

Section A: Student Entry Procedures

Frequently asked questions

Q1. Can the student commence a course and then provide the copy of the certificate of education before their first census date?

- A. The onus is on the provider to ascertain a student's entitlement to VET FEE-HELP as close as possible to enrolment or commencement to ensure, where VET FEE-HELP is the preferred payment option, that entitlement is established well in advance of the census date. Entitlement will not be established until evidence is provided.

A provider's administrative procedures must ensure that the evidence of academic suitability is retained for at least five years.

Q2. Can any other qualification that a student has attained be used to access a VET FEE-HELP loan?

- A. No. The requirement is that if a student does not have a Senior Secondary Certificate of Education, they must complete the Language Literacy and Numeracy (LLN) testing to be eligible to access a VET FEE-HELP loan. If an applicant cannot produce evidence (the certificate) of completion of year 12 secondary education, they must prove eligibility through the test – a letter from a secondary school delegate will not be accepted in replacement. Other qualifications will **not** be accepted to be eligible for a VET FEE-HELP loan, including:

- a VET qualification (e.g. Cert III, Cert IV, diploma)
- a higher education qualification (e.g. degree or higher tertiary qualification)
- an overseas year 12 equivalent qualification
- achievement of a Certificate IV within the same suite of the applied Diploma
- any 'Fee for Service' program that has Reading and Numeracy components in it to provide another pathway for students that do not meet Level Exit Level 3, and should they pass this unit, gain entry into the diploma

Q3. Are students that have not yet finished year 12 able to access VET FEE-HELP?

- A. Yes, if they meet the requisite requirements.
- i. Students who are not able to present a Senior Secondary Certificate of Education on completion of year 12 will need to demonstrate competency using an approved LLN assessment tool.

- ii. Students who are still completing their secondary schooling may access a VET FEE-HELP loan if they meet the requisite requirements for a loan and meet the new requirements concerning protection for students under 18 years.

Q4. Where can I find: “Assessment of LLN testing instruments and processes for VET FEE-HELP providers”?

- A. The *Assessment of LLN testing instruments and processes for VET FEE-HELP Report (Stage 2)* is available on the departmental website www.education.gov.au. The report can be downloaded in PDF or Word format from: <https://docs.education.gov.au/node/39181>.

Q5. What process needs to be followed to approve an external LLN assessment tool and who should the application be sent to?

- A. Please refer to the [Assessment of LLN testing instruments and processes for VET FEE-HELP providers Report \(Stage 2\)](#) (the Report) for comprehensive information. In summary, the process is as follows:
- The provider must arrange to have their LLN assessment tool independently assessed.
 - An independent assessor who undertakes the audits of any LLN testing instruments should be an independent body or approved independent and specialist personnel, such as an auditor with VET experience, see page 29 of the Report for details.
 - The independent assessment must directly respond to the specifications and requirements for approval outlined on pages 23–28 of the Report. Additionally, please note the checklist of auditable requirements for LLN testing instruments on pages 31–43.
 - Once completed, the assessment must be sent to the Secretary of the Department of Education and Training, care of the Branch Manager, VET FEE-HELP Branch for approval. This could be in electronic or paper form, via:
 - TSEnquiries@education.gov.au; or
 - The Secretary of the Department of Education and Training
c/o the Branch Manager, VET FEE-HELP Branch
50 Marcus Clarke St
CANBERRA ACT 2601

Q6. What are the likely timeframes in the approval process for a provider who seeks to use its own/an external LLN assessment tool?

- A. The timeframe will vary according to the independent assessor’s timeframes and the department’s approval timeframes. Providers should make alternate arrangements with access to the Core Skills Profile for Adults (CSPA) in the interim.

Q7. Do students who are enrolled in 2015, for 2016 course commencement, have to abide by the new student entry procedures? (i.e. obtain their Senior Secondary Certificate of Education or display competency through an approved test)

A. The student entry procedures apply to request for Commonwealth assistance forms completed from 1 January 2016 in relation to VET courses of study where enrolment occurs on or after 1 January 2016.

Q8. Does a VET FEE-HELP applicant need to demonstrate competency in any skills other than Reading and Numeracy?

