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**Response by Australian Council of Deans of Education (ACDE) to DEST Discussion Paper:  
Review of the impact of the *Higher Education Support Act 2003*.**

Please find attached the response of the Australian Council of Deans of Education to the paper:  
Review of the impact of the *Higher Education Support Act 2003*.

This document has been circulated to the full membership of the Council (over page) and their feedback incorporated into successive drafts. It has also been approved by the Board which has a member from each State and Territory.

Fifteen months ago, in response to "Questions on Notice" from the House of Representatives Inquiry into Teacher Education, the ACDE made a submission in relation to the funding of Teacher Education. In the following pages, we have presented some of those same arguments in relation to the impact on teacher education of the mechanism and level of funding under the Commonwealth Grant Scheme (CGS) and the Relative Funding Model (RFM) before it.

We have also commented on complexities of the management of load and funding that were not central to answering the questions on notice from the House of Representatives Inquiry, including the Administrative Guidelines pertaining to work experience in industry.

Further, we have made two alternative proposals for the mechanisms for funding of the clinical/placement component.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sue Willis', is written over a light blue horizontal line.

Professor Sue Willis  
President: Australian Council of Deans of Education  
Dean, Faculty of Education, Monash University

## **MEMBERS OF ACDE**

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University of Sydney, Faculty of Education and Social Work

University of Wollongong, Faculty of Education

Macquarie University, Australian Centre for Educational Studies

University of Newcastle, School of Education

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# SUBMISSION BY THE AUSTRALIAN COUNCIL OF DEANS OF EDUCATION (ACDE) TO THE REVIEW OF THE IMPACT OF THE HIGHER EDUCATION SUPPORT ACT 2003

## Overview

In brief, the ACDE submits the following:

### a Overall levels of funding

The overall level of funding to teacher education is inadequate. The specialist and necessarily small group nature of much of the teaching and the infrastructure requirements together suggest that funding should be at least commensurate with Nursing and Cluster 7 (Languages and Visual and Performing Arts). The cost of placement adds to this considerably and the practical loading introduced under HESA falls far short of addressing the escalating cost of clinical placements.

### b National priority

Rather than advancing the position of teacher education, Teaching's designation as a National Priority Area has worked in concert with the other changes to further disadvantage Education relative to other fields. Even after the Practical Loading, undergraduate places are able to earn some \$300 less than they would have had teacher education not been made a national priority, graduate diploma places suffered a total loss of income of over \$1000 as a result of a combination of reducing the differential between undergraduate and post graduate places and being designated a national priority. There is little evidence that the level of HECS is influential on students' choice of field. Although there has been some growth in teacher education enrolments over recent years, this has been due to extra places being provided. The large increase, for example, in applications to teacher education in Victoria occurred between 2001 and 2004, prior to the CGS, resulting in a significant improvement in the quality of commencers into teacher education over those years.

### c Funding through enrolment in units

Although the CGS and RFM before it, describe fees and grants in terms of the FTE student enrolled in a course, fees and grants are actually derived through enrolments in units. As a result, the funding to an Education faculty/school will depend upon the proportion of units in a course that are studied in (designated as) Education. The single biggest cost in a teacher education course, the cost of placement, will be the same regardless of whether the student takes units outside the faculty or not. However, due to the Administrative guidelines of HESA pertaining to industry based units, the school placement will have to be funded from the income to Education coming through university based units. The Practical Loading is similarly tied to the enrolment in units in Education so that the approximately \$600 in funding only applies pro rata to units actually studied in Education.

### d Differentiation between undergraduate and post graduate places

The ACDE considers that the removal of the funding distinction between undergraduate and post graduate does not acknowledge the difference in costs of delivery. Post graduate courses are generally of shorter duration than undergraduate courses, but many of the costs, particularly recruitment and administration are fixed for the whole course. Many require intensive placements, research and professional projects to be undertaken for professional accreditation purposes.

### e The micro-management of load

Managing load has become increasingly complex and inflexible with the result that Education faculties are unable to respond quickly to variations in demand across subject areas and campuses *even when* moving load would serve the best interests of the profession and community by providing places in hard to fill subject areas and locations. This is because moving teacher education places from, for example, English to Science would result in changes to the load in Arts and Science.

