of 200 or so unfunded places (in 2018). **USC suggestion: Some form of demand demonstration is important in place allocation, although institutional limited over-enrolment may be due to financial constraints, not limited demand. Demand demonstration: 30% weighting.**
- *Profile of commencing students / profile of catchment:* Allocation on the basis of catchment profile would best support the use of enabling course CSPs as a mechanism to overcome educational disadvantage. To be practical, catchment should be defined as 30 minutes by car to a university campus or learning node, with the campus or learning node offering Higher Education programs additional to enabling courses. **USC suggestion: Areas of high disadvantage and/or regional, rural and remote locations should be allowed a completely “demand driven” scenario for enabling CSPs. Demand and disadvantage assessment could be 50% of weighting.**
- *Innovative teaching models:* Improvement in teaching practices should be a normal part of higher education. **USC suggestion: 0-10% of weighting.**

Consultation Issues – sub-bachelor places

USC currently offers very few (non-enabling) sub-bachelor degree places. This is mainly due to financial considerations, and a proportionately large over-enrolment in enabling courses – USC’s over-enrolment in designated sub-bachelor load was the equivalent of around \$1.8 million in unfunded CSP income in 2017. USC has been active in lobbying, particularly to the previous Education Minister, for additional sub-bachelor load for its more regional / disadvantaged campuses, including Caboolture, Fraser Coast and, to a lesser extent, Gympie.

USC’s interest in sub-bachelor load revolves around meeting the needs of students from regional and disadvantaged backgrounds, where students often cannot commit to many years of contiguous tertiary study to finish with a bachelor’s degree. The commitment to a 3-4 year course (or 6-8 years part-time) may be overwhelming for many potential applicants from these backgrounds, so a more practical study plan could see the student obtain a reduced duration credential that also scaffolds toward a bachelor’s degree qualification, likely with some time off for family / personal reasons between 12-18 month bursts. This form of study plan may also suit younger people, where the achievement of shorter-duration credentials may suit the current trends in lifestyles and life paths and satisfy immediate employment requirements. The challenge is to have meaningful (from a credentialed employment perspective) sub-bachelor qualifications capable of providing further study towards multiple bachelor’s degrees. The University would continue to engage with these students regarding future study options (e.g. bachelor degrees) following completion of their sub-bachelors qualifications supporting their potential return to study for higher qualifications, as needed.

Advisory groups emphasise skills portability to young people, to provide opportunities to move between related areas of work as specific jobs grow and decline in the future. The Foundation for Young Australians used a taxonomy based on portable skills to group jobs under headings:

- Technologists – with skills to understand and manipulate digital technology.
- Carers – in jobs that seek to improve the mental or physical health or well-being of others.
- Informers – professions that involve the provision of information, education or business services.
- Designers – jobs that involve deploying skills and knowledge of science, mathematics and design to construct or engineer products, infrastructure, etc.
- Generators – comprise jobs that require high levels of interpersonal interaction in retail, sales, hospitality and entertainment.
- Coordinators – comprise jobs that involved repetitive administrative and behind-the-scenes process or service tasks.
- Artisans – require skill in manual tasks related to construction, production, maintenance or technical customer service.

Universities are arguably the entrance point for at least the first five of these groupings, and Diploma or Associate Degree offerings in these groups could present useful study options. The advantages of this approach:

- Shorter duration courses (1-2 years) where the student can leave with a portable credential.
- Greater flexibility of specialist degree choice at the end of the first stage of study.
- The flexibility to continue towards bachelor’s degree study in courses offered at the same institutions, or any other institution in Australia.
- Greater throughput of students for a given load (applied over 1-2 years of study, rather than 3-4). For regional areas or areas with a disadvantaged catchment, this may shorten the time required to make a genuine difference to the population.

