

ANNEX

CBIE Response to CIC: Proposed Changes to International Student Program

July 26, 2012

1. Rationale

CBIE and its member institutions are fully committed to supporting the integrity of the International Student Program and supporting the Canadian education brand. This includes measures to reduce fraud and abuse based on available evidence. We are full partners with CIC and with fellow members of the Canadian Consortium for International Education Marketing (CCIEM) in this regard.

CBIE also recognizes that a key element of Canada's reputation abroad has been its welcoming and supportive environment for international students. A critical factor for international students choosing a destination for studies abroad is favourable immigration policies and practices. Changes to enhance the integrity of the system are valued. At the same time, attention must be paid to maintaining a welcoming approach for qualified bona fide students.

2. Consultation

A robust and sustainable system can only be developed in partnership with those who design and deliver the academic services which attract and retain international students for Canada. To this end, we recommend that consultations with provinces/territories and with stakeholder organizations, notably CBIE which is the national international education association representing institutions at all levels of study, continue in parallel to ensure that appropriate expertise is applied where it can have the greatest impact. Consultations will also allow CIC to project realistic timelines for implementation, given that institutional input will enhance both policy and operational program development. We urge CIC to consult directly with CBIE, CCIEM and their member institutions throughout the policy and operational revision processes, both at CBIE's annual conference in Montréal (November 4-7) and in other venues.

3. Requirement to Study - Flexibility

CBIE supports the proposal to require that study permit holders engage in study.

On the operational level, however, we urge reasonable flexibility for bona fide students who are between programs or otherwise unable to enrol, such as exists with the CAQ for Québec institutions.

4. Requirement to Study – Reporting

CBIE recommends that consideration be given to assigning to the student responsibility for reporting ongoing enrolment. In the current system, students are responsible for providing CIC with official documentation of their initial admission and subsequent ongoing enrolment when required by CIC. The reporting period can be adjusted to reflect the new requirement to study.

Should student self-reporting and provision of official documents to CIC be perceived as inadequate, CBIE recommends an approach to monitoring enrolment that runs in tandem with existing work permit systems such as OCWP, in order to streamline administration both for institutions and CIC.

5. No Study Permit under Six Months – Impact

CBIE is concerned about the proposed elimination of study permits for study of less than six months. Many institutions, particularly at the post-secondary level, host students for less than six months in programs that require the possession of a study permit. Some institutions require study permits for

all of their international students. Study permits are frequently required to access institutional health insurance coverage. Many of Canada's government scholarship programs, such as the Emerging Leaders of the Americas Program (ELAP), are short-term, and the student participants rely on obtaining institutional health insurance.

Numerous international agreements and partnerships are predicated on the opportunity for short-term study permit holders to gain practical work experience in Canada as a complement to their studies, which they can do on campus with a valid study permit or while holding a study permit along with a co-op/internship work permit. Work experiences for short-term students provide insight into Canadian social norms, create a connection to the local community, and in some cases allow students to apply what they are learning in their studies to the Canadian workplace, thereby enhancing the educational benefit of the classroom experience. Such agreements include visiting research students who study and gain experience in research on campus, one-term exchange students whose exchange includes the opportunity to work on campus and one-term visiting students who participate in a concurrent or subsequent internship. Students who come as visiting researchers or exchange students are more likely to return to Canada for graduate study, and short-term students who benefit from the opportunity to work are likely to be net promoters of Canada to their friends and colleagues.

Canada is known internationally as a study destination with an impressive array of study options, including the opportunity to gain valuable work experience alongside studies. Eliminating the opportunity for short-term work alongside studies would harm Canada's brand and attractiveness to international students.

Should the change to eliminate study permits for study of less than six months be adopted, we urge CIC to identify alternative solutions to support the growing market for short-term study/work opportunities in Canada.

6. Work Permit – Restriction to Student-Specific Programs

The Notice alludes to restricting work permit eligibility for work permit programs specifically designed for international students (such as OCWP and the Co-op Internship Work Permit Program). CBIE urges a broader approach, inclusive of current options such as permits for destitute students and for students who obtain a favourable Labour Market Opinion. In general, CBIE urges that CIC adopt an approach to work permit eligibility that is supportive of Canada's overarching immigration objective of retaining talent.

Note that changes to work permits in the UK have seriously eroded opportunities for international students and negatively impacted the country's reputation as a favourable destination for new students. For reference, see:

<http://www.universityworldnews.com/article.php?story=201207201619366>.

7. Study less than six months – In-Canada Processing of Initial Study Permits

CBIE applauds the move to create a mechanism for visitors to apply within Canada for initial study permits. This is particularly needed in light of recent closures of visa sections in certain Canadian missions in the US which has made it problematic for visitors in Canada to apply by a secure method for initial study permits.

8. Identification of Eligible Institutions

CBIE supports efforts that improve the integrity of the ISP. That being said, we urge an inclusive approach to the identification of institutions eligible to host international students. A restrictive, exclusionary approach may needlessly eliminate institutions and damage reputations, as well as limit the pathway options for which Canada is known and valued by international students.

9. Resources

CBIE urges that CIC be adequately resourced to administer the ISP at the operational level. Canada's competitiveness in the international education market rests in large measure on CIC's ability to deliver timely and accurate service. We urge that any policy and program include ambitious processing time targets and be designed for optimal administrative simplicity. This will be crucial, in particular, in the case of government sponsored programs such as Saudi Arabia's King Abdullah Scholarships and Brazil's Science without Borders Scholarships where competitor countries are offering an array of enticements including swift processing.