

2024 Disability Support Fund (DSF) Reports

Reporting Drop-In Sessions - FAQs

Monday 24/2/2025, Wednesday 25/2/2025, Tuesday 4/3/2025, and Wednesday 5/3/2025

Program Intent

In 2025, the Australian Government committed to providing further support to students with disability and quadrupled the Disability Support Fund (DSF) component of the Disability Support Program (DSP) from \$13 million to \$53 million (indexed) per year. The underpinning intent of this funding increase is to provide **supplementary** support to assist universities in delivering more programs and services to empower students with disability to access, participate and succeed in undergraduate and post-graduate studies

The <u>amendment</u> to the <u>Higher Education Provider Guidelines 2022</u> operationalises this underpinning intent, setting out the expectations and conditions that apply to expenditure of DSF funding. As per the revised guidelines (Part 3, Division 1, Section 41) a broader range of activities are now eligible under the DSF including but not limited to:

- implementation of universal design for learning (UDL);
- salaries for those staff whose only duties involve supporting students with disability;
- purchase of ICT licenses in bulk (such as for inclusion support software for students with disability);
- lowering the high-cost-claims threshold to \$5,000 per student with disability (ensuring a larger reach of students).

This is in addition to the pre-existing eligible activities as follows:

- activities aimed at attracting and supporting students with disability to participate in higher education;
- educational support and equipment for students with disability;
- making modifications to course content, teaching materials and delivery methods to better meet the needs of students with disability; and
- training staff to support students with disability.

Some practical examples under the above listed eligible activities may be, but not limited to:

1. hiring of additional disability advisors who advise on reasonable adjustments and coordinate support services, including mentoring and coaching students, liaising with academic staff, teaching and coaching academic staff, and teaching how to use assistive technology etc;

- professional development;
- resource development for university staff;
- campus access;
- 2. drafting and/or revising Disability Action Plans (DAPs);
 - assistive technology specialists;
- 3. staff employed to implement individual adjustments, e.g. accessible materials; and
- 4. teaching and learning staff with specialist disability knowledge.

The increase in funding is backdated to the 2024 funding year. The department understands the likelihood of rollovers due to late notification of increased funding and will work with universities to reduce underspends over the next year.

The intent of annual reporting against a provider's DSF funding is to demonstrate accountability to the Minister for Education as assessed by the Department of Education. As a secondary outcome, the report (provided to the department) is intended to enhance sector performance insights and drive improvements to future policy and program delivery approaches.

The department will take a great interest in analysing reported expenditures to consolidate and verify whether the overall increase in funds has had a pronounced effect on increasing student reach as well as statistical increases in student access, participation and completion.

Please note: additional support should not replace services that the University provides for all students, or that the University is required to provide to meet its minimum requirements under the *Disability Discrimination Act 1992* (DDA) and *Disability Standards for Education 2005* (DSE). It may be used to provide supplementary support to implement adjustments or specialist services for students with disability, or to build the capacity of the university in inclusive practices, including universal design for learning in order to directly improve access, participation and success for students with disabilities.

Frequently Asked Questions

Reporting

1. What is meant by pre-access, access, participation, and completion?

These terms align with the four student lifecycle stages, drawn from the <u>Student Equity in Higher Education Evaluation Framework (SEHEEF)</u>, which the department uses across its programs to structure reporting and other evaluation of equity activity.

- Pre-access: the period before a student enrols and largely involves outreach activity.
- Access: the process a student undertakes to successfully enrol and mostly involves pathways and admissions activity.
- Participation: a student's transition into, and engagement in, higher education itself, with activity spanning from life skills workshops to academic tutoring.
- **Completion:** the period where a student receives their qualification and transitions into the workforce, with activities including career advice, networking events, internships, and workintegrated learning (Note: "Completion" has been included as a proxy for SEHEEF's "Attainment & Transition Out").

Using these reporting categories provides the department insight into the stages in a student's higher education experience at which providers are most likely to provide support. If costs are not able to be proportioned exactly, a best possible estimate against each student lifecycle will suffice. For additional information regarding the student lifecycle stages, providers are encouraged to consult pages 4 and 7 of the <u>SEHEEF Guidance Manual</u>.

2. Must columns H and J in the "1. Expenditure Data" tab of the Enrolments-Based Funding report total 100%?

Yes, Columns H and J must total 100%.

Funding Increase

3. What percentage of High-Cost Claims (HCCs) will be reimbursed?

The percentage of HCCs reimbursed is determined by the total funds claimed by providers and the number of providers who report any HCCs at all. For context, when \$5,738,668 was available within the HCC funding envelope in 2023, and 33 out of 38 universities claimed HCCs in their reporting, the department reimbursed 98.8% of all reported HCCs. A total of \$23.9 million is available for all HCCs in 2024.

As total DSF funding has quadrupled to \$53.1 million for 2024 (of which \$23.9m will be allocated to the HCC funding envelope), the department finds it likely that all claims will be reimbursed, even with per-student support costs reducing from \$10,631 to \$5,000 for HCCs – thus creating a wider reach and larger number of HCCs.

