ACPET Submission

TEQSA Schedule of Proposed Fees for Registration and Course Accreditation

Submission
January 2012
About ACPET

Established in 1992, the Australian Council for Private Education and Training (ACPET) is the national industry association for private providers of post-compulsory education and training. ACPET has over 1,100 members nationally delivering a full range of higher education, and vocational education and training (VET), including apprenticeships and traineeships, and English language courses across all States and Territories.

ACPET’s Higher Education members form a very diverse group of specialised institutions and operate both as universities and non-self accrediting institutions. ACPET’s higher education members deliver qualifications in the fields of theology, business, information technology, natural therapies, hospitality, health, law, design, accounting, creative media technologies, music and linguistics.

ACPET’s mission is to enhance quality, choice, innovation and diversity in Australian education and training. ACPET works with governments, education and training providers, industries, and community organisations, to ensure vocational and higher education and training services are well-targeted, accessible, and well-delivered with courses of high quality, and providing for choice and diversity.
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Opening Statement

ACPET has welcomed the establishment of the Tertiary Education Quality and Standards Agency (TEQSA) as the National Higher Education Regulator. The establishment of TEQSA and the introduction of a national system of registration and accreditation are of great importance. ACPET believes that the Tertiary Education Quality and Standards Agency Act 2011 significantly strengthens the ability of the regulator to take action against seriously non-complaint Institutions and therefore will serve to improve the quality of Higher Education being delivered in Australia.

To date ACPET has been pleased with the level of consultation during the establishment of TESQA. We appreciate the invitation to provide feedback on aspects of the new system. At this juncture we do however have deep concerns regarding the proposed fees for the registration of higher education organisations and the accreditation of courses. This submission outlines our major concerns and provides a number of recommendations.

Whilst TESQA is only now beginning its operations, many Higher Education Providers (HEPs) have already begun to feel the strain of issues associated with the transition from their state/territory based regulator to TEQSA. These issues predominately lie with the State and Territory agencies and ACPET has been addressing them. Regardless of where the issues reside it is essential to acknowledge that HEPs are feeling uneasy about the climate in which they operate. This unease is likely to be compounded by the deep seated concerns that many HEPs will have with TESQA’s proposed regulatory fee structure and the impact that possible fee hikes may have on their business.

Accordingly, ACPET believes that it is imperative that a high level of both consultation and detail be provided to stakeholders regarding the proposed fees.

ACPET’s submission raises in detail a number of concerns with the TEQSA proposed fee structure for its services, and these concerns are encompassed in four distinct areas:

1. Time frame for stakeholder consultation
2. Methodology used to develop Schedule of Fees
3. Formulas used in setting Schedule of Fees
4. Comparison of fees with existing jurisdictions

ACPET also take this opportunity to put forward a series of recommendations relating to the TEQSA proposed fee structure for its services.
Recommendations

Recommendation 1
ACPET recommends that TEQSA undertake a more detailed and exhaustive consultation process in which the stakeholders have adequate time to examine and assess the proposed Schedule of Fees and provide TEQSA with considered feedback. ACPET believes that this should take place over the first half of 2012, with a detailed Schedule of Fees released in the second half of 2012.

Recommendation 2
ACPET recommends that TEQSA provides significant details as to how the fees will be calculated in order to provide clarity as what “up to” means.

Recommendation 3
ACPET recommends that TEQSA provide the rationale and assumptions that have been used to develop the costing in the proposed Schedule of Fees.

Recommendation 4
ACPET recommends that TEQSA consider and identify the implications if an increase in the proposed fees acts as a barrier to entry for smaller HEPs and whether it will cause a reduction in choice and diversity in the HE sector.

Recommendation 5
ACPET recommends that in the interest of transparency, a detailed cross comparison of the proposed TEQSA fees with the fees of states and territories are included for each of the functions offered.
1. Time frame for stakeholder consultation

The proposed Schedule of Fees for higher education providers (HEPs) circulated by TEQSA has occurred at a time when many stakeholders are not available to review or to provide feedback to TEQSA. Accordingly ACPET believes that further consultation must be undertaken to ensure stakeholders have an appropriate time period in which to provide feedback.

