



**Australian Government**  
**Department of Education and Training**

---

**COST RECOVERY IMPLEMENTATION STATEMENT**  
**Cost recovery activities for the VET Student Loans program**

# **1. INTRODUCTION**

## **1.1. Purpose of the CRIS**

This Cost Recovery Implementation Statement (CRIS) provides information on how the Department of Education and Training (the department) implements regulatory charging associated with the VET Student Loans program. This includes the collection of an application fee from all registered training organisations (RTOs) seeking approval to offer VET Student Loans, and an annual charge to all approved providers. The department will maintain the CRIS until the activity or cost recovery for the activity has been discontinued.

## **1.2. Summary of VET Student Loans**

The VET Student Loans program commenced 1 January 2017. VET Student Loans replaced the VET FEE-HELP scheme which closed to new students on 31 December 2016. VET Student Loans provides capped income contingent loans to eligible students undertaking vocational education and training (VET) in eligible courses.

Registered Training Organisations (RTOs) delivering approved VET courses may apply to become an approved VET Student Loans provider. Where an eligible student is accessing VET Students Loans, the Government pays the student's tuition fees directly to the approved provider, and the student accumulates a debt to the Government, which is managed by the Australian Taxation Office (ATO).

The key features of the VET Student Loans program are:

- Course eligibility that aligns with industry needs and employment outcomes
- Loan caps on all eligible courses: \$5,000, \$10,000 and \$15,000 based on cost of delivery
- A student engagement requirement, where students must demonstrate continued engagement in their course to continue accessing their loan
- An outcomes-focussed application process for providers to access the scheme, including time limited approvals
- A strong legislative, compliance and payment framework, including monthly payment in arrears and the ability for Government to impose loan caps on providers on a case by case basis
- Prohibiting approved providers from using brokers and directly soliciting prospective students, and limiting arrangements to subcontract training.

While many aspects of the VET Student Loans program have been developed to overcome issues relating to the VET FEE-HELP scheme, VET Student Loans is a standalone program and is separate from VET FEE-HELP. This distinction is important, as regulatory charges do not form part of VET FEE-HELP and these arrangements are therefore not comparable to VET Student Loans.

## **1.3. Description of the regulatory charging activity**

Charging for the VET Student Loans program activity ensures providers contribute to the cost of program administration and regulation to maintain the integrity and fiscal sustainability of the program over the long term. The prices of the charges raised are for cost recovery and should be set to recover the efficient full costs of specific activity unless the Government has decided otherwise. This means costs need to be built up according to each applicable administrative activity, and adjusted to take into account different levels of effort required to manage different providers.

The Australian Government Charging Framework, including the Government's Cost Recovery Guidelines (CRGs), sets out the overarching framework under which government entities design, implement and review cost recovered activities. The Government's overarching charging policy is that, where appropriate, non-government recipients of regulatory activities should be charged some or all of the efficient costs of those activities. The cost recovery policy promotes consistent, transparent and accountable charging for government regulatory activity and supports the proper use of public resources<sup>1</sup>.

Cost recovery in vocational education and training is not new. The Australian Skills Quality Authority charges RTOs in order to recover the costs of its regulatory activities, and has cost recovered for a number of years.

The VET Student Loans program comprises two regulatory activities:

- **Application fee** - The application from RTOs for VET Student Loans approval will be accompanied by an application fee. The collection of an application fee assists with the recovery of the costs associated with processing and assessing applications. The Secretary is not required to accept an application if it is not in an approved form. If the Secretary does not accept an application, the application fee must be refunded.
- **Annual charge** - The annual charge will apply to all approved VET Student Loans providers. Collection of an annual charge assists with recovering the costs associated with administering the program, such as compliance and auditing costs, payments, processing and actioning complaints, and provider and student management.