Under the <u>Higher Education Support (Other Grants) Guidelines 2022</u> (Part 3, Division 1, Section 39(8)), when the sum of all HCCs reported by providers is less than the funding envelope for HCCs (\$23.9 million in 2024), any unspent funds remaining, after reporting, will be transferred into the Enrolments-Based Funding (EBF) funding envelope and added to each provider's EBF allocation.

To summarise, if reported HCCs total less than \$23.9 million in 2024, all eligible providers will receive more in EBF funds than originally outlined in the indicative funding allocation emails sent by the department on 17 February 2025.

4. When will payments be made to universities?

Funds are paid as soon as the Minister has approved the publishing of the latest student data. Please note DSF is paid in arrears. Allocations are calculated using the content of the DSF reports and verified student data for HCCs submitted. Exact timing of payments cannot be confirmed due to the dependence on student data being published.

Mainstream Funding

5. What kinds of activity should providers report in the "2. Mainstream University Funding" tab?

Mainstream funding refers to the university's overall budget and may be used by all areas of the university to support various activities, including activities supplemented by the DSF.

When reporting on mainstream funding, practitioners should include all activities intended to benefit students with disability, whether they have already appeared in the "1. Expenditure Data" tab or not. Those completing the report are recommended to work with the provider's finance team to determine how activity costs are split between DSF and mainstream funding sources. Providers are encouraged to include this information in the report to indicate the baseline of funding they are providing to disability services in comparison to DSF's supplementary contributions.

If mainstream funding figures are not able to be identified, providers may instead acknowledge that there is a mainstream funding contribution without including a specific amount. However, this impacts the department's ability to accurately gauge the DSF's impact for the provider and the sector in analysis of report data.

6. In the mainstream tab, should dual sector providers (e.g. those who provide both VET and higher education courses) only report details regarding higher education?

Yes, DSF reporting relates only to higher education activity, as supported by the program objectives in the <u>Higher Education Support (Other Grants) Guidelines 2022</u> (Part 3, Division 1, Section 36).

- In the Enrolments-Based Funding Report (tab "2. Mainstream University Funding") there is no requirement to report activities that support VET or other non-higher education students.
- In the **High-Cost Claims Form**, in the instance of an overlap between sectors (e.g. during student transfers), providers are encouraged to clearly identify how any relevant costs are split, giving any necessary context as a comment in the relevant cell(s).

7. Do mainstream costs include staff salaries? Can additional staff be claimed?

Mainstream costs include staff salaries. If it is not possible to list figures for staff salaries, it is sufficient to report the staff in Column A (Tab 2. Mainstream University Funding) without recording amounts in Columns B to F. The cost of current salaried disability staff cannot be claimed under the DSF as universities have an obligation to contribute to staff salaries. However, the cost of hiring additional staff to undertake specific activities for students with disability can be claimed.

Providers are encouraged to indicate any increases in disability support staff numbers and costs. DSF-funded staff must be qualified and experienced, meaning a specialist, social worker, and/or someone with at least 5 years industry experience. As such, administrative roles are not eligible.

Note: The department does not direct universities on how they wish to employ their staff. The above only speaks to the expenditure of DSF funding.

Eligibility of Activities and Supports

8. When an activity or support is available to all students and may not specifically target students with disability (e.g. academic support), can providers claim the cost of providing that support to students with disability?

When, for example, academic support is available to all students as part of mainstream funding, the DSF can only cover the cost of providing academic support to students with disability beyond what is made available to students generally. E.g. if up to 10 hours of tutoring is available to all students and a student with disability requires 14 hours (additional 4 hours) of tutoring, only the cost of the additional 4 hours <u>may</u> be an eligible cost under the DSF pending approval. This reflects the supplementary nature of DSF funding. This approach is in contravention of the non-eligible list of activities within the <u>Higher Education Support (Other Grants) Guidelines 2022</u>. As such, if additional academic support is made available via a disability practitioner referral, it is highly recommended the university contact the department to discuss the circumstances surrounding this request and seek an exemption from the guidelines for the additional support costs required

9. Can refurbishment of internal spaces (e.g. sensory rooms for neurodivergent students) be claimed?

Where there is refurbishment of a space that would be classified as an infrastructure activity, the cost of that activity cannot be claimed under the DSF. However, the cost of sensory equipment purchased for and only used by students with disability can be claimed. This may include specific desks, lighting, fidget toys, etc. to create a sensory space.

10. Can activities focused on attracting students with disability to participate, or activities supporting the student experience, be claimed?

Yes. Most activities with this focus will be eligible, as Access and Participation are student lifecycle stages supported by DSF, assuming that all other eligibility criteria are satisfied.