The Australian Government Cost Recovery Guidelines note that ‘the preparation of the cost recovery impact statement (CRIS) should involve an appropriate level of consultation with stakeholders’¹. ACPET contends that the requirement for an ‘appropriate’ consultation period has not been met and that stakeholders have not had the opportunity to fully understand the depth and breadth of the proposed fees.

Recommendation 1
ACPET recommends that TEQSA undertake a more detailed and exhaustive consultation process in which the stakeholders have adequate time to examine and assess the proposed Schedule of Fees and provide TEQSA with considered feedback. ACPET recommends that this should take place over the first half of 2012, with a detailed Schedule of Fees released in the second half of 2012.

2. Methodology used to develop Schedule of Fees

Currently the proposed Schedule of Fees does not provide methodology on how fees will be struck. The proposed Schedule of Fees does not provide detail on the procedures associated with the registration and accreditation functions of TEQSA nor how they will be delivered. Although a maximum fee for these functions is indicated, we do not know how fees will be calculated for each function.

Currently the schedule specifies an ‘up to $’ amount. The lack of information means that ACPET is unable to accurately assess whether the formulas used to develop the proposed fees reflect the reality of the operation of quality regulation, and therefore whether the fees nominated reflect what could fairly be assessed as cost recovery.

In addition to the poor timing of the consultation period, the lack of sufficient detail provided acts as a further deterrent for ACPET to be able to provide well considered advice that is representative of the view of ACPET’s membership.

ACPET notes from TEQSA’s email of 3 January that “TEQSA is currently finalising business processes for each regulatory activity including guidelines to accompany the fee table.” Until such time as this is information is circulated, ACPET is unable to fully consider the proposed schedule.

When this additional detail is provided it should include internal business processes and procedures for each regulatory activity and how these will be delivered. It should also include guidelines to

¹ Australian Government Cost Recovery Guidelines July 2005, p 54
accompany the fee table, with appropriate consideration having been given to issues that may arise in each category of functions. This information will then provide a clearer basis for calculating fees, and for providing stakeholders with a more definite estimate of the fees they will incur.

“We have just been through the registration and accreditation process with VRQA and found it fairly straightforward. The fees proposed by TEQSA are significantly higher than those charged by VRQA despite being based on a partial fee recovery. I am not sure how TEQSA have reached these figures, but if you take course accreditation as an example and allow $1200 per day ($150 per hour) for decent consultancy and 20% for TEQSA overheads the fee would suggest that over 50 hours are needed to assess an application for accreditation of a single course. I am not sure how many hours the state regulators would consider to be the benchmark for this task but having recently prepared an application for accreditation I cannot see how a competent authority could justify this amount of time being needed to assess the suitability of a bread and butter undergraduate program in Business, IT etc. To then ask for the same fee to re-accredit an existing course seems even more difficult to justify.”

Comment provided by a HEP ACPET member

Some examples of issues that require TEQSA’s serious consideration in setting an appropriate Schedule of Fees are:

- It is envisaged that a small private university campus would be charged less than the maximum fee of $90,000. But how much? As stated clearly in the Tertiary Education Quality and Standards Agency Act 2011 (Division 6 -158 (4)) ‘The fees determined under subsection (1) must not be such as to amount to taxation.’

- Within the analysis of functions in order to calculate hours spent on various aspects of regulation ACPET has concerns that analysis does not take into account duplication of functions between HEP registration and CRICOS registration. For example when carrying out the financial viability assessment there may be duplication in activity, which may lead to duplication in fees. ACPET contends that there are synergies here that should reduce the cost of the regulatory process.

- The fees should represent value for money, and value-added benefits to higher education providers. One of the benefits of the previous state-based process, for example, lay in the contact that it brought with a panel of experts willing and able to make suggestions on the applications before them and open to a range of different approaches and models.

- The issue of international students needs careful consideration. ACPET maintains that registration fees for HEPs (non-universities) with international students attending classes in Australia should be lower for HEPs offering distance learning activities with international students as the related costs for TEQSA would be considerably lower.