A. Not for access to VET FEE-HELP. Of the 5 core skills described in the Australian Core Skills Framework, only reading and numeracy competencies need to be demonstrated to be eligible for a VET FEE-HELP loan. Even if the course does not include aspects of reading or numeracy these competencies must still be met to access the loan.

Q9. Does the student entry procedure (i.e. competency at or above Exit Level 3 in reading and numeracy) apply to the Certificate IV trial qualifications?

A. No.

Q10. When will the Core Skills Profile for Adults (CSPA) approved testing tool be available? And in what format is it?

A. The CSPA can be sourced by providers now. For further information about the test, visit the [VET FEE-HELP](#) and [FAQ's](#) pages on the ACER website. CSPA is an online assessment of foundation skills that assesses and reports on learner skills instantly (no human marking is required) with reports on candidate performance available immediately after completion of the assessments for use as evidence of competency.

Q11. If a student has met all course entry requirements but does not display competence at or above Exit Level 3 in the Australian Core Skills Framework, is the student precluded from entry to the course?

A. No. The entry requirements apply to accessing a VET FEE-HELP loan – not to the course.

Q12. Can a student resit an LLN assessment (using an approved testing tool)? And if so, when? How many times?

A. Students would re-sit based on the provider's assessment of readiness. The Australian Council for Educational Research's (ACER's) recommendation is that at least three months between assessments should provide enough time for progress to be made and improvement to be

able to be demonstrated. This would allow time for the learner and the RTO to implement any targeted LLN support and to have sufficient time for the learner to improve their LLN skills to the required level.

Providers are reminded of the Guideline requirement for the results of pre-requisite assessments to be reported to the Secretary when requested. Providers are also reminded of the need to conduct the process with honesty and integrity (Higher Education Support (VET) Guideline 2015, Section 38(1)(c)).

Q13. If a provider is in the process of seeking Ministerial approval to use an external LLN assessment tool, can the provider use the test that is under consideration?

- A. No. Providers should ensure that students who are enrolled from 1 January 2016 that do not provide a Senior Secondary Certificate of Education are adequately assessed for VET FEE-HELP entitlement before accessing a VET FEE-HELP loan. If providers use a test that is not yet approved and allow students to access VET FEE-HELP loans based on that eligibility, those students would not be entitled to access a VET FEE-HELP loan. The provider will be in breach of the *Higher Education Support Act 2003* (the Act) (as amended by the *Higher Education Support Amendment (VET FEE-HELP Reform) Act 2015*) provisions and the students may be entitled to request a remission of their debt under clause 23B of Schedule 1A of the Act.

Q14. Does an applicant's score/results from their Senior Secondary Certificate of Education effect their eligibility for a VET FEE-HELP loan?

- A. No. Access to a VET FEE-HELP loan can be granted to a student with a Senior Secondary Certificate of Education awarded on completion of year 12, and who meets the other requisite criteria (See the [Study Assist website](#) for information). It is up to providers to determine whether students meet other pre-requisite course requirements to access the diploma and above qualification.

Q15. Can a provider make an offer to a student of a place in a course prior to the completion of the LLN testing?

- A. Yes. However, access to a VET FEE-HELP loan prior to the student displaying competency at or above Exit Level 3 in the Australian Core Skills Framework in reading and numeracy will be a breach of the Act's provisions.

Q16. What is the process for gaining access to the Foundation Skills Assessment Tool (FSAT)?

- A. FSAT is not yet available. Providers will be advised by the Department when it does become available, this is likely to be in the first half of 2016.

Section C: VET FEE-HELP Invoice Notice

Frequently asked questions

Q17. A student must be issued with a 'VET FEE-HELP Invoice Notice' at least 14 days before the census date, does this mean that the minimum amount of time a student can be eligible for VFH assistance is 14 days prior to census date?

A. Yes. Refer page 16 of the [VET Administrative Information for Providers Addendum](#):

For example, from 1 January 2016 a VET provider must issue an Invoice Notice to a student no less than 14 days prior to the census date. A student would need to be enrolled in the course to be invoiced for units of study. Therefore course enrolment would need to occur at least 14 days prior to the census date.

Q18. How does the two business day gap interact with the 14 day invoice notice requirement? Do these requirements mean the student cannot enrol less than 16 days before the census date?

