Griffith University’s response to:

*Proposed changes to the DEST higher education student collection to improve data on credit-transfer and articulation consultation paper*

Griffith University is pleased to submit this response to the Credit Transfer and Articulation Data Experts Working Group’s consultation paper on the way data on credit-transfer and articulation can be improved. Before addressing the specific questions in the consultation paper, we first offer some general comments.

**Australia needs a lifelong learning policy to structure data collection in all sectors**

The gap between policy and the data needed to inform it is evidenced by this project, which seeks to improve data on the extent of credit-transfer and articulation between the VET and higher education sectors. This problem arises because the data that is collected in each sector is developed without regard for the other sectors of education and training, and is incommensurable across sectors. This is a poor basis for policy development, and for facilitating lifelong learning in Australia. While the proposals outlined in the consultation paper may go some way to addressing these problems, the end result will be far from satisfactory, because the proposals can only tinker at the edges in the way in which issues such as access, participation, progression, outcomes, student load, and transfer between sectors is defined.

**Systemic and institutional interests in data collection need to be distinguished in determining how to collect robust and reliable data**

Our premise is that the best assurance of data’s completeness and accuracy is where those entering and managing the data have a stake in its completeness and accuracy. For example, in some States basis of admission to an undergraduate degree is not derived from the data collected by State tertiary admission centre as part of the admissions process but is entered by
universities as part of the enrolment process, and thus when the institutions have no stake in its accuracy. Consequently many institutions do not invest significant resources in collecting and verifying these data beyond complying with the requirements of DEST’s file structure and validation check. The reported data are thus not accurate and are not very useful in informing policy or monitoring, for example, the proportion of students admitted on the basis of a TAFE qualification.

One way of improving the accuracy of this data would be to require institutions to report on access, progress, retention and outcomes on the basis of admission, say as part of the learning and teaching performance fund. Alternatively, the Government could offer extra funding for increasing access by VET articulators.

In contrast, universities have an interest in recording credit and exemptions accurately because it determines students’ fees and eligibility for the award of a qualification.

**The level of information required should reflect the level of risk**

We need to distinguish the thoroughness of documentation needed for admissions and for the award of credit. Students who are admitted on the basis of their prior VET studies vary in the extent to which they have documentary evidence that supports their claims, particularly if their studies were undertaken some time ago. A decision to admit a student may be based on multiple criteria that include prior VET studies, their work history, and their mature aged status, while only one of these is designated as the basis of admission. Their VET studies may precede the systematisation of provider numbers and course codes on the NTIS, and in these circumstances students may be able to demonstrate that they have studied at TAFE, but find it difficult to provide the information specified in the proposed changes.

A higher onus of proof is required of the student in making a claim for credit on the basis of their prior TAFE studies. These claims need to be supported by academic transcripts and often by provision of curriculum outlines or similar evidence. However, even here students may have problems because training packages have been implemented over time. Students may be able to demonstrate their prior academic outcomes, but find it more difficult to provide the precise information specified in the proposed changes.

Institutions will need to be flexible in the sort of information they require of students in making a decision about admissions and credit. If realistic data is to be reported that reflects actual decisions taken, the fields in the proposed changes must provide for data that falls outside the current tight specification of VET course code and VET provider code. Tighter specifications may be required for the report of credit compared the report of admissions.
Systemic measures are needed to collect data needed at the systemic level, and this means we need a universal student identifier

Universities differ in the extent to which they value TAFE articulators, admit students on the basis of VET studies and the extent to which they use basis of admissions data internally. Yet it is very important at the systemic level that we have accurate information about student flows because it is the basis upon which policy needs to be made. We need to know if VET students gain access to university, and which universities they gain access to. It allows an evaluation to be made on the extent to which Australia is meeting its access and social justice objectives at the system level and within individual universities, as well as broader systemic objectives to do with effectiveness and efficiency and building a knowledge economy.

