



SUSI Grant Reform 2024

Equity of access to higher education is a core component of USI's work. Between the rising cost of living and extortionate rents, it is more expensive than ever to be a student in Ireland. The Student Universal Support Ireland (SUSI) system is a core component of reducing educational inequality in higher education. In fact, we know from self-reported data in the INDECON 2022 Review of the Student Grant Scheme that most undergraduate and postgraduate recipients of SUSI would have been unlikely to have pursued their studies without this support. We recognize and appreciate that SUSI supports many students through college, however we have also identified major areas for improvement. The support structures we have are not working optimally, and the proposals in this paper seek to rectify some of the inequalities.

Scope of this paper

To note, postgraduate specific access measures regarding SUSI are under separate review as per 2023 WEL 4: Reforming SUSI: Eligibility Criteria for Postgraduates and so they are not included in this paper as it would potentially create duplicated or contradictory policy. There is major need for improvement for postgraduate students' access to SUSI, so much so that it deserves its own report to adequately address the shortcomings in the student grant system for postgraduate students. USI is in favour of a complete abolition of the student contribution charge, and thus the scope of this paper will also exclude content on undergraduate SUSI fee grants. This policy is comprehensive but not exhaustive and allows for additional complementary SUSI policies/ mandates to be adopted by Congress/National Council.

Grant Threshold and Rate

USI welcomes the measures introduced this year to increase the maintenance grant. However, these measures still fail to meet the rising cost of living for students. The maintenance grant is the only permanent measure dedicated to putting money directly back in students' pockets and it allows students to use spend their money in whatever way they need it most. The grant thresholds themselves must be increased in addition to the grant rates if we are to alleviate pressures on the most financially vulnerable students.

In 2023, the DFHERIS outlined potential options for funding the cost of college for students in 2024. USI favored Option 4 – the Combined Maintenance and Threshold Option, which would put €119.8 million euro back in students' pockets through a combination of increasing student grant rates and adjusting the thresholds. We are in favor of an investment in the region of an additional €120 million to improve access to college for students.

Recommendations:

- Grant rates should be increased to reflect the rising cost of living.
- That the grant thresholds are increased.
- That the government allocate at least an additional €120 million dedicated to increasing the SUSI grant threshold and rate.

Grant Adjacency Rates

Currently, the adjacent rate of SUSI grant is paid when a student's college is less than 30km from their normal residence. The non-adjacent rate is paid when a student's college is 30km or more from their normal residence. Pre-2011 budget cuts, this distance was 24km and was subsequently changed to 45km. The INDECON SUSI Review 2022 found that students whose normal residence is far from college (>25km) report greater financial difficulties, so it is particularly important to prioritize this cohort.

'As the crow flies' is used to determine a student's distance from their institution, which poses problems for students from rural areas as this method doesn't consider what a 'reasonable' shortest route is. A 30km distance translates to different commuting times for students depending on the roads and transport available in their area and whether they drive.

Recommendations:

- For the Department of Further and Higher Education, Research, Innovation and Science to restore the grant adjacency rates to the pre-Budget 2011 rate of 24km instead of the current 30km.
- Real time travel time at peak hours to replace the ‘as the crow flies’ method of determining adjacency rates.

Dependent Children

The current brackets for dependent children do not reflect the increased costs families have had to incur over the past few years. This mechanism is in place to assess the true cost dependent children may have on a household when looking to qualify for a grant. The brackets must be changed to reflect the reality of increasing costs, and the following changes are proposed:

With Current Model	Proposed Change
Fewer than 4	Up to 2
4-7	3-4
8 or more	5 or more

Residency Criteria

To be eligible for a SUSI grant, you must have been resident in the Irish State, the EU, EEA, UK or Swiss Federation for three of the last five years. There are no exemptions to this residency rule, which creates an excessive financial burden for these students to accessing to higher education in Ireland.

Recommendations:

- That the residency criteria be scrapped to enable access to SUSI for returning emigrants, asylum seekers, migrants, those who are undocumented and those living in Direct Provision.

Documentation to Prove Independent Residence

The list of documentation accepted to prove independent residence is limited, and many students living independently as renters would not have access to the listed documentation. Examples of proof include RTB registration, letter from rental agency, etc. SUSI’s policy explicitly states “Private Housing Lease Agreements will not be accepted” as proof of independent residence. The only option that SUSI provides for these students is that they can reapply within 30 days as a dependent applicant, which would mean much

lower financial supports for that student. This policy prohibits many independent students from accessing the appropriate grant.