A. The 14 day invoice notice requirement is separate from the two business day gap. The two business day gap can occur within the 14 day invoice notice time period in cases where an invoice is provide to a student on enrolment.

Q19. Do the new invoicing requirements apply to students who were enrolled in 2015 but who have census dates in 2016?

A. The invoicing requirements apply to Commonwealth supported students who have census dates after 28 January 2016.

Section D: Two Day Gap between enrolment and loan request

Frequently asked questions

Q20. Can the student complete most of the Commonwealth assistance form at the time of enrolment, and sign after the two day (business days) gap?

A. No.

Q21. During the 2 day gap are providers able to be in contact with the students?

A. The legislation requires students enrolled in a VET course of study not submit a request for Commonwealth assistance form until two business days has elapsed following enrolment. The Act does not otherwise regulate contact within this period.

Section E: Minimum of Three Fee Periods Requirements

Frequently asked questions

Q22. Are students who have started their course in 2015 but who have census dates 2016 subject to the “three fee period” requirements?

A. No. The three fee period requirement applies in relation to a student enrolled as a VET student in the VET units of study forming part of a VET course of study, if the course commences on or after 1 January 2016.

Q23. Can a provider set a fee period for every unit of study?

A. Yes, if the fee periods are sequential and proportionate.

Q24. Do providers need to advise the Department of their fee periods for each course?

A. No, unless asked as part of compliance investigations or monitoring.

Q25. Does the minimum three fee periods requirement apply across the course or is it across the year for each year of the course?

A. The minimum three fee periods apply to the course.

Q26. Can the fee amount for the respective fee period be proportionate to the VET course of study load? Or does the fee amount for the three fee periods need to be based on a maximum of one-third of the total course fees?

A. The intent of the fee period measure is to ensure that students incur their debt as they progress through the course – not in one upfront hit.

To maintain compliance, approved providers must have at least three fee-periods of equal length (duration), with at least one census date in each fee period. The VET provider must also ensure that the student’s VET tuition fees for the course are spread over the duration of the course so that the same portion of the VET tuition fees becomes payable in each of the fee periods of the course. For example if you have three fee periods, the maximum you can charge per fee period is one third of the total course tuition fees.

The Australian Government is aware however in some circumstances where final units of study are more resource intensive (e.g. in health and aviation related fields) it is difficult to apportion all tuition fees equally across your fee periods. That is why the Government may consider limited

flexibility to charge more than the apportioned course fee in **the final fee period** but only where less has been charged in the initial fee periods. The Government prefers that providers apportion fees equally across fee periods, therefore this flexibility is only to be used where the provider advises the department that they cannot reasonably apply the requirement due to their course content and construct, and obtains prior approval for this adjustment.

Compliance tips:

- Flexibility may be applied for the **final fee period only**.
- Providers should advise the department of circumstances requiring application of flexible arrangements, and obtain prior approval from the department.
- Fee periods must still be equal in length as required in the **Higher Education Support (VET) Guideline 2015**. Therefore, you cannot have short initial fee periods and a longer final fee period.
- Before enrolment, prospective students are to be informed of their VET tuition fees as specified in Section 31 of the VET Guideline.
- Any abuse of the increased flexibility for the fee-period requirement will result in flexibility being removed for that provider. Where this occurs the department will advise the provider in writing.

This flexibility is in line with the intent of the fee-period measure as it still allows students to incur debt as they progress through the course. An increased fee in **the final fee period** does not cause the student to be charge in one upfront hit, spreads debt accrual across the course and ensures genuine students progressing through to completion are charged accordingly. Providers must of course ensure all other requirements are complied with, including issuing of invoice notices, provision of fee information and publishing prior to enrolment, gap between enrolment and loan request, and census date requirements.

Section F: Marketing and publishing

Frequently asked questions

Q27. What is defined as marketing material?

A. This material includes all activities that market, advertise or promote a provider's units, courses or services. This requirement extends to any marketing, advertising or promotion done by another person or body for the VET provider. A VET provider must ensure that all marketing, advertising or promoting of any of its VET units of study or VET courses of study clearly and prominently mentions:

- (a) the VET provider's name, registered business name (if any), any other business name it uses; and
- (b) the maximum VET tuition fees payable for the units or courses.

