

Comments on

Amendments to VET Guidelines

15 June 2015

**Comments on proposed amendments to
Higher Education Support Act 2003
VET Guidelines 2015**

General Comments

ACPET welcomes the opportunity to provide comments on the amendments to the VET Guidelines as requested 11 June 2015.

While appreciating the need for timely action to address shortcomings in existing VET FEE-HELP arrangements ACPET is concerned that some of the amendments proposed for 1 July 2015, in particular, may provide significant challenges for providers. This will especially be the case where adjustments to marketing and web-based information are required.

More broadly, while these amendments may address some identified shortfalls they will negatively impact on the great majority of providers that are providing quality training outcomes in accordance with the intent of VET FEE-HELP.

Rather than continuing to add to the regulatory burden in an attempt to address program shortfalls and some exploitation, the Australian Government should consider measures that enhance its capability to monitor provider performance and apply necessary sanctions.

4.5 Marketing of VET FEE-HELP

While ACPET does not disagree with the proposed changes, there may be cost and time impacts for providers given that significant changes to marketing and related materials may be required.

ACPET believes that the changes could impose significant cost imposts where new marketing and web-based materials are required.

There may not be sufficient time to withdraw marketing materials, adjust web sites, and contact agents etc. before the implementation date of 1 July 2015.

4.6 Agents

Section 4.6.4 does not specify that agreements have duration - this should be included.

It is considered that there may not time to have agent agreements in place by 1 July 2015. It might assist providers if DET were able to provide an exemplar or template for such agreements.

4.7 Provision of Information

The provision of the required information, depending on the existing arrangements, could be onerous. Adjustments to web sites and the removal and reprinting of marketing and enrolment documents may be required and distributed to campuses and agents. Given the requirements providers will want to take care to ensure that these materials are correct and do not expose them to breach/legal action.

It is questionable if this could be done by 1 July 2015.

4.8 Commonwealth Assistance Form

ACPET acknowledges and supports the intent of providing what is essentially a two day minimum ‘cooling off’ period for persons undertaking a course with VET FEE-HELP.

It is questioned how this will work in practice and particularly the impact on students and providers. Will the student be required to complete, sign, date and submit the form a minimum of two days after having undertaken all other enrolment procedures? Will this not add to the bureaucratic burden and cause added inconvenience to students? Could the provider simply not be required to hold the completed form and submit after two days?

4.9 Barriers to Withdrawal

What ‘subsequent units of study’ means may need clarification. Does this mean any withdrawal requires the re-enrolment for all other units of study - or only where it was a pre-requisite unit was withdrawn from?

7.6 Schedule of VET Tuition Fees and Census Dates

ACPET notes the implementation date may provide a challenge for some providers.

7.8 Fee Periods for Charging of Tuition Fees for a VET Course of Study

ACPET’s reading of this proposal is there are to be four fee periods and each fee period “charge” is to be 25% of the total course fee. If this does not align with the delivery pattern/effort/cost this may create financial pressures for providers and increase administration costs.

That these fee periods are unlikely to align to enrolment patterns (semesters/terms) will create confusion for students and providers alike.

This measure may drive course design and delivery towards reducing provider exposure rather than delivery that best supports quality learning and student engagement.

If the intent is to stop the upfront payment of all fees, a more appropriate arrangement may be to impose a maximum percentage (say 50%) and align fee periods to the course enrolments/delivery patterns. Alignment to semesters/terms might also assist in reducing confusion and administrative burden.

At 7.8.5 it is proposed that each fee period is to include at least one unit of study with a census date. A unit of study is not defined in the Guidelines. Is the unit of study census date to have passed or be within the fee period?

9.2 Information that a VET FEE-HELP invoice notice must contain

The inclusion of the USI might assist in student tracking, data analysis, research etc.