



Course Progress Policy and Procedure

Purpose

The purpose of this policy is to ensure that American College systematically monitors students' course progress which includes recording, monitoring, assessing, counselling and reporting the course progress of each student.

Definitions

- **Compassionate or Compelling circumstances:** is defined as circumstances beyond the control of the student and which have an impact upon the student's course progress or wellbeing. These could include, but are not limited to:
 - a) Serious illness or injury, where a medical certificate states that the student was unable to attend classes,
 - b) Bereavement of close family members such as parents or grandparents (Where possible a death certificate should be provided),
 - c) Major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the student's studies,
 - d) A traumatic experience which could include:
 - Involvement in, or witnessing of a serious accident; or
 - Witnessing or being the victim of a serious crime, and these experiences have impacted on the student (cases should be supported by police or psychologist's reports)
 - e) Inability to begin studying on the course commencement date due to delay in receiving a student visa.
 - f) Where the registered provider was unable to offer a pre-requisite unit, or the overseas student has failed a prerequisite unit and therefore faces a shortage of relevant units for which they are eligible to enrol.

Policy

American College will monitor, record and assess the course progress of each student for the course in which the student is currently enrolled.

American College will assess each student's progress at the end of each study period. Each study period will equal one term which equates to approximately 3 months of study. This may vary according to course requirements, duration and number of assessments to be completed in the program

Note: 10-12 weeks is usually considered the minimum length of time in which it is reasonable for the provider to make an assessment of a student's course progress. For the purposes of this policy, the maximum length for a study period is three months. Where a provider does not divide courses into study periods, course progress must be monitored at least every three months.

Unsatisfactory progress is defined as not successfully completing or demonstrating competency in at least 50% of the course requirements in that study period.



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American College defines the course requirements for each study period and can identify when a student has not passed 50% or more of the course requirements. The course requirements for each study period must also be made clear to the student at the start of the course, or if variable, each study period.

American College has and will implement an intervention strategy for any student who is not making satisfactory course progress. The intervention strategy is for students at risk who, at minimum, have failed or are not competent in 50 per cent or more of the units in a study period.

It must be made available to staff and students and must specify:

- i. procedures for contacting and counselling students;
- ii. strategies to assist identified students to achieve satisfactory course progress; and
- iii. the process by which the intervention strategy is activated.

The intervention strategy must include provisions for:

- i. where appropriate, advising students on the suitability of the course in which they are enrolled;
- ii. assisting students by advising of opportunities for the students to be reassessed for tasks in units or subjects they had previously failed, and
- iii. advising students that unsatisfactory course progress in two consecutive study periods for a course could lead to the student being reported to DHA and cancellation of his or her visa, depending on the outcome of any appeals process.

At the end of each study period, students must be assessed against the course progress policy. If a student is identified for the first time as not making satisfactory course progress, the intervention strategy as outlined above and in the "Intervention Strategy Document" is implemented. The intervention strategy must be activated within the first four weeks of the following study period.

However, if a provider identifies that a student is at risk of making unsatisfactory course progress before the end of the study period, the provider is encouraged to implement its intervention strategy as early as practicable.

If a student is identified as not making satisfactory course progress in a second **consecutive study period** in a course, the provider **must notify** the student of its intention to report the student to DHA for unsatisfactory progress. The provider does this through the written notice described below.

The written notice (of intention to report the student for unsatisfactory progress) must inform the student that he or she is able to access the registered provider's complaints and appeals process under Standard 10 and that the student has 20 working days in which to do so. A student may appeal on the following grounds:

- i. provider's failure to record or calculate a student's marks accurately,
- ii. compassionate or compelling circumstances, or
- iii. provider has not implemented its intervention strategy and other policies according to its documented policies and procedures that have been made available to the student.

Where the student's appeal is successful, the outcomes may vary according to the findings of the appeals process.

- i. If the appeal shows that there was an error in calculation, and the student actually made satisfactory course progress (successfully completed more than 50% of the course requirements for that study period), the provider does not report the student, and there is no requirement for intervention.



