

LA TROBE UNIVERSITY SUBMISSION

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**Higher Education
Standards Panel
Consultation on Higher
Education Admissions
Processes**

ENQUIRIES

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INTRODUCTORY REMARKS

La Trobe University welcomes the opportunity to provide a submission to the Higher Education Standards Panel Consultation on Higher Education Admissions Processes. There is a longstanding public interest in matters relating to higher education admissions, and the current consultation process will contribute to enduring public confidence in higher education admissions practices.

Public interest in access to university is grounded in positive motivations that provide a useful reference point for a review of admissions policy and practice. It is widely recognised that higher education confers significant benefits proportional to individual endeavour. What students get out of a degree depends on what they put in, with higher education standards ensuring there are no short cuts to entry or qualification.

When university places were capped and controlled by government, admissions practices sought to allocate scarce places on a meritocratic basis, taking into account evidence of academic achievement, educational disadvantage and likelihood of success.

The transition to demand driven funding retains meritocratic allocation principles in many courses and institutions, but has shifted the logic of admissions practices. The sector now compliments concern about allocating places to those most deserving with assessment of eligibility for access to an entitlement for Commonwealth subsidy. The assessment of eligibility takes place in accordance with higher education provider policies, predominantly within self-accrediting autonomous public universities. The mechanisms that assess eligibility are more diverse than in the past and are not well understood by the public.

The critical question emerging from the current policy context relates to the integrity of institutional assessment of eligibility for Commonwealth subsidy. This submission will assess the question of integrity of admissions practice primarily from within the prism of La Trobe's own policy and practice.

La Trobe University is distinctive in Australian higher education as an institution with campuses across city and country, and a high level strategic commitment 'to be a University where inclusiveness and globally recognised excellence meet'. La Trobe University utilises a range of admissions mechanisms designed to identify those who are likely to have a reasonable expectation of success in their chosen course.

La Trobe has confidence in the integrity of its admissions practices. This confidence is grounded in systematic evaluation practices that include a coherent policy and evaluation framework, and establishment of the widely respected Access and Achievement Research Unit (AARU). Through this framework, La Trobe systematically examines relationships between admissions, teaching and learning, student support and student achievement. La Trobe University demonstrates high levels of achievement across student cohorts, and adopts innovative practices in admissions, teaching and support where there is evidence of lower achievement within specific cohorts.

Recent expansion of higher education does not appear to have had a significant detrimental effect on system-wide performance metrics such as success, retention and completion. There are, however, legitimate concerns around admissions practices within higher education. Some cohorts of students in some institutions demonstrate poor progress and completion rates that warrant further analysis. Some institutions demonstrate poor performance on equity, prioritising meritocratic selection over equity with downstream effects that include low representation of Indigenous persons across the professions.

It is important that higher education policy adapts to changing needs over time whilst maintaining public confidence in entry and qualification standards. Greater complexity in admissions practices combined with increasing public outlays and ill-informed commentary of lax admission standards erode public confidence.

The key proposition driving La Trobe's submission is that improved transparency is a key mechanism for maintaining standards and for building public confidence in the Australian higher education system.

THE CASE FOR IMPROVED TRANSPARENCY

The admissions system in Australian higher education is not perfect, but nor is it a policy failure. Tertiary Admissions Centres are at the core of a system which operates for the most part effectively and efficiently.

Tertiary Admissions Centres allow for efficient standardised assessment of academic achievement and educational disadvantage that provides participating institutions with a justifiable, defensible and evidence-based approach to selection for large numbers of applicants. Where there has been evidence of sub-optimal practice, for example in the indiscriminate use of bonus points in South Australia, the system has demonstrated a capacity to self-correct to improve the integrity of admissions practices.

The efficiency gains associated with streamlined processing and ranking of applications does however, impact on system transparency and effectiveness. The less informed students are about their academic potential and entry standards for particular programs, the less effective the process of matching applicants to places will be. The logic of the informed consumer is integral to demand driven funding and enhanced information provision through QILT, but there remains much potential to enhance the information made available to students.

