To Department of Education

disability@education.gov.au

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**EPHEA response to the Department of Education and Training to evaluate the Higher Education Disability Support Program**

EPHEA welcomes the opportunity to provide feedback on the Department of Education’s *Disability Support Program: Consultation following program evaluation* (October 2016) and has outlined our position under the suggested questions posed in the consultation paper.

About EPHEA

As the national body of equity practitioners in the Higher Education sector our core business is to ensure positive outcomes for staff and students from equity target groups in employment and study. Our membership includes equity practitioners from all of Australia’s universities supporting all equity target groups – Aboriginal and Torres Strait Islander peoples; people from low socioeconomic status backgrounds (LSES); people from regional and remote areas; people with disabilities; people from culturally and linguistically diverse backgrounds; and women in non-traditional areas. We wish to ensure the continuing essential work of our members is well supported. We appreciate the consultation with the sector on the matters raised in this discussion paper and would welcome the opportunity to discuss our submission and proposals in more detail.

# Key points

EPHEA supports:

* an increase in funding amount for the Disability Support Program (DSP) to support the increasing numbers of students with disabilities, increased complexities of students’ needs, and increasing costs of support
* streamlining the DSP to make it equitable and less administratively burdensome. The proposed funding model has merit with some provisos around how funding is calculated and further consideration around support for students with significantly high support needs. Further modelling is recommended to strike an appropriate balance which meets the needs of the diverse range of students with disabilities and assists universities to provide adequate support to these students
* a streamlined reporting process with transparent benchmarking and evaluation processes
* staff capacity-building and curriculum reform as an important activity for improving accessibility and inclusion but these activities require additional funding streams rather than attempting to access already limited DSP funds
* ADCET’s role as central to improving accessibility and inclusion but requires additional funding rather than attempting to access the already limited DSP funds.

**For additional information contact: Ms Gabrielle O’Brien, President, EPHEA at** **info@ephea.org**

1. **Is distributing DSP funding via formula the best method of simplifying the administration arrangements for providers under the current ASSD? If so, is the proposed formula the most appropriate to use?**

**Formula**

In terms of equitable distribution of the DSP across the Sector a funding formula as suggested by the Department is a reasonable method and will vastly reduce the administrative burden of completing ASSD claims. A funding model based on numbers of students with disabilities rather than how effectively universities claim through the ASSD is welcomed.

Returns on the ASSD are only around 50% to 60% based on the particular needs of some individuals who meet a narrow set of guidelines and thresholds. A formula-based approach provides some surety about the funding of students with disabilities and can be spread across a broader range of student needs.

However, a number of universities have expressed concern about students with disabilities who have extraordinarily high support needs that will not be suitably supported by a formula-based funding model and some consideration needs to be given to balancing the overall support of students with disabilities across a broader range of functional impacts.

The KPMG review stated that students with learning disabilities or mental health conditions cost less that other students with complex needs (e.g. Deaf and hard of hearing students or visually-impaired students) but our experience is that this is not necessarily the case. Students with learning disabilities often benefit from assistive technology, notetakers and participation assistants which can be expensive. There are also a rising numbers of students with mental health conditions; so staff training in Mental Health First Aid and other initiatives to build staff capacity and service students (e.g. counselling services) is essential but costly.

A funding formula will allow universities to spread funds over a broader range of students’ needs – not just equipment and traditional educational supports claimed under the ASSD. However, there will be students with significantly higher costs and consideration needs to be given to universities with higher numbers of these students. An example of an alternative funding model might be broken down as follows:

In this scenario the bulk of funding is provided to institutions based on enrolments and providers utilise it as appropriate to meet the needs of their students.

A separate allocation for ‘high costs’ is set aside for providers to bid or claim for on the basis of the high costs e.g. students over $20k pa. Not all providers will be eligible for this but it would assist those universities with more high cost students to claim additional funds and doesn’t penalise the sector by retaining a claims-based system.

DSP performance funding should continue to be a feature to support other activities such as attracting and support students with disabilities; as well as continued support funds for ADCET.

**Student cohort**

EPHEA supports the adoption of the formula model however we require clarity about whether OUA (Open Learning Australia) students and students in enabling courses. OUA students and students in enabling courses make up a significant number of student cohorts with disabilities and should be included in any formula-based funding model.

