



**Submission to the Department of Further and Higher Education,
Research, Innovation and Science on the Review of the Student
Grant Scheme – SUSI Student Universal Support Ireland**

April 2021

Introduction

The Citizens Information Board (CIB) welcomes the opportunity to make a submission to the Department of Further and Higher Education, Research, Innovation and Science commissioned review of the Student Grant Scheme – SUSI. A review of the Student Grant Scheme in 2020 (following the impact of COVID-19) was committed to as part of the Programme for Government. We welcome the scope of the review being undertaken by Indecon Consultants which will focus on SUSI eligibility criteria, the maintenance grant support, the potential impact of increasing the grant values and/or making adjustments to the income thresholds and the impact and associated costs arising from widening the supports to include part time provision.

The impact of the pandemic on students and their families is wide ranging, and not just in terms of educational access and progression, but more broadly across the social and economic domains of people's lives. Issues relating to reduced incomes, loss of employment, and digital constraints and exclusion (the lack of broadband access, lack of or limited access to IT equipment and limited IT skills) have had a significant impact on people's lives. These issues have been reflected in the queries and policy concerns arising throughout regional CIB funded delivery services providing information, advice and advocacy services.¹

Covid-19 has led to an upsurge in unemployment, with the Covid-19 Adjusted Measure of Unemployment indicating a rate as high as 24.2%, where all Pandemic Unemployment Payment (PUP) recipients are included. Approximately 468,850 people claimed the Pandemic Unemployment Payment during the first week of March, and employers received Employment Wage Subsidy Scheme (EWSS) payments for approximately 309,500 qualifying employees in February 2021.²

Supplementary information provided by the Department of Social Protection indicates that at least 8% of all PUP recipients since March 2020 were attending full-time education, and for those aged under 25 years this increases to at least 33%, and is as low as 1.3% for those aged over 25 years.³ Those in receipt of the Employment Wage Subsidy Scheme (EWSS) are classified as employed, as they still have an attachment to their employer.

The impact of the crisis on people's labour market situation indicates a potential increase in demand for places in education in the short, medium and long-term. When and how the recovery will occur is as yet uncertain, and there is also a risk that poverty, and inequalities will increase. This points to an increase in demand for financial supports to access and participate in further and higher education.

¹ These services received over 15,000 Education and Training queries in 2020 with over 5,000 specific SUSI eligibility entitlement related enquiries.

² ESRI Quarterly Economic Commentary, Spring 2021. <https://www.esri.ie/publications/quarterly-economic-commentary-spring-2021>

³ This information was provided when applicants were asked to certify their status on MyWelfare.ie. Note this information is not complete.

The economic consequences of Covid-19 have led to difficulties particularly for disadvantaged students identified as the target groups by the National Plan for Equity of Access to Higher Education (NAP), e.g. those disadvantaged by socio-economic group, and Travellers⁴. Covid-19 has highlighted access issues for groups beyond those identified in the NAP, e.g. students living in Direct Provision centres, challenges especially for women in balancing caring, working and learning, as well as the requirements to upskill, retrain, for those who have lost jobs, and whose work/life situation has been affected by the pandemic.

Public health guidance related to Covid-19 has had a significant impact on the further and higher educational landscape. Colleges have been required to tackle the implications of closures for their learning, teaching, research, innovation, education outcomes, and financial stability. Of necessity there has been a move away from the campus based higher and further educational model to a remote and blended/hybrid model in the 2020/2021 academic year.

The changes that have occurred in the labour market over the past decades combined with the uncertainty that the pandemic has brought reinforce the fact that those with higher levels of qualifications fare better in a labour market that has become increasingly knowledge-based. Therefore the priority should be to ensure that access to high quality third level education is possible for a significant share of the population in the coming years.⁵

At the same time, the Parliamentary Budget Office estimated that funding per undergraduate student (full-time, part-time, remote and FETAC) enrolled in 2019 was 50 per cent lower than in 2008.⁶ In this regard, the Cassells report⁷ recommended that an additional €1 billion in annual funding would be needed by 2030 in order to sustain and improve provision of higher education in Ireland, with €600m of this required by 2021. Despite increases in funding in recent Budgets, e.g. the Budget for 2021 was €118 million, there will not be an additional €600m invested in the sector in 2021⁸.

