



**USI Submission to Department of Further & Higher Education, Research,
Innovation and Science SUSI Review.**

About USI

The Union of Students in Ireland (Aontas na Mac Léinn in Éirinn) is the national representative body for third-level students in Ireland. Founded in 1959, USI now represents more than 374,000 students in over thirty colleges across the island of Ireland. The goal of USI is to work for the rights of students and a fair and equal third-level education system in Ireland.

USI is a full member of the European Students' Union (ESU) which represents students from 46 National Students' Unions in 39 countries.

Introduction

Equity of access to higher education is a core component of the work of the Union of Students in Ireland (USI). The support structures we have at present are not working optimally and there have been significant cuts to the Student Universal Support Ireland (SUSI) grant over the last decade, a time where the cost of living has increased enormously and rental accommodation costs have risen year on year.

The cost of living coupled with the rising cost of accommodation and the Student Contribution Charge remain the largest barrier in accessing third level education in Ireland today.

USI welcomes the opportunity to make this submission to the review panel and welcomes the opportunity to further engage in this process through the Steering Group where USI is represented by the President.

Grants Thresholds and rates

[The TU Dublin Cost of Living Guide \(2019-2020\)](#) details that on average the total cost to attend third level education nationally in Ireland is €12,171 per annum. The [TU Dublin Cost of Living Guide](#) outlines that the monthly expenditure for accommodation and the cost of living, excluding fees for a student living away from home is €1,352 nationally. The rent in Dublin can vary from less

than €495 per month for a shared room, up to €1,976 or more for a one-bedroom unit. This does not come close to being met, even by the highest rate of €657 per month for an undergraduate or PLC student.

[A Strategy for Funding Higher Education](#)’ (2016) states that an additional €100 million would be needed to fund student financial aid. This funding must ensure that the rate of grant is increased to match in the increased cost of living. Thresholds must also be adjusted to allow middle income earners to be able to access the SUSI grant.

PLC & Undergraduate Grant Levels (Maintenance Levels)

Levels of Grant	Maintenance Non-Adjacent Rate 2011-2012	Maintenance Adjacent Rate 2011-2012	Maintenance Non-Adjacent Rate 2019-2020	Maintenance Adjacent Rate 2019-2020
	€	€	€	€
Special Rate of Maintenance Grant	6,100	2,445	5,915	2,375
Standard Rate 100% Maintenance	3,120	1,250	3,025	1,215
Standard Rate 75% Maintenance	2,340	940	2,270	910
Standard Rate 50% Maintenance	1,560	625	1,515	605
Standard Rate 25% Maintenance	780	315	755	305

Source: <https://susi.ie/>

While USI welcomes increases that have been introduced in recent years such as in the reforms to the Postgraduate Grant in Budget 2021, unfortunately these measures don’t go far enough and still fail to meet the rising cost of living for students.

USI welcomes the approach being taken by the Department to determine the cost of attending further and higher education. We believe this should encompass all costs associated with engaging in tertiary education such as levies, placement costs, materials costs alongside the traditional costs of transport, accommodation, food etc. It is also important to recognise and reflect that there may be varied costs for different student cohorts e.g. student parents, careers etc.

Recommendation:

- For the Department of Further and Higher Education, Research, Innovation and Science and the Department for Public Expenditure and Reform to restore the grant thresholds to their pre-Budget 2011 rates.
- That the grant rates should be increased to reflect the rise in the cost of living.

Grant Adjacency Rates

USI strongly believes there is a need to reverse the decision taken in Budget 2011 and decrease the qualifying distance for the non-adjacent rate of the grant from 45km to 24km. The current qualifying distance of 45km is intended to take into account a reasonable distance which

students may commute on a daily basis. However, this puts many students at a disadvantage - especially those outside major urban areas for various reasons.

Furthermore, the use of 'as the crow flies' to determine a student's distance from their institution is particularly problematic for students from rural areas as this method doesn't necessarily take into account what a 'reasonable' the shortest route is.

Some rural public transport links are so poor to the point that students miss early or late lectures. Example: Birr Co. Offaly, population 5,741 is 40km from its nearest third level institution, Athlone Institute of Technology (AIT). The earliest a student can arrive in AIT using direct bus is 1.25pm. This means that students are missing lectures, which is a negative impact on their education.

