

# Submission in Response to Consultation Paper on the Reallocation of Commonwealth Supported Places for Enabling, Sub-Bachelor and Postgraduate Courses

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## Executive Summary

Federation University Australia (FedUni) welcomes the opportunity to respond to the Government's consultation paper on the reallocation of Commonwealth Supported Places (CSP) for enabling, sub-bachelor and postgraduate courses. The University supports the review of designated load allocations to better reflect the demands on institutions for enabling, sub-bachelor and postgraduate programs, particularly given the shifts in demand for higher education since the introduction of the demand driven system, and more specifically within regional and rural settings.

Since 2014, the University has been challenged by the need to consistently manage our Funding Agreement allocations and restrict enrolments in enabling load, whilst carrying excess load in postgraduate allocations. However, due to restrictions of designated load limits and regulation, the University has been unable to reallocate load to where demand exists for current programs, and further develop viable new programs to service the rural and regional areas in which the University operates.

During this 5 year period, the University has been positioning itself by both widening the operational footprint with the addition of two new campuses (Gippsland and Berwick), and internally restructuring the Academic Portfolio to position for future growth in domestic higher education. Having arrived at a position to capitalise on this growth strategy, the University is now effectively prevented from growing its enabling and sub-bachelor load, and is restricted in postgraduate CSP delivery as a result of cuts in allocations arising from MYEFO December 2017.

The inflexibility of the designated load system has resulted in an under-provision of postgraduate delivery, capped cohort enrolments in enabling load, and an inability to further develop viable sub-bachelor programs to meet the domestic demands of the University's communities. It is therefore timely to consider changes to the designated load system to allow universities the flexibility to shift load between postgraduate levels and sub-bachelor levels. This would allow universities the ability to tailor their program development and delivery to meet domestic demand, rather than restricting their delivery to meet system regulation requirements.

As sub-bachelor diploma and postgraduate programs tend to be shorter than the three year undergraduate degrees, we propose that designated load allocations be reviewed every two years. This would allow universities sufficient time to plan future delivery and manage existing cohorts within program timeframes to meet domestic demand, whilst still allowing the Government the overarching ability to alter allocations to meet national domestic demand and population trends.

In relation to timing, enabling programs tend to be shorter again. Therefore, the University would recommend an annual review of allocations across the sector to provide sufficient time for planned delivery, whilst allowing re-allocations of load across the sector to best meet shifting demand across regions.

It is essential for geographical locations to be considered in the reallocation of CSP in designated load. Regional, rural and remote students tend to be drawn from the lower socio economic groups, and it is this cohort of students who would benefit from the re-allocation of designated load across the sector.

It is also important that people in regional and rural areas are provided with opportunities to acquire postgraduate qualifications to increase regional workforce skill levels. Any reallocation of load across the sector must take into consideration geographical location in order to drive participation in higher education by allowing universities that operate in those regions the ability to develop and offer viable programs, without the limiting constraints of load restriction.

## **Summary of Recommendations**

Federation University Australia recommends:

1. Universities be given the flexibility to shift designated load allocations between sub-bachelor and postgraduate qualifications, allowing them to effectively tailor their Maximum Base Grant Allocation to the nature of the demand in the regions in which they operate.
2. Federation University Australia's total Designated Load allocations be restored to the CSP levels prior to MYEFO of 2017, on the premise that universities be given the flexibility to shift load between postgraduate and sub-bachelor levels, noted in point one above.
3. Designated Load allocations be maintained on two year Funding Agreement amendments, allowing universities to plan for future delivery through program renewal, whilst maintaining existing delivery arrangements longer than a 12 month cycle.
4. Enabling allocations across the sector be managed on an annual basis as a result of the nature of program length and delivery, allowing the best utilisation by the sector in relation to population trends and educational demands.
5. Geographical location should be considered when allocating institutional designated loads for enabling, sub-bachelor pathway programs and postgraduate program delivery across Australia. This would provide further educational opportunities to rural and regional populations, as well as those from disadvantaged backgrounds linked to location.
6. Minimum viable allocations must be large enough to empower institutions to innovate, develop and deploy enabling, sub-bachelor and postgraduate programs in line with educational demand.