Students have sub-optimal knowledge of how their academic endeavour translates into relative measures of their academic performance and potential, and of the courses for which they are best suited and likely to gain entry. Current policy settings give primacy to ATAR as a measure of academic performance and potential, and signals to the general public a precise and definitive ranking of performance and likelihood of success. The importance associated with ATAR drives pressure on students to 'spend their ATAR' rather than focus on the course and institution that most aligns with aptitude and interest.

In truth, ATAR is constructed from complex statistical models. Students have little comprehension of this, but nonetheless trust in the simplicity of the output. The subsequent application of bonus point adjustments that reward participation in some subjects or recognise specific forms of disadvantage make it harder for students to make informed decisions.

Australian higher education is far from a post-ATAR world. Cohort studies highlight a strong relationship between ATAR and completion rates. High ATAR students have a higher probability of completion and complete faster than other cohorts. However, demand for higher education graduates cannot be fulfilled by enrolling only those students with an ATAR above arbitrarily defined levels of 90, 80 or 70.

In response to rising demand from non-school leavers and lower ATAR students, institutions are increasingly utilising contextual and direct admissions practices. Students with lower ATARs or no ATAR can and do complete and succeed. Additional information about applicant context and circumstance can provide evidence of academic aptitude and likelihood of success. Public information on the contextual criteria utilised during selection and the success of students selected on this basis is limited. This has implications for the degree to which students are informed and the efficient functioning of the higher education market.

An imperfectly informed prospective student is less likely to be matched to a program of study and institution that best suits their needs. Higher attrition, lower completion and higher individual and public costs are the result. A commitment to better transparency in admissions is an important policy mechanism for improving the efficiency and effectiveness of the Australian higher education system.

PRINCIPLES INFORMING TRANSPARENCY IN ADMISSIONS

The Higher Education Standards Panel has proposed principles that will inform its deliberations and advice to the Minister around admissions practices. La Trobe University supports a principle driven approach, but recommends some refinement of the draft principles.

PRINCIPLE	COMMENT	SUGGESTED REVISION
A student-centred approach to transparency should be central to any solution	Agreed Transparency should be considered as an interdependent element of higher education policy and framed in the positive	Transparency in admissions supports student decision making that enhances the operations of Australian higher education
All students should have the same knowledge of how admissions arrangements work	Not Supported Unrealistic as diverse cohorts have diverse needs	Students should have fair access to knowledge and information about the characteristics upon which selection decisions are made
The broad autonomy of institutions over their admissions policies should be accepted	Agreed Institutional autonomy should be considered as interdependent with accountability frameworks	Institutions have broad autonomy for their admissions policies subject to continuing compliance with relevant legislation, policy and regulation
The revised Higher Education Standards, should provide the operating framework	Agreed With scope for local interpretation and contextualisation	The revised Higher Education Standards provide the operating framework for informing transparency in admissions
Any new requirements or changes should apply equally to all higher education institutions	Agreed Subject to conditions of registration and other relevant factors	Measures that improve transparency in admissions should apply equally to all higher education institutions subject to conditions of registration and other relevant factors
Consistently presented and comparable information should be available for each institution by discipline or course	Not Supported There is no consensus around the level of information that would be useful nor how sector-wide variation could be accommodated	Transparency in admissions will be advanced by progressively standardising information provision and access
A guide to admissions policies and student enrolments should be made available through a single online platform	Not Supported It is unclear how a single platform would accommodate State-based differences and be better than established Tertiary Admissions Centres	Transparency in admissions will be advanced by progressively standardising information on admissions policies and enrolments
Universities Australia and other peak bodies should support clarity on how ATAR/alternatives are used and applied	Agreed La Trobe supports an improved transparency agenda – although a key issue is research and data access rather than peak body support	Transparency in admissions will be advanced by improved knowledge about criteria used in admissions processes underpinned by more robust data collection
It should be made clear that ATAR thresholds generally apply to (bonus point) adjusted ATARs; and serve as a guide	Agreed La Trobe supports an improved transparency agenda – although this principle is secondary to principles 6 and 8 and may be redundant	Consider deletion
Higher education institutions should be held accountable for public claims against their stated entry policies	Agreed Acknowledging there are limits to how admissions policies are considered within existing accountability frameworks	Transparency in admissions will be advanced by progressively integrating relevant requirements in higher education regulation and accountability frameworks