The adjacent grant exists to provide maintenance for those who are capable of commuting. However, as a result of the increase in the adjacency rate, the cost of travel may be comparable to a rental-costs in the vicinity of the student's college of study, defeating the purpose of this rate.

Example: Killarney, Co. Kerry, population 14,504 is 36 km from its nearest third level institution, MTU Kerry. The cost of using public transport to travel from Killarney to Tralee is €64.00 per month by bus or €122 per month by train. Student accommodation in Tralee is available from €70.00 per week in Kings Court Student Accommodation.

Recommendations:

- For the Department of Further and Higher Education, Research, Innovation and Science and the Department of Public Expenditure and Reform to restore the grant adjacency rates to the pre-Budget 2011 rate of 24km.
- A rural exemption or decrease in rate for rural colleges with poor transport links.
- Less reliance on 'as the crow flies' as the method employed to determine eligibility.
- Introduce a Free Travel Card for grant and BTEA recipients.

Residential Issues

Students who have not lived in Ireland or another EU member state for 3 of the last 5 years do not qualify for EU tuition fee levels or the student maintenance grant, regardless of their nationality and/or citizenship. This decision greatly impacts Irish citizens who have lived abroad and recently returned to Ireland. In light of the COVID-19 this policy decision negatively impacts Irish citizens who may have returned from abroad as a result of the COVID-19 pandemic and who choose to pursue a course of study in years to come.

To prove eligibility to SUSI, in both the [independent](#) and [nationality residency](#) criteria, an applicant must be resident in an EEA state for three of the five years prior to starting a course. The current guidelines state there are no exceptions to this rule.

With these strict criteria, accessing education for many disadvantaged groups is more difficult particularly migrants, asylum seekers, those in Direct Provision and those who are undocumented. These stringent criteria impose an excessive financial burden to their access to higher level education in Ireland. USI believes that all Irish Citizens alongside those with residency status, asylum seekers, migrants, those who are undocumented and those in Direct Provision should qualify for the EU tuition fee levels regardless of their number of years resident in the country and if they meet all other criteria, should be eligible to receive a maintenance grant.

USI welcomes support for asylum seekers through the Student Grant Scheme for Asylum Seekers. However, this residency criteria also directly affects asylum seekers, migrants and those who are undocumented who have entered Ireland seeking asylum. The residency criteria coupled with the poor financial supports for those living in direct provision, makes accessing higher education extremely difficult and therefore USI recommends that refugees, those who are undocumented migrants, migrants and those living in direct provision should be omitted from the residency criteria.

Recommendations:

- That SUSI allows for flexibility in certain cases as not every application can fit the criteria as comfortably as others.
- To scrap the residency rule to enable access to SUSI for returning emigrants, asylum seekers, migrants, those who are undocumented and those living in Direct Provision.

Residency Evidence

USI has become aware of many issues of students being denied grants due to their privately rented accommodation not being registered with the Residential Tenancies Board (RTB).

The Residential Tenancies Board (RTB) is a public body set up to support and develop a well-functioning rental housing sector and they maintain a national registry of tenancies. [SUSI requires that to prove residency](#), one must have a letter confirming that the address is registered with the RTB.

With a student accommodation and housing crisis across Ireland, students have no other choice than to rent accommodation that is not registered. In most cases, students are unaware that the accommodation is not registered with the RTB until it is too late in the process of applying for a grant. This is directly affecting students applying for the grant under the 'Independent' category and leaves many having to reapply under the 'Dependent' category and/or making them ineligible for a grant in either case. In other cases, students are going to the SUSI appeals board stage and being successful after months of financial strain of being without grant supports.

Recommendations:

- To build more awareness of RTB registration requirement and its links to grant.
- To relax the rule around RTB registration and to look at other evidence in order to allow earlier access to grant.

Independent Status

By SUSI's definition, an 'Independent' Student must be "23 years of age or over on Jan 1st of the year when you first enter/re-enter further or higher education." The 'Dependent' classification in the current system is divided into two categories, 'Mature Dependent' and 'Dependent', while the Independent classification only has the one category.

In the current SUSI system, students who are legal adults (18+ years) and support themselves through college, cannot be assessed as independent adults, unless they are mature students or have proof of estrangement. This omits a large category of students who are not dependent on their parents between the ages of 18-23.

On top of this, students are required to inform SUSI of change in circumstances but this does not allow for a transition to financially independent living.