**Overall funding**

EPHEA strongly recommends that the Department of Education increase the DSP funding. The key underlying issue around the DSP is that the funding (around $7m per annum) is wholly inadequate to support the costs of providing students with disabilities across the Higher Education sector with equipment, software and services that enable equitable access, participation and success. The KPMG report failed to address this underlying issue and so EPHEA hopes this consultation will focus on the low levels of funding.

What the KPMG report does concede is that numbers of students with disabilities have increased significantly over time since the DSP was introduced (p.13). In part this is likely due to widening participation activities, and better support for students with disabilities to access Higher Education especially through on-line and blended modes of delivery and technology. The Disability Standards for Education have also been instrumental in highlighting the responsibilities of institutions to be inclusive.

However, at a time when the government is focussed on issues such as increased equity participation more broadly, the specific needs of people with disabilities to access, participate and graduate from Higher Education is being overlooked. Workforce participation for people with disabilities is crucial to economic well-being and social participation and the Government needs to better support students with disabilities within the Higher Education sector to graduate qualifications and compete in the labour market.

The introduction of the NDIS, once fully implemented, should also see increased participation in Higher Education to facilitate the personal care and other needs of PWD to enhance their participation in educational, social and economic life.

Apart from small changes due to indexation DSP funding has stayed relatively the same. Meanwhile, the costs of supporting students have increased considerably (e.g. increased staffing costs for disability practitioners, participation assistants, sign language interpreters; increased use of assistive technology and specialised equipment). Concomitantly, the complexity of support needs of students with disabilities has increased (e.g. students with multiple disabilities, increased diagnoses of students with learning disabilities, students with mental health conditions, hearing and visually impaired students).

The Review is now suggesting that additional activities be included in the DSP (i.e. capacity-building in staff and curriculum reform). While these additional activities are admirable and relevant, they put added pressure on the DSP and existing priorities. This pressure on resources may potentially impact on universities being able to be fully responsive to students. A true commitment by the Government to encouraging access and participation for people with disabilities is required through increasing overall funding.

**EPHEA supports the adoption of the formula model with the following stipulations:**

* OUA students and students in enabling programs need to be included in total enrolment counts for the funding formula
* increased funding is needed to support the additional activities proposed, and to reflect increased numbers of students with disabilities, and increased costs in supporting them
* guidelines for expenditure, schedules for payments, and reporting obligations need to be clear
* further consideration is required regarding funds for students who have extremely high costs e.g. students requiring sign language interpreters or participation assistants
* There should be no conflation of DSP and HEPPP funding. The aim of the DSP is to support the specific needs of people with disabilities and the funds are so limited that conflation with HEPPP risks diluting DSP’s program objectives.
1. Are there particular issues that should be considered further in developing the new DSP reporting requirements? Is there easily reportable and standardised data collected by providers that would be useful in conveying the benefits and outcomes obtained through DSP funding?

In making reports to the Department of Education a recommended reporting strategy which would satisfy the universities obligations and which isn’t administratively burdensome would include:

* **number of students being serviced annually.** Information may be identified or de-identified. This data would allow the Department to track the progression of students with a disability from enrolment to graduation.
* **type of disabilities of students.** There are six standard categories – hearing, learning, mobility, vision, medical and other – by which students are categorised for statistical purposes. Mental health conditions need to be included as an additional category so they can be better tracked as a group needing additional support and finding some way to get specificity for the ‘other’ category. Students may have a primary and secondary disability – the secondary disability may be equally significant in terms of costs and currently there is limited capacity to unpack this information through existing reporting.
* **total costs of supporting students.** Rather than provide the detailed costs of support of each student as recorded in the ASSD it would be useful and reasonable to allow institutions to provide an overview of the mains costs associated with support e.g. total cost of sign language interpreting services; total staff costs for disability staffing and administration; total costs for equipment and so on. This would not create an unreasonable administrative burden and it would give both universities and the Department continuing clarity on the accurate costs of supporting people with disabilities. The guidelines around the DSP need to provide suitable guidance on acceptable costs but not be so restrictive as to limit the flexibility needed to support students.
* **Impact tracking.** Tracking students’ retention, progress and graduate outcomes is also a useful exercise to monitor and measure impact. However, care needs to be taken in how these statistics are analysed and interpreted. SWD do have slightly lower retention rates and they can have lower progression and success rates but that is not necessarily an indicator of poor support but rather the particular challenges for students. Graduate outcomes of students with disabilities can also provide a good measure of the success of support activities aimed at assisting this cohort with the transition to employment.
* **reporting on programs to enhance access and retention.** This couldincludeprogram cost, number of students supported, and outcomes (impact). At present there are not sufficient funds to support access and participation programs from DSP allocations but most universities do have some disability-specific programs funded by DSP performance funds or embedded programming from other funds (e.g. HEPPP, university funding). The proportion of funding allocated to outreach and access as well as to participation and success would need to be reflected in reporting.
* **training activities and initiatives for staff specifically aimed at improving accessibility and inclusion** (especially in teaching and learning). Numbers of staff attending training, frequency and impact could all be reported. There is currently not enough DSP funding to provide for these activities and they are currently supported through multiple sources (e.g. DSP, HEPPP, university funding). Funding allocated to capacity building would need to be reflected in reporting.