## **2. POLICY AND STATUTORY AUTHORITY TO COST RECOVER**

### **2.1 Government policy approval to cost recover the regulatory activity**

The VET Student Loans program was announced on 5 October 2016 by the Minister for Education and Training, Senator the Hon Simon Birmingham. The VET Student Loans Bills, which included fees and charges, were introduced by the Assistant Minister for Vocational Education and Skills, the Hon Karen Andrews MP, on 19 October 2016, and passed Parliament on 1 December 2016.

### **2.2 Statutory and policy authority to charge**

The statutory authority for the VET Student Loans fees and charges is provided as follows:

- *Part 4 Division 1 of the VET Student Loans Act 2016* - <https://www.legislation.gov.au/Details/C2016A00098>
- *Section 6 of the VET Student Loans (Charges) Act 2016* - <https://www.legislation.gov.au/Details/C2016A00099>

## **3. COST RECOVERY MODEL**

### **3.1 Outputs and business processes of the regulatory charging activity**

The CRGs note the need to break down the **activity** into distinct **outputs** and the key **business processes** that are used to produce those outputs. These outputs should have a discernible link with the costs, charges and performance of the activity.

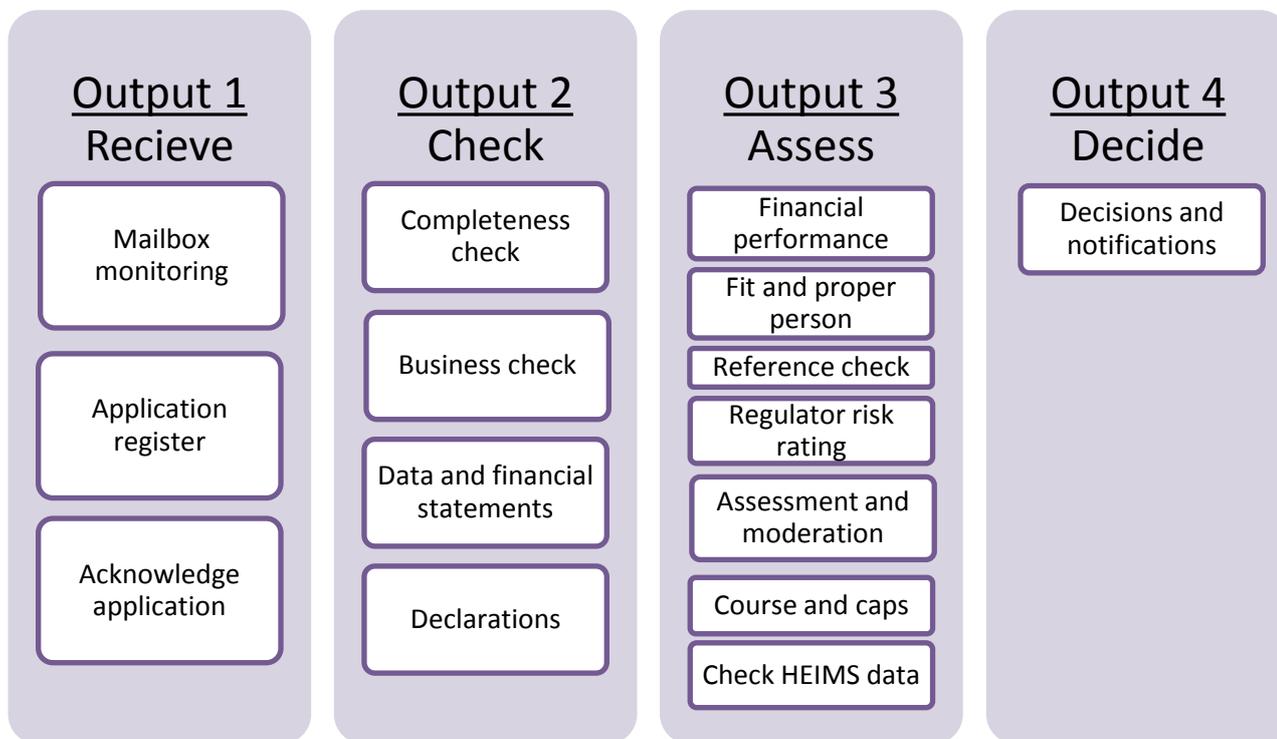
---

<sup>1</sup> Australian Government Cost Recovery Guidelines, Resource Management Guide No. 304.