The only mechanism that seems capable of providing the kind of information we need about student flows and about progress, retention and outcomes is a universal student identifier. This will yield data about patterns of movement within higher education as well as between the different sectors of post-compulsory education and training. In their report entitled *Analysis of Equity Groups in Higher Education 1991 – 2002*, Richard James and his colleagues (2004: 61-63) discuss the problems associated with measuring equity group membership, duplicate student IDs within individual universities, student self-reporting, and inconsistent program coding within universities. They explain that it is very difficult to gain accurate information about student flows and completions within single institutions and across higher education institutions. These problems are multiplied when trying to gain accurate data about students’ learning histories, program completions in VET, and basis of admission in higher education. Rather than move to reducing the number of student IDs, Australian higher education policy is leading to their proliferation. Queensland university students currently have the following ID numbers related to their admission and study:

- their Queensland Tertiary Admission Centre number
- their University ID
- their Commonwealth higher education student support number (CHESSN) in the case of students who accrue a HECS or Fee-Help debt
- their tax file number in the case of students who accrue a HECS or Fee-Help debt.

Several countries have implemented a universal student identifier, as has several Australian states for their public school and public VET systems. We need to learn from overseas experience and build on the work the states are engaging in, rather than increase the complexity of data collection processes, and the number of different IDs students have within tertiary education. This would allow DEST to:
• follow student flows and student outcomes within and across sectors
• collect data about the full extent of student movement, rather than limiting data to highest previous level of study
• compare and contrast student access to and outcomes within different institutions, and gain a much better idea of retention and completions across the system rather than at individual universities
• monitor student access, participation and outcomes by field of education
• map credit to student learning histories, institutions, and fields of education
• reduce the level of reporting required of universities, and thereby increase the accuracy and completeness of the data.

Private higher education institutions should be required to report as fully as universities

Whilst private higher education providers currently enrol only a small percentage of higher education students overall, this is expected to expand as a consequence of recent government policies. Higher education needs to learn from the experiences of VET and the difficulties it has gaining an understanding of the full extent of accredited education and training within an increasingly privatised sector. The VET sector currently is not able to report on all training that leads to the award of a qualification, because it requires only publicly funded training to be reported. This has led to wildly divergent claims about the size and importance of the private VET sector. Higher education faces a similar risk of having only a partial picture of the sector. Public universities are required to report on all students, all staff and all finances, regardless of whether the students were supported by the Commonwealth, took out a fee-help loan or studied in publicly funded facilities. If a graduate of a private higher education institution is able to claim that they have a nationally recognised higher education award, regardless of whether they had access to fee-help, then these outcomes should be nationally reported, and private higher education providers should have the same obligations to report on credit-transfer and articulation as universities. Having more onerous reporting requirements for universities also disadvantages them in competing with private providers by imposing higher costs and reducing their flexibility.

We should limit the amount of information we expect students to provide

The consultation paper provides an extensive list of information that students would be expected to provide. Even though most of this information is based on official transcripts from the VET institution they initially attended, the complexity and scope of information required is nonetheless too onerous, and requires students to have insights into the nature of the data we are asking
them to provide. Students do not know what VTE or RTO means. Often they have trouble understanding what a unit of competency is, or even what a training package is. They are less likely to know what the provider number is for their RTO. These problems cannot be avoided by just asking students to supply the official records paper they were provided with. Recent institutional research within Griffith has found that students who transfer from VET to higher education find the process extremely difficult. Once they have been admitted to Griffith the process is much easier, but in our interviews with students they reported that they were given the wrong information at TAFE and at QTAC, and that they didn’t understand what they needed to do, or the sort of information that they needed to provide. These issues will be helped but not resolved if the MCEETYA good practice principles on information to students are implemented. While MCEETYA’s principles explicitly include accredited providers of VET as well as higher education, the emphasis is on the obligations of the receiving institution to ensure students know what they need to do to apply for admission and for credit.

Moreover, student movement between the sectors will become more complex because many universities are now registered as RTOs, and TAFEs and other VET providers are increasingly offering higher education programs. What should a student enter on their enrolment form if they have undertaken a higher education program at a TAFE institution or a VET program at a higher education institution? They will not understand these complexities.

All data on student admissions such as previous qualifications and basis of admission should be collected or derived from the automatic results transfer system (ARTS) managed by the State tertiary admission centres and the admission centres’ data. This will require many VET providers to invest resources in becoming part of this process – as universities have invested heavily since the centres’ establishment.

