

**PROPOSED NEW IMMIGRATION REGIME FOR
FULL TIME NON-EEA STUDENTS**

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CONSULTATION PAPER



Department of Justice, Equality and Law Reform
An Roinn Dlí agus Cirt, Comhionannais agus Athchóirithe Dlí

Irish Naturalisation and Immigration Service

Introduction

The provision of educational services to overseas students is a very important sector of the economy, contributing not just in terms of the fees charged by universities and colleges but also in terms of accommodation, hosting services and living expenses while the student is in Ireland. While no definitive data exists as to the overall annual economic value to Ireland of international education services, various sectoral estimates have been made and these, if accurate, would suggest a cumulative value of about €900m per annum. There is also scope for further development albeit that this is a highly competitive market.

At the same time, there are certain issues that need to be addressed. While abuses of the system are confined to a small minority of colleges, there is nonetheless a clear need for reform of the regulatory environment and for a more co-ordinated approach in terms of policy and operation. This is in the interest of all genuinely motivated stakeholders.

The Minister for Justice, Equality and Law Reform is therefore setting out a series of proposals aimed at reform of the regulatory environment for student migration and the promotion of policy coherence. This Consultation Paper is the first step in this process and other Government Departments have been consulted in its preparation.

Student migration should be seen not as a stand alone channel for entry to the State but as a subset of Ireland's overall immigration system and what is done in relation to this subset must be consistent with immigration policy generally and with broader public policy objectives. Long stay overseas students, in addition to their economic contribution to the State as consumers, are also migrants and, since they are permitted to work in Ireland during their stay, their presence has implications for labour market policy. Consequently, it is important that the concession introduced in 2001 by the Minister for Justice, Equality and Law Reform which permitted students to work part time during term time and full time during vacations, is kept under review, particularly at a time of economic recession.

It must also be recalled that for non-EEA citizens, student migration represents a way for persons who could not otherwise do so to come and work in Ireland for a

number of years. This can be seen as a valuable commodity and this key dynamic cannot be ignored in future policy making.

The proposals in this document are confined to full time non-EEA students. EU/EEA students represent the majority of those coming for educational purposes but, since they have rights of free movement, no immigration issues arise in these cases. Non-EEA study visitors on short stays are not a significant immigration issue at present.

For the purposes of this document the relevant educational services are divided into three broad yet distinct groupings. Clearly there are different subgroups within these but for the present it is intended to deal broadly with the following:-

- (1) Higher Education (Universities, Institutes of technology and private higher education providers) offering validated courses at National Framework of Qualifications (NFQ) level 7 and above.
- (2) Further Education (For the purposes of this document, further education should be defined as programmes of education outside of the higher education sector at below NFQ level 7, not including either English language courses or attendance at primary and post-primary school. Such programmes correspond to Levels 1-6 of the NFQ)
- (3) English Language Sector

To date the student immigration has developed on a “one size fits all” basis. Under the present regime there is no weighting as between the academic level of the course, the ability or potential of the student, the reputation of the institution or the subjects being studied. However to align better with government policy in other areas, the student regime needs the flexibility to develop on a more differentiated basis. This would allow for better targeting of incentives to students of high ability, in line with Irish economic policy objectives generally.

There is, at present, no requirement that the student should progress academically through the system and there is currently no limit to the amount of time a person can spend here as a student. These issues also need to be addressed.

There is also a need to address the issue of placements by agencies of unaccompanied children in State schools and enrolment of minor children in State schools by parents who are themselves present on student permission.

Concerns have been raised as regards the level of information available to prospective and current students. It is accepted that there is a need for considerably greater transparency regarding this sector for the benefit of student and official alike.

These proposals should be read in conjunction with new structures announced by the Minister for Education and Science. The Minister for Education and Science has recently announced that the National Qualifications Authority of Ireland (NQA) will take on responsibility for the regulatory aspect of the role envisaged for Education Ireland¹, including for the establishment of the Quality Mark. Enterprise Ireland will be responsible for the promotion of Higher Education Services and Fáilte Ireland for the promotion of the English Language Sector.