Unfortunately, with sub-bachelor designated load being capped under the demand driven system, USC, as a growing regional university, has become very Bachelor-degree centric in its offerings (as these were the types of degrees where growth was funded) and has been unable to provide the mix of sub-bachelor / bachelor / post-graduate offerings that would best suit the catchment. A comparison of USC course offerings for domestic students in 2017 to national averages:

- Bachelor's degree students: USC 80.3% of students, versus 71.1% nationally.
- Enabling: USC: 9.2% of students, versus 2.4% nationally.
- Sub-bachelor excluding enabling: USC 0.9% of students versus 3.4% nationally.
- Postgraduate Coursework: USC 5.3% of students versus 17.8% nationally, with the national trend being growth in PGC numbers of 8% per annum (largely due to international students – domestic students accounted for less than half the cohort and grew at around 1.9%).

From a practical perspective, it will take some time for USC to develop, execute and communicate a fulsome suite of sub-bachelor offerings. However, given the likely positive impact on USC catchments, USC would be looking for re-allocation mechanisms that provide this opportunity for around 300 CSPs.

In response to the issues for feedback:

- *Address industry needs.* USC agrees with the criterion. Professional body accreditation, particularly in areas under the broad heading of “health and care” for the USC catchment, is important and will require work with the relevant professional bodies. That said, please note that in regional settings a credential such as a “diploma” may still see the person able to obtain professional roles (apart from where a Medicare provider number is necessary, for example).
- *Existing utilisation of places.* USC agrees with this, but with the caveat that greater or lesser levels of over-enrolment is more likely a reflection of the university's capacity to carry unfunded teaching load, rather than demand (as was the case for USC in 2018, where caps were imposed at a level of over-enrolment equal to around \$1.8m of CSP funding foregone.).
- *Completions and transitions, and attrition.* The nature of study in regional areas and in catchment with disadvantage suggests caution with these criteria, as the immediacy of reporting assessment does not match the intentions and actions of students who may require one or more years of break between study bursts to balance personal, employment, and study obligations.
- *Demonstrated demand, demonstrated need.* USC strongly agrees with these criteria, and they are the underlying reason why USC has lobbied for additional places (*community need*). Note again that the USC catchment includes the two areas with the lowest rate of young adult degree attainment in the country – Moreton Bay North (13%) and Wide Bay (14%). Sub-bachelor offerings are part of a larger set of initiatives designed to address long-standing disadvantage in these areas, in education, health and socio-economic status.

Finally, the Consultation Paper seeks suggestions on how universities currently without sub-bachelor load can demonstrate performance. **For USC, the request is to provide the sub-bachelor CSPs based on community need (circa 300 EFTSL), and then allow USC three years to implement and build these courses.** Success or otherwise should be apparent then.

Consultation Issues – postgraduate places

The University of the Sunshine Coast, like many regional universities, has traditionally applied the majority of its postgraduate CSPs to teacher training (Graduate Diploma, and now Master's) and to those other courses that

have been formally approved by the Department (Social Work, Counselling, Clinical Psychology and Nursing). As a result, the last few years have seen both over-enrolment and under-enrolment, as pent-up demand was exhausted in the final days of the Graduate Diploma and a new market has now developed for the Master's. The situation now seems to have settled, although the cycle is informative for any approach to reallocation based on utilisation – there are times when a short-term assessment should be avoided.

The legacy issue, as outlined in the Consultation Paper, is the extreme inconsistency between institutions, even when they are in geographic proximity (for example, differences in the Master of Education, where CSPs are available at QUT and UQ but not USC). It is presumed that this will be picked up under the heading of “*which courses are subsidised*”.

In terms of the criteria listed in the Consultation Paper:

