



Rachael Weiss
University Quality Manager

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Dr Mary Russell
Acting Chief Executive Officer, TEQSA
costrecovery@teqsa.gov.au

Dear Dr Russell,

Thank you for the opportunity to provide feedback to TEQSA on the proposed changes to TEQSA's fees and charges.

The University of Sydney supports the bulk of the changes and in particular welcomes the significant decrease in the cost of ESOS relocation site applications.

Our only comment relates to the increase in the cost of requesting a CRICOS number for new courses: *Add additional course to ESOS Act registration*. The proposed fee change is from \$400 to \$500 per request, or a 25% increase. Prior to the introduction of the Cost Recovery Model, providers were able to lodge a single CRICOS request for multiple new courses; under the new model, providers are obliged to submit separate applications for each new course. This change has resulted in significantly increased administration costs. In the case of The University of Sydney, and presumably other self-accrediting providers, the request we make is sufficiently substantiated to require little additional effort from TEQSA. A 25% increase in the cost, in addition to the increased administrative costs already incurred does not seem appropriate within the cost recovery model.

While we largely support the principle of shared costs so that riskier, smaller providers are supported by the sector as a whole, we would prefer a costing for this item which reflects the significant difference in the workload TEQSA incurs and we would prefer that TEQSA streamlined the process to bring the new system in line with the efficiencies of the old system before considering an increase in fees.

Yours sincerely,

(signature removed)

Rachael Weiss