## Enabling Load

FedUni has carefully managed its enabling enrolments to remain as close to its CSP allocation as possible, despite the vagaries of student demand. The enrolment figures therefore do not accurately reflect demand that has consistently exceeded the institution's modest allocation.

### Current Load Utilisation

FedUni Enabling Load Utilisation Summary 2014 - 2018					
	2014	2015	2016	2017	2018
Funding Contract - Enabling places	80.0	130.0	130.0	130.0	130.0
Total Delivered - Enabling Places	70.1	104.0	134.4	118.0	130.1
Managed variance to Funding Agreement	9.9	26.0	-4.4	12.0	-0.1

*Federation University's admission team have been actively managing the enrolments in our enabling program to keep them as close as possible to Funding Agreement allocations. Once student cohorts are filled for delivery, excess student demand is put on a waiting list for the next semester intake.*

*A description of the University's FAST (Foundation Access Studies) enabling program is included at Appendix 1.*

## Sub-Bachelor Load

FedUni has a current Funding Agreement allocation of 149 CSPs, of which 130 are utilised within our enabling program. This does not leave an adequate balance of CSPs to allow the University to further develop and offer viable pathway programs for Higher Education at the sub-bachelor level.

The University is concerned that progressively, over the last two years, Funding Agreement allocations have decreased in postgraduate load by 339 places, yet we have not been able to develop viable sub-bachelor pathway programs because of our inability to reallocate load. The University argues that had this flexibility been available, diploma pathway programs for regional and rural participants could have been developed and delivered earlier, whilst still operating within the Maximum Base Grant Allocation of our Funding Agreements.

Detail on the development of a possible diploma pathway program, which would complement the FAST enabling program is provided in Appendix 2. The development of such innovative pathways will require the provision of greater sub-bachelor load to the University.

## Postgraduate Load

At the beginning of 2014, the University began delivering programs from the Churchill campus in Gippsland, acquired from Monash University. During the period from 2014 to 2017, the University focused its efforts on program consolidation between the former University of Ballarat and Monash Gippsland campus offerings. Therefore, the development of new program offerings allowing for growth in postgraduate load were stifled.

Throughout 2017 and 2018, the University restructured the Academic Portfolio into six new Higher Education Schools for program delivery, again pausing the development and growth in postgraduate load.

From 2019, the University is now embarking on higher education program redevelopment and renewal, which will place greater emphasis on postgraduate delivery. This comes at a time when our Funding Agreement postgraduate load allocation has been cut in 2018 and 2019 by 219 EFTSL and 120 EFTSL respectively. An effective reduction in designated postgraduate load of 45% in a little over 12 months is now thwarting any further growth in postgraduate offerings by the University.

Planned delivery of postgraduate CSP programs for 2019 is set for 400+ EFTSL. This will fully utilise our Funding Agreement allocations and leave no opportunity for further growth or the reallocation of load within our agreement from postgraduate to sub-bachelor levels.

#### **Postgraduate Load Utilisation:**

<b>FedUni Postgraduate Load Utilisation Summary 2014 - 2019</b>						
	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>
Funding Contract - Postgraduate Allocation	626.0	708.0	746.0	748.9	530.0	410
Total Delivered - Postgraduate Places	328.2	404.2	418.4	357.4	353.8	400
Under-Utilisation	-297.8	-303.8	-327.6	-391.5	-176.2	10.0

*Load is predominantly utilised in supporting students enrolled into programs in Education and Social Sciences, whilst maintaining consistent delivery across the reported time frame in Para-medicine, Midwifery and Engineering.*

## Appendix 1: Federation University – Enabling Load FAST Program

Federation University Australia's enabling program, FAST (Foundation Access Studies), has operated since 1990 to provide students with the requisite skills and knowledge to undertake further tertiary education. It is aimed at students who enter university through non-traditional pathways, particularly those without an ATAR. Since 2015, it has experienced strong demand from school leavers with low ATARs, students who completed unscored VCE and students who completed VCAL. These students are seeking a preparatory pathway that provides them with an opportunity to hone their study skills for the tertiary environment.