- The cost to handle any application that does not involve appointing an external panel or external auditor should be kept to a minimum (examples: changes in board or shareholding or campus location and capacity).
• The fees for other major changes (registration) should be kept bearable and certainly within the means of most providers. As a guide it should not be more than previously charged by the state regulators.

• The fees for course accreditation should be such so as to avoid excessive payment. For example, there should be one charge for a nested courses of Grad Cert, Grad Dip and Master degree.

• There should be one charge only if a single panel is going to consider two or more courses simultaneously. An attempt should be made to combine the accreditation panels as far as possible so as to minimise the cost and time investment needed to undergo the accreditation processes.

Recommendation 2
ACPET recommends that TEQSA provides significant details as to how the fees will be calculated so to provide clarity as what “up to” means.

Recommendation 3
ACPET recommends that TEQSA provide the rationale and assumptions that have been used to develop the costing in the proposed Schedule of Fees.

3. Regulatory fees should not be used as a barrier to entry

Without detail on exactly how the TEQSA Schedule of Fees will be put into practice ACPET is fearful that the proposed Schedule of Fees may impact some HEPs which may decide, as a consequence, to close, or may discourage other potential HEPs from entering the market.

ACPET contends that a quality market, one that is effective, efficient and equitable shouldn’t influence or discourage entry and renewal, or give access only to highly cashed-up businesses. ACPET contends that regulators should not inadvertently create a homogenised industry; in fact the niche, boutique and small HEPs that offer a focussed or limited number of qualifications have spawned because larger HEPs have found that it is not feasible to service these qualifications or markets. Not for profit and low profit organisations play a critical role in providing choice and diversity. The rationale behind an increase in fees for registration, accreditation and reaccreditation is often associated with the notion that limited capacity to pay upfront fees equals low quality, and vice versa. This is a flawed assumption.

By erecting barriers to entry for niche and highly focussed HEPs on financial grounds rather than focussing on the overall quality of HEPs we may well send the industry down a path that becomes void of innovation and ingenuity. ACPET firmly believes that this is an issue that needs consideration.
Recommendation 4
ACPET recommends that TEQSA consider and identify the implications if an increase in the proposed fees acts as a barrier to entry for smaller HEPs and whether it will cause a reduction in choice and diversity in the HE sector.

4. Comparison of fees with existing jurisdictions

ACPET contends that the Schedule of Fees should explicitly compare in some degree of detail current fees with proposed fees.

ACPET contends that a new Schedule of Fees aiming at partial (or total) cost recovery should transparently demonstrate compliance with the Australian Cost Recovery Guidelines which promote the Australian government cost recovery arrangements and the efficient allocation of resources. The current Schedule of Fees proposed by TEQSA does not possess any detail in this regard, thus it is inadequate in demonstrating the impact of the proposed fees.

The Schedule of Fees released by TEQSA proposes that fees will be higher than currently levied by state and territory agencies.

Below are examples from Victoria and NSW of what level of detail ACPET contends should be provided in a new national Schedule of Fees so as to provide stakeholders with a comparison of the proposed cost versus current costs.