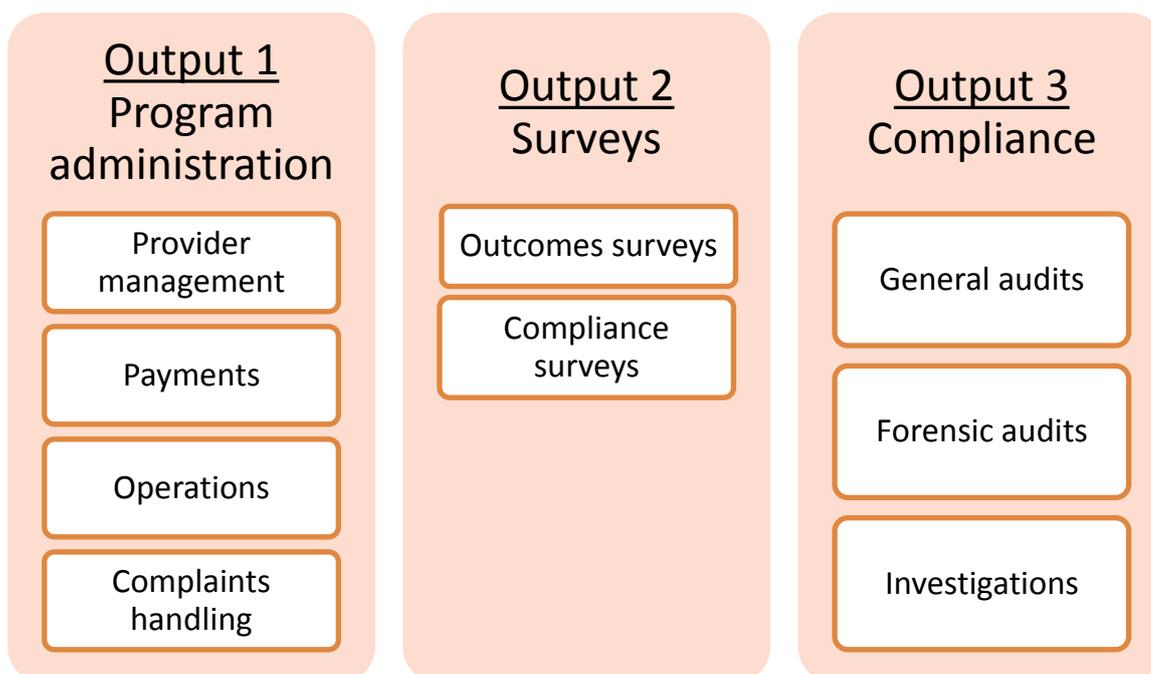
The VET Student Loans cost recovery model consists of two activities, seven outputs, and a number of business processes corresponding to these outputs (as shown in Figures 1 and 2). The outputs and associated business processes are based on the department’s assessment of key regulatory impacts of the program.

The business processes associated with effort expended on assessing applications from RTOs are shown in Figure 1, while business processes associated with effort expended on program management and administration, compliance, and investigations are shown in Figure 2. These types of cost recovery activities, and their corresponding outputs and business processes, are consistent with the CRGs.

**Figure 1: Activity 1 – assessing applications**



**Figure 2: Activity 2 – program management and administration**



The VET Student Loans provider application fee includes the following business processes:

