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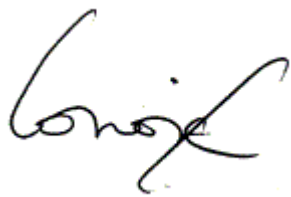
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Dear Bruce

Please find attached the IRU's comments on the Pro-form for reporting on the Higher Education Participation and Partnerships Program.

The IRU's comments are set against the Government's stated intention for the program following on from the recommendations of the 2008 Higher Education Review. We wish to ensure that the pro-forma once finalised collects the data required to assess the impact of HEPPP, assure Government that the funding was used suitably and is not overly burdensome to universities to complete.

Yours sincerely



Conor King  
Executive Director

## IRU submission: Higher Education Participation and Partnerships Program 2010 Reporting Pro Forma

The Higher Education Participation and Partnerships Program (HEPPP) is a significant element of the Government's higher education reform package set out the 2008 Budget statement *Transforming Australia's Higher Education System*. HEPPP is a major social inclusion initiative designed to encourage universities to raise attainment of university qualifications by people from low-SES backgrounds such that in the longer term they are as likely to do so as people from other backgrounds.

The HEPPP replaces the former equity program, which provided smaller amounts to universities to support equity initiatives. The Higher Education Review (Bradley) review identified the previous program as too small to be effective and not sufficiently sophisticated in its use.

Consistent with the Bradley recommendations there are two elements to HEPPP:

- a performance loading that increases university funding for each low-SES student enrolled; and
- a partnerships program to encourage universities to work with schools, communities and other education providers to increase the number of people from low-SES backgrounds with the capacity and desire to enroll in bachelor degrees.

The key outcome is to increase the number of people from low-SES backgrounds who complete a bachelor degree. The Government's target for 20% low-SES enrolments by 2020 is an initial measure of progress to this end.

The prime measure to assess the pro-forma for HEPPP reporting is the extent to which reporting focuses on information useful for assessing the outcomes of the program against its objectives. The second measure is its consistency with the Government's statement that "Rather than bureaucratic red tape and micromanaging of inputs, the Australian Government will work in partnership with universities but define clear and consistent targets for improvement and reform which will trigger reward payments".<sup>1</sup>

Overall the pro-forma fails to focus on collecting information that will provide good evidence about the impact of the funding but instead seeks to collect very detailed information which will divert effort away from the intent of the program and may also lead universities to shape their actions to support reporting rather than address the issue of under attainment of university qualifications by people from low-SES backgrounds.

The following sections consider in turn the nature of each HEPPP element to identify the necessary reporting for each with the last section commenting directly on each section of the proposed pro-forma, recommending a simplified, targeted collection.

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<sup>1</sup> *Transforming Australia's Higher Education System* 2008 Budget Statement, p47

### *Participation: the low-SES performance loading*

*Transforming Australia's Higher Education System* (p14) defines this element as “a financial incentive to expand their enrolment of low SES students, and to fund the intensive support needed to improve their completion and retention rates”<sup>2</sup>.

The global expectation of universities is that they will meet the educational needs of their students, taking account of learning skills and capacities at entry, providing effective learning support and other services. The performance element of HEPPP both recognizes the likely additional cost of many students from low-SES backgrounds and provides a financial incentive for universities to increase such enrolments.

As the funding increases to its full level in 2012 it will act increasingly as a reward incentive rather than be an explicit source of additional targeted expenditure, as universities reap – or not – the outcome of their low-SES enrolment initiatives. The reward for successfully enrolling more low-SES students acts to reduce the need to monitor the specific expenditure a university may take to achieve that end.

In practice, the performance loading is closely tied to the base grant funding universities receive to provide courses for students. To address the likely needs of low-SES students universities need to focus on the overall suitability of the teaching and learning they provide, both the mainstream classroom activities and various support services for students.

These services target the learning deficits which many low-SES students have. However, not every person from a low-SES background suffers such challenges, nor do people from middle and high SES backgrounds necessarily not suffer from them. It is also relevant that the definition of individuals as low-SES is based on a mix of home location and access to Government income support payments. It is reasonably accurate for assessing overall low-SES participation but not for identifying individuals.

For universities to structure programs that only support students who are captured by the definition will both include students who are not on an individual assessment low-SES and omit others who are. As a result most universities focus on addressing the learning skills of students as identified for each individual, knowing that in doing so they will address the needs of low-SES students.

Hence, there is little meaning in distinguishing use of the funding from the loading from other base funding directed at student learning and teaching. Indeed the risk is that the reporting proposed will be easier to meet by those institutions which focus on distinct support programs for, or significantly for, low SES students in contrast to those that look to provide a more integrated learning experience which encourages mainstream academic programs to take responsibility for the outcomes of all students backed by specific additional services for students.

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<sup>2</sup> *Transforming*, p14

The reporting for the participation element should therefore focus on what matters:

- is the level of low SES enrolment (actual numbers and proportion) rising? This is data already built into university reporting;
- what particular steps is the university taking to increase low-SES numbers. This can be addressed through a qualitative statement building on the universities' compact agreements which address questions of access and attainment.