Nature of the Consultative Process

The proposals in this document will be open to public consultation until 9 October 2009. A dedicated e-mail address has been set up for submissions at studentpolicyproposals@justice.ie While e-mail submissions are preferred, material may also be submitted by post to Student Immigration Review Group, Immigration and Citizenship Policy, Irish Naturalisation and Immigration Service (INIS), 13/14 Burgh Quay, Dublin 2.

All submissions will be evaluated by an interdepartmental committee to be set up by the Minister for Justice, Equality and Law Reform which will make final recommendations to Government. The Inter-departmental committee will also liaise with the High Level Group on International Education to be established by the Minister for Education and Science, including on the preparation of a national strategy for enhanced performance in the area of international education.

¹ “Internationalisation of Irish Education Services”, published in November 2004 by the Department of Education and Science, had recommended putting in place a new statutory agency, Education Ireland, which is not now to be established.

The proposals in this document are not intended to be exhaustive in terms of future regulation. Essentially this document addresses substantive policy issues. Practical implementation issues and matters of an operational nature will be addressed in the preparation of more detailed guidelines and information material but suggestions will also be welcome on such matters during the consultation process.

Recommendations

A. General Structure

It is proposed to introduce a differentiated system better capable of addressing the different requirements of the educational sectors and reflecting the diverse profile of the students. It is proposed that the following new arrangements will apply from 1 January 2010 except where provided otherwise:

- (R1) Student Immigration will in the future operate on a two tier basis. Tier 1 will be reserved for students enrolled in a nationally accredited higher education programme at National Framework of Qualifications (NFQ) level 7 or above. Tier 2 will consist of students engaged in (English) language courses or further education programmes (programmes leading to awards **below** Level 7 in the National Framework of Qualifications).
- (R2) The maximum aggregate time a student may be present in the State for the purpose of attending courses in English Language or further education or combinations thereof (Tier 2) will be limited to **two years**. Permission to remain in the State will expire at that stage, unless the student has been accepted onto a nationally accredited higher education programme at Level 7 or above in the National Framework of Qualifications. The only other exception to the two year limit will be where the Minister for Justice, Equality and Law Reform determines that special circumstances exist (e.g. illness preventing the student from completing their course in time). It will not be permitted for a student to move downwards from a course in Tier 1 to one in Tier 2. Students coming to Ireland for the purpose of enrolling on a course at level 7 or above must therefore satisfy themselves that they have an appropriate standard of English to follow the programme before they leave their own state. If they require a foundation English language programme in Ireland to bring them up to the required standard, this should be arranged in advance and be clearly stated in any application for a visa or leave to remain.

Explanatory Note: It has been observed that many students have been engaged in serial enrolment in English language classes from year to year. (The original proposal as set out in the Internationalisation Report² was that immigration permission for language students be limited to 18 months in total, however the limit has not been strictly applied and in any event some restructuring of language courses to an academic year basis has led to a degree of confusion on the issue).

Explanatory Note: The entitlement to remain in the State will generally be based on an academic year basis (Sept – August) or, for programmes that do not follow the academic year, a maximum of the total number of weeks continuous tuition in any course year (excluding holidays) plus 20 weeks.

- (R3) Non-EEA student permission overall will be limited to 5 years in total except where
- (a) the student is enrolled on a nationally accredited higher education programme at Level 9 or 10 in the national framework of qualifications (Masters, Post Graduate Diploma or PHD) or
 - (b) where the course duration exceeds 5 years (e.g. medicine) and the student can demonstrate that they are progressing in their studies.

The only other exceptions to this limit will be where the Minister for Justice, Equality and Law Reform determines that special circumstances exist (e.g. illness preventing the student from completing their course in time).

It will be a matter for the student to plan his/her educational programme to fit in with this schedule.

