

22 January 2010

Mr Jason Coutts

Branch Manager

Equity, Performance and Indigenous Branch

Department of Education, Employment and Workplace Relations

Dear Jason

Thank you for the opportunity to provide comment on the draft Guidelines for the Higher Education Participation and Partnerships Program (HEPPP).

Innovative Research Universities (IRU) strongly supports the government's ambitions to raise the higher education participation and attainment of low SES Australians. The allocation of appropriate funding to facilitate partnerships with stakeholders aimed at raising educational aspirations and to provide support to students once enrolled is critically important to the achievement of the government's target.

General comments

1. While there is reference within the Guidelines to partnerships with other key stakeholders including schools and community groups, the detail with respect to eligibility and reporting suggests an almost singular focus on school partnerships. The Department's 2008 student statistical collection indicates that only 58 per cent of domestic commencing undergraduate students are aged 19 years or younger. Much of the national potential for increasing low SES educational attainment will be realised by working with disadvantaged communities to enhance educational aspirations for both mature-aged and school leaver generations.
2. The sector needs to have a consistent set of definitions to work with in responding to the government's performance objectives. The definition of low SES is still to be determined as an outcome of the separate consultation process currently underway. The outcomes of this process need to inform the definition adopted in the HEPPP Guidelines.

We also note some inconsistencies between the Guidelines and the Indicator Framework for Higher Education Performance Funding Discussion Paper. For example, the definition of 'completion rate' in the Guidelines is:

... the number of Australian resident undergraduate students who complete their course of study ... in a given year, as a proportion of all Australian resident undergraduate students enrolled in the previous year (p 4).

The definition in the Indicators Framework, however, is described as follows:

The current method divides the number of completions in the reference year by the number of commencements n years before, where n is the number of years of full-time study needed to complete a degree. (p18)

The Indicators Framework paper also points to the lack of validity of the completion rate indicator, describing it as volatile and ‘a fairly crude cross-sectional method’.

IRU questions the inclusion of completion rates in the HEPPP reporting requirements until a more consistent Department-wide definition and valid measure is determined.

3. Greater emphasis needs to be given in the Guidelines to targeting the most disadvantaged communities, many of which are not located in the traditional catchments of university campuses. The challenge of raising low SES participation will rely on the willingness, capacity and resourcing of universities to reach out beyond their historical physical boundaries.

Greater emphasis also needs to be given to ensuring that community and school outreach programs are sustainable and embedded in ongoing practice over the long term. There is a risk that a one year funding cycle will result in an emphasis on inputs (or activities) and short-term, novel programs. To make a sustained difference, we need programs aimed at building deep and longer term engagements which may take a number of years to produce measurable outcomes.

Proposals for funding should also demonstrate how the design of the intended program has been informed by the research evidence on the nature of successful outreach and support programs.

4. The Guidelines need some editorial attention, with incorrect cross-referencing of paragraphs or cross-referencing to paragraphs which don't exist. For example, paragraph 180.30 refers to an elusive paragraph 170.5.

Specific comments

Paragraph	Comment
1.55.7	Further to our comments above in relation to the definition of low SES, the inclusion of Centrelink recipients in the definition of low SES is problematic in our view. The larger group of students falling into this category are students in receipt of Youth Allowance, and consequently are full-time students. There are significant variations across universities in terms of the percentage of students studying part-time and this will significantly and unfairly distort the outcomes.

Paragraph	Comment
	Distance education providers, for example, typically have a higher percentage of part-time students. Given that many of the communities with low educational attainment rates are in rural and regional Australia, distance education provision offers an important mechanism for raising national participation of low SES Australians.
1.65.1	While the list of activities is not intended to be exhaustive, there is a risk that they will result in 'one size fits all' responses and may constrain creativity in the development of new approaches and mechanisms. For example, curriculum innovation and diversification for accessibility and relevance is now recognised as a key factor in increasing participation and success.
1.75.1	Clauses (b) and (d) require clarification in terms of base amounts specified for 2011 and 2013. Is the base amount referred to in (b) equal to the 2010 allocation? Is the base amount allocated in 2013 equal to the 2012 allocation of \$250,000?
1.50.1 (b) and 1.80.1	These paragraphs refer to 'proposals invited by the Minister' and proposals 'invited by the Department'. It is unclear if these refer to the same thing and if there will be a general call for proposals or whether proposals will be selectively invited. IRU supports an open and transparent process with clear published selection criteria.
1.85.1	<p>It is unclear from the Guidelines as to whether the principles outlined here are selection criteria for invited proposals (as discussed in paragraph 1.80) or whether they refer more broadly to eligibility for Component B. This needs to be made clearer in the document, as does the requirement for providers to comply with all or some of the listed principles.</p> <p>Some principles are overly-prescriptive and others are vague. While IRU strongly supports the principle of early intervention to raise aspirations and capability for university study, the restriction of the criteria to programs commencing prior to Year 9 risks creating significant gaps in university outreach programs. Initiatives targeting later years of schooling are an important part of the program mix in increasing access by low SES students.</p>

Paragraph	Comment
	Criteria (d) is very unclear.
1.90.1	This paragraph is confusing and needs to be rewritten to more clearly specify the eligibility requirements for each of the Components.
1.95.1	A reporting date of 31 October is too early to report on all activities undertaken during the calendar year or to provide some of the information specified in 1.95.10. The reporting date should be 31 st March of the year following that in which funding is provided. The Department needs to provide advice on the format of the required report as early as possible in the year to enable institutions to set up appropriate information collection and recording systems.
1.95.5	The use of the word 'targeted' is unclear.
1.95.10	As mentioned above, this infers a singular focus on school partnerships as the answer to raising low SES participation.
1.95.10 (d)	It is unclear what is intended by this item. It would be extremely challenging to report on the progress of students when the program is targeting communities of students rather than individuals. It is also not appropriate for universities to be held accountable for the progress of school students, given the complexity of factors which impact on school success.

Please contact us if you require any clarification on our comments.

Yours sincerely



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Director