

## Standard 9 – Completion within the expected duration of study

### Legislation

#### National Code of Practice

#### Standard 9 – Completion within the expected duration of study

Outcome of Standard 9

**Registered providers monitor the workload of students to ensure they complete the course within the duration specified in their CoE and do not exceed the allowable portion of online or distance learning. Registered providers only enable students to extend the expected duration of study for the course through the issuing of a new COE in limited circumstances.**

9.1 The registered provider must have and implement documented policies and procedures for monitoring the progress of each student to ensure that at all times the student is in a position to complete the course within the expected duration as specified on the student's CoE. In monitoring this enrolment load, the registered provider must ensure that in each compulsory study period for a course, the student is studying at least one unit that is not by distance or online learning.

9.2 The registered provider may only extend the duration of the student's study where it is clear that the student will not complete the course within the expected duration, as specified on the student's CoE, as the result of:

- a. compassionate or compelling circumstances (e.g. illness where a medical certificate states that the student was unable to attend classes or where the registered provider was unable to offer a pre-requisite unit)
- b. the registered provider implementing its intervention strategy for students who were at risk of not meeting satisfactory course progress, or
- d. an approved deferment or suspension of study has been granted under Standard 13 (Deferring, Suspending or Cancelling the Students enrolment).

9.3 Where there is a variation in the student's load which may affect the student's expected duration of study in accordance with 9.2, the registered provider is to record this variation and the reasons for it on the student file. The registered provider must correctly report the student via PRISMS and/or issue a new CoE when the student can only account for the variation/s by extending his or her expected duration of study.

9.4 The registered provider may allow the student to undertake no more than 25 per cent of the student's total course by distance and/or online learning. However, the registered provider must not enrol the student exclusively in distance or online learning units in any compulsory study period.

9.5 Except in the circumstances specified in 9.2, the expected duration of study specified in the student's CoE must not exceed the CRICOS registered course duration

### Compliance Requirements

The purpose of this standard is to ensure that students enrol so that they are able to complete their course within the duration specified in the CoE. Part C, paragraph 7.1 of the National Code, which deals with CRICOS registration issues, requires that courses be registered on CRICOS 'on the basis of the normal amount of full-time study' over the periods of compulsory study. Current practice is for most courses at MU is to be registered on a dual semester basis and for Monash College, a trimester basis. For PhD's, courses are registered to be completed in four years.

The course duration specified on a student's CoE is based on the registered course CRICOS duration adjusted for any credit awarded to the student. Courses in turn are registered on CRICOS according to the Monash business practice: 'The duration of all full-time courses registered by Monash on CRICOS will be calculated on the basis that a student is enrolled for a minimum of 24 credit points per semester. Where the course structure requires that a student enrol in more than 24 credit points for one or more semester of a course, that overload requirement will be taken into account in determining the registered duration of the full-time course.'

In order for students to complete their courses within the duration specified on the CoE, Monash requires that for coursework students, the standard enrolment is 24 credit points per semester. Faculties and Monash College must monitor the expected duration of students by running the 'Duration' report on the Monash Reporting System (MRS) in the ESOS folder (ie. MRS/ESOS/Duration report).

#### 1. Standard 9.1 Documented policies and procedures for monitoring progress

Providers are required to monitor a student's course progress according to documented policies and procedures to 'ensure that at all times the student is in a position to complete the course within the expected duration' (standard 9.1). Organisational units responsible for monitoring course progress should run the Duration report (MRS/ESOS) early in the first week of classes. This will enable students to be contacted and enrolment corrected if necessary by the end of two weeks of classes.

#### 2. Standard 9.2 Extending the duration of a student's course of study

##### **2.1 Circumstances permitting course extension**

Standard 9.2 specifies the circumstances in which the duration of a student's study can be extended (by issuing a new CoE) beyond the period specified on the current CoE. These circumstances are:

- a) compassionate or compelling circumstances
- b) implementation of the provider Intervention Strategy
- c) approved deferment or suspension of study

In order for coursework students to complete their course within the duration specified on their CoE it is Monash policy that students enrol in 24 credit points per semester unless a variation to this enrolment load has been approved.