Another area which should be considered surrounds the documentary evidence required from applicants. The need for additional flexibility is key here, especially concerning cases of estrangement.

We don't believe this is being considered under this review however, this is a significant challenge that must be addressed through amended legislation. We therefore believe that the Minister for Further & Higher Education, Research, Innovation & Science brings forward an amendment to the legislation in line with this recommendation.

Recommendations:

- That anyone over the age of 18 can be eligible to be assessed as 'Independent' if they meet all other criteria.
- That applicants should be able to transition between being classified as a 'Dependent' and an 'Independent' upon production of evidence.
- That a wider range of evidence is accepted as proof of independence, and additional flexibility be afforded to applicants trying to prove estrangement.

Extension of Grant Support

The [current criteria](#) for grant support is firstly based on what education institution a student attends. USI believes that grants should be made available to students based on each individual circumstance on meeting the other required criteria rather than on what education institution they attend. The current criteria is inequitable and a barrier to those trying to attend some third-level institutions.

There are currently 9 institutions listed on the SUSI website not eligible for funding although they are offered through the CAO. Furthermore, students undertaking degree courses in FET colleges are currently considered ineligible for SUSI funding. This appears to be an oversight in the current policy.

Recommendations:

- That grant supports should be extended to offer students the same opportunity to apply for financial support regardless of the college they're studying in.

- That students undertaking courses above Level 6 in FET colleges be eligible for SUSI

Grants for Flexible Learning & Other Courses

USI welcomes this element of the review and believes part-time students should be granted access to the same supports that would be available to full-time students in similar circumstances.

Currently, the Maintenance Grant is only available for students studying on a full-time basis in recognised Higher Education Institution.

According to the of the expenses being paid by students, the average expenses for part-time students (at both the undergraduate and postgraduate level) was higher than full-time students.

It is unfair to punish students who are trying to further themselves through studying but due to circumstance cannot commit to attend a higher education institution in a full-time capacity. The SUSI grant system must be expanded to include these students.

Students enrolled on fully online programmes are also currently ineligible for SUSI as they are not classified as attending on a full-time basis. The recent pandemic has resulted in the vast majority of students in Ireland learning mostly or solely online for most, or all of the academic year. This only serves to demonstrate the inequity of this current rule.

The Higher Education sector is also increasingly looking towards flexible and short-term provision including through micro-credentials. As this practice expands, it's important that this review explores financial supports for students on flexible and short courses such as modular programmes and micro-credentials.

Recommendations:

- That the same grant supports for full-time students be extended and offered to part-time students who qualify under the other criteria.
- That grant eligibility be extended to students studying fully online courses.
- That the review considers how students undertaking modular/ micro-credential courses can be supported.

Postgraduate Grants

USI welcomes the increases in Budget 2021 for the postgraduate grant by €1,500 to €3,500 and the income eligibility threshold increase to €54,000. However, it isn't yet clear whether this will include any change to the existing SUSI maintenance grant for postgraduate students (currently postgraduate students are only eligible for the maintenance grant if they qualify for the special rate).

While this is welcomed, USI believes this review must recommend a full reversal of the cuts made in Budget 2012 to Postgraduate Grants and to further review postgraduate grant funding in line with the costs associated with postgraduate study.

Recommendations:

- To fully reverse the cuts made in Budget 2011 to postgraduate grants.
- To review Postgraduate SUSI funding in line with costs associated with postgraduate study.

Reckonable Income Reform

Students and their families have encountered significant challenges with the income assessment procedures employed by SUSI. SUSI eligibility is currently calculated on the base of gross household income for the previous calendar year. The use of gross income as a basis for calculating eligibility does not take into account PAYE or other income tax paid, nor does it reflect the significant additional costs that students and their families face and is not a fair reflection of the student's ability to support themselves financially through college.

Students can currently have up to €4,500 of income earned outside of term-time deducted from their reckonable income as holiday earnings. It must be acknowledged that due to the increasing costs of attending colleges, students are having to work more during the summer and holiday periods, and the holiday earnings limit should be removed altogether to reflect that. It should also be acknowledged that students receiving PUP as a result of lost employment do not have the same provision to deduct that payment from their reckonable income, which is penalising them twice for the loss of employment caused by the pandemic.