The complexity of VET and higher education is growing and this is not reflected in the consultation paper

The structure of data in the consultation paper still reflects differentiated sectors, yet this is changing as a consequence of VET offering higher education, and higher education offering VET. DEST will need to think through issues such as institutional provider numbers. Will a TAFE institute have a unique identifier on the NTIS and a different HE provider number? How should the data be reported? Should institutions report a student who has undertaken a higher education program at a TAFE institution as a coming from a VET or higher education provider? Unless we think through these issues we risk replicating sectoral divisions and entrenching different reporting mechanisms that do not reflect the complex realities. It will lead to under-reporting student movement between the sectors.
We need to know about all participation in tertiary education, not just the prior highest level undertaken

The consultation paper proposes restricting information on students’ prior learning history to prior highest qualification undertaken. This will only provide a partial account of students’ learning histories, and we will not have the information we need about student flows between and across sectors, and the different ways in which students build their qualifications portfolio. Furthermore, there is considerable uncertainty at least amongst students about the qualifications hierarchy. For example, is a completed year 12 certificate higher or lower than a TAFE certificate I, II or III? This uncertainty is promoted by the Australian Qualifications Framework Advisory Board which removed levels from the AQF in 2002 and since then has perpetrated the myth that qualifications in each sector are of different types, and consequently that it is not possible to draw conclusions about equivalent levels of study and outcomes. This problem can be addressed by increasing the number of fields available to record prior learning history or by seeking data on students’ most recent qualification as well as their highest.

Need to know credit as a % of prior studies, not as a % of commencing or recently completed studies

Consider a student who completed a TAFE diploma that normally requires 2 years’ equivalent full time study who is granted 1.2 EFTSL credit towards a degree that normally requires 4 EFTSL of study to complete. The student was given credit towards 30% of their 4-year degree. However, the far more important point for the student is that they were given credit for 60% of their previous study – 40% remained unused and thus they need to study for a total of 4.8 EFTSL towards a degree that normally takes 4.0 EFTSL to complete.

Now consider the same student who was granted 1.0 EFTSL credit towards a degree that normally requires 3 EFTSL to complete. The student was given credit towards 33.3% of their 3-year degree. This appears to be more generous than the credit granted towards the 4-year degree, which was only 30%. However, the student was given credit for only 50% of their diploma towards their 3-year degree and 1 EFTSL of diploma study remains unused. The student will take 4 EFTSL to complete a degree that normally takes 3 EFTSL to complete.

In this example the student needs to complete an extra 1 EFTSL to complete their 3-year degree but only an extra 0.8 EFTSL to complete their 4-year degree. But reporting credit as a proportion of the commencing or newly completed degree disguises this, the most important point from the student’s perspective and the better measure of efficiency of use of educational resources.
Much of the new data being requested used to be provided, but was removed by DEST

We note that the consultation paper proposes including fields that were previously included as part of the DEST reporting requirements, but which were removed. Changes to the specifications in 2005 meant that a prior incomplete TAFE study was omitted from basis of admission and prior higher education attainment. These changed specifications mean that we have lost much longitudinal data. By removing and then replacing these elements DEST has broken the data sequence thus reducing understanding of student flows and outcomes and has increased universities’ workload.

1. Do the proposed changes address the key limitations identified above in relation to data collected on credit-transfer and articulation?

In general, we support the collection of additional data only where this can be collected or derived from data the State tertiary admission centres collect including through the automated results transfer system. We therefore support collecting prior VET studies, including incomplete studies, on condition that this is collected or derived from State tertiary admission centres’ data but suggest that this be expanded to include all prior credentialled study, and not just the prior highest level of study. This can be achieved by increasing the number of fields.

We support inclusion of the level of the prior complete or incomplete VET qualification on condition that it is collected or derived from data collected by the State tertiary admission centres.

We support inclusion on the type of provider the student previously studied with on condition that it is collected or derived from data collected by the State tertiary admission centres. This condition is particularly important for this data element in view of our previous observation that students do not understand the sectoral distinctions.