Response to Consultation Questions

1. *Based on your experience, what is the most important information needed to help potential higher education students determine which course to study and which institution to apply for? Please feel free to rank the different types of information in order of importance.*

La Trobe University is distinctive in Australian higher education, given the variety of contexts in which it operates and the variety of cohorts that it serves. Whilst most providers can make claims of student diversity, few will have a similar level of successful, sustained commitment to major city and regional delivery and the diversity of students that entails.

A core insight which emerges from the La Trobe experience is that different cohorts have different needs. Some elements of practice and information provision can and should be standardised, but there remains a challenge in any standardisation process of catering for a broad distribution of users.

La Trobe University is moving away from static representation of course and application information towards more dynamic representation of information that responds to expressed user needs and preferences. Students from metropolitan Melbourne, for example, are less interested in the costs of relocation or access to residential accommodation than regional students. The appropriate presentation of information, which is compliant with relative legislative and regulatory requirements, and relevant to the circumstances of a prospective student, is best dealt with at an institutional level.

La Trobe University is increasingly targeting its admissions practices to the needs of specific cohorts. Student choice is influenced by a range of factors that include disciplinary interest, geographic location, academic achievement, and interactions with families, friends and teachers. However, students are less inclined to exercise their choice through Tertiary Admission Centre processes that lack transparency and certainty, and are migrating to alternative admissions pathways and channels.

La Trobe's Aspire program, for example, makes offers on the basis of criteria that include evidence of community service and engagement, and attracts a large number of applicants from regional communities. Aspire applicants may have their ATAR suppressed by the disadvantages evident in regional communities, but are able to demonstrate their aptitude through the application process, and are being more appropriately matched to a course of interest. The contextual information gathered through the application process helps the university to make more informed selection decisions. The process is less efficient than mechanised ATAR driven alternatives, but is more successful. Early evidence suggests that those admitted through Aspire out-perform students admitted on the basis of ATAR with similar levels of academic achievement.

If the Higher Education Standards Panel were to apply the principles (those proposed, or as amended within this submission) to the information requirements of students, the information should genuinely respond to the needs of students. Information should include that which is relevant to the needs of specific cohorts within specific disciplines and fields of study. This will vary from: city to the regions and internationally; higher or lower ATARs; school leavers and mature age students; Indigenous or other equity groups. This information is best managed at an institutional level within clear guidelines, as any attempts at sector-wide standardisation runs the risk of over simplifying relevant information, or communicating an overwhelming level of complexity.

2. *Is knowledge about how the ATAR rankings are calculated and published 'cut-off' thresholds a significant influencing factor on course and institution preferences? How could this information be made more accessible and useful?*
3. *Is there sufficient information about how 'bonus points' are awarded and used to adjust 'raw' ATARs sufficiently understood? Should the application of bonus points be more consistent across different institutions? Is the current variety of different bonus point rules appropriate to meet the needs of individual students and institutions?*
4. *Is there sufficient knowledge of the range of alternative admissions procedures employed by higher education institutions?*
5. *Should there be an annual report of the proportion of students accepted into courses by each higher education institution on the basis of their ATARs and/or what the median ATARs was for each course?*

Research undertaken by La Trobe University Access and Achievement Research Unit highlights a number of challenges around the use of ATAR. La Trobe University is pleased that some of this high quality research has already been shared and discussed with the Higher Education Standards Panel.