Interim and Transitional Measures

It is also recognised that introducing a new student regime will result in a substantial number of students finding themselves in a situation where they have already

² “Internationalisation of Irish Education Services” published November 2004 by Department of Education and Science

exceeded the duration permitted for their stay in the State. Some transitional measures are therefore appropriate to deal with these cases. It is further necessary to set out how existing students who finish their current course of study prior to the new arrangements will be dealt with. All arrangements set out in this section are subject to the normal immigration controls, to the student abiding by any conditions applicable to their residence in Ireland and their satisfying the immigration authorities as to their bona fides. Students will also be required to progress in their courses (including passing their examinations) and may not seek to prolong their course as a means of remaining in the State. The proposals are:-

- (T1) Students will be permitted to complete any course in respect of which they have registered with the immigration authorities prior to publication of these proposals. Where the student can show that they had prior to publication paid fees for a course but not yet commenced it, they will also be permitted to continue with the course. For the purpose of this recommendation, language courses will be taken to have a maximum duration of 1 year (i.e. a person who spends two years in language tuition is regarded as attending two discrete one year courses rather than an overall course of 2 years duration).

- (T2) Students whose immigration permission is due for renewal up to the end of 2009 and whose current course is completed in that time will be permitted to enrol in
 - (a) any nationally approved course of higher education (NFQ7+).
 - (b) any approved course of further education not exceeding 2 years in duration.
 - (c) any language course not exceeding one year in duration provided that they have not at this stage already completed 3 years of language education.

- (T3) Students who complete their current course in 2009, and who are not enrolling in a course as outlined at T2 above, and who will at that point have been registered for 5 or more years as a student, will be eligible for a 6 month extension at the end of their studies during which period they may apply for an employment permit. They may, as an exception to the normal rule, do so without first returning to their country of origin. A temporary permit extending their student permission would be issued (on payment of

the registration fee of €150) to cover their residence during this period. They will be permitted to work 40 hours per week during this extension period. Their application for an Employment Permit would be subject to any eligibility criteria to be applied by the Department of Enterprise, Trade and Employment. Applications for this extension may only be made up to the end of 2009.

Explanatory Note: At the end of the 6 month extension, should they avail of it the student will either be reclassified as a worker with an employment permit (currently Stamp 1) or, should they fail to secure an employment permit in that time, their permission to be in the State will expire. It would not be permissible to re-register as a student at this point.

B Student work Concession

The Department of Justice Equality and Law Reform is essentially neutral on the substantive issue of whether students should be allowed to work. However, the Department must ensure that in granting this concession it continues to reflect broader Government Policy. In this regard the Department notes that, in light of the current economic environment, Ireland has necessarily adopted a more restrictive approach to the issue of employment permits. In the circumstances, there is a prima facie contradiction in continuing to offer indiscriminate access to the same labour market to anyone enrolling on an educational course. At the same time there is an obvious imperative to develop and support viable industries in the face of international competition and the internationalisation of education is such an industry.

Clearly consideration of the work issue cannot be done in isolation from the other matters raised in this Review. Undoubtedly, limitations on the time students can spend in the State helps to justify the work concession and to allay any fears that might arise. The industry also has a role to play in this area. Simply stated, it is much easier to grant a concession in circumstances where there is a visible commitment to high standards and full co-operation and compliance with the State's regulatory regime.

(R4) A detailed evaluation of the effectiveness and rationale for the student work concession should be undertaken. This activity will be co-ordinated by the Department of Justice, Equality and Law Reform. The primary focus

would be on the language and further education sectors. The output from this work (under the auspices of the new interdepartmental committee on student migration, referred to earlier) would be a separate report and regulatory impact analysis in respect of the concession. Among the issues to be taken on board would be

- the state of the labour market and Ireland's policy regarding non-EEA migration
- the importance of the work concession in terms of marketing
- the impact of any changes
- the effectiveness of the other regulatory measures proposed
- issues raised during the consultation on the review as a whole

Explanatory Note: Consideration of the work concession is a separate exercise from the review of the student immigration regime generally and will be carried out over a considerably longer timeframe and will also have regard to the impact of the other measures proposed in this document. While submissions may be made on this issue during this public consultation process, these will be considered in the context of the separate interdepartmental consideration of the work concession and will not form part of the final student immigration recommendations emerging from this document.