**TABLE 1 – Fees applicable in Victoria (VRQA Fees)**

<table>
<thead>
<tr>
<th>Cost Item [for Universities and Higher Education Institutes]</th>
<th>Vic as at 2012</th>
</tr>
</thead>
</table>
| Approval to operate as a university for applications for initial and renewal of registration under protocol D of the National Protocols for Higher Education  
– For initial investigation of application  
– Plus for full investigation of application | $10,240 (non refundable)  
$40,950 |
| Total: $51,190 | |
| Authorisation to conduct higher education courses  
For initial investigation of application | $1,540 (non refundable) |
| Plus:  
Investigation of: | $2,050 [plus $2,050 per |
<table>
<thead>
<tr>
<th>Description</th>
<th>Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) application from a higher education institute registered in another State applying under mutual recognition; or</td>
<td></td>
</tr>
<tr>
<td>b) applications from all other applicants</td>
<td>$6,660</td>
</tr>
<tr>
<td>plus investigation of approval to conduct a non AQF course for each course</td>
<td>$2,050</td>
</tr>
<tr>
<td>Investigation of application to conduct a higher education course involving the assessment of major changes, as defined by the National Protocols for Higher Education;</td>
<td></td>
</tr>
<tr>
<td>a) no site assessment by the Authority is undertaken or</td>
<td>$2,050</td>
</tr>
<tr>
<td>b) a site assessment by the Authority is undertaken</td>
<td>$3,080</td>
</tr>
<tr>
<td>Investigation of all other applications for authorisation to conduct a course of study in higher education</td>
<td>$2,050</td>
</tr>
<tr>
<td>Course Accreditation and Qualifications</td>
<td></td>
</tr>
<tr>
<td>Accreditation of a higher education course application fee plus investigation fee for a:</td>
<td></td>
</tr>
<tr>
<td>Diploma</td>
<td>$4,090</td>
</tr>
<tr>
<td>Advanced Diploma</td>
<td>$4,090</td>
</tr>
<tr>
<td>Associate Degree</td>
<td>$4,090</td>
</tr>
<tr>
<td>Bachelor</td>
<td>$5,120</td>
</tr>
<tr>
<td>Masters</td>
<td>$6,400</td>
</tr>
<tr>
<td>Graduate/Post Graduate Diploma</td>
<td>$4,000</td>
</tr>
<tr>
<td>Graduate/Post Graduate Certificate</td>
<td>$4,000</td>
</tr>
<tr>
<td>Doctoral</td>
<td>$6,400</td>
</tr>
<tr>
<td>Total for accreditation of:</td>
<td></td>
</tr>
<tr>
<td>- one Bachelor degree course</td>
<td>$7170</td>
</tr>
<tr>
<td>- one Masters course</td>
<td>$8450</td>
</tr>
<tr>
<td>Investigation of application to accredit a higher education course involving the assessment of proposed major changes, as defined in the national protocols, affecting</td>
<td>$2,050</td>
</tr>
</tbody>
</table>
course accreditation.

| Fee to investigate an application to accredit a higher education course involving the assessment whether a suspension of accreditation of a higher education course should be lifted, or to investigate whether to revoke or vary accreditation conditions | $2,050 Subject to the discretion of the authority to waive this fee if it considers it appropriate to do so |

**TABLE 2 – Fees applicable in NSW**

<table>
<thead>
<tr>
<th>AUSTRALIAN AND OVERSEAS HIGHER EDUCATION INSTITUTIONS (other than universities)</th>
<th>Application Fee</th>
<th>Assessment Fee</th>
<th>Annual Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration, or re-registration, as a higher education institution</td>
<td>$3,390</td>
<td>$5,630</td>
<td>$2,260</td>
</tr>
<tr>
<td>Accreditation of a course leading to the following Australian awards (per course)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Diploma or Advanced Diploma</td>
<td>$2,260</td>
<td>3,950</td>
<td></td>
</tr>
<tr>
<td>b) Associate Degree</td>
<td>$2,260</td>
<td>$4,790</td>
<td></td>
</tr>
<tr>
<td>c) Bachelor Degree</td>
<td>$2,260</td>
<td>$5,630</td>
<td></td>
</tr>
<tr>
<td>d) Graduate Certificate</td>
<td>$2,260</td>
<td>$3,950</td>
<td></td>
</tr>
<tr>
<td>e) Graduate Diploma</td>
<td>$2,260</td>
<td>$3,950</td>
<td></td>
</tr>
<tr>
<td>f) Masters Degree</td>
<td>$2,260</td>
<td>$7,890</td>
<td></td>
</tr>
<tr>
<td>g) Doctoral Degree</td>
<td>$2,260</td>
<td>$7,890</td>
<td></td>
</tr>
<tr>
<td>Offshore delivery of an Australian higher education qualification (per location)</td>
<td></td>
<td></td>
<td>$5,630</td>
</tr>
<tr>
<td>Approval of an overseas course to be offered in NSW by an overseas higher education institution (per course)</td>
<td>$2,260</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Major Variations to registration or course accreditation</td>
<td>$3,390</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Review of condition of registration, accreditation or</td>
<td>$3,390</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Approval, or renewal of approval, for **self-accrediting authority** (where the application is from an interstate institution with self-accrediting authority seeking to operate in NSW, a reduced fee of $2,260 will be charged)

| Applications to self-accrediting authority | $5,630 | $5,630 |

Fees relating to applications for **approval to provide courses to overseas students** in NSW are included below.

