# Commonwealth Prac Payment (CPP) Provider Guidelines

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# 1 Commonwealth Prac Payment (CPP) Program Introduction

The Australian Government announced on 14 May 2024 the introduction of a new Commonwealth Prac Payment (CPP), from 1 July 2025, that would help students manage the costs associated with undertaking a mandatory placement (also known as a practicum) as part of a higher education course in teaching, nursing, midwifery, and social work.

The Australian Government Department of Education (the department) will work with the higher education sector to deliver the CPP through eligible Higher Education Providers (Providers). This document provides guidance to Providers on the administration of the CPP to students.

Payments for Vocational Education and Training students eligible for the CPP are administered by the Australian Government Department of Employment and Workplace Relations (https://www.dewr.gov.au/skills-and-training/help-cost-training/commonwealth-prac-payment-vocational-education-and-training) and are not a subject of these guidelines.

# 2 About these guidelines

This document intends to outline principles-based approach to Providers' delivery of the CPP. As Providers are responsible for the delivery of the CPP and the relationship with students, this document combines appropriate flexibility for Providers to manage the CPP in a way that makes sense in each Provider's context with essential departmental and Australian Government requirements.

This document should be read in conjunction with the *Higher Education Support (Other Grants) Guidelines 2022* (the OGGs) and the Provider's Condition of Grant (CoG), issued under subsection 41-25(2) of the *Higher Education Support Act 2003* (HESA). This document sets out:

- the purpose of the CPP program
- the student eligibility criteria
- how applications should be considered by Providers
- how the CPP program will be monitored and evaluated
- responsibilities and expectations of students, Providers and the Department of Education in relation to the CPP program.

Any use of the word 'must' in this document must be read as a requirement as it stems from relevant legislation, the OGGs and CoG, while use of the word 'should' is intended as guidance/suggested best practice.

These guidelines may be changed from time-to-time. When this happens, the revised guidelines will be distributed to Providers.

### 2.1 Process Overview

# The Commonwealth Prac Payment Program is designed to achieve Australian Government objectives

This program contributes to the department's Outcome 2. The program is enabled through item 15 of the table in subsections 41-40 (1) of HESA. Program requirements are set out in the OGGs, and eligible Providers are issued CoG.



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**Application Assessment** 

The Provider assesses application against eligibility criteria to determine eligibility or to consider exceptional circumstances.

#### **Outcome Notification**

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The Provider advises student of the outcome of their application and details of forthcoming payment (where applicable).

#### **Student Payment**

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Provider pays student.

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#### **Placement Undertaken**

Student undertakes placement.

#### 1

#### **Funding reconciliation**

Provider reports actual student payments which the department reconciles against the advance payment of the grant.



#### 12-month checkpoint review

The department undertakes a 12-month checkpoint review of the CPP program to measure the early outcomes of the program and effectiveness of program settings. A Stakeholder Reference Group will be established to inform the Review.

#### Legislative Review of CPP (scheduled for 2027-28)

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Under Section 4, Schedule 4 of the *Universities Accord (Student Support and Other Measures) Act 2024*, the Minister must cause an independent review to be conducted of the CPP program which considers:

'the effectiveness of payments provided to students and the appropriateness of expanding payments to students undertaking courses that required university placements, including allied health'.

# 3 About the CPP program

As part of the 2024-25 Budget, the Australian Government announced the introduction of a new Commonwealth Prac Payment for domestic students undertaking a mandatory placement in teaching, nursing, midwifery or social work in a Commonwealth supported place (CSP) at a higher education provider. From 1 July 2025, eligible students will be able to access \$331.65 per week (benchmarked to the single Austudy rate on 1 January each year).

The policy intent for CPP is that, within a fiscally constrained environment, students most in need of support and those who are financially most disadvantaged due to limitations on their ability to undertake paid work during placement, can access a meaningful payment.

# 4 About the Payments

The CPP is paid at a weekly rate benchmarked to the single Austudy rate (i.e. if the Placement is for a period of 4 weeks, the 2025 payment to the eligible student should be  $$1,326.60 (4 \times $331.65))$ .

Eligible students should be paid the first payment for their placement block as close as possible to the Placement Commencement Date (see Payment Frequency).

### 4.1 Nature of Payment

The CPP is not a wage nor a wage subsidy; it is cost of living support while a student undertakes a mandatory placement to help alleviate financial costs associated with undertaking the placement.

# 4.2 Number of weeks CPP available

The maximum number of weeks of CPP that an eligible student may receive is linked to the minimum period of placement required by the relevant accrediting body to achieve entry-topractice in the eligible discipline. Current minimum requirements are outlined in Table 1 below.

Table 1: Maximum CPP funded weeks of placementfor each eligible discipline		
Course name and level	Placement requirement (weeks, rounded)	
Teacher Education		
(Bachelor)	16	
Teacher Education		
(Masters)	12	
Nursing (Bachelor)	20	
Nursing (Masters)	20	
Midwifery (Bachelor)	26	
Midwifery (Masters)	26	
Social Work (Bachelor)	26	
Social Work (Masters)	26	

Where a Provider requires students to undertake a period of placement above the minimum standard requirement as part of the course's requirement/set placement hours, recipients will not be entitled to CPP for the additional weeks.

*Example:* A recipient is completing a Bachelor of Nursing at a Provider which requires 22 weeks of placement. This is 2 weeks more than required by the relevant accrediting body to achieve entry-to-practice for that discipline. The recipient may be eligible for 20 weeks of CPP support but will not be able to apply for CPP for the additional 2 weeks.

If a student fails a placement and is required to retake it, they will not be eligible for additional CPP for the extra weeks. However, if the student is retaking their placement within the CPP week maximum (see Table 1), they may apply for CPP. Providers should ensure that students understand this will affect their ability to apply for CPP in the future. *Example*: A recipient who is undertaking a Bachelor of Teaching at a Provider which requires 16 weeks fails their first placement of 4 weeks and is required to retake this placement. As they have undertaken only 4 weeks, they still have 12 weeks (of 16 weeks) eligibility of CPP left available. The Provider should advise the recipient that they can apply for CPP for the 4 weeks they are repeating, but that this will reduce their future entitlement.

*Example:* A recipient who is undertaking a Bachelor of Teaching at a Provider which requires 16 weeks has successfully undertaken 12 weeks of placements and received CPP for this but has failed their most recent placement of 8 weeks, so is required to retake this placement. As they have undertaken 12 weeks, they still have 4 weeks (of 16 weeks) eligibility of CPP left available. The recipient is only able to claim the CPP for the remaining 4 weeks and not the full 8 weeks of the placement they need to repeat.

Where a student changes eligible disciplines or Providers (e.g. from teaching to social work or from Provider A to Provider B), their entitlement resets, so that the student will be entitled to the full amount of support for that discipline at that Provider.

*Example:* A recipient who has partially completed a Bachelor of Education and received 10 weeks of CPP transfers to a Bachelor of Social Work. Their CPP entitlement resets, making them potentially eligible for the full 26 weeks of CPP support required to achieve entry-to-practice in their new discipline.

*Example:* A recipient commences a Bachelor of Nursing at Provider A and receives CPP for 5 weeks of placement. They then transfer to undertake a Bachelor of Nursing at Provider B. The recipient is eligible to receive the full 20 weeks of CPP support at Provider B.

#### 4.3 Continuity of care model placements (midwifery students)

Given the range of approaches to Continuity of Care model placements for midwifery students (e.g. to be on-call during certain periods of time), Providers can exercise discretion in the best approach to managing the 6 weeks of entitlement per year and associated payments to students.

#### 4.4 Deferral of placement

Where a recipient has their placement deferred for any reason (including placement provider cancellation, student withdrawal or illness), the recipient may retain the amount already received for placement weeks that have not been undertaken. This should be offset against future eligible weeks of placement. The Provider may determine the most appropriate management of payments to recipients in this instance.

#### 4.5 Withdrawal from study

Where a recipient withdraws from their course of study, they will become ineligible for the amount equivalent to the period of placement not undertaken, see Section 8.2 (Debt Recovery).

*Example:* A student commences a 4-week placement and withdraws after completing 30 hours in the first week. The student would be eligible to retain one week of any CPP received in advance.

#### 4.6 Impact of debt recovery on maximum CPP entitlement

Any period of CPP paid to a student counts towards their maximum number of weeks of CPP, unless it is recovered from the student.

*Example:* A Bachelor of Teaching student is paid for one week of placement but is subsequently determined to have been ineligible for that week of placement as it was not undertaken on a full-time basis. The Provider offsets the ineligible week of placement against the student's next eligible week. Following that eligible week of placement, the student has utilised one of their 16 weeks of maximum CPP entitlement.