The following is a list of key findings of Access and Achievement Research Unit analysis of ATAR. These include but are not limited to those contained in a recent study *'The Adaptation of Tertiary Admissions Practices to Growth and Diversity'*:

- Differences between low SES and high SES, and regional and metropolitan school students in awareness of the impact of subject choice on the construction of ATAR, access to subjects (particularly STEM, languages) that will have a favourable impact on ATAR, and use of Special Entry and Access Schemes
- Propensity of higher ATAR students from regional locations to 'spend' their ATAR on courses with entry cut-offs consistent with their achievement
- Differences in provision of highly weighted subjects (e.g. STEM, languages) between metropolitan and regional schools
- Differences in extent to which students from different schools perform against their ATAR, with public school students notably 'outperforming' their ATAR once at university

These findings point to the need for a better mechanism for facilitating an appreciation of how ATAR is constructed, for simplifying the ways in which ATAR is used, and for being more transparent and consistent in the use of bonus points and middle band entry. These findings also underscore the rising importance of contextual admissions practices, which take into account more personal and circumstantial information than that conveyed by ATAR alone.

VTAC has for many years published information on selection outcomes that include clearly-in ATARs and the proportion of those admitted below the clearly-in scores. Within a Tertiary Admission Centre model, transparency could be progressed by publishing the attainment distribution of students admitted through the Tertiary Admissions Centre process within a course.

La Trobe University supports greater transparency in admissions information, but is cautious of over-emphasising the role of ATAR as the central reference point in admissions. There is a downside to the use of ATAR given its stubbornly enduring perception as a signal to prospective students as a precise and definitive ranking of capability and aptitude. Medicine, for example, recognises that ATAR is insufficient alone as a measure of suitability for entry or success, but the broader public remains fixated on ATAR.

The limitations of ATAR contribute to increasing use of contextual admissions, including special entry schemes, principal recommendations programs and direct application processes. There remains a continuing challenge in assessing the impact of these approaches on a system-wide level. Much of the analysis is undertaken within institutional evaluation of admissions policies and is not visible at a system level. More research is required to understand the attributes that are considered during selection, to quantify these

attributes, and to optimise the ways in which contextualised admissions processes are communicated to prospective students.

A better understanding of ATAR and its application, other measures of academic achievement and their application, and other contextual variables considered during selection will support improved transparency in admissions.

Should new measures be introduced that require an annual report of admissions outcomes by course, La Trobe University would prefer that the language and terminology utilised be more neutral in categorisation of academic achievement and more reflective of the composition of the higher education sector. 90,000 non-school leavers were made offers through Tertiary Admissions Centres in 2015, 43% of Tertiary Admissions Centre applicants. Only 20% of non-school leaver applicants applied on the basis of a school qualification. A more appropriate taxonomy of admissions outcomes would balance ATAR as an equivalent form of academic preparation to an incomplete higher education qualification, which itself accounted for 51,000 non-school leaver applications.

An additional consideration in any reporting of admissions outcomes is the social demography of those admitted. The correlation of ATAR with socioeconomic status is well documented and accepted. Many institutions operate in a prestige centric market, where competition for the 'brightest' students displaces consideration of institutional social equity obligations. Institutional equity data is public, but highly aggregated, and disconnected from admissions information. Transparency of admissions information would be progressed if the relationship between entry standards and social demography was more clearly represented. This too could be a powerful driver of institutional reputation and behaviour. An exemplar of how academic and social demographic information is presented is the MySchool website. Parents have access to time series data on school demography, funding, and learning outcomes that shapes decision making.

6. Do the current state-based Tertiary Admissions Centre arrangements adequately cope with students' desire for mobility to institutions across state borders? Would a more national approach to managing applications across borders be beneficial?

Interstate mobility – evidenced by Tertiary Admission Centre applications made to interstate institutions – is primarily associated with high ATAR students, and particularly with those pursuing studies in health. The overwhelming majority of students choose to study within their home region. Around 6% of students with an ATAR of less than 80 apply to an interstate institution. Around 27% of students with an ATAR above 90 apply to an interstate university. Applications to medical studies account for around 20% of interstate applications but less than 2% of home state applications.