Faculties are responsible for receiving and approving [Underload](#) applications from students and for receiving and approving course extension applications (applications for a new CoE). Campus Hubs issue the new CoE based on sign off from faculties that standard 9.2 grounds have been met and advice about the expected course end date. The standard course end date to be entered onto a CoE for students completing mid year is 30 June. See [Monash PRISMS User Manual](#) at p.79.

##### a) Compassionate or compelling circumstances

Monash defines 'compassionate or compelling' as circumstances which are involuntary and present a student with few or no alternative courses of action to reducing their enrolment load

or intermitting their studies for a period. These may arise from a personal situation impacting on enrolment or purely an enrolment situation.

Personal situations include medical grounds where a student has a serious illness or condition or where a student is affected by a grave family situation or bereavement or crisis in their home country and required to provide assistance or support.

An enrolment situation includes an underload arising from course progress rules/prerequisite requirement which prevent an enrolment in a full time load of units and unit failure where some units have been failed but not a sufficient number to activate the Intervention Strategy. It includes a situation where 'a student's course progress or provider-approved study load prior to 1 July 2007 would lead to the student being unable to complete within the expected duration. An extension on compassionate or compelling grounds can be approved as long as information is available that the student was following the provider's course advice' ([DEEWR explanatory guide](#)).

As a general rule, faculties should interpret 'compassionate or compelling' broadly and deem the grounds for refusing a CoE application as not being 'compassionate or compelling' only where clear evidence is available to support such a decision.

For students who have been excluded, are appealing the exclusion and their visa is expiring, a new CoE should be issued. This ensures no pre-empting of the appeal decision and upholds compliance with standard 8.4 which requires provider's to maintain the student's enrolment while the appeal process is ongoing. The CoE should be extended for a period of 6 months.

#### b) Implementation of provider Intervention Strategy

The intervention strategy is implemented through the issue of warning letters, activation of the mid year intervention strategy for semester two commencers, and Underload through the APC process and/or student application for and approval of Underload.

#### **Underload approval**

Approval to Underload on the grounds specified in standard 9.2 can be given either by direct Monash action or following application by the student.

1. Direct Monash action – this involves a Monash decision independent of student application eg Academic Progress Committee (APC) placing a student on an enrolment condition to enrol in a reduced load.
2. Application by student - this arises when a student applies to reduce their study load on the grounds of 'compassionate or compelling circumstances'. Students are required to complete and submit to faculty with supporting documentation the [Underload Application Form- International Students](#).

Underload approval is not required for final semester or final year students completing within their CoE period or for students enrolled in summer or winter units whose enrolment load for the calendar year including semester one or two equates to 48 credit points.

#### **Underload approval arrangements**

If an underload variation to a student's enrolment is approved, the variation must be recorded on Callista in ESOS Notes and the Underload form and any associated documentation scanned to central filing. The recording of the variation in Callista ESOS notes enables easy identification of approved variations when enrolment reports are run.

Once a faculty makes a decision on an Underload application, the student should be notified in writing by letter or email of the outcome of the application. A copy of the faculty notification should be scanned to central filing.

### c) Approved deferment or suspension of study

Approved deferment or suspension of study is the third ground on which a course can be extended in Australia. If a student defers course commencement, is suspended from study or intermits, the student's CoE may change to the status of 'Finished' before their course ends. In this circumstance, the course can be extended.

### **Monitoring course duration**

In order to establish that students can complete on time, faculties are required to actively monitor a student's progress. They do that through running the Duration report (MRS/ESOS).

#### Duration Report in Callista

Faculties are responsible for running the 'Duration' report (MRS/ESOS). This report should be run at least twice per semester- early in the first two weeks of classes and at census dates.

#### *First week of classes*

Students who have been identified in the Duration Report as not being on track to complete within the expected duration of study as specified in their CoE should be contacted within the period allowing for further enrolments to make an appointment with their faculty to discuss their enrolment. Students who do not respond to this request should be contacted (phone, email or letter) advising that if they seek a new CoE to extend their course duration in Australia there may be grounds for refusing the application.