### 4.7 Social Security/Taxation treatment

CPP is considered assessable income for taxation and social security purposes and may impact the rate at which a person receives a social security payment. Recipients are required to declare the amounts of CPP they receive to:

- the Australian Taxation Office (ATO) as part of annual tax returns (recipients should seek their own taxation advice);
- Services Australia, to assess their ongoing rates of social security payment or other allowance, if applicable;
- the Department of Veterans' Affairs, if applicable.

Recipients are responsible for managing their own financial affairs and declarations, including the potential impacts of CPP on any Commonwealth Income Support Payments (ISP) or financial assistance from other sources.

Providers are required to notify recipients in writing, at the end of each financial year, the amount of CPP a recipient has been paid during that financial year. The notification must include the student's full name, date of birth, address and total amount of CPP paid. Providers may issue the notification earlier where it makes sense to do so (i.e. the recipient has graduated).

#### 4.8 Indexation of payment

The CPP rate is benchmarked to the single Austudy rate which is subject to annual indexation. The CPP rate will therefore increase over the life of the program.

Austudy rates are indexed according to changes in the Consumer Price Index, with the effective date of indexation being 1 January each year.

If a student begins a placement that extends to a new calendar year, their weekly CPP rate should be adjusted to reflect indexation on 1 January and paid accordingly.

The department will notify Providers of the new CPP rate prior to 1 January each year.

# 5 Payment Eligibility

Providers are responsible for assessing student eligibility for the CPP. Providers may only provide payments to students who satisfy the eligibility criteria. This includes where they are satisfied that exceptional circumstances apply, see Section 5.6 (Exceptional Circumstances).

# 5.1 Who is Eligible for the CPP?

To be eligible to receive the CPP, students must be:

- a domestic student<sup>1</sup>
- enrolled in a unit of study that is being delivered as part of an eligible course of study that leads to entry-to-practice in teaching, nursing, midwifery and social work, that requires the student to participate in mandatory placements that:
- ordinarily involves the student's participation in the placement for an average of 30 hours or more per week for the duration of the placement (which is linked to the same field of education as the course of study);

OR

- requires the student to participate in a mandatory placement as part of course of study in midwifery known as a continuity of care model placement, which prevents the student from being able to maintain paid work due to the need to ensure their availability during the placement
- enrolled in a CSP in relation to the unit, or is expected to be enrolled in a CSP for the unit
- the unit of study forms part of an eligible course of study that leads to the award of a Bachelor's or Master's degree.

Students who are not exceptional circumstances students, must also meet the following requirements:

- participate in a mandatory placement:
  - for an average of 30 hours or more per week for the duration of the placement)

OR

- that is known as a continuity of care model placement as part of course of study in midwifery, which prevents the student from being able to maintain paid work due to the need to ensure their availability during the placement
- be currently in receipt of an eligible ISP (see Section 5.4).

OR

 has a need to work where students show that they need to work during their normal studies by demonstrating they worked on average more than 15 hours a week either in the four weeks prior to applying for CPP or the four weeks prior to the student commencing their placement, whichever is earlier ('Need to Work Test').

<sup>&</sup>lt;sup>1</sup> Enrolled on a full-time or part-time basis

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#### AND

 did not earn more than \$1,500 per week gross (before tax), on average within the same 4-week evidentiary period, including amounts of scholarships or similar financial cost of living assistance from the Commonwealth, States and Territories ('Income Test').

Further information about the Need to Work Test and Income Test is at Section 6.3 (Supporting Documentation).

# 5.2 Eligible Courses of Study

Eligible courses of study are entry-to-practice Bachelor's or Master's degrees in teaching, nursing, midwifery, and social work that are accredited/approved by the relevant professional standards body.

<u>Note</u>: for dual degrees, where an eligible Field of Education (FoE) is recorded as a secondary FoE, the course remains an eligible course of study where the practicum undertaken leads to entry-to-practice in an eligible discipline and the course is at the Bachelor's or Master's level.

# 5.3 Eligible Units of Study

Eligible practicum units are units that are being delivered as part of an eligible course of study that leads to entry to practice in teaching, nursing, midwifery, and social work that require the student to participate in one or more mandatory placements that:

• ordinarily involves the student's participation for an average of 30 hours or more per week for the duration of the placement

#### OR

• for a mandatory placement for a course of study in midwifery known as a continuity of care placement – prevents the student from being able to maintain paid work due to the need to ensure their availability during placement.

The units usually align to the following FoE codes, as reported in the Tertiary Collection of Student Information (TCSI):

- Teaching Practice: 070100, 070101, 070103, 070105, 070107, 070113, 070199
- Nursing: 060300, 060301, 060305, 060307, 060309, 060311, 060313, 060399
- Midwifery: 060303, 060315
- Social Work: 090501

# 5.4 Eligible Income Support Payments

The following payments are considered to be ISPs for the purposes of CPP eligibility:

- Centrelink ISP:
  - Age Pension
  - Austudy

- o Carer Payment
- Disability Support Pension
- JobSeeker Payment
- Parenting Payment
- Special Benefit
- Farm Household Allowance
- Youth Allowance

#### • Department of Veterans' Affairs (DVA) payments:

- Age Pension
- o Income Support Supplement
- Service Pension
- Veteran Payment
- Education Allowance

#### • ABSTUDY

o ABSTUDY Living Allowance

#### 5.5 Commonwealth supported place

To be eligible to receive a payment under the CPP program, a student must either be in a CSP for the relevant unit, or the Provider must reasonably expect that the student will be in a CSP for the relevant unit, where the placement occurs prior to the relevant census date for the student.

#### 5.6 Exceptional Circumstances

There will likely be a small number of students at risk of placement poverty who may have exceptional circumstances, which prevent them from meeting the CPP eligibility criteria related to placement hours or the Need to Work Test or Income Test, but who still require support so they can participate in their placements alongside other students.

The OGGs allow for Providers to consider whether a student should receive CPP in exceptional circumstances on a case-by-case basis.

Some of these instances might be very clearly identified as exceptional circumstances that a Provider is able to quickly assess and recommend to the department to grant (for example, a student with a disability where approved reasonable adjustments are already in place, including through an agreed Individual Education Plan with their Provider).

In some other cases, the circumstances may be more complex and need more consideration by the Provider and the Provider has an obligation to work with students to help determine whether the student is an exceptional circumstances student.

Providers must be satisfied that, due to these circumstances, the student is unable to meet the requirements in relation to placement hours or the Need to Work and Income Tests (but the student is still required to meet all other eligibility requirements). CPP support will only apply to the week/s in which a student is affected, and Providers must provide recommendations on all exceptional circumstances applications to the department before finalising an outcome to grant or not grant the CPP to a student under exceptional circumstances.

#### 5.6.1 Principles for Providers in considering Exceptional Circumstances

The principles that apply to Providers in considering exceptional circumstances are:

- **Student-centric**: the process Providers apply to the consideration of exceptional circumstances does not create a barrier or a disincentive to people applying for it;
- Proportionate: the assessment of an application for exceptional circumstances is proportionate to the circumstances affecting the student's eligibility to participate in CPP;
- **Contemporary**: the consideration of an application for exceptional circumstances reflects reasonable expectations of a contemporary, diverse and inclusive society, including using social models of disability and is undertaken using culturally safe and trauma-informed practices; and
- **Program integrity**: the granting of exceptional circumstances maintains the outcomes, objectives and eligibility requirements of the CPP program which is a payment targeted to students most in need of financial support while undertaking mandatory placements.

These principles inform the exceptional circumstances guidance for Providers at Attachment A.

# 6 CPP Application Process



Providers are responsible for ensuring that payments are only made to students who are eligible for CPP.

Providers should ensure students are aware that they are responsible for submitting a complete and accurate application and must apply directly to the Provider through which they are studying the eligible course (or the Provider's nominated third party/application process). Providers have a positive obligation to work with students to ensure applications include the relevant information, including supporting documentation.

Providers must also ensure that students are aware they must inform their Provider of changes in circumstances or details that may impact on their payment (e.g. if the student no longer meets the eligibility criteria).

At a minimum, providers should receive evidence to support a student's eligibility at least once every 12 months, with students to confirm eligibility for each subsequent placement (including placements they may need to retake) within those 12 months.

Providers may choose to receive full applications and evidence more frequently if deemed necessary. However, the department expects that a student should not be asked to submit full eligibility documentation more than 2 times in any calendar year (unless there are changes of circumstances).

*Example:* A Provider reviews the student's evidence and determines their eligibility for CPP in Semester 1. Before commencing their placement in Semester 2, the student submits a confirmation of eligibility, declaring that their circumstances remain unchanged. The Provider does not need to request further information from the student and makes the payment.

Providers are required to provide, in writing, information about the CPP Program to students that the Provider anticipates may be eligible for the CPP, in relation to any eligible unit of study that contains a mandatory placement, see Section 10 (Promotion).

