



**Australian Vice-Chancellors' Committee**  
*the council of Australia's university presidents*  
(ACN 008 502 930 - ABN 53 008 502 930)

**Our Ref: K-01-004**

7 June 2006

The Hon Julie Bishop MP  
Minister for Education, Science and Training  
House of Representatives  
Parliament House  
Canberra ACT 2600

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Dear Minister

**The Bologna Process and Australia: Next Steps**

Please find attached the Australian Vice-Chancellors' Committee (AVCC) submission in response to the Department of Education, Science and Training's (DEST) discussion paper, *The Bologna Process and Australia: Next Steps* released in April 2006.

The AVCC acknowledges the importance of understanding the changes occurring in Europe's higher education sector under the Bologna Process and is continuing to engage with European counterparts on the matter.

In order for Australian universities to maintain their high quality reputation and success in the international higher education marketplace, engagement with Europe and the Bologna Process is vital. However, Australia must also retain and continue to strengthen its links with the Asian region, the United States of America, and Canada.

The AVCC believes that academic merit and academic purpose must be the foundations on which any decisions regarding the Bologna Process are made.

The AVCC would like to thank DEST for allowing additional time in which to submit this response and to continuing discussions regarding the Bologna Process and its importance to Australia.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'John Mullarvey', with a long horizontal line extending to the right.

John Mullarvey  
Chief Executive Officer



**Australian Vice-Chancellors' Committee**  
*the council of Australia's university presidents*

**AVCC**  
**Response to Discussion Paper**  
*The Bologna process and Australia:  
Next Steps*

**May 2006**

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## Introduction

The Bologna Process involves 45 European countries undertaking a series of reforms intended to create an integrated European higher education area. There are six objectives underpinning the 1999 Bologna Declaration which, together, aim to establish the European Higher Education Area (EHEA) by 2010. These objectives, ease of staff and student mobility, recognition of qualifications, enhanced by the alignment of national quality assurance agencies, uniform degree structures, the adoption of a common credit transfer system and a common way of describing the qualification, are subject to debate within the Australian higher education sector.

The Department of Education, Science and Training (DEST) has prepared a discussion paper, *The Bologna Process and Australia: Next Steps*, to provide an overview of the current situation on the reforms occurring in Europe with respect to the establishment of the EHEA, and to seek input from stakeholders on how the Australian Government and higher education institutions should respond.

The AVCC response to this DEST discussion paper places a framework around the issues and opportunities presented in the paper. Whilst the paper focuses on aspects such as the 'benefits of Bologna compatibility' and 'risks of Bologna incompatibility,' it does not examine possible risks of Bologna compatibility. It is important that different viewpoints, such as the needs of the Australian workforce, and flexibility and educational choice for students, are addressed to ensure a holistic discussion about the Bologna process and Australia's possible engagement.

It is vital that the distinctive character of the Australian university education system is clearly articulated as part of this discourse, and that recognition of the system's autonomy underpinned by comprehensive and extensive quality assurance mechanisms and frameworks, flexibility and associated success in the international marketplace, competitive advantage and proven ability to find ways of providing transferability of credit and qualifications across countries are accepted and acknowledged by the Australian government .

It is therefore important from the outset that the frame of reference for discussion is positive and does not include language which gives an impression of being dismissive of the Australian system, for example, the reference in the discussion paper to 'shorter, cheaper courses based on the existing Australian model'.

It is acknowledged that the Australian international education industry must understand the changes occurring in Europe and engage in a dialogue about its implications for Australia. But it is equally important that Australia does not assume that full compatibility with the Bologna Process is the only option. Any engagement by Australia with Europe through the Bologna Process must not result in a diminution of the diversity of the Australian university system nor in its collaboration and cooperation with countries around the world especially those in the Asia-Pacific region, nor in any approximation to a one-size fits all approach.

## Specific Commentary to questions raised in Discussion Paper

### 1. How important is it that Australia seeks to align its higher education sector with the outcomes of the Bologna Process?

At the outset there needs to be a clear understanding of a number of issues related to engaging with Europe through the Bologna Process. One important step is to develop a glossary of terms. This glossary should not endeavour to standardise, or lead to any attempt to regulate, current nomenclature used in the Australian university system; rather provide a vocabulary which facilitates communication.

A second step is to clearly define what alignment means within the Australian context. The AVCC proposes that the meaning given to alignment is **comparability**. This will ensure that the diversity of the Australian education system will be able to be maintained and does not infer standardisation which is clearly an element implicit in harmonisation. In addition any desire to work more cooperatively with Europe through the Bologna process should not include any elements of restructuring the Australian education system. Acceptance of the meaning of aligning ourselves with Bologna is an important first step in the process of consultation within the Australian university education context.

