To: The Chief Executive Officer, VET Student Loans Approved Provider

2020 Reporting Requirements for the VET Student Loans Data Collections

I am writing to advise you that the 2020 reporting requirements for the VET Student Loans Data Collections were released today, 24 July 2019.

The Secretary’s Notice, issued under subsection 53(1) of the VET Student Loans Act 2016 (the Act), covers both the information requirements and the method by which the information is collected. This Notice specifically addresses the method as the Australian Government moves from the Higher Education Information Management System (HEIMS) to a more modern means of data collection, Transforming the Collection of Student Information (TCSI).

The changes align with the work done in the higher education sector reviewing reporting requirements in 2012 and identifying pain points in HEIMS, redevelopment workshops in 2016-17, as well as following your feedback on the Redevelopment and Audit of the VET Student Loans Data Collection Discussion Paper, released in April 2018.

In November 2017, the Department of Education partnered with the Department of Human Services (DHS) to redevelop the existing submission technologies to enable simpler, more flexible reporting processes and better support data exchange and availability. The TCSI project is also facilitating the restructuring of the student data collection, to remove duplication across submissions where possible, simplify validation processes and improve data quality and timeliness.

The department has engaged in extensive consultation throughout 2018 and into 2019 to implement changes to data collection. This commenced in January 2018 with the release of the discussion paper Redevelopment and Audit of the Higher Education Data Collection, the April 2018 discussion paper for the VET Student Loans collection, and the establishment of the TCSI co-design group. The Department of Education has continued to work with the sector through webinars, the TCSI newsletters and the DHS Service Hub, in reaching an understanding of your needs and how the TCSI project can meet them.

For VET Student Loans (VSL) providers, the following points are important to note:

- TCSI will be open to all providers from December 2019.
- Providers must use TCSI for reporting 2020 data.
- Payments for 2020 student debts will only be made to VSL providers able to submit data using TCSI (i.e. the 1 March 2020 payment is contingent upon receipt of complete records submitted in TCSI by 7 February 2020).
- Payments will continue to be assessed the 7th of the month, for complete records with census days up to the end of the previous month submitted in TCSI, and then paid on the 1st of the following month.
- Noting the above, some transition arrangements are available up to 31 May 2020 (refer ‘TCSI transition arrangements’ below).
- All providers must have completed the transition to TCSI and have adopted event-based reporting by 31 May 2020. After this date, failure to report student data will be regarded as a compliance breach, noting contravention of the reporting requirements may give rise to a civil penalty and is also a strict liability offence (both of 60 penalty units) [VSL Act 2016 s 53].
**TCSI transition arrangements:**

Noting TCSI will be open to all providers from December 2019, VSL providers will have two transition options:

1. **VSL providers ready to transition in December 2019** may do so, submitting December 2019 (due 7 January 2020) in TCSI, and continuing with event-based reporting in the TCSI system. All data (including 2019 and 2020 data) must be reported in line with the 2020 data scope, structure and requirements (see part 2 ‘Scope, structure and timing’ below).

2. **VSL providers not ready to transition in December 2019:**
   - May submit December 2019 data (due 7 January 2020) in HEPCAT and may transition to TCSI thereafter, by May 2020.
   - All 2020 data must be reported in TCSI and according to the 2020 data scope, structure and requirements.
   - For those providers that have not completely transitioned to TCSI event-based reporting by 7 February 2020, data may be submitted via the TCSI file upload Portal on a monthly basis up to May 2020. Failure to submit data before the 7th of each month will result in payments being delayed. However, there will be no penalty for holding data or submitting monthly up to 31 May 2020.
   - **For example:** a provider may decide that it is not ready to fully transition to TCSI by 7 January 2020. This provider could submit its December 2019 data in HEPCAT by 7 January 2020, and then hold its accumulating 2020 data. If the data is held past the 7th of the month, payments for that data will not be assessed until the 7th of the month after the data is submitted in TCSI. All 2020 data must be submitted in TCSI by 31 May 2020, with event-based reporting to apply from that date.
   - Providers will be able to revise pre-2020 data in HEPCAT until they commence using TCSI. However, a provider’s HEPCAT access will be revoked after their first use of the TCSI system. Also, HEIMS Online post-submission reporting may not accurately reflect VSL provider HEPCAT submissions, as HEIMS Online (or its replacement TCSI reporting systems) will not obtain feedback of payments/recovery processing unless data is submitted using TCSI.

In preparation, the 2020 Secretary’s Notice is issued in two parts.

**Part 1  Submission requirements** (refer attached notice):

This release of the Notice sets out the requirements for the submission of VET Student Loans data in TCSI:

- The primary channel for data submission will use APIs (Application Programming Interface). This channel supports system-to-system submission and reporting functionality.
- A file upload capability is also available for low volume transactions and basic ICT capability.

The technical specifications for APIs are being developed progressively, in collaboration with developers across the sector. Technical documentation is available from the Govdex Developer portal or by contacting HEIMS Data Collections.

**Part 2  Scope, structure and timing requirements:**

An update to this Notice in September 2019 will issue the scope, structure and timing requirements for 2020 data reporting.
Draft documents of the VET Student Loans Scope and Structure requirements were first released on 11 February 2019. Feedback over the past five months has been incorporated into the final versions released today. Providers have a final opportunity to comment by 30 August 2019. All documents for review are available from the TCSI Resources page of HEIMSHELP.

We anticipate issuing the update to the Notice in early September, following the outcomes of the consultation process.

Providers will also be required to submit statutory declarations, as is the current process. Full details will be outlined in the update to the Notice in September 2019.

If you have any queries relating to TCSI, please email TCSI.support@humanservices.gov.au. If you have queries regarding the 2020 VET Student Loans Data reporting requirements more generally, please email VETStudentLoans@education.gov.au.

Yours sincerely

Kathy Dennis
Assistant Secretary
VET Student Loans Branch
24 July 2019