

Navitas Submission on the Redevelopment and Audit of the VET Student Loans Data Collection

May 2018

1 Introduction

2 Reducing reporting burden

2.1 Removing elements and reducing complexity

2.1.1 VET Commonwealth Assisted Students file – HELP Due file (VDU)

Proposal:

Reduce the data collected in this file to just the minimum elements required by the ATO to verify a student's TFN, by removing the proposed elements.

2.1.2 VET Student load/liability (VLL) file

Proposal:

Remove this element from the collection.

2.1.3 VET Student enrolment (VEN) file

Proposal:

Remove elements 476, 486 and 560 through to 566 from the Collection.

2.1.4 Questions for discussion

Question 1: Do you see any value in retaining any of the elements discussed above? If they are retained, should their reporting be mandatory?

Navitas supports the proposal to remove all the proposed elements from the Collection.

Question 2: Are there other elements that no longer serve a purpose and so should be removed from the Collection?

While not directly related to this question, Navitas has a comment with regards to the VDU file. We have found that the character length for the first name element is currently too short.

This is problematic when reporting student names that are longer than 15 characters. We propose that the HEIMS Data Elements – 'student given name – first' and 'student given name – others' is combined into one single data element where it can capture student's first name and middle name if any (Total length: 40-45 characters). This would then align it with the AVETMISS 'client first given name' data element.

2.2 Reducing duplication within the Collection

Proposal:

Restructure data submissions to collect enrolment, name and address data once only at the commencement of a student's course, and provide a simple mechanism to update details as/if required. Unit of study (load/liability) data would then be reported independently, as required, for the duration of the student's course.

2.2.1 Question for discussion

Question 3: What opportunities do you see for reducing duplication of data across files/submissions?

Navitas supports the proposal to reduce duplication of data across files/submissions. This will reduce data errors and promote greater efficiency.

2.3 Aligning the Collection with AVETMISS

2.3.1 Questions for discussion

Question 4: Do you see value in aligning the HEIMS elements listed above with corresponding AVETMISS elements?

Navitas sees value in aligning the HEIMS elements listed under this section with the corresponding AVETMISS elements because this ensures that reporting is more efficient.

Question 5: Are there other HEIMS elements not listed above that you believe should be aligned with AVETMISS elements?

As Navitas noted in our submission on the *Redevelopment and Audit of the Higher Education Student Data Collection* in February this year, we support the adoption of a USI as a single unique identifier across both VET and higher education. This development would enable the tracking of a learner's post-school educational journey throughout their life. Furthermore, the USI element within HEIMS should be aligned with AVETMISS elements.

Question 6: What issues do you see with aligning the elements, noting that it is unlikely the AVETMISS elements will be able to be modified?

Although Navitas supports the alignment of HEIMS elements with AVETMISS elements, such changes would require significant redevelopment of Navitas' internal data systems. Therefore, we request that the Department considers allowing training providers a sufficient timeframe in which to apply changes.

3 Tailoring the Collection to the VET Student Loans program

3.1 Adding new elements

Proposal:

Introduce a range of new elements set out in the table below.

3.1.1 New Elements proposed by the Department

3.1.2 Special case – introduction of element for number of fee periods

Proposal:

Consider the addition of this, and associated fee period elements to the collection.

3.1.3 Questions for discussion

Question 1: Should the 'Number of fee periods' element be added to the collection?

Navitas supports the addition of this element. However, requests that the Department provide appropriate options that reflect the full range of fee periods at various providers, particularly for more flexible delivery models.

Question 2: If so, what other fee period element/s should be added to the Collection and how should these be designed?

As noted above in Question 1, Navitas suggests that the fee period element reflect the full range of fee periods at different providers, as this will ensure more accurate data is captured in the Collection.

Question 3: Do the other proposed new elements above adequately tailor the Collection to the VSL program?

While Navitas is broadly supportive of the additional elements, we suggest that the Department should review the additional proposed elements to avoid duplications across other data collections. For example, the 'enrolment date' and 'course length' elements are captured in eCAF. Indeed, Navitas recommends that the 'course length' should be recorded in months, not years, to provide greater accuracy. Further, other elements proposed are already collected in the AVETMISS data, such as: 'unit of study start date'; 'unit of study end date'; 'student mobile phone'; 'student home number'; and 'student email'.

Navitas believes that the 'study intention' element is an unreliable data field as it is based on a student's intention which may not be clear to them at the outset of their study and is likely to change at various points during their study. The value of including this element is therefore questionable.