Federation University is presently undertaking a significant and strategic repositioning that will entail a progressive return to ATAR score selection processes for undergraduate degrees over the next two years. The effects of this are already being experienced with an increase in early applications to the FAST program. Compared to this time last year, mature age and non-school leaver direct applications have increased by 34% (rising from 91 in 2018 to presently 122 for 2019). VTAC applications from school leavers have increased 55.8% (159 total applications for 2019 compared to 102 applications at this point in 2018). Notably, VTAC first preferences have increased 173% (from 15 at this point in 2018, up to 41 for 2019).

Among recent innovations to the FAST pathway has been the inclusion of:

- A core subject – the first year undergraduate subject Understanding University Learning (for which students receive credit when they enrol into degrees whose program structure contains a non-specific elective in the first year). This subject introduces students to the workload typical of an undergraduate subject along with the learning and assessment practices and expectations of a typical undergraduate subject.
- A STEM elective subject – the first year undergraduate maths subject Introduction to Technical Mathematics (for which students receive credit when they enrol into degrees whose program structure requires VCE level mathematics and contains a non-specific elective in the first year). This subject provides successful completers with the mathematics knowledge and skills required for entry into an engineering degree or a science/mathematics degree. In addition, this subject introduces students to the workload typical of an undergraduate subject along with the learning and assessment practices and expectations of a typical undergraduate subject.
- One undergraduate subject (and two for those students who elect to undertake the advanced mathematics elective) in the FAST enabling program intended to ensure completers are equipped for the rigours of undergraduate study at Federation University or other tertiary providers. The inclusion of undergraduate course/s also provides completers with a record of comparable achievement that can be demonstrated to a range of tertiary institutions. In this way the FAST program provides a pathway to tertiary institutions other than itself for those students seeking opportunities not provided by Federation University. Students are known to have utilised the FAST program as a pathway into a range of Victorian universities, including Deakin and La Trobe.

Further innovation in the FAST program is reliant upon securing additional enabling load. This would provide for the establishment of an Extended FAST program to address the specific literacy needs of some applicants.

The last three years have seen an increased number of culturally and Linguistically Diverse (CALD) applicants from Non-English Speaking Backgrounds (NESB) who demonstrate a need for further English language acquisition when undertaking the program's Literacy selection test. A number of students have undertaken the FAST program and been unable to demonstrate the English language proficiency required to successfully pursue university study. The language needs of applicants from migrant and permanent resident communities in the campuses' local catchments could be addressed by undertaking subjects from the English for Academic Purposes (EAP) program.

Undertaken prior to commencing FAST, this initiative would provide up to 15 weeks (1 semester) of instruction to assist students to acquire English language proficiencies in Speaking, Listening, Reading and Writing tailored to the requirements of university study. This extension of the FAST program (to a full year) could be offered to students on the basis of their results in the Literacy application test, provide appropriate support for these students, remove language barriers for under-represented groups, and address emerging workforce needs and relative socio-economic disadvantage across regions that the university services.

It is anticipated a modest increase in enabling load will allow the FAST program to satisfy established and emerging unmet demand in conjunction with the introduction of a Diploma of University Studies utilising sub-degree load.

## Appendix 2 – Sub-Bachelor Diploma Program Development

A Diploma of University Studies is being developed for introduction in 2020, subject to the securing of sub-degree load.

The Diploma of University Studies is a three semester preparatory pathway that delivers credit/advanced standing for one full year of bachelor degree studies. Students who complete an approved specialisation stream (equivalent to a cognate degree program's first year) would articulate into that degree. The three-semester (1.5 year) Diploma of University Studies is specifically designed to prepare students academically with the skills and preparation necessary for success in a bachelor degree program prior to undertaking their bachelor studies.

