

VET **Student** Loans

Redevelopment and Audit of the VET Student Loans Data Collection

Discussion Paper

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Glossary

ATO Australian Tax Office

AVETMISS Australian Vocational Education and Training Management Information Statistical

Standard

CHESSN Commonwealth Higher Education Student Support Number

DET Commonwealth Department of Education and Training

DHS Commonwealth Department of Human Services

HEIMS Higher Education Information Management System

HELP Higher Education Loan Program

HEPCAT Higher Education Provider Client Assistance Tool

NCVER National Centre for Vocational Education Research

RPL Recognition of Prior Learning

VDU VET HELP Due file

VEN VET Student enrolment file

VET Vocational Education and Training

VFH VET FEE-HELP

VLL VET Student load/liability file

VSL VET Student Loans

1 Introduction

The Department of Education and Training (DET/the department) is proposing to redevelop existing data submission technologies through a partnership with the Department of Human Services (DHS). The new system would provide an opportunity to focus on user-centred design to improve usability, reduce the cost of reporting and support more robust and timely data availability.

The system would also improve data sharing and interoperability between government agencies and the tertiary sector to remove duplication, including the discontinuation of DHS reporting requirements. Better information sharing would allow DHS to improve the experience for students receiving Youth Allowance and other support payments by reducing debts raised and improving payment accuracy.

This is an ideal opportunity to conduct an audit of the VET Student Loans (VSL) Data Collection (the Collection). A more efficient collection, together with new submission technologies, will enable more flexible reporting processes that better support data exchange and availability.

1.1 Purpose of this paper

The Redevelopment and Audit of the VET Student Loans Data Collection Discussion Paper (the paper) opens consultation with VSL stakeholders to seek views on how the department and DHS can ensure relevant, high quality data is collected through the Collection, using best practice submission processes. This paper is similar in purpose and aim to the Redevelopment and Audit of the Higher Education Data Collection Discussion Paper distributed to higher education providers in January 2018.

The aim of the paper is to explore:

- how to report and access data more efficiently using the proposed DHS-built government interface
- ensuring that the elements being collected are relevant and useful, and being collected in a timely way
- reducing the reporting burden for providers by more closely aligning the Collection with the Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS)
- identifying elements that could be adjusted or added to the Collection to better align it with the VSL program
- improvement of data quality.

1.2 Background

The Collection was established in 2009 with the introduction of VET FEE-HELP (VFH), the original income contingent loans scheme in the VET sector. The Collection is the definitive source of VSL statistical data. The Collection's data informs the Australian Taxation Office of students' VFH and VSL debt. It also enables policy development and analysis by government, providers and stakeholders.

The data also enables the Australian Government to fulfil its obligations to provide data to the National VET Funding Collection, managed by the National Centre for Vocational Education Research (NCVER).

The data is currently collected and processed using the department's *Higher Education Provider Client Assistance Tool (HEPCAT)* and the *Higher Education Information Management System (HEIMS)*.

1.3 The challenges

The challenges for the redevelopment and audit of the Collection are discussed under five key sections, with questions for discussion included in each section. In summary, the key challenges include:

1.3.1 Reducing reporting burden

The department is proposing to remove elements from the Collection that no longer meet the purpose for which they were originally designed or do not provide historical or statistical value.

Duplication of information across different file submissions also adds unnecessary clutter to the Collection. This paper proposes eliminating the need to report the same student data more than once during a student's course, unless the data changes (for example, student address information).

The department also proposes to better align elements within the Collection with those required to be reported to the NCVER under AVETMISS.

1.3.2 Tailoring the Collection to the VET Student Loans program

Partnering with DHS to redevelop submission technologies would provide the opportunity to tailor the collection to better align with the VSL program, by introducing new elements or fine-tuning existing elements, while continuing to support essential VFH elements as it is phased out.

1.3.3 Data quality issues

Low quality data impacts on the robustness and usability of the Collection because it results in unreliable and unrepresentative data. This paper invites discussion on how data quality can be improved.

1.3.4 Single-touch reporting

The department's proposed redevelopment of the Collection is focused on more efficient technologies and submission methodologies that would reduce data preparation and submission processes, better facilitating timely reporting.