**INSTITUTIONS SEEKING APPROVAL TO PROVIDE COURSES TO OVERSEAS STUDENTS IN NSW**

<table>
<thead>
<tr>
<th>Description</th>
<th>Application Fee</th>
<th>Assessment Fee</th>
<th>Annual Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approval, or renewal of approval, to provide courses to overseas students in NSW</td>
<td>$5,630</td>
<td>$1,130</td>
<td>$1,130</td>
</tr>
<tr>
<td>if approved to provide up to (and including) 5 higher education courses OR $2,2602 if approved to provide 6 or more higher education courses</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Variation of approval – to add, suspend or cancel a course</td>
<td>$1,130</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Variation of approval – to add a new course delivery location in NSW (per location)</td>
<td>$3,390</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Variation to particulars of registration on PRISMS (other than the variations listed above)</td>
<td>$560</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Review of any condition of approval</td>
<td>$3,390</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The following table represents the Schedule of Fees proposed to be charged by TEQSA.

**TABLE 3 - TEQSA proposed Schedule of Fees (3 Jan 2012)**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Intended Maximum Fee for Service</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registrations – Universities</td>
<td>Up to $90 000</td>
</tr>
<tr>
<td>Registration – Non-universities (without international students)</td>
<td>Up to $22 000</td>
</tr>
<tr>
<td>Registration – Non-universities (with international students)</td>
<td>Up to $27 000</td>
</tr>
<tr>
<td>Accreditation</td>
<td>Up to $10 000</td>
</tr>
<tr>
<td>Re-accreditation</td>
<td>Up to $10 000</td>
</tr>
<tr>
<td>Material Change</td>
<td>Up to $10 000</td>
</tr>
</tbody>
</table>

From the three above tables, the lack of detail provided by TEQSA (maximum fees only are provided – no minimum, or exact fees) is evident. Relevant details in the functions provided by TEQSA are missing. ACPET, and Australian HEPs, therefore find it difficult at this stage to make an informed decision regarding the appropriateness of the Schedule of Fees currently being proposed by TEQSA.

**Research on specific examples**

Research by one ACPET member was undertaken in order to determine what fees are currently in place under the State Accrediting authorities for registration, accreditation, re-accreditation and major changes, and a comparative analysis was attempted against the assumed fees proposed by TEQSA. The research revealed the following scenarios:

1) **TEQSA proposed fees for Registration – Non-universities (with international students) – Up to $27,000**

Under the current State Accrediting Authorities, a HEP would be required to pay the following approximate fees for registration as a Higher Education and CRICOS provider operating in 4 States:

- NSW Higher Education Registration Fees: $3,390 (Application Fee) + $5,630 (Assessment Fee) + $2,260 (Annual Fee) = $11,280 (for primary jurisdiction)
- NSW Higher Education CRICOS Registration Fees: $5,630 (Application Fee) + $2,260 (Annual Fee) = $7,890 (for primary jurisdiction)
- QLD DET Higher Education Registration Fees: $579.00 (Application Fee) (secondary jurisdiction)
- CRICOS Queensland Registration Fees: $282.00 (Application Fee) (secondary jurisdiction)
- VRQA Higher Education Registration Fees: $2,050 (Assessment Fee) + $2,050 (Annual Fee) = $4,100 (secondary jurisdiction)
- VRQA CRICOS Registration Fees: $1,030 (Application Fee) + $4,100 (Assessment Fee) = $5,130 (secondary jurisdiction)
- WA DES Higher Education Registration Fees: $1,500 (Application Fee) = $1,500 (secondary jurisdiction)
- WA DES CRICOS Registration Fees: $675 (Registration Fee) = $675 (secondary jurisdiction).

