run Regional Universities Network

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13 September 2022

The Regional Universities Network (RUN) welcomes the opportunity to comment on the Department of Education's *Microcredentials Pilot in Higher Education: Consultation Paper.*

RUN is a national collaborative group of seven regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, University of Southern Queensland, and University of the Sunshine Coast. This RUN submission does not prohibit RUN universities from making their own submissions addressing in detail any specific issues they wish to explore.

Overview

RUN universities are supportive of the investment to pilot the design and delivery of microcredentials in the higher education sector. The objectives of this pilot enable further engagement with local industry, support flexible access to higher education, and supports the upskilling and reskilling of Australia's regional workforce into the future. For RUN universities, 7 of 10 graduates remain in the regions post-graduation. Working alongside local industry, RUN universities are well-placed to support this pilot while meeting the needs of regional students. RUN universities will continue to play a central role in producing vital human capital to meet the evolving workforce needs of regional Australia.

RUN universities seek further details regarding the implementation of the pilot; and recommend increased flexibility when establishing the criteria and determining alignment with the principles of the National Microcredentials Framework. For each funding round, RUN encourages the Department of Education to consider also identifying essential occupations in which there are shortages restricted to regional Australia.

Eligibility and Proposed Implementation

RUN is supportive of the proposed approach and timeframes outlined for Stage 1, with the design of microcredentials to be delivered in 2023 limited to Table A providers. RUN universities have strong linkages to industry in regional Australia and are supportive of the requirement to obtain industry endorsement of their microcredentials.

The consultation paper outlines the intention for Stage 1 grant recipients to grant a license to the Commonwealth, and other higher education providers, to make course materials for the microcredential available to other providers to deliver the microcredential. RUN is concerned regarding the surrendering of intellectual property and the impact of the license granting on institutional competitive advantage. Additionally, RUN note concerns about the scope of the work to be undertaken in relation to the grant amount.

RUN universities note that course content is traditionally designed within a specific learning management system. As providers use various learning management systems, further details are required on how generic content is to be generated so it can be delivered across multiple platforms, while considering usability and accessibility. To provide consistency for providers and students, an option is for the content to be delivered via a unique platform supported by the Commonwealth Government.

Characteristics of Microcredentials

Under the proposed requirements, RUN universities are seeking clarification regarding the scale of the microcredentials suggested in the consultation paper. The paper notes that microcredentials

must be between 0.25 to 0.49 Equivalent Full Time Student Load (EFTSL). This is considered a substantial study load for a microcredential. RUN is seeking clarification if this requirement is per microcredential or per suite of connected microcredentials?

RUN also notes the requirement for microcredentials to have a census date. A suggestion is that the census date for highly flexible microcredentials may need to be flexibility stated. For example, in terms of percentage of volume of learning hours/days/availability. It is noted however, that configuring this individually would be an extensive exercise for both providers and the Government, to establish and monitor.

RUN seeks further details for the requirement for 'robust assessment'. It is recommended guidance tools be developed with the sector and industry to ensure both quality and minimum standards.

National Priorities and links to Skills

RUN is supportive of the strategy to create microcredentials that provide upskilling or reskilling opportunities in occupations essential to Australia's current workforce needs and future productivity.

The National Skills Commission's 2021 National Skills Priority List[1], identifies occupations in national shortage, including where shortages are restricted to regional areas. The consultation paper outlines that the Department of Education will advise on the national priorities for the program at each funding round. It is recommended the Department of Education consider a geographic approach to coincide with identifying shortages in essential occupations. This approach would enable RUN universities and other regionally based institutions to create and deliver microcredentials that will support the workforce in the communities they are based throughout regional Australia, while enabling metropolitan universities the opportunity to service their community workforce needs

Intended Reporting

RUN cautions the Department on implementing manual collection and reporting arrangements that are overly burdensome, noting there are significant reporting requirements already in place across the sector. RUN is supportive of exploring how existing reporting mechanisms, including the Tertiary Collection of Student Information (TCSI) can be utilised throughout this microcredential pilot.

Moving forward, RUN is eager to work with the Department to develop and refine this approach and welcomes the opportunity to be involved in providing further feedback on the intended reporting.

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[1] https://www.nationalskillscommission.gov.au/topics/skills-priority-list