11. Can transport services be claimed?

As per the non-eligible list of activities within the <u>Higher Education Support (Other Grants)</u> <u>Guidelines 2022</u>, no transport, support service or equipment is eligible for DSF funding if it is already being claimed (or could reasonably be claimed) under the National Disability Insurance Scheme (NDIS).

The DSF is only applicable to a student's requirements to meet their academic needs, not their personal needs. For example, on-campus carts and buggies can be claimed to improve academic participation for students with disability if they allow those students to promptly attend lectures when otherwise they would be running late or be unable to attend.

12. How can providers best report costs for staff whose work crosses outside of the disability sector?

An approximation of a staff members' role in relation to solely supporting students with disability can be made by estimating the percentage of the role dedicated to eligible work.

As an example, for a salaried staff member who works directly with students with disability for two days each week and does administrative work in the First Nations office for one day each week, 2/3 of their salary should be included in the DSF report. Any DSF-eligible costs for those two days each week should be included in Column B of the "1. Expenditure Data" tab of the Enrolments-Based Funding Report.

The same process outlined above also applies to reporting on multiple salaried staff who spend a portion of their time supporting students with disability under one activity. However, providers must ensure that only the work specifically supporting students with disability is included in reporting.

13. Can on-costs – superannuation, Long Service Leave, tax, sick leave, etc. – for disability staff salaries be claimed?

As with most other equity programs administered by the department, on-costs for staff cannot be claimed under the DSF.

14. Given that Universal Design for Learning (UDL) implementation can now be claimed under DSF, is the employment of skilled staff to implement UDL in existing courses also eligible?

Staff salaries and fees for those employed to redesign current curricula to implement UDL are eligible under DSF. However, the staff must only be working on UDL, specifically for the benefit and inclusion of students with disability.

15. Can a role established to build a safer environment by targeting discrimination (including disability discrimination) be partially claimed against DSF?

DSF is not a replacement for core institutionally funded activities aimed at ensuring student wellbeing and safety, including for students with disability. This activity should be covered by mainstream funding in its entirety under the provider's core responsibility to provide support and safety to all its students.

16. What are the limitations placed on eligible professional development for staff? Could a staff member's PhD in a relevant area be supported by the DSF?

There is an expectation that all staff hired are already fully qualified for their roles. DSF is a source of supplementary funding, and professional development under DSF is considered to include training staff to physically and mentally support students with disability. Using funding to support a staff member's PhD distracts from the focus of principally supporting students with a disability to participate and succeed in higher education.

17. Can DSF funding be used to support scholarships?

No. DSF is considered supplementary funding with very specifically targeted eligible activities. As such, scholarships may be funded by mainstream funding or any other source which specifically allows scholarships as an allowable activity.

18. Can students employed by the university in a role to lead or support students with disability, be paid using DSF funding?

If the students are employed by the university (casually or otherwise), their costs can be claimed under DSF as staffing costs. However, DSF funds cannot be used for scholarships, even when that payment is related to their duties.

19. Can activities and supports for international students be claimed?

No, the DSF can only fund activities and supports benefitting domestic students.

The Future of DSF

20. How will reporting templates be presented going forward? Can they be distributed earlier?

The structure of DSF reporting templates will likely remain similar with some additional components such as enquiring how the university meets its legislative requirements under the *Disability Standards for Education 2005* (DSE) and *Disability Discrimination Act 1992* (DDA) as well as seek an update on the drafting/existence of a Disability Action Plan (DAP). Components of the SEHEEF will also continue to be adopted into DSF reporting as it is an appropriate model for evaluation across equity and disability programs.

As the sector is in receipt of additional funding from 2024 onwards, there will be a revision of the current reporting template to be used for reporting 2025 activities, due in March 2026.

The department has undertaken to share the draft reporting template mid-year for feedback and aims to disseminate a finalised version by November 2025, which will be due in March 2026.

21. How can providers and the department manage large rollovers?

In 2025, the department understands the likelihood of rollovers due to late notification of increased funding. If a provider is unable to reduce their underspend balance, the department will work with universities to create a plan to reduce the underspend balance. This may involve a re-evaluation of the type, number, or scale of the activities the provider conducts to support students with disability. Alternately, it may involve assisting with locating and leveraging useful student data such as grades, participation rates, withdrawal rates, and student surveys. If neither of the above approaches are effective, funds may be claimed back and redistributed amongst other institutions based on the DSF funding formula (via a returns-reallocations process).

Other Questions

22. Does the department require providers to maintain a Disability Action Plan (DAP) to receive DSF funding?

The absence of a DAP does not affect a provider's DSF allocation, but the department strongly encourages providers to draft and maintain a current quality DAP, covering a 3-5-year period and published on the <u>Australian Human Rights Commission's Register of Disability Discrimination Act Action Plans</u> to ensure accountability and stimulate continued progress across the sector. With the new eligible activities added to the Other Grants Guidelines, disability advisors can be engaged to create a DAP using DSF funds. Ideally, such a DAP is co-designed and co-implemented with disability practitioners and managers as well as students with disability who have lived experience.