**f Student contribution**

Student fees are not charged on the basis of the course the student is enrolled in but rather on the basis of enrolments in units. Consequently, a student choosing to become a history or English teacher will pay a smaller contribution than a student electing to become a mathematics, science, economics or visual arts teacher because the units studied in their discipline area (typically around half of their units) will be charged at the discipline rate. Critically, these discipline rates are premised on higher earning capacity upon graduation, which is demonstrably not the case for teachers. This may be a disincentive for teacher education students to engage in curriculum studies where teacher supply is insufficient to meet the demand.

**Proposal**

The ACDE proposes that:

- i Education be placed in a funding cluster commensurate with Cluster 7 and the quarantine of Education from charging the variable student contribution be abolished in order to ensure that the potential to provide a high quality student experience is not compromised relative to the rest of the sector.
- ii The Education 'Practical Component' of CSP funding introduced in HESA 2003 be provided through a mechanism that ties funding directly to the number of students enrolled in an Education *course* and their placement requirements rather than to taught load taken within the Education discipline.
- iii A mechanism be sought for acknowledging the course in which a student is enrolled as well as the unit of enrolment in order to:
  - (a) increase flexibility to respond to changes in demand for places in various teaching fields
  - (b) base the student contribution on the course rather than simply the discipline cluster of the unit. This will ensure that fairness and equity applies to the costs of teacher education for different teaching specialisms.
- iv That the Administrative Guidelines associated with HESA relating to work experience in industry be revisited to take into account the high and direct cost to Education of placements, the extent of which are generally prescribed for professional accreditation, possibly by exempting Education from the restrictions in the guidelines.

## DETAILED SUBMISSION PREPARED BY ACDE

### 1 Overall level of funding for Education

Although the funding *mechanism* introduced in HESA 2003, the CGS, differs from the RFM, the CGS largely maintained the cluster funding relativities of the RFM. These relativities were themselves based on historical average expenditure patterns in the binary higher education system rather than necessary costs. When the unified national system was introduced and weighted student units were determined, over 85% of teacher education was carried out in Colleges of Advanced Education. The weighting therefore reflected CAE responsibilities and missions. It did not include the cost of supporting research or the expectation that all ongoing academics would be both teachers and researchers. Consequently, the CGS has perpetuated historical funding inequalities to the long term disadvantage of teacher education, educational research and ultimately the profession and the practice of Education.

The cluster weighting of 1.3 established in 1988 was widely regarded at the time as an under-estimation of the costs involved. Indeed the majority of pre 1988 universities, in recognition of this anomaly, weighted Education more highly for the internal distribution of funds thus subsidising its operation. Such internal re-weighting (usually between 1.6 and 1.9) can only occur, however, by redistributing funds provided for disciplines other than Education and, in tightened circumstances, with increased moves towards strategic cost management, these cross subsidies have become more obvious and less palatable. Such a situation is not sustainable, and having become a national priority has exacerbated the relative under-funding of Education. In a time of teacher shortage, this may become an issue if institutions are reluctant to increase Education places because their income is insufficient to meet the costs of providing a quality education.

Funding for Education is insufficient and should be commensurate with Nursing (and with Cluster 7 -- Languages and Visual and Performing Arts). A significant proportion of any teacher education course involves curriculum 'methods' (what and how to teach and assess in specific areas of the school curriculum). Education thus needs to fund the infrastructure, equipment, materials and technical support for science education laboratories, visual and performance arts spaces including music, and sporting, physical education and human movement education laboratories/facilities. In addition, Education must fund mathematics curriculum materials, wireless laptops and a wide range of educational software across the age span from early childhood to senior secondary across all curriculum areas. Also smaller laboratory class sizes often are needed for practical laboratory sessions and field trips because of pedagogical considerations and OHS regulations. Teaching costs for the campus component of teacher education courses are therefore similar at least to disciplines such as Visual Arts and Languages.