EPHEA recommends that reporting is done via templates provided by the Department; and within timelines that are reasonable for universities and fit with the internal finance and planning schedules.

An evaluation and reporting framework that allows universities to provide feedback using both qualitative and quantitative data is recommended, with national benchmarking provided by the Department.

Funding for the following year should NOT be held up by reporting schedules or delays and should be confirmed in the previous year to allow for planning of activities.

1. Do the combined old and new activities listed in the proposed program parameters correspond to the main challenges faced by providers in supporting students with disability?

While EPHEA strongly supports the idea of improved staff capacity to apply accessibility and inclusion into the curriculum through training and professional development, there is insufficient funding within the DSP to support these additional activities.

Having to balance the more immediate need to provide for costly equipment and supports for students with disabilities against the long-term, albeit necessary, work of curriculum reform would be challenging for institutions in the current funding regime, and ultimately would compromise both areas of work.

Curriculum reform is a core responsibility of universities. Previous reform agendas have included internationalisation, Indigenous perspectives and employability. Universal Design should also be core business. Curriculum reform could only be done with additional funding to support specialised staff such as educational designers with a background in disability, as well funding other supports such as transcribing and captioning, alternative formatting and possibly new technical platforms to transform curriculum over time.

Utilising the resources of ADCET to improve best practice and provide guidelines for developing inclusive curriculum would be one way to address staff capability, but it wouldn’t solve the considerable activity of revising course content.

1. Do providers support an increase in funding for ADCET to $150,000 per year? This represents around two per cent of DSP funds and an increase of around one per cent.

Yes, expanding ADCET’s funding in order to provide support and resources to the sector to assist with improved best practice will be useful but there are a few particular issues with this:

* $150k a year is not a sufficient amount to support the development of resources, increase engagement with practitioners, or to improve web-based traffic.
* The reduction of DSP funding to facilitate the increased funding to ADCET is problematic. However, funds over and above the existing funding pool would see ADCET be able to make a significant impact.
* Clarity around the strategic objectives for this key funding is required. Increased resources to assist the expanded activities of the DSP such as training and curriculum development would be recommended.
1. What additional services or information could ADCET provide that would be most useful to the sector’s ongoing work? 

ADCET could contribute significantly, and has already, to providing resources for academic staff to improve accessibility and inclusion in course materials. This might include development of on-line resources and/or national forums on inclusive curriculum design. Currently, the only disability-based forum for such discussions is [Pathways](http://www.atend.com.au/pathways-conference/) which is held biennially, so something in alternate years to allow for further discussion and information sharing in relevant communities of practice is recommended.

1. Should other or different changes be made to the DSP?

**The Review fails to address the underlying issue of the DSP in that the $7 million is vastly insufficient to support students with disabilities across the sector.** This has been a strong message to the Department from EPHEA ([Equity Practitioners in Higher Education Australasia](http://www.ephea.org/)) and ATEND ([Australian Tertiary Education Network on Disability](http://www.atend.com.au/)). The KPMG Review suggests that it is each university’s legislative responsibility to support SWD and that the DSP is the Government’s stake in the mutual obligation to supporting SWD in Higher Education (p.12). However, the Government has not made any material increases to these funds since the DSP commenced, and so this show of commitment by the Government is limited and inadequate given the increased participation by SWD in higher education.