- Receive and register - Receive and register the application from the provider. This includes mailbox monitoring, an application register, and the acknowledgement of applications.
- Completeness check - Check application for completeness and rectify where required. This includes a check of business, data and financial statements and declarations and ensures applicants have provided all necessary information before assessment begins.
- Financial performance check - Analysis of audited general purpose financial reports from the last three years, or where the applicant forms part of a larger corporate network, consolidated financial statements for the group. Financial performance checks ensure the provider is financially viable to supply training to students.
- Assessment of fit and proper person check - An integrity check is performed by a reputable organisation, actioned by the applicant, ensuring executive staff are well suited to deliver the program. This check is supplied in the application by the provider and assessed by the department.
- Reference check - The department will undertake reference checks to determine industry links of the applicant. This aligns with a key objective of the VET Student Loans program.
- Regulator risk rating - The department will liaise with the Australian Skills Quality Authority (ASQA) or the relevant state regulator (depending on the RTO's registration) to determine the risk level of the applicant. This third party information will aid in determining the applicant's ability to provide quality training.
- Check Higher Education Information Management System (HEIMS) data - The department will cross check applicant data to HEIMS data. Evaluating this data applies only to current VET FEE-HELP providers. HEIMS data will provide a snapshot of the history of the provider under the VET FEE-HELP scheme.
- Assessment and moderation - Paper based assessment of applications against selection criteria, including moderation of assessments and quality assurance. The selection criteria will demonstrate the provider's ability to meet the objectives of the program.
- Courses and caps - Approval of courses and caps. This includes using student numbers, proposed courses and fees, loan caps, completion rates, grandfathered students, and provider history registration (in the HELP Information Technology System) to make course and cap allocation decisions.
- Decisions and notifications - Notifying the applicant and the ATO. Internal notifications include input into HEIMS, to payment systems, StudyAssist and MySkills. External notifications include to applicants and the ATO.

The business processes associated with administering and regulating the VET Student Loans program include the following:

#### *Administration*

- Base administrative effort – Administration and general compliance activities that apply equally across all RTOs, including payments.
- Size related administrative effort – Administration and general compliance activities that are proportional to the size of the RTO, including provider and student management.

#### *Compliance*

- Compliance surveys - Compliance surveys to ensure providers are adhering to requirements of the program.
- Outcomes surveys - Student surveys administered and analysed to determine that students are genuine and satisfied with the quality of their training.
- General audits - Schedule, plan, and conduct a compliance audit as well as processing the audit decision and notifying the provider. General audits are not triggered by particular events, rather are undertaken to ensure compliance in the program.

- Forensic audits - Schedule, plan, and conduct a compliance audit for higher risk or larger providers, as well as processing the audit decision and notifying the applicant.
- Investigations - Specialist investigation to action complaints made against providers.

## 3.2 Costs of the regulatory charging activity

### 3.2.1 Applications

The cost to assess applications has been determined according to the following methodology:

1. Identifying the outputs and business processes that comprise the assessment of each application
2. Estimating the effort (time, skills and resources) required to complete each activity
3. Identifying whether these costs are direct, indirect or capital related
4. Determining the full cost of assessing each application
5. Determine the total cost to be raised by factoring up this cost with the estimated number of applications.

Following the assessment of each business process for applications, as per Figure 1, it was determined that there were no significant indirect or capital costs. As such, the determination of the cost of the regulatory charging activity will only be comprised of direct costs (costs that can be traced to a cost object with a high degree of accuracy<sup>2</sup>).

The recovery of costs associated with assessing applications will be in the form of an Application Fee which will need to accompany the application.

#### Example 1 'Receive and Register' process:

- Receiving and registering a provider application would take one junior administration officer approximately 25 minutes.
- The hourly wage for a junior administration contract officer is \$72.56 (including on-costs).
- $0.25 \times \$72.56 = \$18.14$
- The total cost of the 'receive and register' process is \$18.14 per application.

#### Example 2 'Financial Performance Check' process:

- It would take two administration officers a combined effort of approximately two hours to review the financial performance metrics.
- This review would include entering data on financial statements and analysing an applicant's profitability, equity and liquidity.
- The review would include the use of pre-built (and pre-populated where possible) templates to derive metric outcomes, financial analysis and risk ratings. Each appraisal will provide a risk rating and final conclusion stating any major inclusions or exclusions.
- The average hourly wage rate of an administration officer is \$95.31 (including on-costs)
- $2 \times 2 \times \$95.31 = \$381.24$
- The total cost of the 'financial performance check' process is \$381.24 per application.