C Inspection and Regulation

At present inspection is carried out by the Department of Education and Science, the Garda National Immigration Bureau (GNIB) and the Irish Naturalisation and Immigration Service's Investigations Unit, although it is clear that more needs to be done to address weaknesses in the system. It is essential that issues of quality control and the introduction of a more co-ordinated and robust regulatory environment are addressed as a matter of urgency. It is noted that the regulatory role envisaged for Education Ireland is now being assigned to the NQAI and this is welcome. Some further and specific recommendations in this area are set out below.

Regulation of the higher education sector should continue to operate much as at present. The Immigration authorities will work with the sector in order to ensure that there is better monitoring of the attendance of non-EEA students at their courses and of their academic progress. Some clarity will also be necessary as to the duration

of courses (e.g. where there is a significant time lag between the completion of study and the award of degrees).

- (R5) A statutory quality mark should be introduced, reserved for those who meet set criteria laid out in a statutory code of practice for institutions providing educational services to international students. In addition to generally applicable provisions, the code of practice may include provisions specific to individual sectors, such as English language. Courses that do not meet the Quality Mark should be removed from the Internationalisation Register and non-EEA students no longer permitted to enrol in these courses. It is understood that the Quality Mark and code of practice will be provided for in the legislation establishing the new amalgamated qualifications body.
- (R6) All schools and colleges seeking to offer courses to non-EEA students will be liable to unannounced inspection by immigration and Education personnel with possible use of joint inspection teams. The overall level of inspections will be increased and there will also be a greater emphasis on sharing of information between immigration and education officials.
- (R7) Educational establishments will be required to produce on demand to an immigration officer or official of the Department of Education and Science records showing all registered students by course, their attendance records and also the timetable and location of classes (students will not be free to chose their own hours of attendance but will be obliged to follow a set timetable). Access to all classrooms must also be given whether or not in use. Subject to some variations to be agreed for the Higher Education Sector, establishments will also be required to report early leavers from courses or students who are failing to keep up a sufficient level of attendance. Schools that do not co-operate fully with such inspections or in any way obstruct an immigration officer in the performance of his/her duties will be liable to refusal of recognition for the purposes of student immigration. Similar sanctions will be applied to schools engaged in fraud or abuse of the visa system.
- R(8) Following an appropriate lead-in period, all further and higher education courses on the internationalisation register accredited by international awarding bodies will be required to be aligned with the National Framework

of Qualifications. It is open to international awarding bodies to apply to the National Qualifications Authority of Ireland to have their awards aligned with the NFQ. This process removes any doubt as to the correct level of the Framework that applies to the programme and ensures that the awarding body's quality assurance regime applies in Ireland in the same way in their home state. English language courses on the internationalisation register should be on or aligned with the National Framework of Qualifications at level 5 or above or operate under the ACELS quality assurance and inspection system (or its successor in the amalgamated qualifications body).

- R(9) Further education courses below NFQ level 5 should be phased out in terms of eligibility for bringing in non-EEA students.
- (R10) Consideration should be given to developing a licensing system for providers of education to overseas students. This could ultimately replace the Internationalisation Register. Licenses would not be automatic on course accreditation but would take into account also the track record of the service provider in education, the quality of the premises and matters of immigration compliance. The licensing regime would be funded by fees paid by institutions or on a capitation basis. (It is anticipated that a proposal of this nature would represent a longer term option given the need for legislation and the putting in place of the necessary administrative structures).

D. Placement of Children not accompanied by Parents

For the children of persons in Ireland as students or for unaccompanied children coming to Ireland to study, the existing policy is that non-EEA children can come to Ireland for their secondary (and in theory, primary) education provided that they attend fee paying schools. Some difficulties have arisen in cases where it has been found that students are being placed in State schools contrary to the policy of the Department of Education and Science or in breach of the immigration conditions.