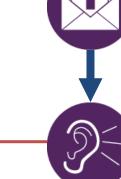
1.3.5 Reducing duplication

The proposed redevelopment of the Collection would provide an opportunity for DHS to discontinue separate VET data reporting by accessing to the department's VSL data. Data sharing between DET and DHS will limit overpayment of DHS student support payments as well as the accumulation of student debts, which potentially contributes to student attrition.

To achieve this aim, the Collection would require additional elements to ensure the availability of data essential to the administration of DHS student support payments.

1.4 Consultation

The department and DHS are committed to working with VSL stakeholders to continually improve the Collection and ensure a robust data collection. To ensure the best ideas are canvassed, we have established a consultation process to drive improvements.



Discussion paper

5 April

This discussion paper commences the formal consultation process.

Feedback and submissions in response to the paper are due 2 May 2018.

Discussion paper responses considered

3-9 May

The department will collate and analyse responses to the discussion paper.

Findings paper is presented

The department will prepare a findings paper that collates all feedback, which will be presented to stakeholders.

Proposed solutions

Proposed solutions will be settled to inform IT development.



Sector communication

Ongoing

The department will use existing communication channels, including newsletters and webinars, to keep the sector updated on the project's progress and outcomes.

The Details

2 Reducing reporting burden

2.1 Removing elements and reducing complexity

This section presents the case for removing around 20 elements that are duplicated across the Collection, or no longer add value to program management, statistics or data analysis. These elements are currently part of one of the following files:

- VET Commonwealth Assisted Students file HELP Due (VDU)
- VET Student enrolment (VEN) file
- VET Student load/liability (VLL) file

The tables below provide the rationale for reducing data in the following files.¹

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

Elements Proposed for	Element in VDU only	Element in multiple files
Removal	405 Student title	314 Date of Birth
	406 Postal address – Part 1	315 Gender Code
	407 Postal address – Part 2	
	466 Postal address – Suburb/Town	
	467 Postal address – State	
	409 Postal address – Postcode	
	468 Postal address – Country Name	
Data element purpose	The VDU file is the only file in the VE reports the personal details, includ (TFN) and the Commonwealth Support Numbers (CHESSN) of all students	ing names, tax file numbers Higher Education Student
	Student details from this file are Taxation Office (ATO).	provided to the Australian
	Both postal and residential address this submission.	es are currently collected in
What has changed?	student HELP debts from D the ATO no longer require p of assessment are now prov	the new nightly transfer of ET to the ATO, in July 2017, postal data. Students' notices ided online through MyGov. not use for postal data or eduplicated in the VEN file.
Proposal	Reduce the data collected in this elements required by the ATO to removing the proposed elements.	•

¹ While this is discussed in the context of the current submission structures, the new submission technologies may generate more efficient ways of reporting this data.

2.1.2 VET Student load/liability (VLL) file

Elements Proposed for Removal	333 Academic Organisational Unit Code
Data element purpose	While the <i>Academic Organisational Unit Code</i> element is not inherently relevant to VSL, the element is currently used for identifying units of study.
What has changed?	Moving to a new data collection system will provide the department with the opportunity to restructure the Collection in a way that allows this element to no longer be collected.
Proposal	Remove this element from the collection.

2.1.3 VET Student Enrolment (VEN) file		
Elements Proposed for Removal	476 Commencing location code of permanent home residence	
	486 Name of suburb/town/locality	
	560 Credit used value	
	561 Details of prior study for which credit/RPL was offered	
	562 Field of prior VET study for which credit/RPL was offered	
	563 Level of education of prior VET study for which credit/RPL was offered	
	564 Type of provider where VET study was undertaken	
	565 Credit offered value	
	566 Credit/status Higher Education provider code	
Data element purpose	Elements 476 and 486 provide information on the location of school leaver students.	
	Elements 560 through to 566 – the former Ministerial Council on Education, Training and Youth Affairs (MCEETYA) endorsed a number of initiatives to strengthen credit transfer and articulation from vocational education and training and higher education. That initiative led to the introduction of these elements in order to measure and assess credit transfer patterns.	
What has changed?	Following the Review of the VFH Data Collection in 2013, all of the above elements were identified as not necessary for program administration or compliance monitoring and it was recommended that they be removed from the collection. To reduce the impact of system changes for providers they were made 'optional', with the intention that they be removed at the next opportunity for structural change.	
Proposal	Remove elements 476, 486 and 560 through to 566 from the Collection.	