If a student does not respond to the faculty warning, a note should be made in ESOS notes in Callista. Further, an email should be sent to the student advising them of the consequences of under enrolling. If a student subsequently seeks a course extension, the faculty should take into account previous communication with the student as well as any new information a student may provide to the faculty as grounds for an extension before making a decision.

At the beginning of semester students should be counselled to enrol in 24 credit points. For continuing students when they enrol on line, if a student does not enrol in 24 credit points a warning on WES is displayed as follows:

*“Under government regulations, international students on a student visa should be enrolled in a full time load per semester. By enrolling in less than 24 credit points per semester, you could be in breach of your visa regulations. If you are a Monash College student enrolling in one trimester at a time, please disregard this message and click YES. Contact your faculty or Monash College for further advice”.*

#### *Census dates*

At census dates, students should be informed of their situation and advised to investigate opportunities for enrolling in additional units in a future non standard semester or if applicable, apply to underload.

### DEEWR guidelines

DEEWR provides useful guidance on monitoring course duration. The [explanatory guide for standard 9](#) states the following:

*“When a provider finds a student is not going to complete within the expected duration, the provider needs to decide how to respond. Essentially, the provider has three options:*

- *encourage the student to ‘catch up’ by taking extra units;*
- *take steps which will enable the provider to issue a new CoE for the student; or*
- *if the student has deliberately enrolled in a reduced load, despite the provider’s advice to the contrary, take appropriate action.*

*As the intention of Standard 9 is that students genuinely try to complete their courses within the expected duration, the provider should encourage the student to pick up extra units during the course. These extra units could be picked up during compulsory periods or during non-compulsory study periods where the provider offers these. However, for students who have failed some units, ‘overloading’ (taking more than a standard load in a compulsory study period) is not recommended.*

*If picking up extra units throughout the course is not appropriate, other actions should be considered. Different responses may be appropriate for different circumstances. The action taken does not necessarily have to involve in-depth counselling or extra study assistance.”*

In essence, active and early the monitoring and regular the communication with students leads to a smoother CoE approval process.

## **2.3 Evidence required for refusing a CoE application**

An [application for a CoE](#) should only be refused when evidence is available (letters, email, file notes of phone calls) that a student has ignored repeated requests to discuss their enrolment load with the faculty and has ignored advice to vary their enrolment load. If the faculty has attempted without success to contact a student on three occasions or more, there would be prima facie grounds (at time of visa renewal) to refuse an extension.

Before a final decision is made, the faculty would need a final review of whether 'compassionate or compelling grounds' exist.

## **2.4 Student application for a CoE (course extension in Australia)**

### Application process

Students apply for new CoE’s by lodging a paper or electronic application. The application is forwarded to faculties where a decision is made to approve or refuse the course extension application.

Where an application is approved, the faculty must indicate the basis for the approval by ticking one of the three standard 9.2 grounds for extending a student’s course in Australia. Where the extension is not approved, the basis for the decision must be stated and students advised by mail that their application has been refused.

Once the faculty decision has been made, HWD is sent an email which states if a course extension has been approved, the reason and if an extension has been approved, the course end date.

### Research students

MRGS will not become aware that a student will be unable to complete their course within the time specified on the CoE until a student applies for an extension of candidature. As for coursework students, approval must be based on the exceptions stated in standard 9.2.

#### 3. Standard 9.3 Recording variations in student enrolment load

This standard requires that variations in a student's enrolment load affecting the student's expected duration must be kept on file. If an underload is approved the documentation must be stored on central file.

#### 4. Standard 9.4 Maximum course enrolment by distance and or online

Students can enrol in no more than 25% of their course by DE or online learning. The MRS/ESOS reports '**Student Course Enrolment - Percentage by DE/Online study and Student compulsory study period enrolment by DE/online study**' should be run in the first week of classes. This provides time for corrective action to be taken.