It provides graduates with a recognised sub-degree qualification (university diploma) that will enable them to undertake appropriate para-professional work in a field related to their area of specialisation (discipline/major). For example:

- graduates of the Diploma of University Studies (Information Technology) will be sufficiently skilled to commence work in an IT business or department on the basis of having completed the first year of the Bachelor of Information Technology degree;
- graduates of the Diploma of University Studies (Engineering) will be sufficiently skilled in the use of CAD programs to commence work in an Engineering business;
- graduates of the Diploma of University Studies (Sport, Physical and Outdoor Education) will be eligible to register as swimming instructors; and,
- graduates of the Diploma of University Studies (Outdoor Environmental Education) will be eligible to register as swimming instructors.

The discipline-specific curriculum for each diploma has been developed by the relevant academic schools of the university in consultation with their various professional bodies. The curriculum of each specialisation replicates that of the first year of the cognate, professionally accredited, undergraduate degree.

As a preparatory program for further university studies the diploma provides students with the necessary academic skills and behaviours to develop 'capital' in the university culture, successfully engage with the higher education learning environment, achieve an effective student identity, and gain an entry-level depth of understanding in one discipline area/specialisation. The completed diploma entitles students to articulate into the second year of their desired cognate bachelor's degree as graduates receive credit/advanced standing for the first year of that degree program.

The diploma program provides flexibility for students who might otherwise prematurely discontinue their higher education studies on account of changes in their area of interest, disenchantment with their initial specialisation choice, or disappointing academic results due to a mismatch of academic aptitude with chosen specialisation requirements. Owing to the diploma's ability to accommodate a range of subjects from varied discipline/specialisation areas, students are able to graduate with a generic Diploma of University Studies that will entitle them to enter the first year of an undergraduate degree with credit/advanced standing for successfully completed subjects related to their degree. Accordingly, the diploma is an effective tool for the minimisation of first-year student attrition.



In addition to theoretical and technical knowledge in the selected discipline/specialisation area the Diploma of University Studies will provide students with broader areas of competency that include:

- the ability to apply knowledge and skills in a range of contexts relating to further tertiary study and/or in a professional workplace;
- the skills required of an independent, lifelong learner;
- the ability to apply, in a practical context, critical thinking and theoretical knowledge;
- well-developed interpersonal skills; and,
- well-developed literacy and numeracy skills.

The establishment of the Diploma of University Studies as a pathway to a bachelor degree program addresses the rising demand from prospective university students for incrementally designed study/qualification programs which, based on current demand, is an area of future growth among applicants who:

- do not have the secondary school pre-requisites for direct entry to degree programs;
- would be better suited to a more supported introduction to university study;
- would prefer to build their confidence and skills in a scaffolded pathway with three exit options; or,
- require an interim qualification with which to support themselves whilst they undertake and complete an undergraduate degree.

Notwithstanding the fact that there is a range of TAFE awards available at diploma level, these are not necessarily available in all areas of specialisation. For example, in the local catchment of the Gippsland campus, there is currently no available vocational education pathway for students interested in an Information Technology career or qualification. Additionally, TAFE studies are not always comprised of curricula that provide pathways that can comprehensively map across to undergraduate programs for credit/advanced standing transfer purposes. The structure of the Diploma of University Studies, because of its embedded area of specialisation, allows students to articulate into their chosen cognate degree with credit for a complete body of first-year study. This design facilitates an economical use of students' resources in terms of time and money.

A significant area of concern across the higher education sector is the number of students who enrol in university degree programs, but who do not successfully complete their studies and who consequently exit with no recognised qualification. Research shows that there is a major point of transition for students when they exit an enabling program and commence their bachelor degree studies in the new academic environment of a university School or Department. The diploma offers students a longer and more supported preparation for undergraduate study that delivers a scaled hand-over from the 'enabling' environment. This model alleviates any 'culture shock' that often occurs when students experience an abrupt withdrawal of the scaffolding provided by the enabling setting.

A more gradual familiarisation process with the School delivering their degree program ensures that students have the security and sense of belonging to the academic environment that is essential for a successful transition from 1<sup>st</sup> year to 2<sup>nd</sup> year undergraduate studies and beyond. The Diploma program can provide this style of transition for those who need it.