Recommendations:

- That SUSI broaden their criteria to include private housing lease agreements, letters from landlord and other documentation to a sufficient extent that students living in private rented accommodation are able to prove that they are independent residents.

Independent Status

You can only be classified as an Independent Student if you were 23 or over on 1 January of the year when you first enter/re-enter further or higher education. Therefore, 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 not dependent on their parents between 18-23. The SUSI change of circumstances process also does not allow for a transition to financially independent living, thus rendering students “stuck” with the dependent status they began college with.

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.

Proof of Estrangement

There is a high burden of proof placed on SUSI applicants who have been estranged from their family. While SUSI provides that “other documentation may be provided”, the only examples of accepted evidence they list include a court order or a letter from a social worker or TUSLA if you have been accessing their services. For most estranged students over the age of 18, neither of these circumstances apply. Many students who have provided supplementary evidence of estrangement signed by psychotherapists, teachers and community supporters that can speak to the students’ personal circumstances have not had their supporting documentation accepted.

Recommendations:

- That SUSI expand the list of acceptable documentation to prove estrangement to include, but not limited to letters of support from the students' support network, residence documentation, and other examples from applicants that have been successful under their "other documentation may be provided" provision.
- SUSI communicates these additions clearly on their website.

"Approved" Institutions

There are currently 9 higher education institutions offering courses through the CAO system that are not on the "approved" list for SUSI funding. Students attending these colleges are not eligible for SUSI. USI believes that grants should be made available to students based on need and not the educational institution they attend.

Recommendation:

- 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.

Grants for Flexible Learning, Online and Part-time courses.

Part-time: USI welcomes the 2023 Budget introduction of SUSI fee grants for part-time undergraduate students at Levels 6,7 and 8. This is particularly meaningful given that a significant minority of students in the SUSI Review Report 2022 would have considered studying part-time if grants were available. However, this should be extended to maintenance grants as a part-time wage cannot be expected to support an adult's full living costs.

Recommendation:

- That the government introduce a maintenance grant for part-time students.

Online: SUSI specifies that to be eligible for the SUSI grant, a course must "take place on the premises of an approved institution". However, during the Covid-19 pandemic, most students in higher education in Ireland learned solely online mostly for most of, or all of the academic year and yet this difference in SUSI allocations has continued.

Recommendation:

- That SUSI grant eligibility be extended to students studying fully online courses.

Micro-credentials: The number of short courses and micro-credentials is increasing in third level.

Recommendation:

- That SUSI fee support be introduced for short courses and micro-credentials.

Reckonable Income Reform

Holiday Earnings: Students can currently have up to €6,552 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.

Recommendation:

- Abolish the cap on holiday earnings.
- Remove the provision which limits deductibles to holiday term earnings only.

Net Income: 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 account for 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.

Recommendation:

- 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.

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 goes against the idea of lifelong education and poses 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, eg. graduate entry medicine. Furthermore, students who must repeat a year of their studies cannot 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.

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.
- That SUSI fully contribute to Graduate Entry Medicine Course fees.
- 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.

Student Placements

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. Professional regulations can also prevent students from being paid for placement. USI believes that all students deserve to be compensated financially for any work that they carry out but that there should also be a placement allowance awarded through SUSI reflective of the costs incurred with placement such as travel, accommodation, uniform etc. This is similar to the award given for mandatory field trips.

Recommendation:

- Introduce a non-means-tested €500 unpaid placement allowance through SUSI.

Students studying outside of the state

Students studying outside of the state i.e students studying in the North, 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 penalised for studying outside of the state and should be eligible for a fee grant to cover their tuition fees.

Recommendation:

- Extend the Fee Grant to students studying outside of the state.

Translation of Documents

Currently, the onus is on students to pay the cost of translation services for SUSI documentation in a language other than English or Irish. For students already financially struggling, this can prove prohibitive to accessing SUSI.

Recommendation: SUSI to provide a dedicated translation service for students and their documentation.

Creative Students

There are numerous hidden costs to college for creative students and there is a need for a materials fund or allowance for their additional materials.

Recommendation: That a materials allowance is awarded to creative arts students and other students experiencing hidden costs through SUSI.