2.1.4 Questions for discussion

- 1. Do you see any value in retaining any of the elements discussed above? If they are retained, should their reporting be mandatory?
- 2. Are there other elements that no longer serve a purpose and so should be removed from the Collection?

2.2 Reducing duplication within the Collection

Issue	Recurring duplication of enrolment and TFN data throughout a student's course
Purpose	The original submission process prior to the introduction of HEIMS (used by higher education providers) saw load and enrolment data reported in two separate files each semester. Without a central repository of students' data, it was necessary to report the enrolment data with each set of load data, to match students' details and track their progress and outcomes.
What has changed?	Provider systems and the department's current data collection processes in HEIMS are structured to continue this original model and receive enrolment, and name and address data with every submission of unit of study data.
	However, the capability exists, with development of new submission methodologies, to collect and store students' enrolment, name and address details on their first submission, and to match new units of study without the need for resubmission during the student's course.
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

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

2.3 Aligning the Collection with AVETMISS

Currently, approved course providers must report VSL data through HEPCAT to HEIMS, while also reporting VET student data to the NCVER in accordance with AVETMISS. Although many data elements in these data collections are the same or similar, they are often required to be categorised differently and/or reported in different formats. This unnecessarily increases the administrative burden on providers. Partnering with DHS to redevelop existing submission technologies would provide opportunities to better align the Collection with AVETMISS, reducing the administrative burden placed upon VET providers.

Elements the department proposes could be aligned with AVETMISS are set out below.

#	HEIMS Element	AVETMISS Element
1	E307 Course Code	Program Identifier
2	E308 Course Name – Full	Program Name
3	E313 Student Identification Code	Client Identifier
4	E314 Date of Birth	Date of Birth
5	E315 Gender Code	Gender
6	E316 Aboriginal and Torres Strait Islander Coder	Indigenous Status Identifier
7	E329 Mode of Attendance Code	Delivery Mode Identifier
8	E330 Type of Attendance Code	Full-time Identifier
9	E346 Country of Birth Code	Country Identifier
10	E348 Language Spoken at Home Code	Language Identifier
11	E355 Unit of study completion status	Outcome identifier - national
12	E386 Disability ²	Disability Flag
		Disability Type Identifier
13	E402 Student Surname	Client Family Name
14	E403 Student Given Name – First	Client First Given Name
15	E405 Student Title	Client Title
16	E410 Address of Permanent Home Residence Part 1	Address Building/Property Name
	E411 Address of Permanent Home Residence Part 2	Address First Line
	E413 Address of Permanent Home Residence Postcode	Address Flat/Unit Details
	E469 Residential Address – Suburb/Town	Address Postal Delivery Box
	E470 Residential Address – State	Address Second Line
	E471 Residential Address – Country Name ³	Address Street Name
		Address Street Number
		Address Suburb, Locality or Town
		Postcode
17	E461 Field of Education Code	Program Field of Education Identifier
18	E477 Postcode or Overseas Country Code Location of	Postcode
	Higher Education/VET Provider Campus/Delivery Location ²	Country Identifier
19	E575 Study Reason Identifier	Study Reason Identifier
20	E576 Labour Force Status Identifier	Labour Force Status Identifier

2.3.1 Questions for discussion

- 4. Do you see value in aligning the HEIMS elements listed above with corresponding AVETMISS elements?
- 5. Are there other HEIMS elements not listed above that you believe should be aligned with

² In these instances, the equivalent HEIMS data is collected through two AVETMISS elements. To align the collections it will be necessary to split the HEIMS element over two elements.

³ AVETMISS collects residence information over nine elements whereas HEIMS collects it over seven. An additional two elements will be necessary in HEIMS in order to align the collections.

AVETMISS elements?