Many students have also found themselves in receipt of the Pandemic Unemployment Payment as a result of lost incoming during the COVID-19 pandemic. It is USI's understanding that this payment is being treated as reckonable income. USI believes that this payment should be treated like other social protection payments and disregarded in calculating reckonable income. Other COVID-19 related payments that students may have received such as the €250 one-off payment, or the student nurses & midwives COVID-19 pandemic grant are not being treated as reckonable income, the same rule should apply in this instance.

Recommendations:

- Change the income assessment procedure to calculate eligibility based on net income, not gross income and introduce allowances for household costs e.g. mortgage payments, rent, utilities.
- Abolish the cap on holiday earnings.
- Include the Pandemic Unemployment Payment and other COVID-19 specific payments under Income Disregards.

Previous Education and Repeat Years

The current SUSI criteria excludes those students who have previously completed a course at the same level on the NFQ from receiving SUSI for the second course. This does not align with the promotion of lifelong learning and poses particular challenges for students on Graduate

Entry programmes who are required to hold a degree at Level 8 on the NFQ in order to get on the programme.

Furthermore, students who have to repeat a year of their studies are unable to receive SUSI for the period they are repeating. Students who have previously undertaken but not completed a course of study are also ineligible for SUSI for the period in which they previously received SUSI and must take a five-year break before being eligible for SUSI altogether. These restrictions serve as further reminders of the range of barriers that students face in attempting to progress through third-level education.

The challenging environment that students have found themselves in over the past year due to COVID-19 will have resulted in some students choosing to withdraw from their course or being forced to repeat a year of studies. It is imperative that students are not punished financially for decisions, or outcomes largely influenced by external factors.

Recommendations:

- Scrap the progression rule within the SUSI criteria, or at the very least reform this to make an exception for students on Graduate Entry programmes.
- Extend SUSI eligibility to students who have previously commenced but not completed a course, without the five-year rule.
- Extend SUSI eligibility to students repeating a year.

Unpaid Placement

Thousands of students are required to complete significant periods of unpaid placement as part of their education. In most cases, completion of placement is a mandatory element of their studies, and a pre-requisite to entry on the relevant professional registry. Despite this, very little financial support is offered to these students and, in many cases, professional regulations prevent them from being paid for placement.

Whilst USI believes that all students deserve to be recognized financially for any work that they carry out, it must be respected that the provision of 'pay' could potentially compromise their position as a student rather than an employee. USI would like to see the introduction of financial supports for unpaid placement through SUSI, as is currently the case for mandatory field trips. USI believes that this should be a non-means tested payment available to all students who are required to undertake placement as part of their education, and should be reflective of the costs incurred with placement such as travel, accommodation, uniform etc.

Recommendation:

- Introduce a non-means-tested unpaid placement allowance through SUSI.

Students studying outside of the State

Students studying outside of the state i.e students studying in Northern Ireland, the UK, or Europe are currently only eligible for maintenance support from SUSI. This is in spite of the higher cost of undergraduate tuition in the North and the UK (ranging from £4,000 to £9,250). USI believes that

students should not be penalized for studying outside of the state and should be eligible for a fee grant to cover their tuition fees.

Students undertaking Erasmus+ mobilities who otherwise meet the SUSI criteria can only receive the non-adjacent rate of grant if they ordinarily receive the non-adjacent rate, or their Erasmus+ mobility is a compulsory element of their programme. Students in receipt of the adjacent rate and undertaking a voluntary Erasmus+ mobility will not be entitled to the non-adjacent rate for their Erasmus+ year. USI believes that the non-adjacent rate should be available to any student undertaking an Erasmus+ mobility, not just those ordinarily in receipt of this rate, or undertaking a mandatory Erasmus+ mobility.

Recommendation:

- Extend the Fee Grant to students studying outside of the state.
- Extend the non-adjacent rate to all students on Erasmus+ mobilities who otherwise meet the criteria.

Conclusion

USI welcomes this review and commits to always voicing the student perspective. Students have been frustrated at the lack of adequate supports over the past decade and are hopeful that this review will lead to action that will provide suitable and accessible financial supports throughout their education.

USI will continue to engage in the review process throughout and we are happy to engage in more detailed conversations about any recommendations within this submission.

USI also support submissions to Department of Further & Higher Education, Research, Innovation and Science SUSI Review from Mature Students Ireland, AHEAD and Disability Federation of Ireland and University of Sanctuary Ireland.