In addition, Education must fund the escalating costs of placement. The cost of arranging field placements has risen rapidly due to the crisis being faced in finding sufficient teachers able and willing to take student teachers. Faculties report turn down rates of over 60% and having to make 6 to 10 phone calls to place one student particularly and ironically in areas of teacher shortage, such as certain foreign languages. Often faculties are forced to place very small numbers of students in a large number of schools, increasing the cost of communication and management, of visits by academic staff and of making payments. (Further detail of cost and funding mechanism is provided in point 3.)

Student-staff ratios provide just one indication of the deterioration in the funding environment for Education faculties relative to other fields. Education has shown a rise of 12% in SSR between 2001 and 2004, compared with a sector rise of 5%.

**SSR (on shore students, includes casual staff) – DEST data**

	2001	2002	2003	2004	Increase 2001-04
Education Units	20.9	22.5	23.2	23.5	12.4%
All Academic Units	18.8	19.6	20.1	19.8	5.3%

In 2001, Education's SSR was 11% higher than the sector average. In 2004 it was almost 19% higher. In 2004, when for the first time in many years the sector wide SSR dropped marginally, Education continued to rise. This precedes the HESA reforms, which the ACDE argues has further disadvantaged Education relative to the sector.

## 2 National priority

Prior to 2005, Education was in the same cluster as the Social Sciences. According to DEST, when it moved from the RFM to the CGS, a practical loading per Full Time Equivalent (FTE) was provided for Nursing and Teaching.

“Under the new funding arrangements universities have been provided with additional funding for nursing and teaching through the Nursing and Teaching cluster funding rates to assist with the costs associated with the practical component of the courses. ... Initially, as with all other funding clusters, the funding rate for ... Teaching was obtained by removing the HECS component from the old RFM value for funding cluster 5.

The funding rates for nursing and education were increased by a practicum loading amount to support the practicum components and placed in separate discipline clusters titled Nursing and Education. Hence, the additional funding for ... the teaching practical loading is the difference between the funding rate for the education cluster (\$7,294) and the funding rate for cluster 5 (\$6,637). Therefore, the loading for the Education Practical component is \$657 per EFTSL in the education cluster.” (Email from DEST to Monash University dated Wednesday 23<sup>rd</sup> March 2005)

The effect of these changes was:

- (a) In 2005, undergraduate entry places in Education received a *net increase* of \$657 per EFTSL over what they would have received under the RFM, whereas the full 25% premium would have brought an additional \$962, *resulting in an effective loss of earning capacity of \$305 per undergraduate FTE* compared to the Social Sciences.
- (b) In 2005, graduate entry places in Education received a *net decrease* of \$149 per FTE. Undergraduate level Education was weighted at 1.3 prior to HESA and graduate entry Education was weighted at 1.4. Under HESA, the funding rate for the graduate level courses reduced to 1.3. The practicum allowance was then added to this lower rate, resulting in a net reduction in funding of \$149 relative to the RFM. This is in spite of the fact that the per annum fixed cost of the shorter Graduate Diploma of Education is relatively greater than for longer courses. *Had graduate entry teacher education and education more generally continued to be funded at 1.4 and allowed to charge the premium it would have earned over \$1100 more. Had funding been reduced to undergraduate levels but remained in the Social Science cluster it still would have been over \$300 per FTE better off.*

As the Minister has herself pointed out, there is little evidence that the level of HECS is influential on students' choice of field. The embargo on charging the extra 25% on the student contribution has had little effect on applications for teacher education. A large increase in applications to teacher education occurred between 2001 and 2004, prior to the CGS, resulting in a significant improvement in the quality of entrants to teacher education and many eligible students not gaining places. In 1998 almost half (48%) of Year 12 students admitted to teacher education in Victoria had an ENTER below 70. Five years later in 2002 it had dropped to 17% and remains around there now. In 1998, only 20% had an ENTER over 80, by 2002 this had doubled to 40%, and almost 10% had ENTERS over 90, a remarkable improvement. The modest growth in teacher education enrolments over 2005-6 was due to extra places not extra applications. If anything there has been

a slight softening of demand in 2005-6, that is, since HESA, although applicant numbers are still strong. (VTAC Entry data, can provide)