There is little doubt that Australia's state based Tertiary Admission Centres pose challenges for those who are interested in an interstate institution, as they navigate different application processes and systems. This cohort is, however, a small proportion of overall applications, and there are straightforward ways of streamlining their application and admissions experience. Each Tertiary Admissions Centre is integrated with and responsive to its respective State education system. National standardisation of practice will be difficult to achieve in this context, but cooperation around streamlined processes for managing interstate applications should be achievable.

7. Is there an understanding of how such mechanisms as early offers, second round offers and forced offers affect the transparency of higher education entry? How, if at all, should these factors be dealt with for the purposes of transparency?

Awareness of admissions processes is generally weak. As tertiary admissions becomes more complex, general awareness will weaken. The net effect of contextual admissions, principal recommendations schemes, forced offers, slip-back offers, early offers and second round offers is to make the system less coherent for all stakeholders. The solution to this scenario is not to impede innovation in admissions, but to require higher education providers to ensure that evolving approaches to admissions are consistent with the Higher Education Standards Framework; that the criteria influencing admissions are transparent and clearly communicated to students; and, that the outcomes of the admissions process are visible to key stakeholders through improved reporting and accountability measures.

8. What information or enhancements do you think should be added to the Australian Government's Quality Indicators for Learning and Teaching (QILT) website?

La Trobe University encourages the Higher Education Standards Panel to consider including within QILT improved information that spans the student life cycle which includes a balanced suite of information about institutional entry requirements, demography, quality of teaching, learning outcomes and graduate outcomes. QILT should evolve in its complexity and continue to provide students with clearly presented information about what they can expect from a given course of university study. The pathway to this goal should be in keeping with progress to date, in collaboration with the sector, methodical and systematic in its approach, and responsive to user experiences and feedback.

9. How best should comparable information on student admissions procedures be made available to the public? What is the most appropriate and effective way to communicate information to students? What information or enhancements do you think should be added to Tertiary Admission Centre websites, university and non-university institution websites, and/or Australian Government websites such as QILT and Study Assist?

10. What special measures are needed to ensure equity of access for disadvantaged students?

Students currently navigate multiple information sources to inform their decision making. Institutional web sites, Tertiary Admissions Centres, QILT and other information sources are all legitimate reference points that inform student decision making. Each information source can be improved and enhanced, and each information source should be clear about the role that it plays in transparency of admissions. The primary responsibility for admissions processes and policies is, however, the institution. As mentioned earlier, each cohort will have different needs, and these needs are best addressed by the institution, within clear standards and guidelines. More central information repositories, such as Admissions Centres and QILT, will play important but different roles and cannot provide the level of information that should be conveyed at an institutional level.

An important consideration is the capacity of students to engage with and understand admissions related information. Students from disadvantaged backgrounds are less likely to be aware of how admissions works, and less confident in engaging with the system to optimise their progress. More information will not resolve this challenge as it has roots in social and cultural capital and the operations of Australian education and school systems. What can help to bridge the gap is investment in support services that seek to shepherd disadvantaged students through the admissions process. This is not simply a matter of assistance in completing application forms, as the choices that influence university admissions can be made years in advance of application.

11. Can you suggest any other changes that would improve public awareness and understanding of tertiary admissions processes?

In addition to the comments made in response to consultation questions, La Trobe University makes the following recommendations as areas for strategic intervention in university admissions.

Policy Interventions for improved transparency in admissions

WITHIN SCOPE OF HESP AND TEQSA	BROADER EDUCATION REFORMS BEYOND SCOPE OF HESP AND TEQSA
1. Empower students to make informed decisions by providing facilitated fair access to knowledge and information about the characteristics upon which selection decisions are actually made.	4. Improve the quality of schools education such that students are better prepared for university. Many of the complexities in admissions are work-arounds that compensate for the inequities evident in schools.
2. Empower students to influence the admissions practices of higher education providers by publishing information on selection decisions, student demography and student outcomes.	5. Resolve base funding challenges for Australian higher education, decoupling pursuit of strategic objectives from revenue derived from unsustainable enrolment growth.
3. Recalibrate regulatory risk frameworks to better emphasise accountability around transparency, and outcomes of, selection decisions.	