Q28. Can a provider advertise the 'loaning' of a laptop or other device?

A. No. Advertising of items, which are loaned or used by students, to induce persons to enrol is prohibited. Providers *can* loan equipment to students accessing VET FEE-HELP however, this loan service cannot be advertised, promoted or marketed (refer Higher Education Support (VET) Guideline 2015, Section 25 (2)). This new requirement is in addition to the total inducement ban that was introduced on 1 April 2015 (which includes cash, meals, prizes, vouchers, laptops etc.) (refer the Act's infringement and civil penalty provisions).

Q29. Can a provider, or associated agent/broker, talk about VET FEE-HELP in a cold-call situation?

A. No. An agent (an individual working on behalf of a provider as a broker/agent/associate) must not use the VET FEE-HELP loan scheme as a marketing tool during a cold-call (i.e. unsolicited contact where a potential customer has not had any prior contact with the agent) as specified in the VET Guideline (Higher Education Support (VET) Guideline 2015, Section 25(3)). An agent may not mention "VET FEE-HELP" during a cold-call, which includes but is not limited to, by telephone, email, door-to-door, in shopping centres or outside Centrelink offices. The intent of this requirement is to enable prospective students to select a VET provider based on considerations of quality and price of training and to make payment decisions with a clear understanding of their rights and obligations.

Compliance tips:

Whilst in a cold-call situation, if the customer enquires about payment options, or specifically seeks information about VET FEE-HELP, the agent could:

- refer the customer to investigate their options (such as via the *Study Assist* or *MySkills* websites for information on Government assistance) and suggest the customer initiate subsequent contact with the provider at a later date; or
- provide the customer with return contact details so if the customer decides they would like further information (including about payment options), then the customer can initiate contact with the agent; or
- offer the physical address details of the provider/campus so that the customer can seek further information by visiting the provider in person.

Q30. My institution recently updated its maximum course tuition fees on the MySkills website. What should I do when these fees change?

- A. The indicative maximum tuition fee for the courses offered by VET FEE-HELP providers in 2016 must be uploaded onto the MySkills website.

You may update information on the MySkills website at any time. Any changes to tuition fees for VET unit/s of study which make up a VET course of study must be done in accordance with the requirements set out in the VET Guidelines in relation to the publishing of VET unit of study tuition fees.

Q31. Where price differences exist based on delivery mode do we list the different prices with the different delivered mode or just the 'Maximum tuition fees'

- A. The maximum tuition fee should be uploaded however providers are able to provide some information in the text field.

Section G: Freeze on Loan Growth

Frequently asked questions

Q32. How will census dates for September 2015 and onwards be taken into account given that census dates between January and August are only being considered for a provider's notional VET FEE-HELP loan account?

- A. The legislative criteria stipulate the calculation of the notional loan accounts. If there are significant issues fitting existing continuing students (enrolled on or prior to 11 December 2015) into the loan cap, send details of the circumstances to Secretary of the Department of Education and Training care of the Branch Manager, VET FEE-HELP Branch for consideration. Circumstances should include details of dates of enrolments of existing or continuing students and course fees from 2014 to 2016. This could be in electronic or paper form, via:
- TSEnquiries@education.gov.au; or
 - The Secretary of the Department of Education and Training
c/- Branch Manager, VET FEE-HELP Branch
GPO Box 9880
CANBERRA ACT 2601

Q33. Are providers to monitor the value of VET FEE-HELP loans across their organisation to ensure they don't exceed their 'cap'? If so, how? What happens to existing continuing students whose second semester falls late in 2016 and their provider has reached the notional VET FEE-HELP limit?

- A. Providers are responsible for monitoring student loans to ensure they do not exceed the cap, with priority provided to existing students. An entitlement of a new student (enrolled from 12 December 2015 onwards) to access VET FEE-HELP is dependent on available cap. Providers have the onus of managing, within a financial VET FEE-HELP cap, existing students, with due business considerations of course prices or other payment options in meeting unmet demand.