- *Which courses are subsidised.* As a rule of thumb, USC has approached the allocation of postgraduate approval process CSPs under the informal criteria described in the paper – professional entry, skills shortage or national significance, as this had been the basis on our PG places had been approved. The University is generally supportive of continuing in this vein, with the suggestion that some mechanism for taking account of regional need (as opposed to community benefit, which focusses more on the split of private financial benefit and what society derives from the profession) be incorporated. For the communities that USC services, an example would be specialist mental health training, such as around PTSD treatment for returned veterans (there is a large community on the Sunshine Coast).
- *Existing utilisation of places:* As pointed out, the assessment should not be short-term, and should include some mechanism for “special / unusual circumstances”.
- *Student satisfaction:* The view of USC is that this should be included in any institutional assessment, but not particularly emphasised in postgraduate CSP allocation.
- *Graduate employment:* As noted in the paper, this will be complicated by many postgraduate students already being employed in a cognate area. However, especially where the postgraduate CSPs were allocated on the basis of some identified need, the success in moving graduates into the identified area should be taken into account.
- *Equity groups:* The University is strongly supportive equity group representation being of high importance when it is relevant, but not necessary for all applications. Examples include: Indigenous representation in health and care study; regional, rural and remote (RRR) student representation in health, science, business and education; LSES and RRR student representation in health and psychological sciences; and the general concept of balancing gender representation in any “unbalanced” cognate area.

In addition, given that there is inconsistency across universities with the allocation of PG CSPs, due to no clear guidelines in recent years and with many universities using legacy load from many years ago, it would be timely for a review of all existing postgraduate courses offered as CSP. We have many conversations with students about why a particular course is commonwealth supported at another institution and not at ours, as even if we had a surplus of places, it would have been assessed as not meeting the criteria. We understand that this would take some time and that teach-out would be required, but this would create a more ‘level playing’ field for the allocation of places. There needs to be clear guidelines around courses required for professional entry and those designed for professional development.

Other issues / questions

As requested in the Consultation Paper:

- *Geographic representation:* It is difficult to justify the current under-representation of Queensland in the allocation of sub-bachelor and postgraduate CSPs, and some re-alignment with population trends is warranted. There are two additional points to make: (1) **USC strongly advocates preferential consideration of regional areas and areas with extreme disadvantage** (for example, Moreton Bay North and Wide Bay), particularly in the allocation of sub-bachelor CSPs. As previously mentioned, a demand driven approach to enabling courses and other sub-bachelor provision in RRR areas would not require a large percentage of the national places, but has the potential to make a significant difference to education disadvantage in those communities, and (2) some consideration of online provision must be made (i.e. it is important that places given to an institution be used in the local catchment).
- *Minimum viable allocation:* This is dependent on circumstance – discipline type, delivery approach, etc. However, some trends are possible to describe. “Break even” for units of study and course delivery depends firstly on whether the activity is viewed as a marginal cost, or whether it must pay a portion of central infrastructure, back-office and institutionally-sponsored research. For USC, the main campus (Sippy Downs, eventually in partnership with the USC Moreton Bay campus) is viewed as responsible for all back-office costs, and the regional / peri-regional operations (mainly Fraser Coast, Gympie and Caboolture) are internally assessed on a marginal-cost scenario. The marginal cost of teaching varies from discipline-to-discipline. For cognate areas without the need for laboratories and placements (e.g. business), the marginal cost of teaching may be of the order of 30% of the fully absorbed cost. For cognate areas requiring laboratories and placements (e.g. nursing), the marginal cost may be 70%+ of the fully absorbed cost. To gain break-even student:staff ratios, the conclusion is that of the order of 15-18 EFTSL per full-time academic staff member is required for the regional campuses at marginal costing. Depending on the level of course and unit of study sharing between courses, **this suggests that around 25-30 EFTSL are needed as minimum viable course allocation for a marginally-costed course**, such as in a regional setting. In a metropolitan setting, there is greater opportunity for sharing units of study between courses, which helps offset the need for contributions towards institutional back-office expenses: 25-30 EFTSL is still a reasonable minimum number for a sub-bachelor or postgraduate coursework course.
- *How often should places be re-distributed, and what proportion should be re-distributed:* Some time is required to communicate courses to a catchment, to ramp up teaching and then, if the course is ceased, to teach out. This suggests three years would be the minimum time between re-distribution, if only a small percentage (e.g. 20-25%) of a university’s total load is redistributed in each round.
- *Views on criteria, and views on how to not lock out provision where there is a limited track record:* USC’s views and rationale are detailed earlier in this response.