#### 6.1 Application

#### 6.1.1 Determining eligibility

Providers must ensure there is a clear human decision maker within their institution for all CPP applications (including where third parties are used to deliver CPP) and there are policies and processes in place to assure themselves students are eligible for the CPP. This includes that documentation submitted by students is valid, complete, and consistent with the eligibility requirements.

This should include at a minimum:

- a student declaration regarding the information and documentation supplied as part of the application including acknowledgement that providing misleading information may be an offence under the Criminal Code
- that an application will not be considered complete until supporting documentation is provided
- a program of audit to review documentation supplied by students

• for exceptional circumstances applications, Providers should assure themselves that all documentation validly supports the application.

#### 6.1.2 Method of application

Providers should establish a clear and accessible process for students to apply for CPP. This would usually be through an application form – either electronic or in hard copy – ensuring considerations for student accessibility. Providers should specify to students the manner and timing by which these applications should be submitted.

Providers have a positive obligation to work with students to ensure applications can be submitted.

#### 6.1.3 Timing of applications

To ensure payment as close as possible to the placement, Providers should open applications with sufficient lead time for students to submit an application and for Providers to assess eligibility prior to placement commencement. As a general practice, applications may be accepted up to two months prior to the placement commencement.

Where an eligible placement has already commenced, students should be encouraged to submit an application as soon as possible. Providers may wish to specify the period within which students should apply. Students should have up to 6 months from commencement of the placement to apply but application should occur prior to graduation.

Applications for exceptional circumstances should be submitted by Providers to the department at <u>CommonwealthPracPayment@education.gov.au</u> at least 4 weeks prior to the student's planned placement, to enable assessment, and timely notification of the outcome.

#### 6.1.4 Confirmation of Eligibility

To remain eligible for CPP, students should complete a confirmation of ongoing eligibility at the beginning of each subsequent relevant placement within a 12-month period. This confirmation should include information about changes of circumstances or details that impact the student's eligibility or method of receiving payment.

This may include, but is not limited to:

- changes that impact the student's ability to undertake the placement for more than 30 hours per week on average
- changes in income (including receiving additional support from other Commonwealth and State/Territory scholarship) and employment (eligibility)
- changes to receipt of ISP (eligibility)
- any information which may impact the payment of CPP to the student.

When a student reports a change in their eligibility circumstances, they are required to provide updated evidence for reassessment of their eligibility.

Where a student has been previously granted CPP under exceptional circumstances, they must follow the process outlined at exceptional circumstances (see <u>Attachment A</u>)..

# 6.2 Payment frequency

The Provider may determine the most appropriate frequency of payment to students but should consider any risk relating to overpayment when determining the amount and frequency of the payment to students.

As the intent of the CPP is to provide financial support to the recipient during their placement to alleviate placement poverty, it is preferred that the Provider make payment in advance of, or as close to, the commencement of the placement, but at least monthly.

Noting this, payments to students must be made by the end of the month in which the student applied for the payment or by the end of the month in which the last relevant week of their placement occurred, whichever is later, as set out OGGs.

It is a requirement of the OGGs that a Provider must inform the department if the Provider becomes aware it will not be able to make payment to a student within the timeframes specified. The department will consider the request and if agreed, issue a revised CoG to enable payment to the student outside of the timeframes specified.

*Example:* A student submits an application for CPP two months after commencing their first placement. The Provider reviews the application, verifies eligibility, and processes the payment to ensure the student receives their entitlement by the end of the month.

*Example:* A student undertakes a placement which ends on 15 August. They submit an application for CPP on 29 August. The Provider seeks approval from the department to process and make the payment to the student in September (which is outside of the monthly timeframe).

# 6.3 Supporting Documentation

#### 6.3.1 Income Support Payment

Providers are strongly encouraged to use Centrelink Confirmation eServices (CCeS) to verify a student's ISP status. Further details on CCeS can be found at <a href="https://www.servicesaustralia.gov.au/centrelink-confirmation-eservices-cces-for-businesses">https://www.servicesaustralia.gov.au/centrelink-confirmation-eservices-cces-for-businesses</a>.

Until this service is in place, acceptable evidence of receipt of ISP paid by Centrelink can be obtained by the student using the Centrelink Online Services 'request document' functionality. 'Centrelink Payment Details' or 'Income Statement' demonstrating current eligibility for a payment listed at 'Eligible ISPs' is acceptable evidence for this eligibility requirement.

For ISPs issued by DVA, acceptable evidence includes a DVA Payment Summary or a General Statement of Pension.

#### 6.3.2 Need to Work Test

To meet the Need to Work Test, students must provide evidence confirming they have worked for a minimum of 60 hours over a continuous four-week period during their most recent study period (i.e. not during holidays or during placement if undertaking back-to-back placements) prior to application submission and placement commencement.

Acceptable evidence includes payroll prints, time and wages sheets or payslips, a letter from the employer or, for self-employed students, client invoicing and billing information and/or sole trader timesheets.

For students who receive employment income fortnightly, the student's four-week evidentiary period should be assessed based on the end of the most recent pay period preceding the application and commencing four weeks prior to the date last date covered by that pay period. The same considerations should be used for students paid on other timeframes (e.g. monthly).

*Example:* A student applies for the CPP on 1 September for a placement starting on 16 September and is paid fortnightly, with their most recent payslip covering the fortnight ending 20 August. As a result, the Provider considers the evidentiary period to have started on 24 July and ended on 20 August.

Where the placement occurs outside of a study period, the most recent study period prior to placement should be considered the relevant study period for the purposes of confirming eligibility for that placement.

#### 6.3.3 Income Test

To meet the Income Test, students must provide evidence demonstrating their gross (before tax) income does not exceed \$6,000 over the same continuous four-week period (\$1,500 per week on average, before tax is taken out) as the Need to Work Test.

Acceptable evidence includes payroll prints, time and wages sheets or payslips or, for selfemployed students, client invoicing and billing information and/or sole trader timesheets.

#### Indexation of income threshold

As outlined in Section 88 of the OGGs, the Income Test threshold will be indexed annually from 1 January 2026 to reflect changes in the Consumer Price Index, with the effective date of indexation being 1 January each year.

The department will notify Providers of the new income threshold prior to 1 January each year.

#### 6.3.4 Receipt of Other Support

Income from all sources within the evidentiary period should be considered by the Provider when assessing students' eligibility against the Income Test requirements.

This includes scholarships/bursaries, wages/wage subsidies and any other university or Commonwealth and State/Territory Government supports which are paid directly to the student. Students will need to declare this income as part of the application process.

Payment of student contribution amounts, other student fees, supplied accommodation or any other forms of indirect/in-kind support to students should not be counted by Providers towards the Income Test requirements.

#### Annual/lump sum support

If a student receives a relevant annual/lump sum scholarship/bursary within the evidentiary period to support their studies (including from a source from outside of the Provider's institution e.g. a State or Territory or private or not-for-profit organisation), the total value of the scholarship should be converted to a weekly amount (i.e. divided by 52 weeks) and must be considered by the Provider as part of the income threshold for the purpose of assessing eligibility.

*Example:* A student applies to their Provider for the CPP. In addition to providing wage evidence demonstrating they typically work 20 hours per week, earning \$500 per week, the student also receives a \$3,000 fee reduction and a bursary of \$2,000 towards their studies for that year. As the fee reduction has not been paid directly to the student, it is excluded from their Income Test requirements. However, as the bursary is paid directly to the student, it must be included in income calculation. The bursary amount should be converted into a weekly amount of \$38.46 per week (\$2,000 divided by 52 weeks) and be considered by the Provider in conjunction with their wage evidence.

#### 6.4 Notification of Application Outcome

Providers should notify the student in writing (including via email and/or SMS alerts) of the outcome of their application. Where eligible, the successful student should be informed of the payment schedule and the process for applying for future payments during subsequent study or placement periods.

For students assessed as eligible, the notification should also include the following: 'If you get an income support payment from Services Australia, you must declare you're going to get the CPP. You should do this as soon as you know the dates of your placement. Learn about when and how to report at servicesaustralia.gov.au/commpracpayment.'

Providers should also inform students they are required to declare the income from the CPP to the ATO as part of their annual tax return. 'You will also need to declare the income you receive from the CPP to the Australian Taxation Office as part of your annual tax return. You will receive a statement at the end of the financial year to assist you in reporting this to the ATO.'

For information on application outcomes in exceptional circumstances, refer to Section 5.6 (Exceptional Circumstances).

# 7 Department of Education Payment to Providers and Provider Reporting

# 7.1 Payment to Providers

Providers will receive three types of payments from the department to be made in three different payment periods:

Payment type to Providers	Payment period
Establishment Grant (one-off)	January to July 2025
Student Grant Payment (ongoing)	<ul><li>Six-month payment instalments each year</li><li>January to June each year</li><li>July to December each year</li></ul>
Administrative Payment (ongoing)	<ul> <li>Six-month payment instalments each year</li> <li>January to June each year</li> <li>July to December each year</li> </ul>

As outlined in sections 85 and 86(3) and (5) of the OGGs, Providers must provide students the full weekly CPP amount if they meet the eligibility criteria or are an exceptional circumstances student. Providers can only use the student grant amount to make payments to students. The administrative component of the grant is to be used by Providers to administer payments to students.