Figure 3 lists each output and business process and the resulting cost to be recovered through the application fee.

In relation to the application fee, the following activities are excluded (consistent with Figure 12 of the CRGs):

- Advice to government in relation to the application process, methodology and outcomes
- Drafting of legislation and associated instruments relating to the application process

<sup>2</sup> Cost Recovery Guidelines, paragraph 84.

- Preparation of general advisory material
- Preparation of forms and checklists
- General communications relating to the applications process, methodology and outcomes.

**Figure 3: Regulatory costs per application, by output and activity**

Outputs and business processes	Cost per application
Receive	
Receive and register	\$18
Check	
Completeness check	\$73
Assess	
Financial performance check	\$381
Assessment of fit and proper person check	\$43
Reference check	\$73
Review of track record	\$43
Assessment and moderation	\$2,495
Allocate courses and caps	\$1,144
Data check and verification	\$87
Decide	
Decisions and notifications	\$22
Assessment oversight	\$731
<b>TOTAL (rounded)</b>	<b>\$5,110</b>

### 3.2.2 Administration of the program

The cost to administer the program has been determined according to the following methodology:

1. Identifying the outputs and business processes, as per Figure 2, that comprise the administration of VET Student Loans
2. Identifying direct, indirect or capital related costs of each business process
3. Determining whether the regulatory effort for each business process applies equally across all providers, or whether some providers will require more regulatory effort than others; where effort varies for each provider, determining the driver of that effort
4. Estimating the effort (time, skill and resources) required to complete each business process
5. Calculating the total cost of each output, derived from the costs of each business process within that output
6. Determining the total cost to be raised by factoring up the full cost of each output with the appropriate cost driver.

#### *Identifying the activities*

Based on experience in managing the VET FEE-HELP scheme, the department has identified the following outputs that will form the basis of the determination of the annual charge:

- Program administration (including provider management, payments, operations and complaints handling)
- Surveys (student and audit)
- Compliance (general and forensic audits, and investigations)

#### *Identifying whether eligible activities are direct, indirect or capital related*

Following the assessment of each activity, it was determined that there are a small number of indirect costs that can be attributed to providers. These costs include data analysis and some communications activity. Other than these costs, the costs allocated to the annual charge are assigned to each output as direct costs because they can be

traced to an activity. This activity is demonstrated through the use of existing IT systems to capture student and provider data, and to administer vital aspects of the program, such as payments.

#### *Determining whether the regulatory impact for each activity applies equally across all providers*

Based on experience in managing the VET FEE-HELP scheme, the department has found that for most activities, the efficient cost of regulating and administering the program (cost recovered through an annual fee) is related to the size of the provider (defined as number of student enrolments estimated for 2017), grouped into small, medium and large providers. For example, the student-focussed nature of audits and surveys undertaken by the department means there is a direct relationship between the number of student enrolments and the cost of the investigation. To account for this effect, and to best approximate an efficient level of regulatory effort to each provider while maintaining simplicity<sup>3</sup>, the annual charge will have three amounts based on provider size:

- Small: Providers with fewer than 200 student enrolments
- Medium: Providers with at least 200 student enrolments, but up to and including 1,000 student enrolments
- Large: Providers with at least 1,000 student enrolments.

Under the VET Student Loans program, the department has assessed the risk level per student to be broadly equal for both public and private providers of a given size. While historically, public providers have generally been considered lower risk, under VET Student Loans, high risk providers will not have access to the program, meaning that the range of risk profiles across a given provider size band will be significantly reduced. Consequently, the same annual charge amount will apply to both public and private providers (within a given provider size band).