A fundamental precept of any possible future comparability with the Bologna Process must be the strong features of Australia's higher education sector and should not be at the expense of the national system that has proven successful in developing and diversifying Australia's international student recruitment.

The issue of comparability should also be based on academic merit and academic rationalisation for change. This aspect, rather than a regulated or legislated approach, will sustain Australia's distinctive education system.

Australia should examine the global compatibility and all aspects of portability and recognition of the Australian Qualifications Framework using Bologna as a reference point to drive regional discussions about an Asia Pacific Higher Education space. Key to this is consideration of what the impact will be on Australia's position in relation to the North American higher education sector, especially in light of the close ties between North America and Asian countries, most notably China. Analysis of the future demographics and student populations of Europe and Asia needs to be undertaken as it is likely that in the future Australian students will be seeking education in Asia to a much greater extent. Therefore, harmonisation within the Asian region may be much more important than with Europe.

Whilst there is existing strong compatibility between the Bologna Process and the Australian system, an analysis of the impact of the Bologna Process on students from Europe undertaking short term study in Australia and visa versa should be undertaken. It will also be important to identify the benefits of long term alignment beyond the immediately evident advantages of convenience and ease of recognition for Australian higher education.

Australia's future engagement also needs to take account of the fact that some of the timelines being applied to the Bologna Process may be extended from 2010 to 2020; therefore, Australia needs to be mindful of the actual time it may take to achieve the European Higher Education Area (EHEA).

#### Recommendation 1

**The AVCC recommends that DEST:**

- (i) develop a glossary of common terms relevant to comparability with the Bologna Process;**

- (ii) confirm that by alignment it means comparability of education systems;
- (iii) identify the implications for the Australian university sector of engaging with the Bologna Process, including areas such as conforming to external quality frameworks;
- (iv) confirm that discussions about comparability with the Bologna Process will be based on academic merit rather than a regulated or legislated approach;
- (v) undertake an analysis of the impact of the Bologna Process on students from Europe undertaking short term study in Australia and visa versa;
- (vi) in its deliberations re Australian's engagement, accept and recognise that the Bologna timelines will for many countries extend beyond 2010; and
- (vii) review the implications of Australia's engagement with the Bologna process from a regional perspective.

## **2. What are the implications for the autonomy of Australian institutions and the diversity of the sector in becoming Bologna compatible?**

The autonomy and flexibility of Australian institutions to shape their courses, structures and processes; to provide an excellent educational experience for their students; to meet 'market' requirements; to maintain the distinctiveness of Australian higher education in the global education market; and to maintain diversity across the sector should all be considered in relation to the possibility of becoming Bologna compatible.

Regard needs to be given not only to the general structural changes recommended by the Bologna Process but also to the likely resultant changes required to be implemented at the national level. It is anticipated that such changes will not be a one-model-fits-all set of changes.

### **Recommendation 2**

**The AVCC recommends that DEST base any engagement with the Bologna Process on the precepts of university autonomy, flexibility, distinctive nature and diversity.**

## **3. What risks do we run by failing to pay adequate regard to these European developments?**

The AVCC suggests that a risk analysis be undertaken of both the potential risk from losing European market share as well as the risk associated with aligning Australia closely with European systems in the context of the Asia Pacific region and North American markets.

### **Recommendation 3**

**The AVCC recommends that DEST undertake a risk analysis of the risk from losing European market share as well as the risk associated with aligning Australia closely with European systems in the context of the Asia Pacific region and North American markets.**

## **4. What further steps does Australia need to achieve a three cycle (Bachelor, Masters, and Doctorate) degree structure which is compatible with the Bologna architecture?**

While the DEST discussion paper presumes that Bologna dictates three year Bachelors, two year Masters and three year PhD structure, in reality the Bologna Process is being implemented in different participating countries and in different regions of participating countries with some slight variations to the general model. In the Netherlands for example, the government has adopted a 4+1+3 model rather than a more common 3+2+3. It can therefore be stated that Australian higher

education is already aligned with the Bologna architecture to a significant extent. It would not seem prudent to try to match fully a 3+2+3 model when variation exists in the Bologna process within Europe itself.