Providers must manage grant funds in accordance with the CoG, including that any funds must be able to be identified separately in the Provider's accounting records and interest generated on the Grant funds must only be used for the purposes of the CPP Program.

#### 7.1.2 Payment Period 1 – January-July 2025

#### One off Establishment Grant

To facilitate the administration of student payments starting from 1 July 2025, some Providers<sup>2</sup> received a one-off separate grant in April 2025 – an upfront Establishment Grant.

This was made for the purposes of supporting Providers' mechanisms to provide payments to students who are undertaking mandatory placements.

Commonwealth Prac Payment (CPP) Guidelines v1

<sup>&</sup>lt;sup>2</sup> Non-table A and B providers will receive their payment once the OGGs have been finalised.

#### 7.1.3 Payment Period 2 – July-December 2025

#### 6-monthly CPP Student Grant Payment

From July 2025, the department will pay to Providers a 6-monthly CPP Student Grant Payment for CPP delivery to eligible students. This will be the amount of expected eligible students, the number of weeks expected to be paid, and the weekly CPP amount of \$331.65. The initial allocation will be determined based on Provider estimates reports submitted in April 2025.

*End of year reconciliation* – in March 2026, Providers will submit a 2025 end of year reconciliation report to the department detailing the total CPP issued to eligible students for that year. The next available payment to the Provider will be adjusted to reflect actual delivery.

#### 6-Monthly CPP Administrative Payment

From July 2025, the department will pay Providers a 6-monthly CPP Administrative Payment to administer CPP to eligible students. The allocation will be calculated as 5 per cent of the equivalent total CPP Student Grant Payment and will be paid with the CPP Student Grant Payment. Any adjustment to the CPP Student Grant Payment due to reconciliation (either to reflect an overpayment or underpayment) will also be reflected in the Provider's Administrative Payment and will be adjusted in the next payment cycle. For example, if a Provider receives a total Student Grant Payment of \$500,000, then it will receive \$25,000 (5 per cent) of this as an Administrative Payment, subject to reconciliation.

#### 7.1.4 Payment Period 3 – 2026 calendar year and thereafter

#### 6-Monthly CPP Student Grant Payment

The January 2026 6-monthly CPP Student Grant Payment allocation will be based on the October 2025 Provider reporting. The Payment will be the amount of expected eligible students, the number of weeks expected to be paid, and the weekly CPP amount for 2026.

Following receipt of the Provider's April 2026 reported anticipated annual student placement weeks, the department will review and adjust Providers' January 2026 entitlement and subsequent 6 Monthly CPP student grant payments in July.

*End of year reconciliation* – in the March of the following year (i.e. March 2027), Providers will submit an end of year reconciliation report to the department, with the final amount of CPP paid to eligible students for that year. The next available payment to the Provider will be adjusted to reflect actual delivery.

#### 6-Monthly CPP Administrative Payment from January 2026

The Administrative Payment will be calculated as 5 per cent of the equivalent CPP Student Grant Payment and will be paid with the CPP Student Grant Payment. Any adjustment to the CPP Student Grant Payment as a result of reconciliation or estimate review (either to reflect an overpayment or underpayment) will also be reflected in adjustments to the Provider's Administrative Payment. This will occur in the next available payment. For example, if a Provider receives a total Student Grant Payment of \$500,000, then it will receive \$25,000 (5 per cent) of this as an Administrative Payment, subject to reconciliation.

Subsequent calendar years will follow the same payment/reporting patterns as for Payment Period 3.

#### 7.1.5 Variations

If during a payment period a Provider forecasts that there will be a shortfall of more than 10 per cent in the Student Grant Payment they can submit a request for variation by emailing <u>commonwealthpracpayment@education.gov.au</u>. The department will provide a template for variation requests.

#### 7.2 Provider reporting

#### 7.2.1 April/October estimates reporting

Providers must report estimated student enrolment numbers and practicum weeks for eligible entry-to-practice courses in April and October each year. Provider estimates will be used to determine anticipated Provider payment entitlements.

#### 7.2.2 Payment reconciliation reporting

Providers must report actual CPP made to eligible students and exceptional circumstances students in March of each year, as well as any CPP amounts paid to ineligible recipients in its end-of-year reconciliation report, see Section 8.2 (Debt Recovery). These reports facilitate payment reconciliation and adjustments to reflect actual delivery of payments to students.

#### 7.2.3 Progress reporting

Providers will be required to submit twice-yearly Progress Reports to support ongoing program review and evaluation and ensure alignment with program objectives.

These progress reports include relevant implementation details including information on applications for exceptional circumstances, that will offer insights into the program's delivery and effectiveness and will also assist in assessing whether program objectives are being met and identifying areas for improvements.

Specific reporting requirements, including templates and submission guidelines, are outlined in the CoGs and associated Provider reporting templates.

The department is also able under Section 19-70 of HESA and through the CoG to request information from Providers at any time.

# 8 Compliance

#### 8.1 Student Notifications

The Provider must ensure that CPP recipients are aware of their obligation to provide true and correct information as part of their application and to notify the Provider of any significant events or personal circumstances that may impact their eligibility or ability to undertake a placement.

These include:

- a decision to withdraw their CPP application
- changes to the timing or duration of a placement
- a change of circumstances that affects eligibility, such as no longer qualifying for ISP or exceeding the income threshold
- a decision to withdraw from, or removal from, a placement/course.

Providers are responsible for ensuring students understand the consequences of failing to report these changes.

This includes that failure to notify the Provider of any changes may result in:

- the requirement to repay any payments received during the reassessment of future CPP eligibility, and
- potential investigations for misrepresentation or fraud, which may lead to compliance actions or legal consequences.

### 8.2 Debt Recovery

The design of the program is such that the amount of money a student receives in a single payment is minimised to reduce the likelihood of overpayment and the requirement for any subsequent repayment.

However, where a CPP recipient receives payment for their placement in advance and does not commence or withdraws from their course of study, they will be ineligible for the CPP for the period of their mandatory placement that was not undertaken. CPP recipients will also be ineligible where the student has fraudulently claimed the CPP. The Provider must reflect any amounts paid to ineligible recipients in its end-of-year reconciliation report.

The Provider is responsible for establishing processes for recovering funds from students who are found to have been ineligible for payments received where it is economic to do so. Such students owe a debt to their Provider and do not owe a debt to the Commonwealth. Ineligible students must be identified by the Provider so that payments can be adjusted as required as part of the department's reconciliation process, see Section 7.2.1 (Payment Reconciliation Reporting). However, the Provider will not be eligible to receive or retain CPP funding from the Commonwealth for this student.

### 8.3 Review of Decisions and Dispute Resolution

#### 8.3.1 Standard application process

#### Request for review

Where the Provider has assessed the student as ineligible for the CPP, the student may lodge a complaint in line with the Provider's grievance policy which is required under paragraphs 19-45(1)(a) of HESA.

#### Dispute resolution/complaints management

Providers must manage student disputes and complaints in line with their existing disputes resolution and complaints management policies. These policies must comply with the grievance provisions set out in paragraphs 19-45(1)(a) of HESA and Section 2.2.4 of the Higher Education Standards Framework (Threshold Standards) 2021. This includes that applicants can also refer their complaint to the National Student Ombudsman (NSO) under section 21AD of the *Ombudsman Act 1976*, where it relates to the provider's conduct or process in administering the application.

Providers should consider whether they should have in place a specific policy on dealing with complaints and review of CPP decisions.

#### 8.3.2 Exceptional Circumstances

#### Request for review

Where the Provider has informed the student that their application under exceptional circumstances has not been successful a student may lodge a complaint to the Department of Education in line with the Department of Education's complaints policy.

#### Dispute resolution/complaints management

The Department of Education must manage student disputes and complaints in line with their existing disputes resolution and complaints management policies. The department's Complaints Procedures are outlined in the <u>Complaints Factsheet</u>. All complaints to the department about the CPP must be provided in writing.

Where a student or their authorised representative raises a dispute or complaint with the department, the department may seek relevant information from the Provider to facilitate the resolution process. Providers must cooperate fully and provide all necessary documentation upon request.

If students do not agree with the way the department has handled a complaint, they may refer their complaint to the Commonwealth Ombudsman under section 7 of the *Ombudsman Act 1976*, where it relates to the department's conduct or process in administering the application. The Ombudsman will not usually look into a complaint unless the matter has first been raised directly with the department.

#### 8.3.3 Program settings

Feedback regarding the broader program settings should be directed to the department for consideration.

#### 8.4 Audit

The department reserves the right to request, in writing and at any time, copies of relevant documentation relating to the delivery of the CPP program for audit and/or verification purposes.