Navitas supports the proposal to add a 'citizenship documentation' element. However, the discussion paper does not state what specific evidence would be required as evidence. We recommend that simple codes for specific evidence be implemented to ensure reliable data collection. For example, for birth certificates or passports.

The description of the 'student engagement' element does not state how frequently a provider would need to update this field. Manual flagging of this field would be resource intensive for providers. While systems development to enable automatic updating of these activities would be far preferable in terms of administrative burden, it requires significant investment and a considerable amount of time. Navitas would be open to undertaking this body of work, given an appropriate amount of time to be compliant. However, we would also wish to see the requirement to submit VSL student progression forms to cease.

Finally, Navitas already captures information about student withdrawals and deferrals. It is unclear how this data will be collected by the Department in the current proposals.

Question 4: Do the proposed new elements improve the Collection in terms of administration of the VSL program, as well as of VFH during its phase-out period?

See comments above in Question 3.

Question 5: Are there other elements that could be added to the Collection to:

- more closely align it with the VSL program; or
- improve administration of the VFH and VSL programs?

Navitas does not recommend any further elements to be added to the Collection, beyond those that are currently proposed. Indeed, as noted above in Question 3 we suggest that the Department review other collections such as eCAF and AVETMISS to ensure some of the proposed elements are not duplicating elements of those data sets.

Question 6: What are the issues providers may encounter with reporting the above elements? Are there specific elements that would provide excessive administrative burden?

Navitas believes that the proposed reporting requirements would significantly increase the administrative burden on providers. This is particularly if the provider was required to report specific information such as RTO codes or student passport numbers. For Navitas to fully understand the proposal to include the above elements to the Collection, further clarification and rationale of their addition is requested. We suggest face-to-face consultations with the sector to work through the detail of these proposed changes and understand where the opportunities are to reduce the overall administrative burden on providers.

3.2 Tailoring existing elements

3.2.1 Academic suitability

Proposal:

Change the codes for element 327 **New basis for admission** to cover the academic suitability requirements set out in section 80 of the VET Student Loans Rules 2016. These are:

- Senior Secondary Certificate of Education

- *LLN test – name of tool used (for students assessed as displaying competence at or above Exit Level 3 in the Australian Core Skills Framework in both reading and numeracy)*
- *a certificate for a qualification at level 4 or above in the Australian Qualifications Framework awarded to the student.*

3.2.2 Debt remission

Proposal:

Consider the addition of new codes for element 446 Variation reason code to cover the variety of circumstances in which debt may be remitted.

3.2.3 Questions for discussion

Question 7: Do proposed changes to the two elements above more closely align them with the *VET Student Loans Act 2016* and *VET Student Loans Rules 2016*?

Navitas believes these changes do align more closely with the Act and Rules.

Question 8: Are there other elements that could be changed to improve the Collection's alignment with VSL?

Navitas does not recommend other elements to be changed.

Question 9: Do providers wish to raise any issues with the above elements?

Navitas has no issues to raise with the above elements

4 Data quality issues

4.1 Misreporting of "No information" location codes

Proposal:

Remove the "No information" codes from the three elements so that only a valid postcode can be reported for each location element.

4.2 Highest educational participation prior to commencement

Proposal:

Review the codes and coding notes for this element to clarify how highest educational participation could be most effectively reported.

4.3 Student status code

Review whether a change to element 490 Student Status code to differentiate between loan programs would improve the quality of the Collection.

4.4 Course of study load or duration

- Consider how the coding notes for element 350 Course of study load could be revised to improve providers' understanding of what is required to be reported under this element.
- Consider removing this element and only reporting Course of study duration as a measure of time (e.g., years, or parts of years).
- Consider aligning this element with AVETMISS data element, "Hours attended".

4.4.1 Questions for discussion

Question 10: How can data quality be improved for these elements?

Navitas supports proposals to improve the quality of the data within the Collection and offers the following comments:

4.1 – In principle, Navitas agrees that the ability to note 'no information' for location codes makes the data set unreliable. However, there are many occasions when the student does not provide the required information, or it is inaccurate. Removing the 'no information' code will, in these circumstances, force providers to either spend resources chasing learners for this data which may well be unreliable in any event or there is potential that they may enter a valid – but incorrect – postcode in order to make the submission.

Either scenario makes the data unreliable. Navitas suggests, as we did in our submission on higher education data collection that an alternative approach is to maintain the 'No information' code, with the Department monitoring the use of this code. Those providers who are excessive users of the 'No information' option could be called to account for the quality of their data.

4.2 – Navitas supports the review of codes and coding notes for element 493 to clarify the information to be reported.