### 3 Funding through enrolment in campus units

Although the CGS and RFM before it describe fees and grants in terms of the FTE student enrolled in a course, fees and grants are actually derived through enrolments in units. As a result, the funding to an Education faculty/school will depend upon the proportion of units in a course that are studied in (designated as) Education. At face value, this appears reasonable. Education is funded for the part of the program it teaches. However, the cost of placements must be borne from the enrolment in non placement units. That is, due to the Administrative Guidelines (Final draft, 1.4.04) of HESA, pertaining to work experience in industry, CGS, funds cannot be used for units which are essentially professional placement. Thus even if a unit fulfils ALL of the following:

- (a) interaction between the supervisor and the student which may include site visits; and
- (b) organisation of student placements; and
- (c) ongoing monitoring of student work and progress; and
- (d) assessment of the student learning and performance during the placement

the unit may NOT be counted as load and does NOT attract funding under the CGS. Consequently such placements must be funded from other university based units of study. These costs are not discretionary: placements are necessary in order for courses to gain professional accreditation, Reviews and Inquiries regularly recommend more placement days but without providing funds to sustain those placements. Furthermore, school teachers taking student teachers are actually paid by the university for each day of placement as a result of an historical industrial agreement, and the cost of making and administering placements is escalating. Our estimate is that the cost of school teacher payments and administering the placement together comprise between 65% and 80% of the total cost of placement, with the rest relating to visits by university supervisors<sup>1</sup>. Given this, in the case of Education, this administrative guideline of HESA is inexplicable.

At present undergraduate teacher education is at least four years long and typically involves around 80-100 days of placement, of which up to 20 days may be in various education/community settings and around 80 in formal school settings (there are variations on this). Faculties and Schools of Education must fund the whole placement experience from the funding provided for 'units of study' classified as being in the Education discipline. If a student is enrolled in a four-year Bachelor degree course in which all of the units are classified as Education discipline, the Faculty will fund the 80-100 days of placement from four years of funding. If a student is enrolled in a four-year course in which part of the study is in another discipline -- perhaps music, science, history or indigenous studies (almost always true of secondary qualifications and common for many primary qualifications) -- the Faculty will fund the same amount of placement from the proportion of the course studied in Education.

In 2005 the Victorian Council of Deans of Education analysed costs in two Universities. In one of these, in the one year Graduate Diploma of Education providing 50 days of placement, payments to cooperating teachers were around \$1310 and the total cost of placement was conservatively calculated to be around \$2400. Yet these placements are not counted as load and do not attract CGS. As a result the university delivers a full 8 semester units on campus as well as the placements from one year of funding. The cost of placement leaves faculties with significantly less income per unit than an Arts place even though its delivery demands are much more like those of Cluster 7. A four year double degree program providing 80 days of placement, in which schools were visited by academic staff for only two of the five placements, teacher payments were around \$1985 and total costs around \$3800, and in a four year degree program involving 80 days of experience but spread over more placements and four visits by academic staff, the total costs were around \$4380<sup>2</sup>.

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<sup>1</sup> 2005 data provided by Monash University to the House of Representatives Inquiry into Teacher Education, and available upon request

<sup>2</sup> As above

Clearly, field placement costs are considerably more than \$657 per EFTSU provided as the 'Practical loading' and DEST recognises this in the quotation above which describes the loading as *assisting* with costs of the practical component. However, let us consider only the practicum loading. Student A, taking a four year course with all units of study in Education, will attract a loading of \$2628 (4 x \$657) over four years. By contrast student B, qualifying to become a History teacher and taking a double degree in Arts and Education, would do 50% of the course in Arts and 50% in Education. The university would be funded at the Arts rate for half of student B's course and at the Education rate for half the course, and would receive a 'Practical loading' of only \$1314 (2 x \$675) over four years even though the practicum costs for student B will be the same as for student A.