This submission is based on the issues that were raised by citizens in their queries to and contact with CIB delivery services - Citizens Information Services (CISs) and the Citizens Information Phone Service (CIPS) in a pre and post Covid-19 context. Policy issues that were identified by frontline staff during the course of processing these queries from members of

⁴All Ireland Journal of Higher Education Volume 12, Number 3: Special Issue: The Impact of COVID-19 on Irish Higher Education (Part 1) <https://ojs.aishe.org/index.php/aishe-j/article/view/491>

⁵ OECD (2020) Education at a Glance 2020. <https://www.oecd.org/education/the-impact-of-covid-19-on-education-insights-education-at-a-glance-2020.pdf>

⁶Parliamentary Budget Office (2019) – An Overview of Tertiary Education Funding in Ireland. Houses of the Oireachtas. https://data.oireachtas.ie/ie/oireachtas/parliamentaryBudgetOffice/2019/2019-11-25_an-overview-of-tertiary-education-funding-in-ireland_en.pdf

⁷Investing in National Ambition: A Strategy for Funding Higher Education. Report of the Expert Group on Future Funding of Higher Education 2016. (Cassells Report 2016). <https://www.education.ie/en/publications/policy-reports/investing-in-national-ambition-a-strategy-for-funding-higher-education.pdf>

⁸ Social Justice Ireland (2021) Social Justice Matters. 2021 Guide to a Fairer Irish Society. <https://www.socialjustice.ie/content/publications/social-justice-matters-2021-guide-fairer-irish-society>

the public are drawn from in the discussion of the issues and challenges below that relate to specific Terms of Reference as set out in the Public Consultation.

Eligibility

To be eligible for student funding, applicants must meet certain criteria, relating to residency and nationality, income, maximum period of grant assistance available, approved course, and previous education and progression.

Approved Course

The design of the current grant scheme is geared towards full-time students, and it does not reflect the reality of need that exists for lifelong learning and re-training and upskilling that will be required particularly in relation to part-time and flexible provision in a post Covid-19 world. Access to part-time as well as postgraduate provision is constrained by the current funding model.

Financial supports have been identified as a key barrier for part-time learning over many years. Currently, part-time students cannot avail of any student supports outside of those available under targeted activation programmes, social protection allowances and tax reliefs⁹. Most part-time learners are adults and it is recognised that there are specific barriers for these learners including childcare and family responsibilities. While many part-time students are able to combine study and work, there are some that need assistance with living costs.

Adults in particular can benefit from more flexible further and higher education provision. This has become particularly pertinent as a result of Covid-19, with individuals losing their employment and looking for opportunities to re-train, or upskill. In a Covid-19 context adult learning can help adults to develop and maintain key skills e.g. information processing skills, ICT skills and support them in acquiring other knowledge and skills. Covid-19 has also meant that some workers have had to change their working habits relying more on technology and remote working. This may also have implications for further education and training.

Part-time education - engaging with a part-time course rather than with a full-time course - often works out more expensive in the long run.

Approved Institution

Feedback from CISs indicated that consideration should be given to providing financial supports to students applying to attend private institutions. Courses in private colleges are not eligible for SUSI funding. For example, Hibernia College provides courses such as the Professional Master of Education (PME) in Primary¹⁰ or Post Primary Education, or other Professional qualifications. The lack of funding available to participate in Hibernia College courses has arisen in queries to CISs. A recent example is of a caller who lost her job because of Covid-19 who wished to retrain as a teacher through undertaking a postgraduate course in Hibernia College. The course included blended/online delivery and part-time provision to facilitate access for people who are not able to take part in full-time

¹⁰ This is a 120-credit award at Level 9 delivered over 24 months.

programmes. The course is not an approved course, and she was not eligible for the Back to Education Allowance (BTEA).

Improved grant supports for postgraduate students were secured in Budget 2021. From September 2021 the postgraduate fee grant will increase to €3,500 from €2,000, and the fee income threshold will increase from €31,500 to €54,240. However, applicants who are eligible for a Postgraduate Fee Contribution of €3,500, are not entitled to a maintenance grant. These increases are welcomed, and will alleviate some of the costs of postgraduate study, however, do not go far enough and there continues to be a real risk that some socio-economic groups would be locked out of a range of professions such as teaching as a result. This could contribute to driving a social class divide at this level, permeating into the labour market and life chances of different groups as many professions and careers now require a postgraduate qualification.¹¹

Lack of flexibility and Choice in Approved Courses at Further Education level

A caller attending a Post Leaving Certificate PLC course in a Community College applied for a SUSI grant, and qualified on means but their chosen course was not an approved one. The only approved PLC course in this location is Nursing Studies & Community Care.