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

3 Tailoring the Collection to the VET Student Loans program

3.1 Adding new elements

The issue	The VSL program differs from the VFH program it replaces in many ways. The existing Collection was designed for VFH and requires a range of new elements to reflect the transition to the VSL program.
	The department proposes that the addition of some new elements would improve the Collection in terms of administering both the VSL program. Essential elements for administering VFH during its phase-out period would be retained.
	In reviewing the list of proposed new elements in the table below, it is worth noting that some elements are also proposed in Section 6 (Reducing duplication) of this discussion paper.
Proposal	Introduce a range of new elements set out in the table below.

3.1.1 New elements proposed by the department

Proposed new element	Description/Potential benefits
Enrolment date	The date the student signs up to enrol in the course, as opposed to the date the student commences study in the course, which is currently collected.
Course length	The full-time duration of the course in years.
Course end date	Date the student withdrew, successfully completed or deferred their study.
Reason for course withdrawal	The reason a student withdrew from, or deferred, her or his study.
Unit of study start date	The date the unit of study starts.
Unit of study end date	This is the date the provider has scheduled the unit of study to end (i.e., the date the provider uses to ensure the census day occurs no earlier than 20 per cent of the way through the period the unit is delivered).
Unit of study completion date	The date a student withdrew, failed or successfully completed the unit of study.
Skill set completions	Skill set code/s (as listed on training.gov.au) would be reported for students who complete and are awarded skill sets when undertaking an approved course. Collection of this data would enable the department to report on the level of micro credentialing, particularly with respect to students who withdraw before completing their course of study.
Study intention	This element would collect data on student study intentions (i.e., whether the student is enrolling in their course with the intention of completing the entire course or simply to complete certain parts or skills sets embedded within the course).
Date VET student loan fee notice	The date the provider issued the student her or his VET Student Loan

issued	fee notice.
Student engagement	An element that shows in what way the student has been engaged in their studies. The department proposes that this element would provide a range of engagement activities that the provider could flag the student as having undertaken (activities such as class attendance, submission of academic work etc.). It is envisaged that coding structure for this element would be along the same lines as the coding structure used for element 386 <i>Disability</i> .
Student email	The student's email address.
Student mobile number	The student's mobile telephone number.
Student home number	The student's home telephone number.
Academic suitability - provider	This element relates to circumstances in which a provider has obtained a copy of a certificate of a qualification at level 4 or above in the Australian Qualifications Framework, for the purposes of meeting the academic suitability requirements of section 80 of the VET Student Loans Rules 2016. This element would collect the RTO code of the RTO that delivered the qualification detailed on the certificate where the qualification is a VET award or a code to signify that the provider is a higher education provider.
Academic suitability – course	This element relates to circumstances in which a provider has obtained a copy of a certificate of a qualification at level 4 or above in the Australian Qualifications Framework, for the purposes of meeting the academic suitability requirements of requirements of section 80 of the VET Student Loans Rules 2016. This element would collect the course code of the qualification detailed on the certificate where the qualification is a VET award or where the qualification is a higher education award, a code to identify level of the qualification.
Academic suitability – year	This element relates to circumstances in which a provider has obtained a copy of a certificate of a qualification at level 4 or above in the Australian Qualifications Framework, for the purposes of meeting the academic suitability requirements of requirements of section 80 of the VET Student Loans Rules 2016. This element would collect the year the qualification was attained by the student.
Course assurance flag	An element that identifies a student who is undertaking their study after having been transferred to the provider under a course assurance arrangement operating under a tuition assurance scheme.
Citizenship documentation	This element would collect information on the citizenship evidence that the provider relied upon when accepting the student's course enrolment.

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

This section proposes a new element be added to the Collection to collect the number of fee periods for each course. However, this element would only add value to the Collection if other data relating to the length and/or timing of the fee periods were also collected. Feedback is sought on the appropriateness of adding fee period related elements to the Collection. If considered appropriate, feedback is also sought on the best way of collecting fee period length/timing data.