1. Empower students to make informed decisions by providing facilitated fair access to knowledge and information about the characteristics upon which selection decisions are actually made

A variety of considerations are taken into account during selection across programs and providers, including school results, aptitude tests and interviews. Students should have access to the characteristics which are valued within institutional selection processes, allowing them to structure their aspirations, preparation and application accordingly. Empowering students to participate in selection processes will mark a shift in the locus of power from institutions to students, and require active support from unbiased brokerage services, particularly for cohorts who have limited access to relevant social and cultural capital.

2. Empower students to influence the admissions practices of higher education providers by publishing information on selection decisions, student demography and student outcomes

Australian higher education retains an inherent bias towards elite historic notions of universities. Performance data is constructed in normative values around academic standards and institutional performance. Students may gravitate to what they perceive as the best quality program that aligns with their circumstances, but their notion of quality is informed by elite system indicators and discourse. Students can be better empowered through the admissions process if they have access to information about the characteristics that are considered during selection, the basis of these selection decisions, and relevant student outcome data.

This approach would be consistent with QILT, where we see some institutions that are more accessible having better outcomes than institutions that are more selective. QILT could be enhanced by additional data on key elements of student demography and outcomes. Better data may also place greater pressure on institutions to justify their student intakes and composition. Transparency on the demography and performance by cohort, discipline and institution will facilitate much needed conversations on why some groups, such as Indigenous students or those with disability, are clustered in some disciplines, but remain largely underrepresented in others.

3. Recalibrate regulatory risk frameworks to better emphasise accountability around transparency, and outcomes of, selection decisions

The current TEQSA Risk Framework places emphasis on primarily whole of institution indicators of student load, completion, retention, progress, satisfaction and graduate destinations. There is limited provision within the Risk Framework that assesses risks relating to transparency of outcomes of admissions processes, unless there are material notification triggers or changes to these whole of institution performance indicators.

The 2015 Threshold Standards also include enhanced provisions for representation of under-represented groups and utilising evaluation of their participation, progress and completion within admissions policies. There is scope for the TEQSA Risk Framework to play an important role in upholding diversity and equity related standards and building public confidence in the Australian higher education system by better integrating consideration of admissions practices and outcomes.

Higher education providers would take their responsibilities for compliance with admissions relevant elements of the Standards Framework more seriously if they were given greater prominence in risk assessments. This could take the form of explicit reference to load, completion, retention, progress, satisfaction and graduate destinations data across student demography and disciplinary reference points. This could also involve capturing the characteristics utilised during selection processes, and making these available to students at earlier points in their decision-making.

4. Improve the quality of schools education such that students are better prepared for university. Many of the complexities in admissions are work-arounds that compensate for the inequities evident in schools.

Higher education interacts with Australian school systems, and much of the innovation in higher education admissions practices arises as a result of responding to inequities in schools education. Reforms to transparency in admissions practices will not resolve these inequities. There is likely to be continuing need for higher education to innovate in admissions and teaching and support, as it accommodates varied preparedness of Australian school leavers. If innovation in higher education admissions is a public policy problem, a core part of the solution resides in improving the quality of school education.

5. Resolve base funding and regulatory challenges for Australian higher education, decoupling pursuit of strategic objectives from revenue derived from unsustainable enrolment growth.

Higher education admissions are influenced by higher education financing. Policy drivers that include, but are not limited to, demand driven funding have coupled institutional performance with revenue growth and enrolment growth. Increasing transparency in admissions will not break this nexus. Empowering students will

make the higher education market and admissions processes more efficient, but the growth imperative remains, with implications for public expenditure and the characteristics that higher education providers will consider in admissions processes.

The shift towards greater private investment in higher education seems an inevitable conclusion from the current trajectory of higher education policy, with declining government subsidy and increasing student contributions. This may weaken the relationship between revenue growth and enrolment growth, but this too will not break the nexus. Alternative approaches could include the resurrection of work that considers higher education provider categories. This may lead to regulatory interventions that disrupt the structural dynamics of Australian higher education and find new ways of generating the skills and graduates that Australia needs.