Progression rule

In general, an applicant must be increasing their position on the NFQ (National Framework for Qualifications) to be eligible for a grant. 'Second chance' students may be eligible where they have previously attended but not completed a course, had a 5-year break in studies since leaving that course, and are returning to attend an approved course. Callers presented with difficulties with the 'second chance' rule being too restrictive in respect of applicants wishing to retrain in another profession, or in the case of non-completion of a course, where an applicant did not receive funding to undertake a course at a higher level.

Funding for Periods of Study Overseas

The SUSI website states that students undertaking periods of study abroad on Erasmus will continue to receive their maintenance grant payments. The issue of a lack of flexibility for students in receipt of SUSI funding and undertaking courses that require non Erasmus periods of study overseas was highlighted in the queries. For example, a caller studying Marketing and Chinese, who was in receipt of a SUSI grant, queried the lack of funding within the Student Grant Scheme to assist students required to live abroad as part of their studies such as this client who will be going to China for the third year of this course.

Nationality and Residency

Eligibility for a grant under the scheme is provided for particular provisions, e.g. having refugee status, being granted leave to remain under S. 3 of the Immigration Act 1999, being an applicant for International Protection who qualifies for the Student Support Scheme for

¹¹ Investing in National Ambition: A Strategy for Funding Higher Education. Report of the Expert Group on Future Funding of Higher Education 2016.

Asylum Seekers. However, if a person is granted residency because they are a parent of an Irish citizen child, even holders of Stamp 4, there is no eligibility for the grant.

This issue arose as a social policy concern and an example included a daughter of a Stamp 4 holder not being eligible for grant funding as she was not born in Ireland and her mother had not acquired Irish citizenship. Stamp 4 holders meanwhile can take up employment, work in a profession, or access state funds and services as determined by Government departments or agencies. The regulations for the Student Grant Scheme are therefore more restrictive and result in inequalities of access and treatment for this cohort.

Another issue arising here was the impact of Covid-19 on public services, where a client who was applying for SUSI funding was unable to provide a renewed Irish Residence Permit (IRP) card, due to office closures. All IRP permissions have been extended on a month by month basis but this did not suffice for his application. The delay resulted in client's application being put on hold.

Due to Covid-19, many young people have returned to Ireland from countries outside of the EU/EEA and while they are Irish citizens they are unable to prove residency in their own country for 3 of the previous 5 years. This time period is prohibitive and prevents returning Irish emigrants from accessing further qualifications to allow them integrate into the labour market.

Income/Means Test

The income assessment is based on the applicant and/or household gross income from the previous year. The calculation of the grant is based on whether the applicant is classed as dependent or independent. Dependent Status refers to an applicant being ordinarily resident with parents from the 1st October of the year prior to entry or re-entry to an approved course.

For the years 2018, 2019, and 2020, feedback from CISs raised the following issues:

Providing evidence of living independently

As an independent student, an applicant must be aged over 23 years, living independently from their parents/legal guardians from the October in the year prior to their first point of entry/re-entry into further or higher education. As an independent applicant, the person is assessed under their own, and their spouse/civil partner/ co-habitant's income.

To be assessed as an independent applicant one must produce one of the identified forms of documentation specified by SUSI.

Callers contacted CISs with difficulties encountered in proving independent residency and in particular with securing the required documentary evidence. Examples included where an applicant's accommodation was not registered with the RTB, and a letter from the homeowner along with tax documentation did not suffice; where utility bills are included in

rent, and where a tenancy agreement stating utilities were included in the rent was not accepted.

These issues are particularly challenging in the context of the current housing situation, where fear of loss of tenancy may prevent an applicant from acquiring one of the documents as proof of independent residence. An applicant could be renting a room subject to the Rent a Room relief, which may not be registered with the RTB, may not have been acquired through a Rental Agency, and where the applicant may not be in receipt of Rent Allowance, or HAP or have official documentation posted to the applicant pertaining to that residence.

There were also examples of older applicants in their late 20s and 30s, who had been living in Ireland for many years and whose parents lived abroad who did not have official documentation proving their independent residence. An example included a client who was aged over 33 years, who had lived at home for a number of years due to ill health, and was now living rent free in a relative's property, and thus did not have a utility bill in their own name. The question was posed about the reasonableness of requiring such a person to be assessed on their parent's income and comparisons drawn with benefit and privilege rules for the purposes of social protection payments which have an upper age limit.