The monitoring of DE/On line study involves three groups of students and template letters have been developed for each group:

- Students who are at risk of enrolling in more than the permissible DE/On line enrolment
- Students who have exceeded the maximum permissible DE/Online enrolment
- Students who are enrolled in only DE/On line units.

It is important to keep in mind that even though there is no restriction on students enrolling in DE during non compulsory study periods (eg Summer) this period of enrolment is included in the overall calculation of percentage by DE/Online study. See [explanatory guide](#).

#### 5. Standard 9.5 The expected course duration specified on the CoE must not exceed the registered duration unless standard 9.2 applies

This standard places the onus on providers to issue CoE's in accordance with the registered duration specified on CRICOS. The only exception to this is if a course extension is approved on standard 9.2 grounds.

## **Compliance Obligations**

### Faculty

- Ensure that the ‘full time enrolment/load’ policy is implemented
- Monitor expected completion of student by running the [Duration report](#) at the beginning of each semester and at census date and contacting students who will not complete on time.
- Ensure that students enrol in no more than 25 per cent of the total course in which they are enrolled by distance education or online study
- Monitor enrolment by DE/on line by running the MRS/ESOS reports [[Student Course Enrolment - Percentage by DE/Online study](#) and [Student compulsory study period enrolment by DE/online study](#)] to ensure students are not enrolled exclusively in distance or online learning units in any compulsory study period
- Assess applications and make decisions for a reduced load in accord with Monash ‘Monitoring a Student’s Workload’ procedure
- Assess applications for Deferment or Intermission in accordance with Monash ‘Deferment of study procedure’ and ‘Application for Intermission procedure’
- Make decisions concerning Suspending students from study in accordance with statute 4.1
- Record variations to a student’s enrolment load approvals on central filing

### **MRGS**

- Ensure that the ‘full time enrolment/load’ policy is implemented
- Assess applications for Deferment or Intermission in accordance with Monash ‘Deferment of study procedure’ and ‘Application for Intermission procedure’
- Make decisions concerning Suspending students from study in accordance with statute 4.1
- Record variations to a student’s enrolment load approvals on central filing
- Monitor expected completion of student by running [Duration report](#) in MRS/ESOS at the beginning of each semester.

### **Monash College Pty Ltd (MCPL)**

- Ensure that the ‘full time enrolment/load’ policy is implemented
- Ensure that student’s enrol in no more than 25 per cent of the total course in which they are enrolled by distance education or online study
- Monitor enrolment by DE/on line by running the MRS/ESOS report [Student Course Enrolment - Percentage by DE/Online study](#) and [Student compulsory study period enrolment by DE/online study](#) to ensure students are not enrolled exclusively in distance or online learning units in any compulsory study period
- Assess applications and make decisions for a reduced load in accord with MCPL procedures
- Assess applications for Deferment or Intermission in accordance with MCPL ‘Deferment of study procedure’ and ‘Application for Intermission procedure’
- Make decisions concerning Suspending students from study in accordance with MCPL procedure
- Variations to a student’s enrolment load are recorded on MCPL central filing
- Monitor expected completion of student by running Duration report at the beginning of each trimester.

### **Campus Hub**

- If the reason for the decision on Course extension is not indicated on the email from Faculty or the hard copy application form, check ESOS notes and/or student's file or confirm with faculty before issuing a new CoE.

## **Monash documentation**

### Policies and Procedures

- [Course Structure Policy](#)
- Procedure for approving deferment or suspension of study (See standard 13) or for applying [statute 4.1 discipline](#).

### Business Rules

- A business practice for updating a student's file and reporting the student via PRISMS and/or issuing a new COE when the circumstances outlined in 9.2 apply.
- A business practice for reporting students when approved to extend duration of study under standard 9.2.

### Guidelines

- As stated in Compliance requirements

### Other

#### *Reports*

- MRS report to check that no more than 25% of the student's total course by distance and/or online learning

#### *Ask Monash*

- FAQ's for students explaining enrolment policy for ESOS students