



Fees and charges proposal for cost recovery for quality assurance and regulation of higher education

Consultation paper response template

Please complete and return your submission to the cost recovery consultation team at:
consultation@teqsa.gov.au by 5:00pm AEST Thursday 3 June 2021.

Submission cover sheet

Title	Ms
First Name	Louise
Surname	Batchelor
Position	Registrar
Organisation	Bond University
Email	lbatchel@bond.edu.au
Telephone	07 5595 1117
Date	28 May 2021

☒ I consent to this submission being published in full on the TEQSA website.

OR

☐ I do NOT consent to this submission being published on the TEQSA website.

Signature:

Date:

31/5/2021

Consultation response

Please refer to the submission guidelines as outlined in Section 7 (p. 28) of the Consultation paper.

Q1: What are your views on TEQSA's proposed approach to implementing increased cost recovery in line with the Government's policy?

Introduction of Full Cost Recovery

At a time where providers have been subjected to increased costs in responding to the COVID crisis and decreased revenue from the loss of international students, this is not the ideal time to add further costs of between \$40,000 to \$80,000 per annum per provider.

Cost Transparency

It would be helpful for TEQSA to provide information on the calculation of fees for example the \$150 per hour fee for investigations in relation to provider specific regulatory activities.

Registration Renewal Assessment Levels

As there are significant differences in fees for registration renewal (Level 1 \$38,487; Level 2 \$100,060 and Level 3 \$163,947) more information regarding the estimated workload for this assessment should be available to each provider for planning and budgeting purposes.

Q2: Do you agree or disagree with TEQSA's proposed approach to attribute application-based costs according to relative regulatory effort?

ELICOS Courses

Table 2 (page 13) identifies a 'CRICOS Add ELICOS Course' cost of \$20071.

As a self-accrediting provider, previously existing ELICOS Courses were more extensively reviewed as an extension of CRICOS re-registration on a seven year basis. This was to assess the ELICOS provider against the ESOS Act, the National Code and the ELICOS National Standards. Additional ELICOS courses, that were then added during a current CRICOS registration period, did not require the same level of regulatory effort in every instance, such as repeating the review of educational resourcing, staffing, management of ELICOS delivery, and policies around younger students.

Bond recommends that CRICOS 'Add ELICOS Course' fees should be two tiered to allow for subsequent assessments within the same CRICOS registration period, without the provider having to incur significant costs for each assessment. This will also allow ELICOS providers to remain flexible in response to student demand and develop courses without financial impediment.

CRICOS – Add ELICOS Course \$20100

CRICOS – Add additional ELICOS Course (same CRICOS Registration period) \$smaller fee i.e., \$355

Foundation Courses

Table 2 (page 13) identifies a 'CRICOS Add Foundation Course' cost of \$20071. The same rationale that was put forward for ELICOS Courses (above) also apply for the application-based charge identified for CRICOS Add Foundation Course.

Bond recommends that CRICOS 'Add Foundation Course' fees should be two tiered to allow for subsequent assessments within the same CRICOS registration period, without the provider having to incur significant costs for each assessment.

CRICOS – Add Foundation Course	\$20100
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CRICOS – Add additional Foundation Course (same CRICOS Registration period) \$smaller fee i.e., \$355

Q3: Do you have any comments on the proposed method of adjusting course accreditation fees based on a provider's student numbers?

Exception to Cost Recovery – Course Accreditation and Re-accreditation

The sliding scale proposed for cost recovery in relation to course accreditation and re-accreditation based on EFTSL is dependent on EFTSL being calculated correctly. This does not always occur for providers delivering a trimester year e.g., Bond University EFTSL is incorrect (50% overstated) in the Department's HEIMS system due to the University's trimester model.

Q4: Do you agree or disagree that the cost of compliance and investigatory activities should be borne by those providers being investigated?

Single Provider Charges:

Complaints

Bond University agrees that the cost of compliance and investigatory activities should be borne by those providers being investigated, if the complaint sits outside of the established mechanisms recognised under the Higher Education Standards Framework (Threshold Standards) 2015.

Bond recommends TEQSA develop some legislative thresholds about taking up a complaint to provide clarity for all providers.

Investigator Experience

TEQSA have a reasonably high rate of staff change as observed through case management turnover. To determine a charge based on a standard hourly rate, does not allow for variations in investigator experience or level of provider knowledge of the staff member allocated to the provider-specific regulatory activity. Investigator experience should be considered in calculating these costs.

Q5: Do you have any comments on the structure of the proposed new annual levy?

Guidance Notes:

The annual levy should exclude the recovery of guidance notes costs as it is usually inappropriate to cost recover some government activities, such as general policy development. In certain circumstances, cost recovery may also be contrary to intended policy outcomes, such as the provision of community services or industry support. [*Australian Government Cost Recovery Guidelines (RMG 304)*]

Are there any other comments you wish to make in relation to the fees and charges proposal for cost recovery consultation paper?