Exceptions to whose income is considered for Dependent Student aged under 23 years

Being a dependent student normally means that income is calculated on an applicant's, (if applicable), and the income of the parents/legal guardian. There are exceptions to this rule, one where the applicant is estranged from their parents, or where applicant's parents are separated/divorced. Others include being an unaccompanied minor refugee, an orphan, being fostered, and certain guardianship provisions.

Proof of Estrangement

Young people aged under 23 years may be estranged from their parents, and so be independent of them, but may not have the required documentation to prove this. Proving estrangement from parents through acquiring the necessary documentary evidence, i.e. a court order, or a letter from a Social Worker or TUSLA is not always possible. This occurred for applicants aged 18 years and over who became estranged from parents, where due to their age, services were not involved. Young people/children also rarely get a court order against their parents. For example, an applicant became estranged from her parents at 19, as she was 'put out' of the house. As she was over 18 years she was not covered under TUSLA services, and there was no Garda report at the time. Now at age 22 years, having been financially self-reliant from when she left home, she is not eligible for funding under the Student Grant Scheme.

In another example, other documentation did not suffice, e.g. an affidavit stating that parents and young person were estranged, where applicant was living with and being supported by a grandparent. Another example was where a client was living independently from parents since they were 18 years. The client had been homeless and sleeping rough, as

they were unable to afford to pay their rent. The Information Officer noted in this case that there is no legislation requiring parents to support their children until the age of 23 years.

Providing Evidence of Separation

This proved problematic in the cases of non-legal separation, where applicants could not afford to pay for a legal separation, or who applied to the Legal Aid Board (LAB), and were on a waiting list, and where official documentation proving spouse's address could not be provided for different reasons. Other issues that arose were delays in securing documentary evidence in time to meet grant deadline, due to spouse living abroad, not being in contact with the applicant, or not willing to provide documentation.

An applicant's mother was separated from her husband for 11 years, and she was no longer in receipt of the One-Parent Family Payment (OFP), but on a CE scheme. SUSI required proof of a judicial separation to show that applicant's mother was parenting alone. There was a delay experienced of up to a year in her application for a judicial separation through the Legal Aid Board. In the end, SUSI allowed the grant for her daughter upon receiving a letter from the LAB stating that an application for a judicial separation had been made.

In many cases, a solicitor's letter was not accepted as the wording could only say that 'client advises 'they are going for a separation' rather than they are in the 'process' of getting a separation. The financial pressure then is on parents, who may be amicably separated to proceed with a legal separation.

Another example was where a solicitor's letter about a case of rent arrears between the local authority and client that occurred when parent's former spouse left was not accepted. The applicant's mother was on Disability Allowance, and had 2 children, and was under the income threshold.

Feedback highlighted that the supporting documentation required by SUSI to establish a parent's separation is restrictive. Where clients have never gone through a formal separation/divorce/mediation with their ex-partner, it can be very difficult to prove the separated status. Previous receipt of OFP will not suffice, OFP is stopped when child reaches the cut-off age. Client may never have received Deserted Wife's Allowance.

Information/documentation may not be provided where there is continued conflict between the parents and one partner refuses to comply.

The exceptions to the condition that a student aged under 23 years can be classed as independent were considered to be too limited where applicants are under 23 years and are living independently, including financially independent from parents for different reasons. This does not allow for the many students who are of adult age and supporting their own college journey without any family financial support.

Re-classification

The only points at which an applicant can be reclassified from a dependent student to an independent student are progression from further education to higher education or where they have a 3-year break in their studies or are returning as a second-chance student after a

5-year break in their studies. There has to be a gap of three years between completion of a grant aided programme and the commencement of another before re-classification is even considered.

Client examples:

Client is aged 24 going into a second year undergraduate (level 7) course in receipt of the BTEA. He is estranged from his parents, living independently, but cannot access the SUSI grant for fees as he has to have left the education system for 3 years to be classed as an independent student. He cannot provide the required proof of estrangement for re-classification. His family circumstances have changed and his father will not provide income details to assess him as dependent. Client is on BTEA (underlying JSA), and has no means to pay fees. The SUSI rule of a 3 year break in studies will have a huge impact on this student who will be unable to carry on higher education due to stringent classification rules.