However, in a general sense the discussion about possible compatibility and alignment will need to consider:

- allocation of resources to institutions;
- community reaction – would such a move be supported given the likely increased cost the 3+2+3 would add to obtaining a higher education and the extension of time required to achieve the same or a similar professional status?
- Australia's qualifications framework in light of the fact that not all European Union members will follow the 3+2 model. For instance, in Sweden, it is likely that professional undergraduate degrees will be 4+ years in duration.
- the impact on Australia's research capacity of any adherence to Bologna;
- the standing of undergraduate and postgraduate double degree programs;
- the discipline areas within the Bologna model which are exempt from the 3+2+3 model; namely, engineering, medicine and related fields, architecture and, in some cases, law;
- the implications of conforming with the Bologna model on private and overseas providers in Australia;
- the capability of universities to offer graduate level 'professional' courses in the nature of 'graduate schools';
- a review of the learning entitlements of Australian students, for example, the trend towards some standards on credit points and weight; equivalent full time study load (EFTSL); and
- the possible impact on four year bachelors, honours years, and one year masters in a current environment of variation based on perceived market advantage.

It would be useful to involve professional accrediting bodies in the discussion processes.

#### **Recommendation 4**

**The AVCC recommends that DEST:**

- (i) acknowledge the different models operating under Bologna during its deliberations of engagement;**
- (ii) involve professional bodies and potential employers in the deliberation process; and**
- (iii) consider the repercussion on resources, professional courses, research and the Australian Qualifications Framework of engagement with Bologna.**

#### **5. What are the implications of the Bologna Process for four-year Bachelor level qualifications, one-year Masters courses and the pathway to Doctorate studies via an Australian honours degree?**

It should be remembered that the European reforms are aimed at fixing a range of difficulties experienced at the national level within and across Europe. These same difficulties do not exist

within Australia and the purpose of being compatible with Bologna reforms by Australian institutions needs to be carefully considered.

The discussion paper suggests that the European degree architecture will accommodate three year and four year undergraduate degrees, along with one-year or two-year Masters. It is the view of the AVCC that the current Australian honours degree model (3+1) fits into the model described. However a mandated shift by Australian universities towards the European model could effectively disadvantage Australia. Further discussion with the United Kingdom on this issue would be useful as it is not clear that the United Kingdom has any intention of altering its degree structures to fit the Bologna model.

In addition, there would be significant work and resource issues associated with a move from the current Australian degree structures.

Anecdotal information is that it will be very difficult to ensure the adoption of two-year Masters programs within a short to medium term timeframe given the presence of one-year Master programs in the current higher education market. The discussion paper makes no mention of the considerable difficulties being encountered in areas such as medical degrees.

Further discussion and debate is required about the role of honours, honours and Masters by research, and on research training pathways.

#### **Recommendation 5**

**The AVCC recommends that DEST:**

- (i) undertake a survey of European country compliance with Bologna; and**
- (ii) research the impact on the Australian higher education system of making changes to the system.**

#### **6. Is there a need to review the content of Doctorate programs to align them with Bologna thinking, given the Bergen declaration that Doctorate programs should include interdisciplinary training and the development of transferable skills?**

As not all European doctorates will conform to the above requirement, further consultation is required as the issue of comparability should also be based on academic merit as determined by universities.

#### **Recommendation 6**

**The AVCC recommends that DEST consult further with universities to canvass a sector wide response as to whether Doctorate programs should include interdisciplinary training and the development of transferable skills.**

#### **7. Are there any implications for current funding or regulatory structures which need to be considered?**

The AVCC recommends that a comprehensive analysis be undertaken across a wide range of funding and structural areas in order to identify the costs and demands on universities. The following are examples of some of these areas of concern:

- **The current EFTSL funding model.** If a professional qualification is to be gained at the end of a 3+2 program then DEST would need to reconsider the undergraduate/postgraduate EFTSL allocations taking into account various situations for individual universities. These situations could include decreasing the minimum number of undergraduate EFTSL's so more EFTSL's could be directed into postgraduate coursework; providing additional EFTSL's for those universities where undergraduate demand is such that they can fill all their

Commonwealth places, or alternatively providing additional places as full fee paying places (resulting in students bearing the cost associated with funding, rather than DEST).

- **An expansion of the FEE-HELP scheme for students who were required to pay full-fees under the 3+2 model.** There are currently a number of Masters courses at, near or above the current FEE-HELP maximum loan. This would increase significantly as universities turned existing undergraduate professional programs into Masters-level programs. Students who had taken a FEE-HELP supported full-fee place for their undergraduate course would not be able to complete professional qualifications unless they could afford up-front fees.
- **Extending Youth Allowance and Austudy eligibility to Masters students as part of the 3+2 model.** If this did not occur, financially disadvantaged students would be precluded from enrolling in professional degrees (which offer the educational means of improving this group's financial situation). It should be noted that even with Youth Allowance or Austudy, five rather than three years of study would impose a significant cost in lost wages and work experience.