4.3 – Navitas supports the review on element 490 Student Status code to differentiate student data by loan program if it improves the quality of the Collection. However, we believe that adding more codes may complicate reporting. We suggest that rather than including new codes within element 490, a separate element should be developed containing codes specifically for VSL.

4.4 – Navitas supports simplifying the data reporting process as much as possible and therefore does not support changes to element 350. We believe that aligning this element with the AVETMISS data element 'hours attended' would not necessarily capture duration adequately.

If a provider is unclear on what is required to be reported under this element, further training and information should be provided to that provider.

Question 11: Are there other elements where a lack of clarity impacts on data quality and usability?

Navitas supports increased clarity on elements in the Collection and suggested that this could be supported by the Department via the development of element descriptors and use cases for providers. This would improve provision of data requirements and the alignment of provider data systems.

Navitas believes the VSL data collection would benefit from self-directed online help information for providers and a regularly updated Frequently Asked Questions (FAQ). Navitas suggests that, as part of the Redevelopment and Audit of the VET Student Loans Data Collection project, the Department invite providers to submit queries for each element and that these queries form the basis for a FAQ.

5 Single-touch reporting

5.1 Enter your data once

Proposal:

New submission methodologies can enable single-touch reporting of student data. A single-touch reporting methodology would have the greatest benefit for providers with relatively sophisticated student administration software.

Single-touch reporting only requires student data to be entered into the approved course provider's student administrative system, with the appropriate data then being automatically submitted to the Collection. That data can then be validated to identify any errors that may have been made.

Under a new system, reporting effort would be spent responding to the small number of errors rather than manipulating, interrogating and manually submitting large datasets at multiple points in time.

5.1.1 Questions for discussion

Question 12: How might we implement single-touch reporting?

Navitas fully supports the proposal to move to single-touch reporting and acknowledges the wide range of benefits for learners, providers and government agencies.

Further, Navitas sees an opportunity for single-touch reporting to not only streamline data reporting, but also to align the timing of various data submission requirements. Many of Navitas' colleges are dual sector providers that also have CRICOS registration. The alignment of data submission dates across programs such as FEE HELP and VET Student Loans (VSL) and other reportable programs would mean a significant reduction in administrative burden for providers. An example of this in practice, is the requirement to report FEE-HELP liabilities in HEIMS for higher education learners within four weeks of any census date and then the requirement to do the same for a VET census date for VSL, which means two different submission dates.

Regarding how single-touch reporting might be implemented – and noting Navitas does not have a detailed understanding of current government data and ICT systems and capabilities – it seems that this could be achieved with the development of two related systems.

First, a student portal linked to the Unique Student Identifier (USI), that may be built as part of MyGov, would enable learners to keep their personal data current themselves. This would mean providers would not have to gather, enter, validate and submit this data multiple times. Providers would then have access to their learners' data via the USI system which would need to be interoperable with the institutions' systems.

Second, the technical advancements of Application Programming Interfaces (APIs) will provide an opportunity to move away from the traditional 'push' model of data reporting. For providers, this will mean instead of having to provide data in a format and at a time determined by the government agency, an API allows the required data to be extracted directly from our systems. Navitas is currently building this capability into various systems across our operations.

Question 13: How do we ensure data is updated with changes so that it is current, without compromising single-touch reporting?

See above response.

6 Reducing Duplication

6.1 Discontinuing Department of Human Services reporting

Proposal:

Investigate the most efficient way to incorporate requirements for DHS into the Collection with a view to removing the separate reporting requirement.

6.1.1 Question for discussion

Question 14: What challenges could there be in meeting these reporting requirements and how might we overcome them?

Navitas supports the proposal to incorporate the Department of Human Services' (DHS) requirements into the Collection in order to remove the need for a separate reporting mechanism. There are benefits for providers in reducing the administrative burden, and for all stakeholders with a likely reduction in the error rate of the data. Incorporating this change into the proposed VSL redevelopment and the single-touch reporting initiative would be highly beneficial.

One element that should be addressed in this process is that the current DHS form is designed for providers with a two semester academic year. It does not accommodate providers – like Navitas – who operate on a three trimester basis.

Finally, consideration should also be given to how information, once supplied, can be amended when a learner has a change in their circumstances. This is an important consideration given the implication for a learner's student support payments.

7 Any other comments

Navitas would like to highlight, in the context of the recent changes to the Privacy Act, that the government must work across agencies and with providers to ensure that providers are able to maintain their responsibilities under the reportable data breach provisions.

The sector takes its responsibilities very seriously and while the advent of single-touch reporting, USIs and the like, bring benefits and opportunities, there are also risks of unintended data breaches as machines and systems take on a greater role in data collection, storage and re-distribution.

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