Student is working part time and doing a postgraduate Masters course. She could not apply for a student grant as an independent mature student although she had been living independently of her parents in the previous year and could prove it. This is because of the rule preventing students from changing their classification even though their circumstances have changed as in the case of this client who is now estranged from her parents. She is having to desperately struggle to live and pay rent without support from her parents. She is not a minor. It seems unfair that because she was once dependent, she is still classified as dependant, even though there was a significant change in her circumstances.

Finally, there were examples of applicants aged under 23 years encountering difficulties in securing grant funding where parents were unwilling to provide financial information.

SUSI assesses income from inside and outside the state. Income disregards include income from Working Family Payment, but not in relation to similar income supports paid in the form of Working Family Tax Credits for someone working in Northern Ireland. SUSI only receive data from the Revenue Commissioners and the Department of Social Protection in relation to the evaluation and processing of grant applications. Client's household income is therefore over the income threshold for grant.

Special Rate Grant for Disadvantaged Students

To receive the special rate of grant a member of the applicant's household needs to be in receipt of a long-term social welfare payment. The fact that Illness Benefit (IB) is not included as one of the eligible long-term payments and for example, Invalidity Pension is, was raised by Information Officers as a concern for clients of CISs, who were on IB for varying lengths, e.g. 2 years, 12 years, 14 years.¹² It was suggested that for clients who were

¹² One client who was in receipt of IB for 14 years then applied for a long-term SW payment, so that the student would be eligible for the special rate of grant, however, the client would need to be in receipt of long-term disability payment for 15 months on 31st December in the year prior to the SUSI application, and no change in circumstances rule was applicable to this rule. For another client on IB for 12 years, it was likely that he would remain on this payment until he reached pension age.

on Illness Benefit for an extended period that this payment should be re-categorised as a long term payment.

There were many cases where a change in social welfare payment led to ineligibility for the Special Rate Grant. For example, an applicant's parent who is long-term unemployed transferred from Jobseekers allowance to Supplementary Welfare Allowance (SWA) following an accident. He was not eligible for Illness Benefit or Disability Allowance due to not having the requisite PRSI, and due to the uncertain nature/length of the recovery period. The special rate of grant was not awarded in this case, even though household income remained the same. The student had received the special rate for the previous two years, but was unable to qualify while the parent was on SWA.

An applicant for a SUSI grant who was expecting to receive a full-rate grant as the household income was below the required income threshold was only eligible for a half-rate grant as father who was in receipt of Supplementary Welfare Allowance (SWA) needed to be receiving SWA for 15 months. The issue here is that the father as claimant for a social welfare payment should not have to wait so long on SWA before receiving a social welfare payment.

These rules in relation to the special rate grant were considered to be unfair, as SWA is not intended to be a long-term payment, yet there is a requirement to be in receipt of it for 15 continuous months for eligibility, and there is no provision to combine periods on SWA with previous periods on Jobseekers Allowance. In addition, there is no provision for a period of illness where no entitlement exists to IB or DA. It does not seem equitable, as the household member was in receipt of social welfare support, and his income continued to be below the required threshold.

In other examples clients who were previously on eligible long-term payments such as the Working Family Payment, or Jobseekers Allowance became ill with a chronic condition or had an accident and thus transferred to Illness Benefit, making the students ineligible for the special rate grant. In these examples, the household income remains the same, but the level of maintenance grant can be halved (e.g. from €5,915 to €3,025).

Another example was a client who is a single parent and was working part time and in receipt of Jobseekers Allowance for previous 4 years. Client became ill in September 2019 and went on Illness Benefit. Son was refused SUSI special rate grant as client had broken the 15 month Jobseekers Allowance payment that is required. Client cannot afford to send child to college.

Allowable Earnings

Student earnings during term time are taken into account for grant funding in the following year, resulting in a lower grant. The disregard of €4,500 allowed for student earnings outside of term time covering 2 weeks at Easter, 2 weeks at Christmas, and 12 weeks of summer was considered to be too low. This can act as a deterrent to students taking on work to fund the costs of their education. Many students are dependent on part-time jobs to supplement their income during the college year, even where they receive the full

maintenance grant. However, earnings outside of term-time will be taken into account in full in the means assessment for the Student Grant. This can lead to financial hardship for students and their families and it acts as a disincentive to students who are willing to work in order to support their education.