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- ii. If the appeals process shows that the student has not made satisfactory progress, but there are compassionate or compelling reasons for the lack of progress, ongoing support must be provided to the student through the provider's intervention strategy, and the provider does not report the student. (See notes at the end of this document)

Where:

- i. the student has chosen not to access the complaints and appeals processes within the 20 working day period; or
- ii. the student withdraws from the process; or
- iii. the process is completed and results in a decision supporting the registered provider (ie. the student's appeal was unsuccessful);

American College must notify the Secretary of DET through PRISMS as soon as practicable of the student not achieving satisfactory course progress.

Related Policies and Procedures:

- Early Intervention Strategy

Procedures

Procedure for assessing satisfactory course progress and determining the point at which the student has failed to meet satisfactory course progress

To ensure fairness, equity and maintain an open process, American College will use the following process for determining the point at which the student has failed to meet satisfactory course progress

1. The Trainer and Assessors will assess and monitor the course progress of students by:
 - reviewing attendance records
 - reviewing class participation
 - evaluating assessments
 - checking overall competency
2. All Trainers are required to record and access the progress of each student at the end of each semester to identify students at risk of progressing.
3. If the Trainer identifies a learner at risk of not meeting their course progress requirements they will implement the appropriate Early Intervention Strategy.

Procedure for implementing intervention strategy for students at risk of failing to achieve satisfactory course progress

If a student is identified as being at risk of not completing the course in time or failing to meet the required 50% completion rate in a study period, the following process should be followed.

1. The Trainer will contact the student by way of letter or email requesting a meeting with the Director, do develop strategies to ensure the student maintains satisfactory course progress.

(Staff to use the following document to contact student and place similar wording into an email- *Letter to Student - Early Intervention.doc*)

2. All staff to follow "Early Intervention Strategy"

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Procedure for notifying students of unsatisfactory progress in two consecutive study periods

If a student is identified as failing to meet the required 50% completion rate in two consecutive study periods, the following process should be followed.

1. The Trainer drafts a letter using the template (Letter to Student - Intent toReport.doc)
2. The Director will review the letter before authorising it to be send using registered post to the student.
3. The Trainer or Customer Service Manager will post the letter to the current address onfile.

Copy of all correspondence must be put on student file for future reference

4. The Trainer or Customer Service Manager will contact the Student within 4 working days of sending the letter, either by phone and / or email, to ensure they have received theletter.
5. The Trainer or Customer Service Manager will note and set a reminder in a calendar when 20 working days has lapsed and check if an Appeal has beenlodged.
6. If no appeal has been lodged, they will proceed to report the breach onPRISMS.
7. If an appeal has been lodged, the appeals process willbegin.

Procedure Reporting Students for Unsatisfactory Progress by Notifying DHA of Visa Breach

The following process should be followed when reporting a student for breach of their visa requirements relating to unsatisfactory course progress.

Refer to the "PRISMS - Provider User Guide" to assist in the following process.

1. If appeal lodged, wait until appeal is heard and finalised before progressing. Once finalised and the intent to report is to proceedcontinue.
2. If no appeal lodged or it is finalised, Trainer advises the Director of intent to advise breach onPRISMS.
3. The Director checks all the facts and documentation related to the case and if everything is in order, authorises Campus Manager to report the student under course progress viaPRISMS.

Extension to an expected course duration

- Extensions to the course duration specified on the COE are only allowedwhere:
 - A student is complying with an intervention strategy implemented for students identified at risk of not making satisfactory course progress,or
 - An approved deferral or suspension of studies has been granted in accordance with American College's *Deferral, Suspension and Cancellation Policy andProcedures*.