In reviewing decision making by Providers for student eligibility for the CPP program, the department may seek to review documentation which includes, but is not limited to:

- completed CPP application forms, including for exceptional circumstances applications
- · documentation to confirm eligibility, such as payslips, proof of receipt of ISP
- evidence verifying that the student completed their placement
- policies and procedures of the Provider that outline their assurance process for eligibility for the CPP program.

Providers must retain all relevant documentation related to CPP applicants and recipients in an accessible format for a minimum of seven years.

#### 8.5 Document validation

Providers are responsible for ensuring there are policies and processes in place to assure themselves that documentation submitted by students is valid, complete, and consistent with the eligibility requirements.

This should include at a minimum:

- a student declaration regarding the information and documentation supplied as part of the application
- that an application will not be considered complete until supporting documentation is provided
- a program of audit to review documentation supplied by students.

For exceptional circumstances applications Providers should assure themselves that all documentation validly supports the application.

# 9 Program Roles and Responsibilities

#### **Applicant Responsibilities**

Students applying for CPP are responsible for:

• accurately completing their CPP application

- applying for CPP within the timeframes specified by their Provider
- gathering and giving evidence of eligibility to Providers
- notifying their provider of changes in circumstances

Students should be informed that giving false or misleading information may be an offence under the <u>Criminal Code Act 1995</u> and provision of false or misleading information will be investigated and may exclude an application from further consideration.

#### **Recipient Responsibilities**

Students who are CPP recipients are responsible for:

- undertaking their placement in line with the requirements necessary to complete their course and achieve entry-to-practice.
- notifying their Provider of any relevant changes of circumstances as described at Section 8.1
- declaring any income they receive from the CPP to the appropriate agencies including Services Australia, the ATO, and DVA.

#### **Provider Responsibilities**

The Provider is responsible for:

- complying with HESA, the OGGs in relation to the CPP program, and their CoG
- promoting the CPP to potentially eligible students through specific, targeted and accessible communication products
- managing an accessible CPP application process including dispute resolution and complaints management in line with their positive obligation work with students accessing the CPP
- ensuring there is a clear human decision maker within their institution for all CPP applications (including where third parties are used to deliver CPP)
- ensuring there are appropriate processes in place to assure the human decision maker that an applicant is eligible for CPP
- making timely payments to recipients
- if a recipient is found to be ineligible for payment, considering whether it is appropriate to recover the payment from the recipient
- providing reports and reconciliations to the department as described at Section 7 and Section 11.

#### Department of Education Responsibilities

The department is responsible for:

- program policy, legislative authority, financial management, and parliamentary accountability
- payment to Providers to allow for administration of the CPP

- providing operational guidance on the management of the CPP
- considering Provider recommendations regarding exceptional circumstances applications
- promotion of the CPP more broadly and provision of communications materials to Providers
- review of program settings and program evaluation

# 10 Promotion

The positive promotion of the CPP will be conducted by both the department and the Provider.

Providers must ensure they provide written information about the CPP program, including application, eligibility and timeframes, to potentially eligible students enrolling in any relevant unit that involves a mandatory placement.

Providers should undertake broad and positive promotion of the CPP to students in entry-topractice pathways in eligible FoEs, that is accessible, readable and up to date. Providers should consider timing of positive promotion to provide eligible students every opportunity to apply for CPP prior to commencement of their placement.

This can include, but is not limited to:

- the Provider's CPP webpage
- information or prompts to visit the webpage within course guides, student portals and other advertising opportunities
- direct student communication such as emails and in-class reminders.
- social media and other targeted promotion.

The department will promote the CPP at the national level, as part of a broader communications strategy, using departmental websites and social media streams. It will also create general communication materials and stakeholder packs to assist with Provider promotion of CPP. However, it is the Provider's responsibility to provide students with targeted information that informs them about the specific application procedures, payment schedules, and other CPP processes relevant to their institution for their student cohorts.

# 11 Performance Reporting and Monitoring

The department will collect data for the purpose of CPP Program assurance, including reporting on the students funded and achievement of CPP Program objectives.

### 11.1 12-month checkpoint review

After one year of implementation, the department will undertake a checkpoint review of the CPP to measure the extent to which the program's early implementation has been successful and to identify the suitability of program settings.

The department intends to establish a Stakeholder Reference Group to provide input to this review.

#### 11.2 Legislative review

The Universities Accord (Student Support and Other Measures) Act 2024 contains a legislated requirement to review the program.

In particular, it must consider, but is not limited to, the:

- effectiveness of payments provided to students
- appropriateness of expanding payments to students undertaking courses that require university placements, including allied health courses.

In undertaking this review, the department may use information from applications or seek to survey students or ask for more information to help consider how effective the program was in achieving its outcomes. Providers must inform students of this as part of the application process.

# 12 Probity

Providers must ensure that all application assessment processes are conducted fairly, transparently, and delivered in accordance with these guidelines, OGGs, and their CoG. Providers must ensure that administration of the CPP occurs in line with the Provider's Fraud Management Plan and adequately protects the program against fraud and corruption.

#### 12.1 Enquiries and Feedback

Advice regarding complaints and feedback from students and other relevant parties, is as outlined in Section 8.3 (Review of Decisions and Dispute Resolution)

Any questions from Providers about the CPP Program should be sent to CommonwealthPracPayment@education.gov.au.

#### 12.2 Privacy

As outlined in the CoG, Providers and any third party acting on behalf of Providers must treat personal information in accordance with the requirements in the <u>Privacy Act 1988</u> (the Privacy Act) and the <u>Australian Privacy Principles</u> in that Act.

This includes letting applicants know:

- what personal information is collected
- why personal information is collected
- who personal information is given to.

The Australian Government may collect, disclose, make a record, or otherwise use a student's personal information for the purposes of administering the program, or for another reason where an exemption applies. The Privacy Act and the Australian Privacy Principles govern how personal information is collected, used, disclosed, and stored by the department.

The department may share a student's personal information with other Commonwealth entities for research, statistical analysis, and policy development in relation to the program where use of this information is reasonably necessary. The department may also share the information about students with Providers and State and Territory Governments for the purposes of administration of the CPP Program.

A Provider must:

- comply with all of the requirements of the Privacy Act (including the Australian Privacy Principles) in relation to the delivery of the CPP as if the Provider were an agency as defined in the Privacy Act.
- deal with personal information received, collected, created or held by the Provider submitted by students in the course of applying for CPP only to fulfil the Providers obligations for the delivery of the CPP.
- ensure that any contractor or third party engaged by the Provider for the delivery of the CPP is contractually bound to comply with the Australian Privacy Principles

Providers should treat personal information in accordance with the requirements in relevant federal, state and territory legislation.

#### 12.3 Freedom of Information

All documents in the possession of the Australian Government, including those about the CPP, are subject to the *Freedom of Information Act 1982* (FOI Act).

The purpose of the FOI Act is to give members of the public rights of access to information held by the Australian Government and its entities. Under the FOI Act, members of the public can seek access to documents held by the Australian Government. This right of access is limited only by the exceptions and exemptions necessary to protect essential public interests and private and business affairs of persons in respect of whom the information relates.

# 13 Glossary

Term	Definition
Applicant	A student that plans to or has submitted an application for the CPP.
Assessable income	Income that can be assessed for tax purposes as defined by subsection 995-1(1) of the <i>Income Tax Assessment Act 1997.</i>
Course of Study	An enabling course, a single course leading to higher education award, or a combined or double course leading to one or more higher education awards.
Commencement date	The expected start date for a mandatory placement.
Commonwealth entity	A Department of State, or a Parliamentary Department, or a listed entity or a body corporate established by a law of the Commonwealth. See subsections 10(1) and (2) of the PGPA Act.
Commonwealth Income Support Payment (ISP)	One of the payments listed at Section 5.4 of these guidelines.
Continuity of care model placement	A midwifery practicum where the student is rostered for clinical shifts and must also remain on call to attend births and postnatal appointments alongside an assigned midwife or as part of the Continuity of Care Experience midwifery requirements.
CPP Administrative Payment	The payment made to the Provider to administer the CPP, calculated as 5 per cent of the CPP Student Grant Payment amount.
CPP Student Grant Payment	The amount paid to the Provider for payment to recipients, initially paid as an advance payment calculated using Provider estimates reporting and amended through the reconciliation process.
Commonwealth Supported Place (CSP)	A place in a course of study occupied by a Commonwealth Supported Student as defined at section 36 - 5 of the <i>Higher Education Support Act 2003</i> .
Department	Australian Government Department of Education or any such Australian Government department with responsibility for administering this Program.