Impact of Covid-19

- The client has finished her first year in college and is in receipt of a SUSI Grant. She began working on a placement with the HSE as part of her course and is concerned as her reckonable income will exceed the €4,500 holiday earnings allowance. Due to Covid-19 and the resulting closure of the college, her placement commenced in March earlier than it normally would have (in summer break) and will run until October. Client was concerned about the impact of these earnings on her SUSI grant for 2021/2022 period.
- Lack of timely information about whether the Covid-19 PUP was to be treated as reckonable income in the grant assessment for the 2021/2022 period was raised as a concern by some clients. It was subsequently announced in March 2021 that the PUP would be included in the income assessment. For many students they will find themselves on a reduced level of grant or will not be eligible for a grant in this academic year, for example, one caller had received €3,500 in Covid-19 PUP in term time alone.

Current maintenance grant

Current grant levels are too low, when the costs of accommodation are taken into account. The effects of this include students having to opt for courses in areas that have cheaper rents, influencing their course choice/career path; and having to apply to the Student Assistance Fund for extra funding to pay for food and books. The current actual costs of attending college should be reviewed and reflected in the grant levels.

DCU's student support and development office estimated that, for the year 2019-2020, students living away from home could expect to spend at least €1,494 per month, i.e. €13,466 for the year based on a 9 monthly academic calendar.¹³ Meanwhile, a standard rate maintenance grant provides students with €3,025 (non-adjacent). Clearly maintenance payments have fallen well below the actual living costs. The current Special Rate of maintenance grant of €5,915 for families on long term social welfare payments goes some way to meeting the costs of housing and utilities, but leaves little for other essentials.

The costs of going to college both direct and the opportunity cost of not working both act as a disincentive to participating in higher education. The Expert Group on Future Funding of Higher Education (Cassells Report, 2016) recommended increases to the value of maintenance grants in 2016. Yet there have still been no changes introduced to these levels.

¹³ <https://www.irishtimes.com/news/education/how-much-does-college-cost-1.4121745>

Current Income Thresholds

Current income thresholds do not reflect people's actual financial circumstances, in particular their outgoings including the costs of rent, mortgage, or travel costs to work. Household incomes can appear high, but when deductions have been made for housing costs, they are often well below the income thresholds. Other government benefits/schemes for example, the Medical Card treat housing costs as an allowable expense.

The income thresholds have remained static for over ten years,¹⁴ meanwhile wages have increased in that time period, meaning that a proportion of students who would have formerly been eligible for grants based on household income are no longer eligible.

Feedback from services indicated that the current threshold for households of less than 4 children was inadequate, and that consideration should be given to introducing different thresholds for households with differing numbers of children under 4.

Gross income is assessed from the previous year and may not be a true reflection of income at the time of application. Parents' decision-making on sending their child/children to college can be based on their current income and not the income from the previous year. This is relevant in a Covid-19 context, notwithstanding the change in circumstances rule introduced for the 2021/2022 academic year, in relation to income and non-income related changes.

Current adjacent/non adjacent rates of grant

The distance criteria have resulted in a reduction in funding available to some students, who are living just within the 45km and are commuting long distances as a result. The cut-off point between adjacent and non-adjacent rates appears arbitrary, and yet has a significant impact on a student who is living just inside the 45 km point, who is considered to be living adjacent to the institution, who will still incur high transport costs, but will receive the significantly lower adjacent rate of grant. At the same time, those living in rural areas between 30km – 45km from the institution where there are no public transport options may have to move to private rented accommodation/student accommodation closer to the college, but will still only receive the lower adjacent rate. In many instances, the cost of travel exceeds the non-adjacent rate, unless students are awarded the special rate grant.

The availability of, and cost of rented accommodation is also forcing students to stay in the family home, and commute on a daily basis, which is in itself costly.

Aware of a situation where a student applied to attend a course in Limerick, cost of travel to college would have been €75 a week if she had used public transport, and even then the parent would have had to drive her 17 km every morning to catch an early bus, otherwise she would have been half an hour late for lectures every day.

¹⁴ In relation to postgraduate supports, there has been an increase to the income threshold from €31,500 to €54,240.

She would have had to get up at 6am every day to get there and would not have arrived back until 7pm every evening. In the end she managed to secure a lift every day to Limerick.