This raises the question that if the NSW Department of Education and Communities can process a registration application for $9,020 (excluding the annual fee of $2,260), then it would be envisaged that the national regulator TEQSA should be able to undertake a similar process at a similar or reduced cost.
2) TEQSA proposed fees for Accreditation - Up to $10 000

Under the current State Accrediting Authorities, a HEP would be required to pay the following approximate fees for each accredited and CRICOS approved Higher Education course:

- NSW Higher Education and CRICOS Course Accreditation Fees: $2,260 (Application Fee) + $5,630 (Assessment Fee) = $7,890 (for primary jurisdiction)
- QLD DET Higher Education Accreditation Fees: $579.00 (Application Fee) + $4,052.50 (Assessment Fee) = $4,631 (secondary jurisdiction)
- CRICOS Queensland Accreditation Fees: $70.50 per batch of 20 courses (Course Registration Fee) (secondary jurisdiction)
- VRQA Higher Education and CRICOS Accreditation Fees: $2,050 (Application Fee) + $5,120 (Assessment Fee) = $7,170 (secondary jurisdiction)
- WA DES Higher Education and CRICOS Accreditation Fees: $5,940 (Assessment Fee) = $5,940 (secondary jurisdiction)

It is noted that the NSW Department of Education and Communities can process a course accreditation application for $7,890. It would therefore be assumed that TEQSA should be able to process a course accreditation application at a similar or reduced cost.

3. TEQSA proposed fees for Re-accreditation - Up to $10 000

Re-accreditation fees are the same as accreditation fees for most State Accrediting Authorities. Therefore comments relating to the proposed Re-accreditation Fees of up to $10,000 are the same as those provided above under ‘accreditation fees’.

4) TEQSA proposed fees for Material Change – Up to $10 000

Under the current State Accrediting Authorities, a HEP would be required to pay the following approximate fees for a material change in each State in which it is registered:

- NSW Higher Education Major Variation to registration or course accreditation Fees: $3,390 (for primary jurisdiction)
- NSW Higher Education CRICOS Variation Fees: $1,130 (variation to approval - add/suspend/cancel a course) or $3,390 (variation to approval – add a new course delivery location) or $560 (variation to particulars on PRISMS)
- QLD DET Higher Education Major Change to registration or course accreditation Fees: $1,052.50 (secondary jurisdiction)
- CRICOS Queensland Registration or Course Amendment Fees: $70.50 per batch of 20 courses (secondary jurisdiction)
- VRQA Higher Education and CRICOS Major Change Fees: $2,050 (Assessment Fee without site-visit) or $3,080 (Assessment Fee with site-visit) (secondary jurisdiction)
- WA DES Higher Education and CRICOS Amendment to Certificate of Registration Fees: $675 (secondary jurisdiction)

It is noted that the NSW Department of Education and Communities can process a material change application for $3,390. It would therefore be assumed that TEQSA should be able to process a material change application at a similar or reduced cost. As a material change will now be processed by a single national regulator, for implementation across all States and Territories, the HEP envisions that the fees relating to this process would be significantly lower than the total fees incurred under the current framework.
ACPET contends that in the interest of transparency, further details regarding the *Proposed Schedule of Fees* need to be released by TEQSA. ACPET also requests that TEQSA conduct a more detailed cross comparison of the proposed TEQSA fees with the fees of states and territories included for each of the functions offered, so that a carefully weighed and informed decision about the proposed fees may be made.

**Recommendation 5**

ACPET recommends that in the interest of transparency, a detailed cross comparison of the proposed TEQSA fees with the fees of states and territories are included for each of the functions offered.

5. **Concluding Statement**

ACPET’s contention is that the proposed fees for charges for registration of training organisations and accreditation of courses by TEQSA are likely to have a significant impact on HEPs. Given the arguments above, it is quite possible that this may result in closures of HEPs, loss of employment and a reduced service offering by HEPs.

ACPET believes that the *Schedule of Fees* circulated by TEQSA has failed to provide sufficient detail for ACPET to provide informed comment on their suitability.

ACPET would be pleased to work with TEQSA to help address the concerns raised and we look forward to further consultation on the *Schedule of Fees*.

**Further information**

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