It is proposed to abolish the existing distinction between fee paying schools with State funding and State Schools. The following proposal therefore deals with all schools.

(R11) Commencing with the school year 2010-11

- (a) no further placement of unaccompanied non-EEA children in Irish Schools will be permitted except where
 - (i). the placement is part of a Government approved exchange programme with another state or
 - (ii). the school operates entirely without State funding or
 - (iii). the parent has paid an immigration levy set by the Government as a means of recovering the costs of the child's education and the Department of Education and Science has approved the placement either on an individual basis or via a general sanction for all placements.

Explanatory Note: Prior to 2010 the current policy limiting placements to fee paying schools will continue. Placements of unaccompanied children in non fee paying schools will continue to be prohibited.

Family Reunification

(R 12) Subject to the exceptions set out below, students will continue to have no rights of family reunification. Partners and spouses will be considered as applicants in their own right but cannot advance their application for entry or residence on the basis of their relationship to another student. Students will not be permitted to be accompanied or joined by children other than

those born during their stay. Students will be informed of these conditions and also asked to confirm that they do not intend to be joined by dependents of any kind.

Exemptions from the above policy will be allowed where

- (a) The student is within Tier 1 and is pursuing a course at PhD level³. In these cases the student will be required to progress academically (verified by letter from academic supervisor) and to complete their doctorate within 4 years or
- (b) The student is a participant in an academic programme agreed between the Irish State and another state whereby the student and dependents are fully funded in respect of all expenses in Ireland or
- (c) The student can demonstrate private means on an annual basis at a level that clearly allows them to support themselves and their family without recourse to public funds and without engaging in employment and the parent has paid an immigration levy set by the Government as a means of recovering the costs of the child's education or
- (d) the child is on a short visit to their parent(s) who can show special circumstances and can guarantee that the child will return home at the end of their holiday. [Failure to comply with this condition would result in the termination of the parent's own permission]

(R13) Permission to remain in the State for students will generally be conditional on their ensuring that no claims for social welfare benefits are made on their own behalf or on behalf of any dependents accompanying them. Students will also continue to require private medical insurance. Breach of these fundamental conditions may render the student and any accompanying dependents liable to have their immigration permission terminated regardless of their course of study. Further discussions on this matter will be held between relevant Departments in the context of the interdepartmental committee.

³ This cohort could be extended to target persons of high academic ability engaged in masters level courses of study considered to be of strategic importance to the State

Transitional Measures

(T4) To cater for the situation of children already (registered prior to publication of this document) in the education system, it is proposed to adopt the following policy on an entirely ex gratia basis:-

- (a) The children will be permitted to continue in their existing school whether or not this is a State school until the end July 2011 or the parent completes their current course, whichever is the earlier. Parents will not be permitted to transfer to a new course.

Explanatory Note: It should be noted that the Immigration Residence and Protection Bill 2008 currently before the Oireachtas proposes to require that all non-EEA children in the State be registered with the GNIB (previously this condition only applied to those age 16 and over).

F. Work Placements and Internship

There is an increasing tendency in academic programmes to include a work experience element as part of the course. While it is accepted that there is a valid academic reason for this, it is also a potentially problematic issue. It is obvious that unrestricted use of work placements as part of an academic programme would create an avenue to almost fulltime work and a method of bypassing Ireland's employment permits regime. It is also open to exploitation of the worker who is dependent on the employer for their ultimate qualification. At the same time there is clearly merit in the student gaining practical experience as part of their academic programme. It is a question of obtaining the appropriate balance.

The following arrangements should therefore apply in cases where a course has a work placement or internship component

- (R14) (a) Internships will be permitted only in courses at NFQ 7 and above.
- (b) The internship or work placement component of the course cannot exceed 50% of the duration of the course. e.g. a 4 year course would permit 2 years of work placement.
- (c) The employment will be subject to any requirements determined by the Department of Enterprise Trade and Employment, in the area of employment rights, rates of pay or related to the operation of the labour market. This will be a matter for the Department of Enterprise, Trade and Employment.
- (d) The colleges will need to furnish details of any courses on which internship is offered, setting out
- the qualification offered,
 - the duration of the course,
 - the length of the internship,
 - the proportion of the final credits allocated to the internship component
 - An assurance that this course has students from Ireland or the EU (i.e. persons who do not need permission to work)

- (e) Work placements as part of an academic programme must form an integral part of the course as accredited and their completion contribute to the final award. Educational establishments must also ensure that the placements are appropriate to the nature and level of the academic programme being pursued.