A provider's notional VET FEE-HELP account is established through the Estimates module in HITS. Once approved, providers can view their cap (or estimate if less than the cap) under the field **Decided total annual estimate amount** in the 2016 estimates screen and this reflects the maximum amount the Department has agreed to pay for student loans incurred in 2016. The value of reported HELP student loans a provider has submitted to the department for 2016 can also be viewed in the **2016 Estimate Details** screen in HITS. This value appears in the **Reported HELP student loans field**. Alternatively, providers can also check their reported student liabilities through the Higher Education Information Management System (HEIMS). Providers can determine the value of their remaining cap by deducting the reported student liabilities from the total cap. When enrolling new students, providers should assess the likely value of loans each student will access given the number of census dates they will progress through in 2016. The value of reported student loans plus the expected loans from all students with future 2016 census dates must not exceed the cap. The

Department is intending enhancements to IT systems to be able to provide systematic alerts to providers when they reach a certain percentage of their cap.

Note: The value of the notional VET FEE-HELP account may be less than the cap if that has been agreed. In those cases, providers will be able to request increases to their estimate up to the cap. Additional information was recently sent to providers. If you did not receive this information, email TSEnquiries@education.gov.au with 'VFH cap payment information' in the subject line.

If providers expect to reach their nominal account limit solely due to existing or continuing students enrolled on or prior to 11 December 2015, please provide details including dates of enrolments and course prices from 2014 to 2016, to the Branch Manager, VET FEE-HELP Branch via TSEnquiries@education.gov.au.

Q34. Does a provider's notional VET FEE-HELP loan account apply to only new enrolled students, or continuing existing students accessing a VET FEE-HELP loan as well?

A. The notional VET FEE-HELP loan account applies to all students accessing a VET FEE-HELP loan. By definition, the notional VET FEE-HELP account is a limit on the *total* value of VET FEE-HELP loans a provider's students can incur.

Q35. Why are the notional VET FEE-HELP loan accounts based on data reported for census dates occurring from 1 January to 31 August 2015?

A. Data for the total 2015 calendar year will not be available until mid-2016, which would be too late to be able to use the data with regard to implementing these measures. The methodology in the legislation therefore used eight months of data, which was required to be reported under existing provisions by 31 Oct 2015, as a base for full-year calculation.

Q36. Are all providers subject to the same notional loan account requirements?

A. Yes, the requirements apply to all approved VET FEE-HELP providers (including public, private, subsidised and non-subsidised). Section H outlines the limited exceptions to increasing the notional loan account.

Q37. What do the reforms mean for providers who have plans to expand scope and business? Will new diploma courses be subject to the freeze?

A. Expansion and growth, that directly involves students accessing VET FEE-HELP loans, may be limited including for new courses. Providers may alter their business models or reduce fees for existing courses to fit more students under the cap or provide other payment options for students.

Q38. There is reference to amounts being paid in arrears, does this apply to providers who exceed their 'cap'?

A. No. This is not an additional payment above the 'cap' for providers. Payment to providers in arrears (up to their notional account cap only) will be applied in some cases. The department will use a risk-based approach to identify circumstances where this will be necessary. The department will contact all providers to advise individual applicable payment arrangements.

Q39. Does the notional loan account calculation use estimates or payments or liabilities (refer the methodology of calculating a VET provider's nominal loan account)?

A. The reference to 'paid' in the Act (subclause 45D(3)) needs to be read in conjunction with the Commonwealth's liability to 'pay' providers only for VET FEE-HELP liabilities incurred (see Division 9 of Schedule 1A to the Act – clause 55). In this context therefore, 'paid' refers to the amounts of VFH liabilities incurred by students on census dates that occurred from 1 January 2015 to 31 August 2015.

Section H: Increases to the notional VET FEE-HELP account

Frequently asked questions

Q40. Can a provider increase their notional loan account?

A. There are only two circumstances where an increase to the notional loan account can be made. These are detailed below:

1) When another VET FEE-HELP approved provider ceases to be a provider

The Minister may, by legislative instrument, determine whether credits arise in the VET FEE-HELP accounts of specified VET providers when another body ceases to be a VET provider, and the amounts of such credits.