Proposed new element	Number of fee periods
Purpose	Under the VSL Rules providers must structure their courses into three or more fee periods. Currently no data is collected on the expected number of fee periods for a course or expected duration of each fee period. Collecting information on the number of fee periods may be useful for analysis of the VSL program's performance and design as well as assessment of provider compliance with fee period and tuition fee apportionment requirements.
Challenge	Other elements within the collection already provide data that enables evaluation of the VSL program and assessment of provider compliance with fee period and tuition fee apportionment requirements.
	While the addition of this element could add value to the Collection, it would only do so if other elements relating to the length and/or timing of the fee periods were also added to the Collection. However, design of such elements would need to take into account that these elements would be reported at the course level and that courses often span various study breaks (such as Christmas holidays, mid-year and mid-semester breaks etc.), and the complexities with changes in student enrolment patterns (such as moving from full-time to part-time, etc.).
Proposal	Consider the addition of this, and associated fee period elements to the collection.

3.1.3 Questions for discussion

- 1. Should the 'Number of fee periods' element be added to the collection?
- 2. If so, what other fee period element/s should be added to the Collection and how should these be designed?
- 3. Do the other proposed new elements above adequately tailor the Collection to the VSL program?
- 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?
- 5. Are there other elements that could be added to the Collection to:
 - o more closely align it with the VSL program; or
 - o improve administration of the VFH and VSL programs?
- 6. What are the issues providers may encounter with reporting the above elements? Are there specific elements that would provide excessive administrative burden?

3.2 Tailoring existing elements

3.2.1 Academic suitability

Impacted element	327 New basis for admission
Issue	The codes listed under element 327 <i>New basis for admission</i> do not align with the academic suitability requirements outlined in section 80 of the VET Student Loans Rules 2016.
Proposal	Change the codes for element 327 <i>New basis for admission</i> to cover the academic suitability requirements set out in section 80 of the VET Student Loans Rules 2016. These are: O 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

Impacted element	446 Variation reason code
Issue	Codes available under element 446 <i>Variation reason code</i> allow the following variation reasons to be reported:
	Remission due to special circumstances
	Revised record due to administrative error
	Deletions due to administrative error
	Additional record or new record reported for the first time
	Divisions 2 and 3 of the <i>VET Student Loans Act 2016</i> provide a number of reasons, not listed above, for student debt to be re-credited by the provider or the Secretary. These include reasons such as:
	Course not provided to completion
	The student not being an eligible student
	The student not being a genuine student
	Provider failing to comply with the Act
	Unacceptable provider conduct
Proposal	Consider the addition of new codes for element 446 <i>Variation reason code</i> to cover the variety of circumstances in which debt may be remitted.

3.2.3 Questions for discussion

- 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?
- 8. Are there other elements that could be changed to improve the Collection's alignment with VSL?
- 9. Do providers wish to raise any issues with the above elements?

4 Data quality issues

Some data in the Collection are of limited use because of poor reporting practices and/or misinterpretation of what is required. This section discusses elements the department is proposing to modify to improve the usability of the Collection.

4.1 Misreporting of "No information" location codes

Impacted elements	 319 Location code of term residence 320 Location code of permanent home residence 477 Postcode or overseas country code location of campus/delivery location
Issue	'No information' codes should only be reported in circumstances where it has not been possible to obtain the actual information from the student. There should only be a very limited number of circumstances when the 'No information' (i.e., 99999) code is submitted.
Challenge	Submitted data for elements 319, 320 and 477 are frequently inadequate for analysis purposes when drilling into specific data characteristics such as regional or remote locations or indigenous students, or student with low socio-economic status.
	Analysis of the data suggests that providers are not capturing this information for all students or are simply using "no information" code as a default value.
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

Impacted element	493 Highest educational participation prior to commencement
Purpose	Highest educational attainment was updated to collect data on highest educational participation following the introduction of credit transfer arrangements in 2008, prior to the implementation of VFH.
Challenges	Data is reported inconsistently across the sector, with many providers focussing on <i>attainment</i> rather than <i>participation</i> .
	There is also a lack of clarity about the hierarchy of the awards. As an example, a student who has previously completed a Bachelor's degree and also participated in, but not completed, a Master's degree would be coded as having 'An incomplete Higher education course'. There would be no indication in the data that the student has successfully completed an award course.
	The usability and reliability of this data is diminished by this ambiguity.
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

Impacted element	490 Student Status code
Issue	The collection receives student data relating to both the VFH scheme and VSL program. However, the Collection's data must be combined with data from the department's eCAF system in order to categorise student data into one of the two programs.
Challenge	Codes could be added under element 490 <i>Student Status code</i> to differentiate student data by loan program. However, by the time such a proposal was implemented, very little, if any VFH data would still be required to be reported, lessening the benefit.
Proposal	Review whether a change to element 490 <i>Student Status code</i> to differentiate between loan programs would improve the quality of the Collection.