Based on experience from VET FEE-HELP, it is expected that the regulatory effort for the annual charge will be consistent within each group<sup>4</sup>. That is, those providers with lower student enrolment numbers in one band, and those providers with higher student enrolment numbers in the same band, require broadly the same amount of regulatory effort as the median in each band. A small number of providers in the large provider band are expected to have disproportionately higher student enrolment numbers in comparison to all other providers in this band. Under VET Student Loans, restricting course eligibility and capping loan amounts means the regulatory effect for these large providers (and therefore student enrolment numbers) will be more in line with other large providers.

#### *Identifying costs for each annual charge activity*

A number of administrative costs have been assessed to apply equally across all providers regardless of size. These costs include payment operations and basic compliance and monitoring activities. For example, a minimum sample size is needed to achieve reliable results in a survey to draw conclusions about a provider's enrolment practices. For these costs, staffing levels were allocated and then a base rate per provider (assuming 148 providers) was applied. This rate equals \$19,190.76 per provider.

A number of administrative costs have been assessed to apply on a per student enrolment basis. These costs include provider management, and complex compliance and monitoring activities. For these costs, staffing levels were allocated and then a base rate per student enrolment (assuming 169,103 student enrolments) was applied. This rate equals \$8.22 per student enrolment.

For compliance-related activities, costs were based on VET FEE-HELP actuals, including costs relating to recent audits, investigations and student surveys. Figure 4 details the regulatory costs for each activity, based on provider size.

---

<sup>3</sup> Cost Recovery Guidelines, paragraph 92.

<sup>4</sup> This assumption will be tested during 2017 and 2018 and form part of the post implementation review of the program, including fees and charges.

### Example 3 – General compliance and administration cost

- This cost involves administration and general compliance activities that are proportional to the size of the RTO, including provider and student management.
- Per student enrolment, the cost for administration and general compliance activity is \$8.22
- Therefore, the cost per provider must be determined by size:
  - The cost for a small provider (1-199 student enrolments) for this activity = \$380
  - The cost for a medium provider (200-1,000 student enrolments) for this activity = \$3,750
  - The cost for a large provider (1,000+ student enrolments) for this activity = \$18,890

### Example 4 - Forensic audits cost

- A forensic audit involves scheduling, planning and conducting a compliance audit for higher risk or larger providers, as well as processing the audit decision and notifying the applicant.
- Per student enrolment, the cost for a forensic audit is \$6.02
- Therefore, the cost per provider must be determined by size:
  - The cost for a small provider (1-199 student enrolments) for this activity = \$280
  - The cost for a medium provider (200-1,000 student enrolments) for this activity = \$2,750
  - The cost for a large provider (1,000+ student enrolments) for this activity = \$13,830

### Example 5 – Survey charge

- This cost involves student surveys administered and analysed to determine that students are genuine and satisfied with the quality of their training.
- Per student enrolment, the cost for student surveys is \$2.37
- Therefore, the cost per provider must be determined by size:
  - The cost for a small provider (1-199 student enrolments) for this activity = \$110
  - The cost for a medium provider (200-1,000 student enrolments) for this activity = \$1,080
  - The cost for a large provider (1,000+ student enrolments) for this activity = \$5,440

Figure 4 lists each output and business process and the resulting cost, per provider size.

**Figure 4: Regulatory costs per provider, by provider size and activity**

	Cost per enrolment	Small provider	Medium provider	Large provider
Administration (fixed cost)	N/A	\$19,190	\$19,970	\$19,190
Administration (size related)	\$8.22	\$380	\$3,750	\$18,890
Compliance surveys	\$2.37	\$110	\$1,080	\$5,400
Outcomes surveys	\$2.37	\$110	\$1,080	\$5,400
Audits - general	\$6.02	\$280	\$2,750	\$13,830
Audits – forensic	\$6.02	\$280	\$2,750	\$13,830
Investigations	\$2.37	\$110	\$1,080	\$5,400
<b>TOTAL (rounded)</b>	<b>\$27.35</b>	<b>\$20,470</b>	<b>\$31,670</b>	<b>\$82,060</b>

## 4. RISK ASSESSMENT

The *VET FEE-HELP Redesign Regulation Impact Statement* (RIS) sets out some broad risks and impacts relating to the introduction of the VET Student Loans program. In particular, the RIS notes the rapid introduction of the new program could mean some providers may need to quickly change their business models to account for the new course loan caps or restrictions on the use of brokers and third party training providers. In addition, the changes to the eligible course list may lead to some providers changing their course mix, for example removing ineligible courses and offering approved courses.