2) Where a provider is offering a course in a skills area of national importance that leads to employment in a licensed occupation

If the Secretary, on application by the VET provider, is satisfied on a particular day that:

i. the VET provider is offering a VET course of study that confers skills in an identified area of national importance, and

ii. the course is relevant for employment in a licensed occupation; and

iii. one or more students are unable to readily access training places in courses of this kind with any other VET provider; and

iv. insufficient credits have arisen in the VET provider's VET FEE-HELP account for an appropriate number of students to undertake the course with the VET provider; and

v. granting an extra credit of a particular amount is appropriate (which need not be the amount specified in the application);

the Secretary may grant a credit, which arises on that day, that is equal to the amount considered appropriate under paragraph (v) above.

Section I: Changes to new provider approval criteria

Frequently asked questions

Q41. What do these changes mean for providers who are currently applying to become approved to offer VET FEE-HELP?

A. Individual information will be sent to providers who currently have an application in progress. The new requirements will apply to all provider applications from 1 January 2016, including new applications and applications still under review (even if they were lodged prior to 1 January 2016).

Q42. Is there a revised VET FEE-HELP 'application guide' to support the changes?

A. The new application guide will be available in early 2016.

Q43. Concerning the terminology 'offering' in relation to the new Paragraph 6(1)(c) of Schedule 1A to the Act (as amended) regarding qualifying courses for application. Does this mean the provider has had a course on its scope of registration and available for students to enrol; or, does it mean that the provider must have actually had student enrolments in a qualifying VET course and actually delivering the course continuously?

A. Offering means on scope and available for student enrolments and with at least one student enrolled in each year (note – the Act (as amended) requires continuous). Providers are reminded that the VET FEE-HELP notional loan account will be limited to domestic fee enrolments in the qualifying courses in 2015.

Q44. How long will my application take to assess? Why is it taking so long?

A. The Department of Education and Training continues to progress the assessment of a large number of VET FEE-HELP provider applications and cannot advance any application ahead of another. Application processing times vary and are delayed when further information is required or incomplete information has been submitted.

Section J: Financial Viability Requirements

Frequently asked questions

Q45. What are the consequences if a provider does not meet this requirement for the first or subsequent reporting periods?

A. The additional financial viability requirements will be assessed in line with the commencement information in the updated version of the VET Guidelines. Where a provider fails to meet a requirement, the department may seek further information in relation to the failure, implement additional approval conditions, or commence regulatory action as deemed appropriate.

Q46. Does the annual reporting period refer to the Australian financial year calendar for reporting purposes and would therefore be for financial activity between July 1 2016 to June 30 2017 (the first full financial reporting period commenced after 1 January 2016)?

A. The annual reporting period refers to the individual financial reporting cycle of each approved applicant or provider. For instance, if an organisation utilises a financial year reporting basis, then its annual financial reporting period will conclude on 30 June each year. Those organisations that use a calendar year reporting basis will have an annual financial reporting period that concludes on 31 December each year.

Q47. Does 'total expenses' refer to total expenses relating to VET FEE-HELP applicable courses or 'total operating expenses' of the entire business?

A. Total expenses incorporate the entire expense portfolio of the applicant or approved provider, not just those expenses incurred in relation to the delivery of VET FEE-HELP courses. However, the requirement that a designated proportion of annual expenses be available to an applicant or provider in liquid assets represents a condition which may be imposed in some instances, rather than a requirement being levied against all organisations. For most applicants and providers the department will continue to monitor the availability of liquid assets in line with current practices.

Q48. Does the cap of 100 enrolments refer to each qualification on a VET Provider's scope, or total enrolments for the VET Provider?

A. The 100 enrolment cap refers to the total number of enrolments that a provider has in all courses on its scope leading to awards of qualifications in the Australian Qualifications Framework. All providers that have 100 or more such enrolments within an annual financial reporting period will be required to generate a minimum of 20 per cent of their revenue from a source other than VET FEE-HELP.

Q49. For the purposes of first time assessment, is the first annual reporting period after January 2016 considering the financial period that has already commenced in July 2015? Thus, assessment will be conducted June 30th July 2016?

A. For providers that run on calendar year financial reporting cycle the first annual reporting period considered in relation to the financial viability requirements will be the year from 1 January 2016 to 31 December 2016.

For providers that utilise a financial year reporting period it will be the year from 1 July 2016 to 30 June 2017.

Q50. Does 'total revenue' mean revenue just generated from courses delivered or total revenue of the company as a whole?