Term	Definition
Domestic student	<ul> <li>A domestic student as defined at Schedule 1 of the <i>Higher Education Support Act (2003)</i>.</li> <li>an Australian citizen</li> <li>a New Zealand citizen (or dual citizenship holders of either Australia or New Zealand)</li> <li>an Australian permanent resident visa holder</li> </ul>
Eligible course of study	A Bachelor's or Master's by Coursework degree leading to entry-to-practice in the fields of nursing and midwifery, teaching practice, or social work and accredited/approved by the relevant professional standards body.
Eligibility criteria	Refers to the mandatory criteria which must be met for a student to qualify to receive the CPP.
Entry-to-practice	Refers to a course meeting the requirement in subparagraph 81(2)(a)(ii) of the <i>Higher Education Support (Other Grants) Guidelines 2022.</i>
Evidentiary period	A continuous four-week period in the study period, prior to placement and application, whichever is earlier, in which a student (who is not an exceptional circumstances student) not in receipt of ISP must demonstrate that they meet the Need to Work test and Income test to be eligible for the CPP.
Personal Information	As defined in the Privacy Act 1988 (Cth).
Practicum (Prac)	A mandatory workplace placement undertaken by a student as part of their course of study.
Practicum Placement Commencement Date	The first day of a block of practicum.
Program	The Commonwealth Prac Payment (CPP) Program.
Provider	A Higher Education Provider as defined at section 16 - 1 of the <i>Higher Education Support Act (2003)</i> .
Recipient	A successful applicant approved by their Provider to receive the CPP.
Student	A person enrolled in a higher education course with a Provider.

Term	Definition
Study period	The period of study during which a unit of study is offered and does not include any holiday periods or periods of mandatory placement.
UniPay	The department's system for managing payments to Providers.

# Commonwealth Prac Payment Exceptional Circumstances Framework Guidance for Providers

### 1. Introduction

There will likely be a small number of students at risk of placement poverty who may have exceptional circumstances which prevent them from meeting the Commonwealth Prac Payment (CPP) eligibility requirements, but who still require support to participate in their placements alongside other students.

The Higher Education Support (Other Grants) Guidelines 2022 allow for providers to consider whether a student should receive CPP in exceptional circumstances on a case-by-case basis.

Some of these instances might be very clearly identified as exceptional circumstances that a provider is able to reasonably quickly assess and recommend to the department to grant (for example, a student with a disability where approved reasonable adjustments are already in place including through an agreed Individual Education Plan with their provider).

In other cases, the circumstances may be more complex and need a bit more consideration by the provider and the provider has an obligation to work with students to help determine whether the student is an exceptional circumstances student.

### 2. Principles for consideration of exceptional circumstances

The principles that apply to providers in considering exceptional circumstances are:

- **Student-centric**: the process providers apply to the consideration of exceptional circumstances does not create a barrier or a disincentive to people applying for it.
- **Proportionate**: the assessment of an application for exceptional circumstances is proportionate to the circumstances affecting the applicant's eligibility to participate in CPP and the length of time that exceptional circumstances apply.
- **Contemporary**: the consideration of an application for exceptional circumstances reflects reasonable expectations of a contemporary, diverse, and inclusive society including using social models of disability and is undertaken using culturally safe and trauma-informed practices.
- **Program integrity**: the granting of exceptional circumstances maintains the outcomes, objectives, and eligibility requirements of the CPP program which is a payment targeted to students most in need of financial support while undertaking mandatory placements.

# 3. Exceptional circumstances

Exceptional circumstances are circumstances which are:

 outside the applicant's control (such as a disability) <u>and/or</u> temporary, uncommon, irregular, or unusual (such as a short-term illness)

<u>and</u>

 which can be shown via documented and credible evidence to have a direct and significant impact on the student's ability to meet the eligibility requirements related to placement hours or the Need to Work Test or Income Test. <u>and</u>

• in the case of the income support and/or income eligibility requirements, those eligibility requirements would be expected to be satisfied in the student's regular day to day life when undertaking their normal studies.

# 3.1. Exceptional circumstances categories

The categories for exceptional circumstances are:

- **Disability:** where the circumstances of an applicant with a disability are such that they are unable to meet the eligibility requirements of the CPP.
- **Health and Medical**: where an applicant's medical condition is such that they are unable to meet the eligibility requirements of the CPP.
- Acute personal or family life event: where an applicant is experiencing significant personal or family impacts on themselves or someone who has significant relationship to them.

An applicant may apply under more than one exceptional circumstances category.

Exceptional circumstances may be experienced either by the person undertaking the mandatory placement to receive the CPP or someone who has a significant relationship to them.

# 3.2. Exceptional circumstances types

Exceptional circumstances can be:

- **Episodic**: where an applicant does not meet the CPP eligibility criteria because they are affected temporarily, uncommonly, irregularly or unusually (e.g. they or someone who has a significant relationship to them were sick during the four-week evidentiary period and that meant they did not meet the need to work eligibility requirement).
- **Ongoing**: where an applicant does not meet the CPP eligibility criteria due to an ongoing issue (e.g. they are a student with disability). These circumstances are typically long-standing and may predate the CPP evidentiary period but are considered exceptional where they continue to present a barrier to eligibility and are outside the student's control.

# 4. Pre-conditions for exceptional circumstances

For a student to be an exceptional circumstances student for the CPP, an application to be considered for exceptional circumstances in not meeting all or one of the eligibility requirements for the CPP, the student must be an eligible prac student and enrolled in an eligible prac unit, as defined in the Higher Education Support (Other Grants) Guidelines 2022 (OGGs) at subsections 84(1) and 81(2) respectively.

If a student does not meet these definitions, they cannot apply for exceptional circumstances.

# 5. Timing of an exceptional circumstances application

Applications for consideration under exceptional circumstances should be submitted to the higher education provider ahead of placement wherever possible to facilitate timely payment to the affected student.

Applications should not be submitted more than 6 months from the commencement of the relevant placement.

### 6. Assessment of an exceptional circumstances application

An application for exceptional circumstances must be submitted in writing and will only be considered if submitted by an authorised person from the higher education provider. The application needs to identify the **CPP eligibility requirement/s** that an applicant is unable to meet due to exceptional circumstances. Higher education providers have a positive obligation to work with applicants to ensure applications identify the appropriate **CPP eligibility requirement/s** where flexibility is being sought. There is a flowchart at Attachment A3 which can be used with students to assist in navigating whether a student should submit an EC application.

The exceptional circumstance will need to impact on the student's ability to meet one or more of the following CPP eligibility requirement/s:

- meet the placement hour requirement, which requires the student to participate in their placement for 30 hours or more per week, on average; or
- provide evidence that they receive a Commonwealth income support payment such as Youth Allowance, Austudy, ABSTUDY; or
- meet the Need to Work test; or
- meet the **Income test**.

The application then needs to identify the **relevant exceptional circumstances category** that has prevented an applicant from meeting one or more of the CPP eligibility requirement/s.

- Disability
- Health and Medical
- Acute personal or family life event

This should be accompanied by credible evidence and relevant documentation and information. Higher education providers have a positive obligation to work with applicants to ensure applications that are made identify the most relevant exceptional circumstances category being sought.

# 7. Timing of the impact of exceptional circumstances

The exceptional circumstance will need to impact on the student's ability to:

- meet the placement hour requirement, which requires the student to participate in their placement for the number of hours advised by the provider for that week (which must average 30 hours or more per week); or
- provide evidence that they receive a Commonwealth income support payment such as Youth Allowance, Austudy, ABSTUDY; or
- meet the Need to Work test; or
- meet the **Income test**.

Exceptional circumstances that impact eligibility usually occur prior to placement<sup>3</sup>, but the impact of the exceptional circumstance needs to either be within:

- the four-week evidentiary period, (as defined in the Provider Guidelines), if the exceptional circumstances affected the student such that they failed to meet the Need to Work Test or the Income Test.
- during the **period of placement**, if the exceptional circumstances affected the student such that they failed to meet the placement hour requirement.

Timing of Impact examples:

- **Case study 1 –** A student with a disability requires reasonable adjustments to work and study. While they have a casual job, their disability means they can only work 10-hours per week during study periods falling short of the Need to Work test. Similarly, their individual Education Plan limits placement participation to less than 30-hours per week to align with their access needs and capacity. As the impact on the student's ability to meet both the Need to Work test and 30-hour per week placement requirement are evident within the evidentiary period, they are eligible under exceptional circumstances as this circumstance is considered outside of the applicant's control.
- Case study 2 A student, who typically works regular casual shifts averaging more than 15-hours per week, experiences a short-term illness during the four-week evidentiary period. As a result, they are temporarily unable to work and do not meet the Need to Work test. They provide a medical certificate confirming the impact, making them eligible under exceptional circumstances as this is considered a temporary, uncommon, irregular, or unusual circumstance.

A provider can only recommend to the department that a student is an exceptional circumstances student for the CPP for a week (in relation to the student's failure to meet the placement hour requirement), where their eligibility is impacted <u>in that week</u>, by the exceptional circumstance.

