



2 June 2021

Alistair Maclean  
Chief Executive Officer  
Tertiary Education Quality and Standards Agency  
By email: [consultation@teqsa.gov.au](mailto:consultation@teqsa.gov.au)

Dear Mr. Maclean,

### **TEQSA Fees and Charges Consultation Paper**

HEPCO Pty Ltd welcomes the opportunity to make a submission to the Tertiary Education Quality and Standards Agency (TEQSA) in relation to the Fees and Charges Proposal – Cost Recovery for Quality Assurance and Regulation of Higher Education.

HEPCO Pty Ltd trading as The Tax Institute Higher Education is a niche private higher education provider offering a Post Graduate Qualification in Taxation Law that is also recognised as an Approved Course by the Tax Practitioners Board (TPB).

We invite TEQSA to consider our submission and respectfully request that further action is taken to enhance the equity of the proposed model and to limit the adverse impacts the proposal will have on the sector. We have set out below our main concerns and have proposed alternative approaches.

#### **Enhance the equity of the proposal across the sector.**

The current model will see a disproportionate fee recovery effort made by HEPCO and other private providers who often have a significantly smaller student load. To address this inequity, we encourage all components of the cost recovery model to be underpinned by EFSTL. In the case of HEPCO, we have 341 enrolments and an EFTSL of 47. The payment schedule proposed discriminates against smaller providers of Post Graduate Awards.

#### **Minimise adverse impacts on the Sector by reconsidering the implementation timing and phasing.**

The Minister for Education and Youth currently recognises the economic pressures of the sector as indicated by the extension of the current waiver of TEQSA regulatory fees for the remainder of 2021. It stands to reason, the pressures faced by smaller providers of professional certification will not cease to exist over the coming months and it would therefore be reasonable to consider delaying cost recovery initiatives until such time as the sector enters a period of economic stability.

Further, both the timing and phasing of the proposed model unfairly impacts those providers who accepted a registration and/or accreditation extension. In the case of The Tax Institute Higher Education, had the renewal application been submitted as per the original date, fees attributed to this



process would not have been incurred until 2028. Under the proposed model, we will need to plan for this expenditure in 2023.

**Transparent, fair and reasonable application of activity and time-based costing.**

It is our view the Consultation Paper does not provide adequate detail on the method for determining activity and hourly-based costings. Further development and consultation should be considered prior to confirming the Cost Recovery Implementation Statement.

If you would like to discuss any of the above, please contact Alexandra Wilson, our Executive General Manager in the first instance, on (02) 8223 0009.

Best regards,

A handwritten signature in black ink, appearing to be 'Rob Thomasson'.

Rob Thomasson  
Chair, HEPCO Pty Ltd