It will be more difficult to determine the basis of the award of credit at the completion of the higher education award. Consider a student who was granted 1 EFTSL credit for a completed TAFE diploma and commences their higher education studies enrolled in a joint Bachelor of Arts/Bachelor of Business, transfers in their second year of enrolment to a joint Bachelor of Arts/Bachelor of Laws, completes a Bachelor of Arts after their third year of enrolment and completes a Bachelor of Laws after their fourth year of enrolment. How much of the diploma was counted towards the Bachelor of Arts and how much towards the Bachelor of Laws? How much of the student’s business studies was counted towards their Bachelor of Arts and how much towards their Bachelor of Laws? This question is meaningless or at
least not relevant to many institutions. Institutions assess whether students are eligible for the award of a degree based on their whole prior academic history without necessarily ascribing prior study to particular parts of their award.

The reason for the inclusion of this element therefore needs to be made explicit. One argument put forward in the consultation paper is that students may be granted credit but not be able to use it during their program. In other words, universities may not deliver on their promise to students. Is there evidence that this is a widespread problem? The proposed response seems to be out of proportion to the perceived problem.

On the other hand, the consultation paper makes the valid point that students may undertake other VET programs concurrently with their degree and be awarded additional credit after their admission. If that is so, the current field seems to provide scope for including that credit, whilst it does not indicate the basis upon which credit was granted.

2. Are the proposed changes practical and workable for institutions?

In general the proposed changes seem practical from a reporting perspective provided they are collected or derived from data collected by the State tertiary admission centres, but this says nothing about the quality of the data that is entered. If meaningful data is to be reported, DEST will need to work with higher education institutions and state admissions centres to develop reliable processes, particularly on the basis of admissions data.

3. Is the proposed timeframe appropriate?

No. DEST normally guarantees 12 months’ notice for changes in reporting to be implemented. The consultation paper claims nine months will be available for institutions to make these changes, but this fails to take into account the fact that universities start enrolling students (particularly continuing students) towards the end of the year for the following year. Moreover, arrangements will need to be made with the tertiary admissions centres to implement these changes. If this is not done, the existing practice in many states that divorces the admissions process from the recording of the basis of admissions will continue.

Most institutions that use PeopleSoft will upgrade their systems over the next 5 years. Griffith University is one of the earliest institutions to embark on this process, and we have frozen our system until the upgrade is implemented next year. No system change will therefore be made in time for reporting 2007 data.
4. **Are there ways in which the proposals could be improved while still addressing the limitations within the existing data?**

The State tertiary admission centres should be central to the collection of data on student admissions and transfer because they serve most TAFE institutes and private higher education providers as well as universities. Tertiary admission centres would be able to provide data on reverse transfer (from higher education to TAFE) in addition to upward transfer, thus completing the partial data available from higher education institutions alone.

Gaps will remain in the data for the reasons we have outlined in our submission, but also because the proposals will not be able to collect data concerning credit and progression in nested awards in dual-sector universities, or in nested awards that are co-delivered (sequentially or concurrently) in stand alone institutions. We cannot think of a solution to this within current constraints.

A universal student identifier would be able to provide this sort data to some extent, because it would allow student movement across qualification levels and within fields of education to be monitored. It would not tell us how much credit was awarded, but it would tell us about the extent to which students moved sequentially through qualification levels within related fields of education.

There is no one mechanism that will provide the information we need at the system level. However, the reliability of the data can be improved if DEST were to work with institutions and states’ admissions centres to improve data collection processes. In addition, regular research should be undertaken to provide insights into processes and outcomes that cannot be represented by the data. For example, this would allow greater insights into nested awards and dual awards and the extent to which they facilitate student movement. It would also provide insights into the relationship between institutional agreements and MOUs across sectors and the extent to which this has an impact on students’ opportunities to undertake studies in other sectors.

DEST should also try to improve the consistency of definitions and reporting across the sectors. A big step forward was made when both sectors implemented and reported on the basis of the same field of education. In our view, there is scope for increasing consistency between the sectors in a range of other areas, including the definition of student load, progression, and outcomes.