#### **Recommendation 7**

**The AVCC recommends that DEST undertake a comprehensive analysis across a wide range of funding and structural areas in order to identify the costs and demands on universities of any comparability with the Bologna Process.**

#### **8. Do we need to undertake further work in order to achieve a credit accumulation/transfer system compatible with the ECTS?**

The University Mobility in Asia and the Pacific Credit Transfer Scheme (UCTS) which is modelled on the European Credit Transfer Scheme (ECTS) is currently used by Australian universities for exchange in the Asia-Pacific region.

#### **Recommendation 8**

**The AVCC recommends that DEST undertake a comprehensive analysis of the benefits and costs to the sector of widespread adoption of ECTS.**

#### **9. Would our national accreditation/quality assurance framework meet Bologna criteria without further modification?**

The AVCC recommends that the Australian Universities Quality Agency (AUQA) be consulted regarding this issue; and that the current review of AUQA provide an assessment of the extent to which AUQA complies with the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) Code of Practice. It should be recognised, however, that the frameworks in existence in Australia including Australian Qualifications Framework, Australian Quality Training Framework (AQTF) and Education Services for Overseas Students (ESOS) are in many ways ahead of developments in Europe and the region.

#### **Recommendation 9**

**The AVCC recommends that DEST consult further with the Australian Universities Quality Agency regarding national accreditation/quality assurance framework meeting Bologna criteria.**

#### **10. What actions could be taken to address the implications of the Bologna Process for our Asia-Pacific regional interactions with Governments and higher**

## **education providers or our broader relations with the global education community?**

The AVCC recommends that discussions with Asia-Pacific Governments be undertaken to determine if those countries are looking at implementing the Bologna structure, or if they intend adopting a model more aligned with the USA/Canadian model.

The suggestion that Australia might lead the Asia-Pacific countries in establishing the region's own process of educational harmonisation along the lines of the Bologna Process might be laudable but may not sit comfortably next to Australia's desire for alignment with Europe. A clear rationale as to the reason for such harmonisation in the Asia-Pacific region needs to be undertaken as degree structure compatibility and qualifications recognition are already in place. If Australia were to choose to align itself more closely with Europe in degree structures, a well planned and devised communication strategy and campaign would be required with regional partners to counter any perception that it was distancing itself from the region.

It would be worthwhile for DEST to discuss the issue of compatibility with the Bologna Process with regional countries, and for example the United Kingdom (UK). As an English speaking country engaged in the European Higher Education Area, the UK would provide useful information regarding the progress of the process, whilst discussions with regional countries would provide information regarding the importance of Bologna to our neighbouring countries.

### **Recommendation 10**

**The AVCC recommends that DEST undertake discussions with the United Kingdom and Asia-Pacific Governments to determine if these countries are looking at implementing the Bologna structure, or if they intend adopting a model more aligned with the USA/Canadian model.**

## **11. What further processes do we need to put in place to make sure all stakeholders within the Australian system are kept up to date with developments in and implications of the Bologna Process?**

The AVCC strongly recommends that prior to any final decisions being made, the Australian Government liaise with all relevant stakeholders including employers, business, the AVCC and higher education providers in order to:

- develop an effective communications strategy which will ensure a multi-pronged approach and consistency of message and processes;
- undertake risk assessment and mapping activities;
- discuss all relevant issues including credit transfer; diploma supplement; masters degrees; doctoral entry; and
- ensure that appropriate timelines are developed for the consultative process.

### **Recommendation 11**

**The AVCC recommends that DEST liaise with all relevant stakeholders including employers, business, the AVCC and higher education providers regarding developments in and implications of the Bologna Process taking into account timelines for consultation, an appropriate communication strategy, and risk and mapping exercises.**

## 12. What are the costs (financial, resources, and time) to individual institutions to move towards Bologna compatibility?

The AVCC recommends that a limited capability study or trial be undertaken to ascertain the associated cost of any possible compatibility. Such a capability study would need to take account of at least the following:

- implications for individual institutions to implement changes borne of legislative amendments;
- identification and quantification of costs associated with adapting to the Bologna structure including funding model differentials between the current structure and the Bologna structure;
- provision of transition funding to institutions during an implementation period;
- identification and quantification of costs associated with national reporting systems including university student records, completion rates, retention rates; and
- identification and quantification of costs associated with any quality assurance requirements.