4.4 Course of study load or duration

Impacted element	350 Course of study load
Purpose	Element 350 <i>Course of study load</i> provides the aggregated EFTSL value for a course of study, summed across all units of study which meet the academic requirements for the course of study.
	The value is to represent the aggregated EFTSL for all years of the course of study, assuming that:
	 the course of study is undertaken by a full-time student; and
	 the student undertakes a standard program of studies.
	This data enables analysis in relation to how students are progressing through their courses as well as assessing provider compliance in relation to fee periods and fee apportionment.
Challenge	Element 350 <i>Course of study load</i> does not appear to be well understood by some providers, and the quality of this element's data varies significantly between providers.
Proposal	 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

- 10. How can data quality be improved for these elements?
- 11. Are there other elements where a lack of clarity impacts on data quality and usability?

5 Single-touch reporting

5.1 Enter your data once

	formation is currently entered, manipulated and manually transferred ultiple times.
ne pr be	nis imposes a significant reporting burden on approved course providers and egatively impacts the timeliness of student debt transfers to the ATO, and the reparation and release of publications. Delayed publications make provider enchmarking difficult and prevent students from accessing timely information inform their study choices and meet taxation obligations.
СО	abmission deadlines often fall during periods of high administrative and ampliance workloads for providers, making it difficult to meet reporting oligations.
da	ew submission methodologies can enable <i>single-touch reporting</i> of student ata. A single-touch reporting methodology would have the greatest benefit for oviders with relatively sophisticated student administration software.
ap ap	ngle-touch reporting only requires student data to be entered into the oproved course provider's student administrative system, with the opropriate data then being automatically submitted to the Collection. That ata can then be validated to identify any errors that may have been made.
nu	nder a new system, reporting effort would be spent responding to the small umber of errors rather than manipulating, interrogating and manually bmitting large datasets at multiple points in time.
Potential benefits Re	educed reporting burden for approved course providers and government.

5.1.1 Question for discussion

- 12. How might we implement single-touch reporting?
- 13. How do we ensure data is updated with changes so that it is current, without compromising single-touch reporting?

6 Reducing duplication

6.1 Discontinuing Department of Human Services reporting

Opportunity	Approved course providers report data to DHS to help maintain the integrity of student support payments such as Youth Allowance, Austudy and ABSTUDY. The data reported to DHS largely duplicates data already reported to DET via HEPCAT. Submission of data to DHS could be discontinued if a number of minor modifications are made to the Collection as part of the proposed HEIMS Redevelopment.
Modifications needed	 Introducing single-touch reporting would deliver timely, validated data needed by government to accurately determine and adjust student support payments. Date of events – the day certain events occur needs to be known so student support payments can be suspended or cancelled. This ensures students are not underpaid or overpaid. New reporting is needed for withdrawal dates and more detail on course start dates (which are currently only reported with the month and year of commencement). Course end date – student support payments cease once a student stops studying. The indicative course end date is used to support
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

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

7 How to make a submission

Your submission should clearly state:

- The name of the organisation or individual making the submission. (If an organisation, please provide details of a contact person.)
- Your contact details, including, at a minimum:
 - address
 - o email
 - o telephone number

7.1 Addresses for your submission

Submissions and other enquiries can be emailed to:

VETStudentLoans@education.gov.au

or posted to:

Data and IT Section

VET Student Loans Branch
Department of Education and Training
GPO Box 9880
Canberra ACT 2601

7.2 Confidentiality

The Department will not accept submissions that are provided on a wholly confidential basis. If you consider that information in your submission should be treated as confidential, please provide this information as a separate attachment and clearly indicate this in your submission.



7.3 Any questions?

If you have any queries about the content of this discussion paper or the consultation process, please get in touch with us via email at VETStudentLoans@education.gov.au.