A. Total revenue includes all revenue generated by an approved provider. Any revenue that does not arise as a result of the creation of a HELP debt will be counted toward revenue diversification requirements.

Q51. From January 1 2016 does a provider's cash or cash equivalent assets have to be 25% of their 2015 financial year total expenses (most recently completed financial reported period)? Or is the requirement that as at June 30 2016 our cash or cash equivalent assets must be 25% of our Total expenses for the FY 16 year?

A. Requirements in relation to the retention of liquid assets matching a prescribed level of annual expenses is a condition which may be imposed on applicants or providers where deemed necessary. It is not a requirement that all applicants or providers must adhere to. The department will continue to assess the adequacy of liquid asset holdings for most providers in line with current practice.

Where a provider is required to maintain a prescribed level of liquid assets they will be contacted directly by the department and a timeframe for compliance agreed.

Q52. Does the non-HELP revenue need to be derived from educational activities?

A. No. Any revenue that does not arise as the result of the creation of a HELP debt will count towards the 20 per cent requirement. This may include state government subsidised training, revenue arising from consultancy work, room or venue hire, interest or dividend earnings, corporate or short course training activities, donations, the sale of goods, books or services to students or the public, investment income, or any other form of revenue generating activity.

The department may seek further information in relation to non-HELP revenue where its sources are unclear or where it has been generated solely via charges made to related persons or entities.

Q53. Does the non-HELP revenue need to be received directly by the provider, or can one of their subsidiaries or “sister companies” be in receipt of this on their behalf?

A. Non-HELP revenue must be received by the individual legal entity that is approved to offer VET FEE-HELP loans. Revenue received by related entities, or the overall consolidated group of which an approved provider forms part, will not be counted towards the 20 per cent revenue diversification figure.

Q54. Is the 20% non-HELP revenue per qualification on offer or is it total revenue for the RTO across all courses offered?

A. The 20 per cent revenue diversification requirements refer to the total revenue of an approved provider. It is not a measurement made based on an individual course basis or restricted to VET FEE-HELP approved courses.

All revenue generated by an approved provider via a source other than payments of Commonwealth assistance giving rise to HELP debts will contribute towards diversification requirements. This may include state government subsidised training, revenue arising from consultancy work, room or venue hire, interest or dividend earnings, corporate or short course training activities, donations, the sale of goods, books or additional services to students or the public, investment income, or any other form of revenue generating activity.

Section L: Remission of VET FEE-HELP Debt

Frequently asked questions

Q55. What is deemed as 'inappropriate behaviour'?

- A. 'Inappropriate behaviour' refers to the breaches that are infringements in the Act. The Guidelines, which will be published prior to 1 January 2016, provide details of the requirements including but not limited to, marketing, provision of information, enrolment and withdrawal practices and cold-calling.

Q56. How long does a student have to lodge a complaint? And, can a student raise an issue that occurred prior to the implementation of the reforms?

- A. A student has three years after the period in which they undertook the unit to submit an application for re-credit of their FEE-HELP balance. The amendments apply in relation to unacceptable conduct engaged in on or after 1 January 2016.

Q57. What is the "paper process" that will be implemented for the remission of VET FEE-HELP debt (whilst the online system for such applications is being built)?

- A. The department will provide the form for students to complete when they are seeking a remission of their VET FEE-HELP debt. Students will be able to access the form through the *Study Assist* website and it will become available in 2016. The department will advise when it is launched.

Other questions

Frequently asked questions

Q58. Is the Government eCAF due for commencement in January 2016? If so, how will this effect students who have already completed loan request forms for January and February intakes?

A. The Government eCAF is due to be launched from 1 January 2017. The eCAF will be the primary way for students to complete a request for Commonwealth assistance form and in most cases, replace the paper form entirely. The release of the Government eCAF will not impact on existing requests for Commonwealth assistance, meaning students will not have to reapply. More information about the Government eCAF will be made available through future editions of the HELP newsletter. To receive the HELP newsletter, ensure that your details are added as a contact in the HELP IT system (HITS).

Q59. Will the department run information sessions for VET Providers?

A. The Department will provide information to stakeholders as it becomes available to ensure providers are supported. The information will be provided on the [VET Reform Resources](#) page of the departmental website and via the HELP newsletter. The AIP manual will also be updated in early 2016.