It is worth noting that, in the recent AVCC commissioned review by PhillipsKPA of the cost of the Higher Education Reforms, one university estimated that it had spent around \$2 million from 2003 to 2005 on implementation of the reforms. Given the likely involvement of academic staff and others across individual institutions over a sustained period of time, the cost of moving to Bologna compatibility would be considerable.

### **Recommendation 12**

**The AVCC recommends that DEST undertake a limited capability study or trial to ascertain the associated cost of any possible compatibility with the Bologna Process.**

## 13. Would compatibility deliver real benefits for Australian graduates and employers in terms of labour mobility?

Whilst there is no evidence to suggest that this would be the case, the AVCC recognises potential beneficial aspects of 'Bologna compatibility' such as the internationalisation of the professional labour force, mobility amongst educated people, the desirability of increasing the international experience of staff and students from Australian institutions, with reciprocal arrangements in other countries, and that Australian graduates benefit from access to internationally recognised qualifications.

Whilst it is unknown whether compatibility would deliver real benefits for graduates in the employment market in Europe, current indications are that the Master level for professional degrees is an increasing trend in Asia and the USA; and so the Australian system might benefit from a more explicit 3+2 model, particularly in engineering and architecture, the allied health professions such as psychology, physiotherapy etc and in the professional science disciplines. There is however, no data to support claims that mobility is restricted under present arrangements.

The AVCC recommends that analysis of the European situation as well as research into the Australian environment should be undertaken to provide a realistic picture, including answers to the fundamental question of Australia's understanding of the labour mobility of graduates of its current education system.

### **Recommendation 13**

**The AVCC recommends that DEST undertake an analysis of the European and Australian labour mobility trends.**

#### **14. Would longer courses, aligned with Europe, be more attractive to Australian and overseas students than shorter, cheaper courses based on the existing Australian model?**

The AVCC does not support the view that longer courses would be more attractive to Australian and overseas students, given the current enrolment patterns. The principle of compatibility, enabling smoother transfer both in and out of Europe is the issue rather than the courses in Australia being shorter and cheaper, especially considering the benefits of differentiation in the global marketplace. The capacity to select to leave a program of study after year 3 with a qualification is very attractive and must not be ignored. It would appear that the EU movement through Bologna is towards shorter, or at least comparable length, rather than longer courses.

The discussion paper suggests that the European degree architecture will accommodate three year and four year undergraduate degrees, along with one year or two year Masters. However the general feeling is that a compatible three cycle degree structure would pose a real challenge to Australian models and our competitiveness in the Asian market. As outlined in response to question 5, the United Kingdom's position is not yet clear, so a shift by Australian universities towards the European model could effectively disadvantage Australia in the international student market. There would be significant work and resource issues associated with a move from the current Australian degree structures.

A new model would have to be promulgated as a major innovation in higher education, bringing opportunities to Australian students that only derive from international cooperation and career mobility. An issue to be carefully considered is the attitude of professional bodies to the degree structures and the desirability of accepting Master degrees for professional entry.

#### **Recommendation 14**

**The AVCC recommends that DEST consult with universities and professional bodies regarding the impact of a compatible three cycle degree structure on the Australian education model and Australia's subsequent competitiveness in the Asian marketplace.**

#### **15. Would the introduction of the Diploma Supplement in Australia be viable and beneficial?**

The key driver behind the Bologna Process is the mobility of labour, rather than students. The Process aims to facilitate the recognition of awards of different European countries in order to stimulate mobility of labour. Through the implementation of the Diploma Supplement, employers can compare prospective employees regardless of where they undertook their studies. An evaluation of any benefits of introducing a Diploma Supplement in Australia therefore should involve discussion with employers and professional associations.

Curtin University of Technology is currently undertaking a feasibility study (costs versus benefits) of implementing the Diploma Supplement. The University reports that at this stage, whilst it would appear to be viable for Australian students studying overseas and/or seeking employment in Europe or for international students studying in Australia returning home or seeking employment in Europe, there are substantial workload and technical enhancement costs to the University.

The adoption of the Diploma Supplement by Australian institutions would dispel the need for precise alignment between Australian and European degree structures. However, this would have associated financial costs to Australian universities. In addition, developing a national Diploma Supplement that would meet the needs of all Australian degrees would incur substantial costs.

Advice from DEST about the outcome of the Diploma Supplement pilot would be welcomed.

**Recommendation 14**

**The AVCC recommends that DEST:**

- (i) involve employers and professional associations in discussions regarding any possible benefits of implementing a Diploma Supplement in Australia; and**
- (ii) distribute the full results of the Diploma Supplement pilot to inform and facilitate the discussion and consultation process.**