# 8. Duration of the exceptional circumstance determination

A successful exceptional circumstances application can apply for up to 12 months or for the duration of the relevant evidence (e.g. an Individual Education Plan) if the circumstances are ongoing, after which an applicant will need to reapply to their higher education provider. Similar to the standard CPP process, students should confirm that their circumstances have not changed.

For episodic instances (like temporary illness), exceptional circumstances will apply only to the affected period of placement or where the applicant is approved for a specific period. As such, an applicant will need to apply for CPP through the standard CPP application process for future placements, unless new exceptional circumstances arise.

There is a positive obligation on students to notify the higher education provider of any change in their exceptional circumstances.

For example, applying this to the case studies above:

• **Case study 1 –** the student with a disability is granted exceptional circumstances based on evidence of not being able to meet the Need to Work test and 30-hour per week placement

<sup>&</sup>lt;sup>3</sup> See Section 9. Unforeseen circumstances during a placement for guidance when something happens during placement.
requirement. As these are ongoing impacts supported by documented evidence, their eligibility under exceptional circumstances can apply for up to 12-months, or the duration of their relevant evidence. In this example, the circumstance is ongoing and makes its impact during the four-week evidentiary period, and during the period of placement.

• **Case Study 2** – the student experiences a short-term illness during the evidentiary period that prevents them from meeting the Need to Work test during the four-week evidentiary period. As the condition is temporary, exceptional circumstances apply only to that specific placement (i.e. the student does not need to meet the Need to Work test only for this specific placement). The student would need to reapply for CPP through the standard application process for future placements unless new exceptional circumstances arise.

# 9. Unforeseen circumstances during a placement

Unforeseen circumstances can sometimes happen during a placement that prevent a student completing their practicum, including that the placement host (i.e. hospital or clinic, school) may need to change the timing or location of the placement. Provisions are already made for these situations and managed under the higher education provider's usual placement management policies, which may include deferral or rescheduling of the placement.

Further guidance on how these circumstances are treated, including the management of payments, are outlined in the detailed CPP Provider Guidelines (see Section 4.4 - Deferral of placement).

For example:

Case Study 3 – A student becomes unwell or needs to withdraw from their placement due to a family emergency. As the impact arises after CPP eligibility has been assessed and payment issued, it is managed under the provider's placement policies and those outlined in the Provider Guidelines (See Section 4.4, Deferral of placement); it is not considered under the exceptional circumstances provisions. In the instance of a deferral, depending on the amount of the practicum the student has completed, the student may be able to retain the weekly amount they have already received, and with further payments dependent on the student completing an eligible placement. In the instance of a withdrawal, where a student withdraws from their course of study, they will become ineligible to receive the payment for the amount equivalent to the period of placement not undertaken.

## 10. Dispute of outcome

If an applicant does not agree with the outcome of an exceptional circumstances application, they can seek review through the Department or applicants can also refer the assessment of their application to the Commonwealth Ombudsman where it relates to the department's conduct or process in administering the application.

## 11. Exceptional Circumstances Assessment Process

# **Overview Establish CPP preconditions are met** An applicant must be an eligible prac student and enrolled in an eligible prac unit. Confirm category and type of Exceptional Circumstances Category Type Disability • Episodic Health and Medical Ongoing Acute personal or family event • Confirm the Exceptional Circumstances meet the requirements Are the circumstances outside of the AND OR Are the circumstances temporary, applicant's control? uncommon, irregular, or unusual? Confirm circumstances have direct and significant impact Have the circumstances had direct and significant impact on the participant's ability to meet one or more of the eligibility requirements for CPP? Confirm provision of sufficient documentation/evidence Does the documentation provide sufficient evidence to support the exceptional circumstances claim? **Exceptional Circumstances recommendation** The provider decision made on a case-by-case basis to either recommend to GRANT or NOT GRANT. **Recommendation to Department of Education** The provider submits recommendation to the Department to GRANT or NOT GRANT. Department of Education approval Department considers and advises provider of decision within 5 business days. Notification of outcome Student notified of outcome of exceptional circumstances application. Approval on either an episodic or ongoing basis.

#### **CPP Exceptional Circumstances Process Guide**

#### Step 1 Establish that the CPP preconditions are met.

The higher education provider must ensure that an applicant is an eligible prac student and enrolled in an eligible prac unit as per the OGGs.

(The student is required to be domestic, Commonwealth supported student undertaking an entry to practice Bachelor's or Master's degree in nursing, midwifery, teaching, or social work.)

#### Step 2 Establish the exceptional circumstance

#### Confirm category and type of exceptional circumstances

The higher education provider must ensure the exceptional circumstances category is applicable. More than one category may apply.

- Disability
- Health and Medical
- Acute personal or family

Ensure the exceptional circumstances type is applicable.

- Episodic
- Ongoing

Higher education providers to work with students, where required, to ensure selections are appropriate.

#### Confirm the Exceptional Circumstances meet the requirements.

The circumstances are outside of the applicant's control	AND/OR	The circumstances are temporary, uncommon, irregular, or unusual
The higher education provider must decide whether the circumstances identified in the application were outside of the applicant's control		the circumstances identified in the application were temporary, uncommon, irregular, or unusual. They are situations that could not have been reasonably planned for, and they often arise suddenly

# Confirm circumstances have direct and significant impact on the participant's ability to meet one or more of the eligibility requirements

The higher education provider must decide whether the circumstances identified in the application had a direct and significant impact on the applicant's ability to meet all or one of the eligibility requirements in that the circumstances had their full and direct impact prior to the mandatory placement time period (for the placement hour requirement), or during the 4-week eligibility period (for the Need to Work and Income tests).

#### Confirm provision of sufficient documentation/evidence

The higher education provider must decide whether the circumstances identified in the application can be demonstrated via documented and credible evidence that details the impact on the applicant's ability to meet the relevant eligibility criteria/s. Please refer <u>Attachment A1</u> that sets out examples of the documentation and evidence for the different categories of relevant exceptional circumstances. See also <u>Attachment A2</u> which include a case study.

#### Step 3. Make a recommendation to the Department of Education

#### Exceptional Circumstances recommendation

The higher education provider to establish a recommended outcome of the application. Recommendations must be made on a case-by-case basis. The recommendation may be to either:

- **Grant**: A decision to grant the application because exceptional circumstances impacted one or more CPP eligibility requirements.:
- **Not grant**: A decision to not grant the application because the circumstances were not exceptional, or they did not impact on CPP eligibility requirements.

Higher education providers must ensure there is a clear human decision maker within their institution for making recommendation on all exceptional circumstances applications (including where third parties are used to deliver CPP). This includes processes that ensure documentation submitted by students is valid, complete, and consistent with the Exceptional Circumstances Framework requirements.

#### Recommendation to the Department of Education

Higher education providers should submit their recommendation/s the Department at least four weeks before the student's planned placement, **if possible**, to allow time for consideration.

Providers cannot finalise an outcome for an applicant until the Department has considered the recommendation. In arriving at the recommendation, the higher education provider will be required to provide a statement of the major reasons regarding their decision including the following:

- Is the applicant an *eligible prac student* undertaking an *eligible prac unit*?
- What is/are the relevant CPP eligibility criteria to which the exceptional circumstance apply/ies?
- What is the category of circumstance and the time period to which it relates?
- Are the exceptional circumstances episodic or ongoing?
- How does it meet the definition of exceptional circumstances?
- Is there documented evidence of impact on meeting the CPP eligibility criteria?

Only applications submitted by an authorised person from a higher education provider will be considered.

Where the student's exceptional circumstances are such that it is difficult for the higher education provider to make a recommendation, the higher education provider

should work with the Department prior to the submission of the recommendation through the Exceptional Circumstances email (CPPEC@education.gov.au).

#### Departmental approval of recommendation

The Department considers the recommendation of the higher education provider and the process that has been used to arrive at the recommendation and whether the recommendation is an acceptable outcome.

The Department may seek further clarification or details as part of its considerations, before advising the higher education provider on the outcome of its considerations.

The Department will endeavour to notify providers of its review of the exceptional circumstances application in writing, within **5 working days** of the complete application submission by the higher education provider.

#### Step 4 Notification of Outcome

Following this, the higher education provider can notify the applicant of the application's outcome which is either to grant or not grant an exceptional circumstance to the meeting of one or more of the eligibility requirements for the placement.

A decision to grant exceptional circumstances may be for one instance (episodic) or for up to a 12-month period (ongoing).

#### Evidence for categories of exceptional circumstances

The table below sets out the primary types of evidence that may be required to show documented and credible evidence to substantiate an application.

This is not an exhaustive list, and the higher education provider or the Australian Government Department of Education may also reasonably request other types of documentation and evidence. The relevant documentation may also depend on the CPP eligibility criteria that the exceptional circumstance applies to.