There are also specific risks regarding the implementation of cost recovery under VET Student Loans. Cost recovery for VET Student Loans is new, and there is a level of uncertainty as to whether the rates reflect true and efficient costs of each particular business process. As a result of this uncertainty, providers could be over or under charged when compared to the actual cost of the regulatory activity. There is also uncertainty around the numbers of providers that enter the new program over time. The uncertainty impacts on the total estimated revenue raised through the cost recovery mechanisms.

To mitigate these risks, a review of the cost drivers for the application fee and annual charge will occur each year, after the annual charge has been administered for that year. Further, a comprehensive review of the cost recovery model will occur in 2020-21. These reviews will be able to utilise empirical cost/effort data from the assessment of application rounds and of regulating and administering the program. These reviews will ensure the application fee and annual charge rates reflect efficient costs and the drivers of those costs, and will include consultation with stakeholders. Fees may be adjusted following any review.

Over time and with measurable data, for example on the actual costs to assess each application, the accuracy of the cost drivers will improve.

## 5. STAKEHOLDER ENGAGEMENT

The Government undertook extensive consultation as part of the VET FEE-HELP redesign, of which VET Student Loans was the outcome. This includes face to face consultations hosted by the former Minister for Vocational Education and Skills, Senator the Hon Scott Ryan, a public submissions process, and meetings with Australian Government state and territory counterparts.

The department has also established an advisory group comprising peak industry and consumer advocate bodies and providers to provide advice on the implementation of the new program, including the implementation of fees and charges. The VET Student Loans Implementation Advisory Group (the Group) was established to ensure that stakeholder concerns are understood and considered during the transition period.

The Group provides advice on a range of issues, including cost recovery, and the Group was consulted about the methodology and application of this CRIS. This consultation is consistent with the Senate Education and Employment Legislation Committee Inquiry into the VET Student Loans Bill 2016 and two related bills, which encouraged the Department of Education and Training to consult with key stakeholders to ensure that fees and charges are implemented on a fair and equitable basis, taking into account any impact on students.

Consultation on this CRIS:

- Members of the group did not express any concerns regarding the application fee. However, in relation to the annual charge, members concluded:
  - the proposed rates were too high and would have a negative impact, particularly on small businesses;
  - the significant jump in the rate from the medium to large provider size categories was a concern;
  - the proposed model disadvantaged smaller providers when viewed on a per-student enrolment rate perspective;

- the rates proposed provide a disincentive to quality providers entering the program; and
  - given VET FEE-HELP had no fees and charges, the introduction of cost recovery could have adverse impacts on business sustainability.
- As a result of this consultation, the Government has made a decision to partially cost recover program administration of VET Student Loans.

## 6. PARTIAL COST RECOVERY

VET Student Loans will comprise full cost recovery through the application fee and partial cost recovery through the annual charge. That is, 100 per cent of the costs associated with assessing applications will be recovered, and a smaller percentage of the costs associated with program administration will be recovered.

This is achieved by excluding all fixed costs and applying a single, per student enrolment rate across all provider categories. The department will absorb the fixed administrative costs of the program – general compliance activities and payments – and only cost recover on size related and monitoring costs.

The per-student enrolment rate was derived from the total cost of all program administration activities divided by the number of student enrolments. That is, the per student enrolment costs for size related administration, compliance and outcomes surveys, general and forensic audits and investigations were summed to produce a per student enrolment rate. This rate (\$15.57) was then applied to the median number of student enrolments in each provider category.

The rate for the application fee will be specified by legislative instrument and the annual charge rates for each provider will be specified by Regulations. These will be registered at [www.legislation.gov.au](http://www.legislation.gov.au).

