

Submission to TEQSA Fees and Charges Consultation

25 SEPTEMBER 2023



ABOUT THE REGIONAL UNIVERSITIES NETWORK

The Regional Universities Network (RUN) welcomes the opportunity to make a submission to the Tertiary Education Quality and Standards Agency (TEQSA) Fees and Charges Consultation. RUN is a national collaborative group of seven regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, University of Southern Queensland, and University of the Sunshine Coast.

This submission reflects the positions of RUN institutions, and in doing so, also aims to represent the views of those students and communities which RUN universities serve; the one-third of Australians who live outside of metropolitan centres in Regional, Rural and Remote locations.



OVERVIEW

RUN's feedback to the TEQSA consultation is embedded in the principles of transparency, fairness, and continuous improvement. We recognise TEQSA's adherence to the Australian Government Cost Recovery Policy, but advocate for deeper insights into the rationale and methodology behind the proposed fees. RUN further argue that the introduction of measures such as Service Level Agreements (SLAs) could also ensure future fees are aligned with service delivery.

RUN notes that this is the first year TEQSA has been operating on a model of increased cost recovery and appreciates that the focus of this year's review is to ensure the accuracy of assumptions made when the model was first introduced. In future reviews, RUN advocates for a focus on further enhancing TEQSA's operational procedures to ensure a fair cost of service delivery and to better streamline processes for TEQSA and higher education providers.

For further information please contact RUN on [redacted] or execdir@run.edu.au.

PRINCIPLE OF COST RECOVERY

RUN recognise that TEQSA is operating in line with the Australian Government Cost Recovery Policy and therefore will not contest whether cost recovery is appropriate as a principle. We also understand that the cost recovery amount is aligned with TEQSA annual allocation from the Australian Government, not simply aligned with the delivery of actual regulatory activity. RUN members accept the increase to the base component of the Registered Higher Education Provider (RHEP) charge, and recognise the reasons outlined for this increase. In addition, members appreciate the reduction in the amount of charged for monitoring of compliance with conditions attached to the registration of a provider, in recognition that the 2022 version of the Cost Recovery Implementation Statement (CRIS) over-estimated these charges.

BASIS FOR ESTABLISHING CHARGES

Recognising the need for TEQSA's proposed application-based fees to reflect the nature and extend of services, RUN advocates for more clarity and transparency regarding the proposed fees as well as the evidence that the amount being charged is appropriate for the work. At this time there has not been sufficient reasoning provided for components of the proposed charges, for example charging \$500 for a single new course application when this could previously be submitted in bulk. Offering a more transparent insight into how TEQSA determined these charges would enable better understanding of their suitability and confidence in their fairness.

The decision to reduce fees for self-accrediting higher education providers registering new locations under the Education Services for Overseas Students (ESOS) Act due to the lower associated risk is a positive step, and RUN members would like to see this extended to other ESOS-related fees.

■ **RUN RECOMMENDS:**

Increased transparency regarding the basis for fees

LINKING SERVICE FEES WITH SERVICE DELIVERY

Introducing SLAs alongside the changes to application-based fees would more closely link fees with service delivery and give institutions a clear understanding of what to expect in interactions with TEQSA. These SLAs would detail processes and timelines and contain defined service schedules, establishing clear expectations and commitments for both TEQSA and institutions. The introduction of SLAs would help to improve consistency, transparency, and accountability. Agreed timelines would also ensure that providers aren't left in a state of uncertainty for unnecessarily long periods, which is ultimately damaging for confidence in the overall sector.

■ **RUN RECOMMENDS:**

TEQSA consider introducing Service Level Agreements

BROADER TEQSA PAYMENT MECHANISMS

RUN note that this year's review by TEQSA has focused on ensuring the accuracy of assumptions made in establishing the 2022 version of the CRIS, and appreciate the emphasis on ensuring fees fairly reflect the cost of delivery. Moving forward, RUN advocates for a focus on streamlining and automating internal TEQSA processes to reduce fees charged to higher education providers as much as possible as well as reduce the administrative burden. Introducing straightforward solutions, such as payment options by credit card, would offer a smoother and more cost-effective experience for TEQSA and higher education providers.

■ **RUN RECOMMENDS:**

In future reviews TEQSA focus on streamlining and refining processes to reduce fees and administrative cost.