Category of exceptional circumstance	Primary type of evidence to be provided by applicant*
Disability	General details of the disability or condition which affects the student's ability to engage with work or study, the impacts of which are documented by a registered health practitioner. This documentation should also include the kinds of adjustments to work or study that a student may require; - Where reasonable adjustments for study including attendance at placements have already been agreed with the Higher Education Provider through an <b>Individual Education Plan</b> , a <b>Placement Reasonable Adjustment Plan</b> or similar, a copy of that plan will be sufficient.
Health and Medical	Medical certificate or statements or letters of support from registered health practitioner which outlines information including the general details of an illness, or chronic condition which affects the student's ability to engage with work or study. This documentation should also include the kinds of adjustments to work or study that a student may require as a result of their condition; how long these should apply; and the estimated time for which the applicant will be unable to meet the eligibility requirements.

#### Attachment A1

Category of exceptional circumstance	Primary type of evidence to be provided by applicant*
	Where reasonable adjustments for study including attendance at placements have already been agreed with the Higher Education Provider through an <b>Individual Education Plan, a Placement Reasonable</b> <b>Adjustment Plan</b> or similar, a copy of that plan will be sufficient.
	Additional documentation may be required to demonstrate circumstances where the student has caring responsibility i.e. where the applicant is providing care to someone with a significant relationship to them. Letters of support should be provided by the person receiving the care's registered health practitioner, treating registered health practitioner, or service.
Acute personal or family life event	<ul> <li>Accepted documentation and evidence includes, but is not limited to:</li> <li>Statutory declarations.</li> <li>Medical certificate or statements or letters of support from registered health practitioner.</li> <li>Death certificate, death, or funeral notice - if obtaining this documentation is difficult or not culturally appropriate, the applicant may instead provide a letter from a medical or mental health professional who can attest to the impact the circumstances had on the applicant's health or wellbeing.</li> <li>Evidence of mandatory relocation.</li> <li>Documentation from local governments, State or Territory governments, Australian Government departments or agencies such as evidence of income support payments from Services Australia, ATO statements of income.</li> <li>Pay slips from employers or timesheets/invoicing information for sole traders.</li> <li>Support from the Indigenous Higher Education Unit of the Higher Education Provider</li> <li>Family violence support service documents, documents issued by a police service, or documents issued by a court as per the Fair Work Ombudsman's publication, <i>Notice and evidence for family and domestic violence leave</i>.</li> <li>Evidence from a registered service provider.</li> <li>Evidence of residence in an area affected by natural disaster or emergency.</li> <li>Evidence of compulsory legal proceedings or court-imposed requirements or conditions.</li> </ul>

#### Attachment A1

Category of exceptional circumstance	Primary type of evidence to be provided by applicant*	
	<ul> <li>Individual Education Plan, Placement Reasonable Adjustment Plan or similar agreed between applicant and the higher education provider with whom they are enrolled.</li> </ul>	
	*This is not an exhaustive list of evidence.	

#### **Illustrative example**

Kate is a parent with three children undertaking a Bachelor of Social Work.

Kate normally works 16 hours a week, earns under \$1,500 per week and is not on an Income Support Payment.

One of Kate's children has had recent serious health problems which has meant Kate has not been able to work at all in the eight weeks preceding her application for CPP.

She has also made arrangements with her higher education provider and placement host to undertake her placement at reduced hours of 21 hours a week (3 days) to accommodate her personal circumstances while her child is unwell through an agreed Individual Education Plan.

Kate decides to apply to her higher education provider for exceptional circumstances regarding her ability to meet the CPP eligibility requirements for her upcoming 10-week placement which is due to start on 20 April 2026. She submits an application for exceptional circumstances through her higher education provider on 9 March 2026 but is not sure what evidence to provide in her application so just provides general information with a letter from her mother about her circumstances. She does not identify under which category of exceptional circumstances she is applying.

The higher education provider receives Kate's application. It is able to confirm through its student records that Kate is an eligible prac student studying an eligible prac unit in that she is: a domestic student enrolled at an Australian higher education provider; is in a Commonwealth-supported place; and is studying in one of the eligible disciplines and qualifications specified in the Higher Education Support Act (Other Grants) Guidelines 2022, namely studying a Bachelor or Masters of nursing, midwifery, social work or teaching; and the unit ordinarily requires student to undertake their placements on average more than 30 hours per week.

Kate's application is in writing and has been submitted on 9 March 2026 when her practicum starts on 20 April 2026, which is within the six-month timeframe for submitting an application.

The higher education provider considers the CPP eligibility requirements that Kate has identified in her application that she is unable to meet due to exceptional circumstances. Kate has identified that the eligibility requirement for which she is seeking exceptional circumstances is the 'need to work' test i.e. working on average more than 15 hours per week during normal studies. In her application Kate suggested this applies because she has been unable to work in the weeks prior to her application.

The higher education provider notes that Kate would normally work 16 hours per week and would normally meet the need to work Test, but due to her circumstances she is unable to meet the requirement in the period prior to her application. Due to her circumstances, Kate would also not meet the 30 hours per week placement requirement. She also has not provided any supporting independent evidence or documentation with her application. She has not identified what type of exceptional circumstances category that applies.

The higher education provider works with Kate to resubmit her application to ensure it includes all the information it needs to including (1) identifying the exceptional circumstances that would apply to Kate, and (2) identifying for her the independent supporting evidence or

documentation that she needs to supply with her application which would be her approved Individual Education Plan, her payslips which show that she normally worked 16 hours per week and documentation from her child's doctor that notes Kate has been unable to work for eight weeks and that reasonable adjustments are required for work and study to care for the child for the whole semester.

Kate's updated application indicates she is seeking exceptional circumstances for being unable to meet the 30 hours per week placement requirement and for not meeting the need to work test in the weeks prior to her CPP application. The category of exceptional circumstances her application nominates is Medical - episodic. She submits payslips which show that she normally worked 16 hours per week. The documentation from her child's doctor notes that Kate has been unable to work for eight weeks and that reasonable adjustments are required for work and study to care for the child for the whole semester.

The higher education provider works through the assessment steps (Steps 1 and 2) to determine the circumstances which apply.

Kate's circumstances are temporary, uncommon, irregular, or unusual in relation to the placement hours as Kate's child's illness is temporary and uncommon.

The higher education provider considers the documentation provided by Kate from the child's doctor which indicates that the circumstances have a direct impact on Kate's ability to meet the 30-hour placement requirement. This evidence supported an Individual Education Plan agreement between the placement provider, the higher education provider and Kate to undertake the placement at 21-hours per week.

The higher education provider forms a recommendation under Step 2 that Kate's application for exceptional circumstances should be GRANTED on the basis that:

Determination of exceptional circumstances	Response
Does the applicant meet the CPP eligibility criteria?	Yes; the applicant is an eligible student studying an eligible prac unit
What is the relevant CPP eligibility criteria?	<ul> <li>&gt;15-hours/week need to work test</li> <li>and</li> <li>&gt;30-hours/week placement eligibility criteria</li> <li>Kate does not meet eligibility for the need to work test criterion due to caring for her sick child in the eight-weeks preceding the CPP assessment period.</li> <li>Kate also does not meet the &gt;30-hr /week placement criterion due to her reduced placement arrangement of 21-hours/week while her child is unwell.</li> </ul>
What is the category of circumstance?	HEALTH AND MEDICAL and EPISODIC
Were the circumstances temporary, uncommon, irregular, or unusual OR outside the applicant's control?	Yes; the circumstances are temporary and uncommon and also outside Kate's control
Is there documented evidence of impact on meeting the CPP eligibility criteria?	Yes: There is payslip evidence that which show that Kate normally worked 16 hours per week prior to her child's illness. There is medical evidence in the form of a health treatment plan for Kate's child and a statement from the medical provider that notes Kate has been unable to work for eight weeks and this will impact Kate's ability to undertake placement more than 30 hours per week as her child needs close monitoring during recovery. This has supported the development of an Individual Education Plan which documents agreement to undertake the placement at 21 hours per week for the next semester.

The higher education provider passes this application and recommendation onto the Australian Government Department of Education for its consideration on 23 March 2026 which is more than four-weeks prior to Kate's planned placement to enable timely consideration.

The Australian Government Department of Education considers the recommendation on the basis of the information used by the higher education provider to assess the application. The

Department does not seek additional information. The Department notifies the higher education provider that the recommendation to GRANT is an acceptable outcome on 30 March 2026 which is within the five business days.

Following notification by the Australian Government Department of Education, the outcome of the application is provided to Kate on the 6 April 2026, prior to the start of her placement. Kate is advised that she has been GRANTED exceptional circumstances for the period of this placement.

For subsequent placements in the next semester: if Kate's circumstances remain unchanged following her 10-week placement, she could reapply for exceptional circumstances with supporting updated documentation. Otherwise, Kate will need to apply through the standard CPP process for her next placement.



#### **Exceptional Circumstances Higher Education Student Experience**