

25 September 2023

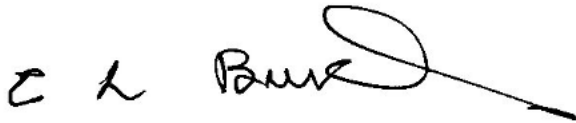
TEQSA

Via costrecovery@teqsa.gov.au**RE: Provider Consultation – Fees and Charges**

Thank you for the opportunity to engage in consultation on TEQSA's proposed updates to fees and charges which are to take effect from 1 January 2024.

Griffith has reviewed the *TEQSA Fees and Charges Consultation Paper (August 2023)*, and our feedback is available at **Appendix A**.

Yours sincerely



Professor Liz Burd

ProvostEnclosed: **Appendix A**

Appendix A

Theme	Feedback / Recommendation
Impact on providers	<ul style="list-style-type: none"> Universities are facing increased regulatory requirements whilst operating in a complex environment resulting from sector-wide disruption caused by COVID and geopolitical factors. Current challenges include decline of key international student markets, challenges to attract and retain domestic students, as well as increasing pressures to support students through hardship and scholarship funding. Furthermore, with TEQSA's proposed risk-based approach to regulation from 2024, it is expected that providers will be required to undertake increased risk monitoring and other relevant regulatory activities, which will have an impact on resourcing and budgets, <i>Recommendation:</i> <ul style="list-style-type: none"> Consider pausing implementation of the cost recovery model for three years until 2026 to allow for TEQSA and the Department of Education to implement an integrated and aligned regulatory approach and for providers to prioritise resources to support students and recover from the current sector disruption.
Transparency of future charging arrangements	<ul style="list-style-type: none"> The proposed fees and charges changes have arisen as a result of the annual review of the 2022 <i>Cost Recovery Implementation Statement (CRIS)</i> and aim to address initial assumptions contained within the 2022 version. The consultation paper provides no indication of the proposed future approach to CRIS review and cost recovery increases (i.e. frequency of reviews, rate of increases, etc.) Under the Australian Government Charging Policy, the <i>Charging Framework</i> provides for a consistent approach to government charging policies, with a commitment to 'improve the transparency, accountability and management of charging arrangements'. <i>Recommendation:</i> <ul style="list-style-type: none"> TEQSA is transparent about the intended frequency and rate of future cost recovery fees and charges reviews and increases.
Fees and charges increases be minimised to CPI	<ul style="list-style-type: none"> The Australian Consumer Price Index (CPI) for the twelve months to the June 2023 quarter rose 6.0%. There does not appear to be a consistent approach to the percentage increase for fees and charges outlined in the consultation paper and none appear to be aligned with CPI. E.g. the proposed increase for 'Adding additional course to ESOS Act registration' from \$400 to \$500 is an increase of 25%. <i>Recommendation:</i> <ul style="list-style-type: none"> Minimise TEQSA fees and charges increases to CPI.
'Adding additional course to ESOS Act registration' increase	<ul style="list-style-type: none"> The proposed increase for 'Adding additional course to ESOS Act registration' is \$100 to \$500. TEQSA revised associated processes from 2023, which has resulted in increased administration for providers. The \$100 increase (25%) is high given providers' increased administration in relation to this process. <i>Recommendation:</i> <ul style="list-style-type: none"> Reduce the increase to 6%.
'Adding additional course to ESOS Act registration' processes	<ul style="list-style-type: none"> The revised process for 'Adding additional course to ESOS Act registration' implemented in 2023 has resulted in increased administration for providers and delays in course publication as a result of the requirement for payment to be made prior to TEQSA processing of the request. Previously providers could complete one application for multiple courses; however providers must now complete one application per course. The requirement for payment prior to processing can delay course publishing for up to four weeks due to internal University procurement processes. <i>Recommendation:</i> <ul style="list-style-type: none"> Streamline process for providers when submitting multiple applications. Shift from a paper-based process to an automated digital process. Implement an online credit card payment facility to facilitate instant payment.
Increasing regulation and potential for regulatory charges	<ul style="list-style-type: none"> In the recent 'Student Support Policy' consultation paper, it was proposed that the Department of Education would have oversight of student support compliance monitoring, alongside existing compliance regulation undertaken by TEQSA. There was no reference in that consultation paper to the costs associated with compliance activities to be undertaken by the Department of Education. At this point it is unclear whether these costs will be covered by the Department or passed onto providers. Providers are already facing increasing costs associated with compliance administration impacting available resources to support students and offer student hardship funding and scholarships. <i>Recommendation:</i> <ul style="list-style-type: none"> Integrate and align regulatory activities and minimise regulatory charges for providers.