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Compassionate or compelling circumstances apply, (suitable evidence must be provided), which may include but is not limited to:

- serious illness or injury, where a medical certificate states that the student was unable to attend classes;
 - bereavement of close family members such as parents or grandparents;
 - major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the student's studies;
 - a traumatic experience which has impacted on the student and which could include involvement in or witnessing of a serious accident; and witnessing or being the victim of a serious crime. These cases should be supported by police or psychologists' reports); or
 - where American College is unable to offer a pre-requisite unit.
 - where the student is unable to begin studying on the course commencement date due to delay in receiving a student visa.
- When the student can only account for the variation/s by extending his or her expected duration of study, this will be reported to the Department of Education and Training (DET) via PRISMS.
 - All variations in the student's study load, including the reasons for the variation will be recorded on the student's file.
 - Where the duration of the student's enrolment is extended, American College will advise the student to contact the Department of Home Affairs (DHA) to seek advice on any potential impacts on their visa, including the need to obtain a new visa.

Note:

- *Reporting a student for unsatisfactory course progress occurs only when the student has been identified as not making satisfactory course progress in two consecutive study periods, and the student has not made a successful appeal against this assessment.*
- *If a student is identified for a second, but not consecutive, study period as not making satisfactory course progress, the provider does not report the student for unsatisfactory course progress.*
- *When a student is reported for unsatisfactory course progress, DHA will, in all but exceptional circumstances, cancel the student's visa. DHA will rely on the provider's report of unsatisfactory course progress, as the report cannot be made until the provider has completed the complaints and appeals process. If a student is dissatisfied with the provision of a complaints and appeals process, the student may lodge a complaint with DET.*
- *Section 19(2) of the ESOS Act 2000 requires providers to report the student for unsatisfactory course progress 'as soon as practicable' after the breach occurs. Good practice would be to report the student through PRISMS within 5 days of finalising the decision to report (ie. within 5 days of 3.9 i., ii., or iii. occurring).*



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Standard 8

Overseas student visa requirements

Monitoring overseas student progress, attendance and course duration

- 8.1 The registered provider must monitor overseas students' course progress and, where applicable, attendance for each course in which the overseas student is enrolled.
- 8.2 The expected duration of study specified in the overseas student's CoE must not exceed the CRICOS registered duration.
- 8.3 The registered provider must monitor the progress of each overseas student to ensure the overseas student is in a position to complete the course within the expected duration specified on the overseas student's COE.
- 8.4 The registered provider must have and implement documented policies and processes to identify, notify and assist an overseas student at risk of not meeting course progress or attendance requirements where there is evidence from the overseas student's assessment tasks, participation in tuition activities or other indicators of academic progress that the overseas student is at risk of not meeting those requirements.
- 8.5 The registered provider must clearly outline and inform the overseas student before they commence the course of the requirements to achieve satisfactory course progress and, where applicable, attendance in each study period.

Vocational education and training (VET): course progress and attendance requirements

- 8.6 The registered provider of a VET course as defined in the NVET Act must have and implement a documented policy and process for assessing course progress that includes:
 - 8.6.1 requirements for achieving satisfactory course progress, including policies that promote and uphold the academic integrity of the registered course and meet the training package or accredited course requirements where applicable, and processes to address misconduct and allegations of misconduct
 - 8.6.2 processes for recording and assessing course progress requirements
 - 8.6.3 processes to identify overseas students at risk of unsatisfactory course progress
 - 8.6.4 details of the registered provider's intervention strategy to assist overseas students at risk of not meeting course progress requirements in sufficient time for those overseas students to achieve satisfactory course progress
 - 8.6.5 processes for determining the point at which the overseas student has failed to meet satisfactory course progress.
- 8.7 The registered provider must have and implement a documented policy and process for monitoring the attendance of overseas students if the requirement to implement and maintain minimum attendance requirements for overseas students is set as a condition of the provider's registration by an ESOS agency.
- 8.8 If an ESOS agency requires a VET provider to monitor overseas student attendance as a

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condition of registration, the minimum requirement for attendance is 80 per cent of the scheduled contact hours for the course.