A shortage of affordable private rented accommodation makes this a considerable additional cost for many families, acting as a significant barrier for students from lower socio-economic backgrounds. In recent years, the financial pressures on students have been compounded in the form of increasing accommodation costs with a lack of affordable student housing, larger class sizes, and the cost of lengthy commutes.¹⁵

In some instances, it makes more sense for a student to apply for a course further away from home, so that they can avail of the higher non-adjacent rate. This demonstrates how the adjacent/non-adjacent rates are influencing students' course/college choices.

A student living between 30 and 40km from a college, living in a rural area with poor transport infrastructure will need to move into rented accommodation closer to the college at an extra cost to the household. For example, a student from Limerick who is studying in Waterford Institute of Technology will receive the same non-adjacent rate as a student from Limerick studying in Dublin where rental costs are a minimum of €700 a month for a room in a family home ('digs'), with additional costs relating to food, books and transport. The distance rates do not accurately reflect the different costs incurred depending on geographic location, whether these costs relate to accommodation, travel, or the impact of poor infrastructure.

Conclusion

Feedback from CISs and CIPS as outlined above demonstrates the need for greater flexibility in the current Student Grant Scheme as well as the introduction of discretion in certain areas. Now is certainly the time to enhance existing student supports, in particular to revise the current maintenance grant levels, given the demands on the higher education and further education systems that Covid-19 will inevitably bring.

At the same time, there are competing demands for public funds. Spending on education may be compromised in the future, as public funds may be directed more towards health and social welfare, and less on further and higher education, notwithstanding short term stimulus and targeted funding¹⁶. In addition, the decline in international student mobility where foreign students pay higher fees will reduce funding for HEIs in a context where HEIs need to reinvent their learning environments so that digitalisation expands and complements student-teacher and other relationships.

It is also vital that there is sufficient funding dedicated to ensure pathways to higher education are available to support part-time and flexible access, postgraduate studies as

¹⁵ Parliamentary Budget Office (2019) – An Overview of Tertiary Education Funding in Ireland. Houses of the Oireachtas

¹⁶ OECD Education at a Glance 2020. For example, the €50 million fund for full-time students third level students in recognition of impact of Covid-19.

well as learners in private institutions. The Covid-19 experience has provided valuable insights into existing student supports and an opportunity now exists to provide an enhanced framework and model of student supports to better reflect the real costs of participation and to improve targeting of supports.

Recommendations:

1. Part-time education leading to a recognised HEI level qualification should be grant aided proportionately to full-time education through provision of funding for both fees and maintenance for students wishing to study on a part-time basis.
2. Consideration should be given to including private colleges as approved institutions for the purposes of providing assistance to students with fees, and in particular for those who wish to study part-time.
3. Postgraduate students should receive a full maintenance grant if they have not received the SUSI grant in the previous 4 years.
4. Maintenance grants should be available for courses leading to professional qualifications, e.g. teaching.
5. Consider introducing greater flexibility in the progression rule.
6. Review the rules for periods of study overseas and consider broadening these study periods to include programmes outside of the Erasmus programme.
7. Include Stamp 4 holders in eligibility for SUSI grant funding.
8. Consider reviewing the rule that a student needs to be resident in Ireland for three of the last five years and to reducing this time period.
9. Consideration should be given to applying the *benefit and privilege* rule relating to eligibility for social welfare payments for those aged 24 years and under living in the family home to the SUSI grant eligibility rules.
10. Consider broadening the types of documentary evidence required to prove estrangement from parents.
11. Expand the options for documentary evidence to prove separation and that parents are living apart, for example, documentation showing separate utility bills and addresses; providing an affidavit; bank statements showing maintenance amounts paid, or a combination of documents. Discretion should be used in cases where formal proof of separation is not available.

12. Review the rules relating to requirement to be on 'long term' social welfare payments, for e.g. that persons must be in receipt of Supplementary Welfare Allowance for 15 months to be eligible for the Special Grant Rate, as SWA itself is not intended to be a long-term payment.
13. Increase the value of maintenance payments to reflect actual living costs with specific attention to those on lower incomes.
14. Consider the recommendation in the Cassells report (2016) that account be taken of capital, assets or accumulated wealth, as well as income in means-testing arrangements.
15. Current income thresholds need to more accurately reflect the current cost of living, particularly in an economy influenced by Covid-19, to reduce the financial burden on middle income families, particularly those just above the grant income thresholds. The Cassells report (2016) proposed that this could take the form of additional tapered fee waivers under the grant scheme or an extension of current tax reliefs.
16. The distance criteria should be reviewed taking into account regional disparities, as well as the impact of financial pressures on students' choices.