G. Visa Issues

The Irish visa system differs significantly from that of most other countries, including the UK. A visa exemption in the UK applies only to short term visitors (i.e. less than 6 months). For people who want to stay longer than that, a visa requirement is applied irrespective of nationality. Under the Irish system, countries are either visa required or they are not, irrespective of the proposed length of stay of its nationals. This matter remains under ongoing consideration and it is logical to assume that at some future point Ireland might change its overall visa system to bring it into line with other jurisdictions. In any event it is now considered appropriate to look at introducing a visa requirement for the majority of long stay students and to bring Ireland more into line with the practice elsewhere. Such a move would however be dependent on ensuring that the visa service to existing customers was not adversely affected.

Given the importance of border control, a visa application process cannot be a mere rubber stamping exercise. However, an applicant with a clean history who can satisfy the authorities as to the bona fides of their application can expect a positive decision. The main reasons for refusal of applications include failure to prove access to adequate funds, false documentation or general lack of credibility. High rates of refusal where they exist are regrettably a function of the quality of the applications. A case in point is the dedicated visa office in Beijing. With no reduction in standard of scrutiny, approval rates have increased to 81% in 2008, compared to less than 30% in the early days of the office. The central point is that better regulation drives out the less credible applicant. The visa office in Moscow is now recording an approval rate of 96% with most of the applicants coming on short stay study visas. Turnaround time is typically 2-3 weeks. An online visa application system (AVATS) has been rolled out over the past year. This should further assist in service delivery.

- (R15) It is proposed to introduce from 1 January 2011 a visa requirement for all students staying beyond 3 months. An analysis will take place in the interim to establish whether there are any countries, by reference either to traditional two-way migration patterns or proven low risk, who may be exempted from this requirement. However this proposal should not be implemented until such time as the Department is satisfied that it will not impact adversely on the processing times for visas generally. It is also anticipated that the Department will over the next year explore the possibility of a more general visa requirement for long stay visitors (in effect bringing Ireland's system more into line with that of other jurisdictions which already have such a policy).
- (R16) The possibility of fast-tracking visa applications for Tier 1 students should be explored by JELR and Department of Foreign Affairs.

H. Information

While there is explicit and detailed information on visa requirements, the entry requirements for non-visa required nationals and the residence conditions and entitlements of students need to be set out much more clearly and in detail. This deficit must be addressed for the new regime.

- (R17) The immigration authorities should publish on its website detailed student guidelines in terms understandable to both immigration staff and students setting out the regime applicable to student immigration to Ireland. Each student on registration should receive a fact sheet on the terms and conditions of student permission. Initially this should be in English but over time versions in other languages should be made available.
- (R18) Where any State Agency or Department is promoting a scheme with overseas Governments, involving the migration of students to Ireland, they must consult in advance with the Irish Naturalisation and Immigration Service and other relevant Departments. The scheme should then be set out in writing and agreed by all parties so as to provide transparency for

State authorities and students⁴.

I. Future Policy Co-ordination

(R19) An interdepartmental committee chaired by the Department of JELR will be set up to address Student immigration policy and operational issues as they arise in the future. This group will establish close ongoing liaison with a High Level Working Group to be established by the Minister for Education and Science to oversee the non-immigration aspects of the internationalisation of education (e.g. marketing, course certification, pastoral care etc).

(R20) A detailed review of the effectiveness of the new arrangements will be conducted before the end of 2011.