#### 4 Differentiation between undergraduate and post graduate places

The ACDE considers that the removal of the funding distinction between undergraduate and post graduate does not acknowledge the difference in costs of delivery. Post graduate courses are generally of shorter duration than undergraduate courses, but many of the costs, particularly recruitment and administration are fixed for the whole course. Marketing and recruitment, selection, enrolment, setting up files, library, email and other accounts, and graduation, transcript and referee processes will have to be covered from perhaps 1 to 1.5 years of income rather than from 3 to 5 years of income. This cannot be 'mechanised'. Many post graduate courses also require intensive placements, research and professional projects to be undertaken for professional accreditation purposes.

The one year Graduate Diploma of Education course is highly efficient in preparing teachers quickly but is nevertheless expensive to run, relative to income:

- They are highly intensive and provide a full academic load (sometimes more) in addition to funding the cost of the practicum;
- The number of days of practicum (40 days minimum and often 50 or more) is commonly at least half the total for the four year degrees (80+ days) and timing makes arranging placements more difficult and time consuming;
- There are many teaching specialisations and these curriculum area units take a relatively larger proportion of the course, making economies of scale difficult to achieve and appropriate placements difficult to organise;
- All the fixed costs of commencement (ranging from police checks to setting up files and email accounts) and graduation (including providing information to employers etc) must be funded from one EFTSL;
- The ratio of turnstile to load is high (that is, each student enrolled brings a total of only one EFTSU compared with up to four EFTSU for undergraduate degrees) which means that the costs of marketing and selection are also proportionally high.
- The selection process itself is considerably more labour intensive than those based computerised selection via tertiary admission scores. All applicants are graduates and qualified to that extent, but grades alone are an insufficient criterion for selection. Education faculties/schools must check that each student has the appropriate range and depth of study for the teaching specialisation requested to enable registration. Where there is a large ratio of applications to places, Universities may also often ask for additional information such as references, and previous relevant experience. From each funded place we must pay for this selection process for multiple applicants all of whom are qualified to the extent that they have a degree relevant to their chosen specialisations.

A total student load of 200 in a four year undergraduate course probably requires the university to attract, select and commence 70 new students per year and graduate approximately 50, in a one year course one must attract, select and commence more than 200 every year!

## 5 The micro-management of load

Managing load has become increasingly complex and inflexible under HESA 2003.

- The effect is that Education faculties are unable to respond quickly to variations in demand across subject areas and campuses even when moving load would serve the best interests of the profession and community. Thus, if we had an upsurge of applicants for science teaching, for example, we could not move load from arts teaching to science teaching even though the teacher education places would be the same, because this would impact upon the discipline load in both arts and science, potentially leading to under enrolment in one and over enrolment in another, and producing financial sanctions in each case. Similarly, if one campus has a reduction in science teaching applications and another has growth, we cannot respond immediately to ensure the overall numbers in science teaching are maintained let alone increased.
- The micromanagement of load has added considerably to the cost of teacher education, particularly since Education has a higher turn style (that is, more commencers as a proportion of total load due to prevalence of one year Graduate Diploma courses) than any other field in higher education and so spends commensurately more of its time and income on selection, new enrolments and load management.

## 6 Student contribution

Student fees are not charged on the basis of the course the student is enrolled in but rather on the basis of enrolments in units of study. Consequently, a student choosing to become a history or English teacher will pay a smaller contribution than a student electing to become a mathematics, science, economics or visual arts teacher because the units studied in their discipline area (typically around half of their units) will be charged at the discipline rate. Critically, these discipline rates are premised on higher earning capacity upon graduation, which is demonstrably not the case for teachers.

## 7 Pipeline funding

The ACDE recognises that the effect of pipeline funding is largely notional and that, when enrolling new students, universities will take into effect the historical patterns of attrition and adjust commencing numbers accordingly. It also recognises that any change is likely to bring complexities into a system that is already too complex and overburdened with paper work. It is, nevertheless, disturbed by the apparent premise that we should expect a 25% attrition rate per annum and believes that the message this sends is at least unfortunate. Even leaving aside the human cost of such high levels of attrition, productivity considerations would suggest that we should be enrolling fewer and graduating more! Having said that, the ACDE is unsure of what alternative funding model might be adopted.