- 8.9 If an ESOS agency requires a VET provider to monitor overseas student attendance, the registered provider must have and implement a documented policy and process for monitoring and recording attendance of the overseas student, specifying:
- 8.9.1 the method for working out minimum attendance under this standard
 - 8.9.2 processes for recording course attendance
 - 8.9.3 details of the registered provider's intervention strategy to identify, notify and assist overseas students who have been absent for more than five consecutive days without approval, or who are at risk of not meeting attendance requirements before the overseas student's attendance drops below 80 per cent
 - 8.9.4 processes for determining the point at which the overseas student has failed to meet satisfactory course attendance.

Reporting unsatisfactory course progress or unsatisfactory course attendance

- 8.10 Where the registered provider has assessed the overseas student as not meeting course progress or attendance requirements, the registered provider must give the overseas student a written notice as soon as practicable which:
- 8.10.1 notifies the overseas student that the registered provider intends to report the overseas student for unsatisfactory course progress or unsatisfactory course attendance
 - 8.10.2 informs the overseas student of the reasons for the intention to report
 - 8.10.3 advises the overseas student of their right to access the registered provider's complaints and appeals process, in accordance with Standard 10 (Complaints and appeals), within 20 working days.
- 8.11 The registered provider must only report unsatisfactory course progress or unsatisfactory course attendance in PRISMS in accordance with section 19(2) of the ESOS Act if:
- 8.11.1 the internal and external complaints processes have been completed and the decision or recommendation supports the registered provider, or
 - 8.11.2 the overseas student has chosen not to access the internal complaints and appeals process within the 20-working day period, or
 - 8.11.3 the overseas student has chosen not to access the external complaints and appeals process, or
 - 8.11.4 the overseas student withdraws from the internal or external appeals processes by notifying the registered provider in writing.
- 8.12 The registered provider may decide not to report the overseas student for breaching the attendance requirements if the overseas student is still attending at least 70 per cent of the scheduled course contact hours and:
- 8.12.1 for VET courses, the student is maintaining satisfactory course progress

Allowable extensions of course duration

- 8.13 The registered provider must not extend the duration of the overseas student's
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enrolment if the overseas student is unable to complete the course within the expected duration, unless:

- 8.13.1 there are compassionate or compelling circumstances, as assessed by the registered provider on the basis of demonstrable evidence, or
 - 8.13.2 the registered provider has implemented, or is in the process of implementing, an intervention strategy for the overseas student because the overseas student is at risk of not meeting course progress requirements, or
 - 8.13.3 an approved deferral or suspension of the overseas student's enrolment has occurred under Standard 9 (Deferring, suspending or cancelling the overseas student's enrolment).
- 8.14 If the registered provider extends the duration of the student's enrolment, the provider must advise the student to contact Immigration to seek advice on any potential impacts on their visa, including the need to obtain a new visa.

Modes of delivery

Note: Online learning is study where the teacher and overseas student primarily communicate through digital media, technology-based tools and IT networks and does not require the overseas student to attend scheduled classes or maintain contact hours. For the purposes of the ESOS framework, online learning does not include the provision of online lectures, tuition or other resources that supplement scheduled classes or contact hours. Distance learning is any learning that an overseas student undertakes off campus and does not require an overseas student on a student visa to physically attend regular tuition for the course on campus at the provider's registered location.

- 8.15 A registered provider must not deliver a course exclusively by online or distance learning to an overseas student.
- 8.16 A registered provider must not deliver more than one-third of the units (or equivalent) of a higher education or VET course by online or distance learning to an overseas student.
- 8.17 A registered provider must ensure that in each compulsory study period for a course, the overseas student is studying at least one unit that is not by distance or online learning, unless the student is completing the last unit of their course.
- 8.18 The registered provider must take all reasonable steps to support overseas students who may be disadvantaged by:
 - 8.18.1 additional costs or other requirements, including for overseas students with special needs, from undertaking online or distance learning
 - 8.18.2 inability to access the resources and community offered by the education institution, or opportunities for engaging with other overseas students while undertaking online or distance learning.