Acquittal of funding beyond the annual provision of university financial statements is not necessary or meaningful. Universities do not specifically acquit many funding elements including the regional loading and enabling loading. Like the low-SES loading the focus is on whether a university is performing in the relevant area, attracting targeted students as the basis for determining the allocation of funding.

#### *Partnership: raising long term readiness for higher education*

The partnership element requires different reporting arrangements.

*Transforming Australia's Higher Education System* (p14) states that the element is to "link universities with low SES schools and VET providers...to create leading practice and competitive practices to increase the aspirations of low SES students".<sup>3</sup> The argument is that universities can work to improve school and other pre-higher education learning outcomes such that the pool of suitable applicants is broader and the need for university action to ameliorate commencing students' learning skills may be reduced.

The funding is provided for project activity. In 2010 the choice of activity has been left to universities. For 2011 and beyond the allocations will be based on competitive assessment of university proposals in collaboration with other partners. The outcome of the projects will be long term – working to improve the academic skills and the perceptions of likely future study and employment of students in primary and junior secondary school will not show through in changes to university enrolments for some years, and any long term change not for up to a decade.

This creates a challenge for reporting. The outcomes desired cannot be measured for some time, while distinguishing the impact of these projects against other factors will be an important methodological issue to be addressed.

In the short term accountability for the funding is required which means reporting on activity and expenditure. However, since this will have only limited demonstrative relationship to the outcomes desired it should be kept to a viable minimum. The detail set out in the pro forma goes much further, to the extent that some universities may consider operating outside the Partnership element to be more fruitful.

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<sup>3</sup> *Transforming*, p14

The medium term accountability should focus on:

- a national evaluation plan and project evaluation plans that sets up what should be multi-year studies, potentially formative, selectively assessing the various programs in train with data provided by the universities on a regular basis to the evaluators; and
- sufficient evidence of activity and expenditure consistent with stated project intentions and agreed modifications to meet Government accountability needs.

The National Centre for Student Equity in Higher Education has devised a framework for evaluating projects in this area which provides one guide to the nature of the evaluations at project and national level that could lead to real learning from the partnership projects including about what does not work.

It is likely that a well constructed evaluation (or evaluations) will require quite detailed data while using sampling to contain the quantum. Once identified in that context universities will be willing to provide the necessary data, knowing that it will be used effectively. The broad brush collection of all possible data on every interaction funded through the program, such as the school by school reports envisaged by the pro-forma, will not provide useful data.

### *Reworking the proposed pro-forma*

Consistent with the conclusions set out above for each element, the IRU provides the following specific comments on each part of the pro-forma to suggest a modified form that would collect the data required to assess the impact of HEPPP, assure Government that the funding was used suitably and not be overly burdensome to universities to provide.

#### **1. Financial summary**

##### Participation

- 1.1 The Department knows the financial loading payment for each university. Expenditure is consistent with each university's expenditure of teaching and learning funding within its base funding allocation as demonstrated in universities' annual financial reports. There is no meaning to asking for under-expenditure.
- 1.2 Where universities have received external funds specifically to support the enrolment of low-SES students they could provide this information and the source.
- 1.3 It is nonsensical to suggest that particular funding sources are specifically allocated to different types of services. Universities should report the broad break up of specific expenditure against the main headings suggested noting that much activity in faculties/schools will not be picked up.
  - "Support services and programs" should be renamed teaching and learning support to reflect the major source of support for low-SES students' learning needs.

- 1.4 It is possible that some activities focused on low-SES enrolments could be done in partnership with other bodies distinct from the Partnerships funding. It is not clear why a university would wish to admit to this and face completion of this table.

#### Partnership

- 1.1 The table is suited to this element
- 1.2 The table is suited to this element
- 1.4 The table assumes a highly specific allocation of expenditure from source to use. Some universities may run distinct projects for each area of engagement with potential students, others will combine them into projects that operate in many settings pursuing a similar approach.

The relevant requirement is to report the funds committed by partners (grouped by type of institution) and the total expenditure. The level of reporting proposed will only encourage the hypothecation of expenditure according to the acquittal expectation of different contributors to minimize repayment or roll-over provisions.

## 2. Overview statements

The requirements of section 2 go to the heart of both elements, permitting each university to report its main actions and any observable outcomes. These statements should build off the equity statements in the university compacts.

Universities should be encouraged to provide supporting data as well as examples and case studies. The statements should contain, or attach, all required information for both elements, including:

- a list of all partner institutions grouped as school, VET provider, community body, and other;
- information about the current education level of those targeted; and
- estimates of the number of individuals targeted and or reached by the projects. The multiple ways in which these projects could operate mean that such data is highly unreliable once aggregated into statements about how many thousand students or schools have been targeted.

Hence Part B is not required. Rather it could be reworked as a short guide to the type of information a university could include in its qualitative statements for Part A section 2. In future years as Partnership projects are subject to competitive allocations the reporting should focus on the activities and expenditure indicated in project plans.