## RECOMMENDATIONS

The ACDE proposes that:

- i Education be placed in a funding cluster commensurate with Cluster 7 and the quarantine of Education from charging the variable student contribution be abolished in order to ensure that the potential to provide a high quality student experience is not compromised relative to the rest of the sector. If Education remains in its present cluster, then the practical component must increase accordingly.
- ii The Education 'practical component' be provided through a mechanism that ties funding directly to the number of students enrolled in an Education *course* and their placement requirements rather than to taught load taken within Education. (see below)
- iii A mechanism be sought for acknowledging the course in which a student is enrolled as well as the unit of enrolment in order to:
  - (a) increase flexibility to respond to changes in demand of various teaching fields
  - (b) base the student contribution on the course rather than simply the discipline cluster of the

unit, and hence assure that fairness and equity applies to the costs of teacher education for different teaching specialisms.

- iv That the Administrative Guidelines associated with HESA relating to work experience in industry be revisited to take into account the high and direct cost to Education of placements, the extent of which are generally prescribed for professional accreditation, possibly by exempting Education from the restrictions in the guidelines.

### **Possible alternative models for the additional 'practical component funding'**

The proposal is that the normal funding to Education continue to be through the usual unit load based mechanism and continue to fund the majority of the cost of placement. However, the supplementary practical component intended to 'assist with the cost of placement' should be disembedded from the *unit* funding and provided through a mechanism that ties it directly to the number of students enrolled in a teacher education *course* and their placement requirements rather than to taught load taken within Education. (This is typically, although not universally, around 80 school based days for a four year BEd or a double degree such as a BA/BEd or BSc/BEd, and 40-50 days for a one year Graduate Diploma of Education.)

#### ***Model 1 for the Practical Component***

The simplest model would be for the Practical Component (PC) to be allocated for each FTE enrolment in a teacher education course, regardless of which discipline the unit enrolments were in. This would require universities to project and provide course enrolment data but this should be relatively straightforward. The ACDE recommends that a rate be struck for undergraduate places with universities receiving the fixed amount (\$PC) for each of four years of study. However, for intensive postgraduate courses this per annum allocation would double. (In effect, a student enrolling in a four year secondary teacher education program would get around 80 to 100 days of placement and attract 4 x \$PC over that period. A student enrolling in an undergraduate degree and then completing a one year intensive Graduate Diploma would get around 40 to 50 days of placement and attract 2 x \$PC over that period.)

#### ***Model 2 for the Practical Component***

A more complex model (2a) could more directly reflect the number of days of placement. Within agreed parameters, universities offering accredited courses would register the amount of placement provided for a particular teacher education course and package the days to suit the particular course structure. In semesters in which students undertook a placement they would register for a number of practicum modules, each of perhaps 5 days, in association with the standard credit bearing units that comprise the course. These modules would not be 'units of study' with credit points attached. Rather, registration for the practicum modules would be in association with enrolment in credit bearing units of study that would continue to bear the majority of the placement costs. We believe this proposal to be consistent with current DEST guidelines in relation to *Work Experience in Industry* (Chapter 3 of the DEST Administrative Guidelines, for HESA, 2004) However, were these guidelines revised as we recommend, a simpler model (2b) could be devised in which students enrolled in placements units which were designated as such, placed in their own category, and funded at a rate congruent with real costs, through the normal mechanisms for funding units.

Model 1 has the advantage of simplicity. Payments will not directly reflect the amount of placement in each year of study but will average out over the period of enrolment. This form of payment will not differentiate between different programs, which is the case now.

Model 2a has the disadvantage of complexity. Payments will directly reflect the amount of placement in each year of study. It will, however, tie funding directly to the placement days and differentiate between different programs. Model 2b preserves the latter characteristic, but is simpler than 2a. However, it would require a change in the administrative guidelines of HESA.

In either case, a significant proportion (typically more than half) of the practicum costs would continue to be met from CGS funding of units of study taught in the Education discipline, as is the

case at present, but the practical loading would be more responsive to the actual costs of student placement. In either case, funding would be based on predictions and agreed during cluster portfolio discussions in the same way as Commonwealth supported load, with adjustments expected for significant variations from predictions.