## 7. FINANCIAL ESTIMATES

Financial performance for the VET Student Loans charging arrangements is provided at Figure 5 below. The 2017–18 financial year and three forward years will be updated each year as financial information becomes available.

The application fee revenue assumes 50 applications each year. Therefore, the total expenses for the application fee are consistent from 2018-2020. There is an estimated net growth in the number of VET Student Loans providers each year. Both the application fee and annual charge assume the same level of regulatory effort each year. Both of these assumptions will be tested as part of the review in 2017-18.

**Figure 5: VET Student Loans Fees and Charges, Expenses and Revenue (\$m) (incl. indexation)**

	2017-18	2018-19	2019-20	2020-21
Expenses = X	\$0.255	\$6.249	\$7.214	\$8.221
Revenue = Y	\$0.255	\$2.929	\$3.361	\$3.812
Balance = Y – X	-	-\$3.320	-\$3.853	-\$4.409
Cumulative balance funded by Government	-	-\$3.320	-\$7.173	-\$11.582

## 8. FINANCIAL AND NON-FINANCE PERFORMANCE

The VET Student Loans program commenced 1 January 2017. Historical information on financial and non-financial performance regarding the management of the application fee and annual charge is not available because these are new cost recovery measures. The department will report this information once data determining financial and non-financial performance is generated.

As noted, non-financial performance measures under VET Student Loans are still being determined, but will likely focus on links with industry and student outcomes such as student completion and employment rates.

Financial performance measures under VET Student Loans are also under development, but are likely to include loans issued, debts not expected to be repaid, payments in arrears / payments made on time.

The key non-financial drivers will be the numbers of provider applications and the numbers of approved providers. It is forecast that some providers will exit the program, while a number of applications will be assessed and approved each year, resulting in a greater number of providers given access to VET Student Loans. As noted above, non-financial performance indicators such as completion rates and employment outcomes are still being determined, as historical VET FEE-HELP data is not reliable to determine these indicators.

**Figure 6: Projection of non-financial performance indicators, 2016-17 to 2019-20**

	2016-17	2017-18	2018-19	2019-20
Applications	250	50	50	50
Providers	148	173	198	223
Student course completion rates	TBD	TBD	TBD	TBD
Student progression rates	TBD	TBD	TBD	TBD

As the VET Student Loans program is in its infancy, and because VET FEE-HELP had no fees or charges, there is potential for a significant variation in revenue when compared to Figure 5 estimates. Further, the non-financial measures in Figure 6 drive the allocation of efficient costs. Therefore, up to and including 20% variation from the amount of VET Student Loans applications, VET Student Loans providers, and estimated revenue will be accepted. Any further variation will trigger a review of the charging activities and any changes will be reflected in the subsequent CRIS. This acceptable variation range will be considered as part of the scheduled review.

## 9. KEY DATES AND EVENTS

Date	Event
November 2016	<ul style="list-style-type: none"> <li>Senate Education and Employment Legislation Committee Inquiry into the VET Student Loans Bill 2016 and two related bills</li> </ul>
December 2016	<ul style="list-style-type: none"> <li>Formal application round opens</li> </ul>
January 2017	<ul style="list-style-type: none"> <li>Consultation on fees and charges commences with the VET Student Loans Implementation Advisory Group</li> </ul>
May 2017	<ul style="list-style-type: none"> <li>Finalisation of fees and charges</li> </ul>
July 2017	<ul style="list-style-type: none"> <li>VET Student Loans formally commences for all providers successful in the application round</li> <li>2017-18 annual charge commences</li> </ul>

2017-18	<ul style="list-style-type: none"> <li>• Post Implementation Review of VET Student Loans</li> <li>• Second round of provider applications open, will require an application fee</li> </ul>
Late 2018	<ul style="list-style-type: none"> <li>• Providers invoiced annual charge for 2017-18 financial year.</li> </ul>

**9. CRIS APPROVAL AND CHANGE REGISTER**

Date of CRIS change	CRIS change	Approver	Basis for change