Longer term Strategy for Student Immigration

The potential of international students and the success of immigration policy in relation to them cannot be measured just in terms of numbers coming to Ireland or the revenue derived from their stay. Longer term policy in this area should recognise students who have completed a high quality education in Ireland as intellectual assets who can contribute to economic development and innovation or through the fostering of stronger networks of influence overseas. A pathway should be developed for Tier 1 students post graduation. In such a context, matters such as post graduate internship, family reunification and, ultimately, access to long term residence could be re-examined to provide further incentives to students of high ability. There is some scope also for looking at some form of “scholar programme” which specifically targets immigration incentives at persons of high academic capacity working in fields considered to be crucial to Ireland’s future economic development (e.g. alternative energy). The possibility of linking graduation at a high academic level with a programme of circular migration⁵ could also be explored. In the shorter term and as part of the consultation process consideration will be given to

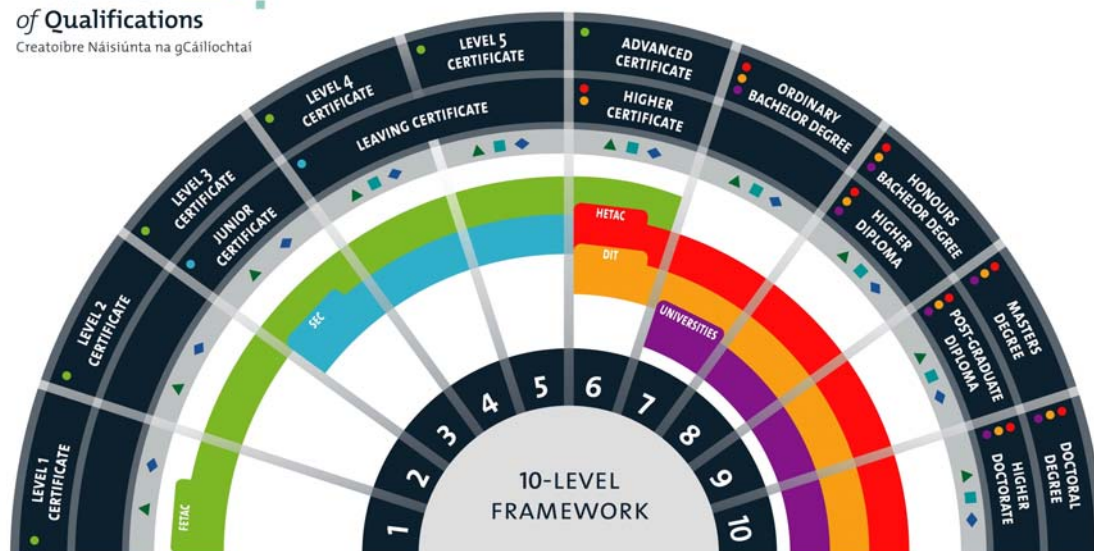
⁴ This policy has begun operating successfully and the Department of JELR will work with institutions and other Departments to develop appropriate terms and conditions.

⁵ Circular Migration is an evolving form of immigration permission that envisages a migrant being able to divide his/her time between the country of origin and destination subject to certain rules. Ireland does not currently make provision for circular migration but the issue will be explored.

the current graduate extension scheme⁶ introduced by the Minister for Justice, Equality and Law Reform and its effectiveness in attracting higher education students.

⁶ Graduates in Higher Education can apply for a 6 month extension to their student permission post qualification to enable them to seek employment.

Appendix 1 – National Framework of Qualifications



KEY

- FETAC - Further Education and Training Awards Council
- SEC - State Examinations Commission (Department of Education & Science)
- HETAC - Higher Education and Training Awards Council
- DIT - Dublin Institute of Technology
- Universities

AWARDS IN THE FRAMEWORK

There are four types of award in the National Framework of Qualifications:

- Major Awards: are the principal class of awards made at a level
- ▲ Minor Awards: are for partial completion of the outcomes for a Major Award
- Supplemental Awards: are for learning that is additional to a Major Award
- ◆ Special Purpose Awards: are for relatively narrow or purpose-specific achievement