



CBIE Immigration Advisory Committee

Briefing Note | October 2019

Co-op Work Permits – Mandatory Work Experience

Issue Statement

At post-secondary educational institutions across the country, there is an increase in programs that incorporate hands-on learning that is outside of the classroom, and therefore has a work-integrated learning (WIL) component that is a requirement for graduation. At the college level specifically, many institutions are embedding in their long-term strategic plans the goal of incorporating a WIL component in 100% of their programs.

The Co-operative Education and Work-Integrated Learning (CEWIL) defines work-integrated learning as a model and process of curricular experiential education which formally and intentionally integrates a student's academic studies within a workplace or practice setting. This includes practicums, field experiences, thesis research activities performed off-campus, clinical studies and clinical courses taken at a teaching hospital.

In addition to this, some programs are more practical in nature and require outside of the classroom learning. For example, students completing a program in a healthcare field such as medicine or nursing, culinary students completing their chef training while working in a restaurant, or students completing a bachelor of education. Educational institutions are struggling to understand whether or not these types of practical components are considered work by Immigration, Refugees and Citizenship Canada (IRCC) and therefore require a co-op work permit.

With the increase of international students in Canada, as well as the increase in these types of programming components, the co-op work permit is becoming an extremely common document connected to international students' immigration status. However, there are processing issues that are creating barriers for students and adding administrative burden for post-secondary institutions across the country. These issues are resulting in students not obtaining their co-op work permit in a timely manner, which has an impact on their ability to pursue their practical placement requirements, that are mandatory for graduation.

There are two issues that the committee would like to highlight:

1. the lengthy processing times and inconsistent issuance of co-op work permits for international students and
2. clarification on the type of practical component that requires a co-op work permit.

The committee also requests that IRCC reviews the name "co-op" work permit which no longer accurately encompasses the various forms of WIL that require a work permit for students.

Issue #1: Processing and issuance of co-op work permits

Specifically:

1. Inconsistent issuance of co-op work permits when applying from outside of Canada, and
2. long processing times for co-op work permits when applying from within Canada.

The Committee and CBIE member institutions from across Canada have noted that international students are not receiving a co-op work permit along with their initial study permit, even when the official letter of acceptance indicates that there is a mandatory work integrated learning component. In some cases, institutions are even providing a separate support letter regarding the work semester with the intent that this letter is used to support the issuance of a co-op work permit with their initial study permit.

When students do not receive their co-op work permit with their study permit, they are required to apply for their work permit from within Canada. This process is very time consuming, as the current processing times for co-op work permit from within Canada is 91 days (as of July 15, 2019). These long processing times can have an impact on a student's ability to start their mandatory work component on time, particularly if they need to complete this component at the beginning of their program.

In addition, some students are eligible to apply for their co-op work permit at point-of-entry (POE), however, some POE only process student work permits on certain days and times, such as the Rainbow Bridge in Niagara Falls, Ontario and Lacolle, Quebec. Students are sometimes turned away at the POE and no work permit is issued. When co-op work permits are issued at the POE, the remarks are sometimes inconsistent and are often confusing to students.

Anecdotally, students have provided feedback that even when they have been approved for a work permit with their study permit as part of their letter of admission, CBSA officers may not issue a work permit if they deem the work semester too far in advance from the entry to Canada. For instance, the work semester may not happen until the third semester, and therefore, the agent does not issue the work permit and asks that the student apply closer to the work semester.

Another issue with the processing and issuance of co-op work permits, is when students transfer from another institution. If a student transfers from one DLI to another, they are able to notify IRCC via their MyCIC account to advise of the transfer for study permit purposes. However, this process does not apply to the co-op work permit, and institutions are under the understanding that students need to apply for a new co-op work permit with the new institution. With the processing time at 91 days, this can impact their eligibility to begin a work semester at their new institution.

Impacts

The major impacts of this issue include:

- 1. Student not receiving their work permit in time to start their WIL component**

Students who do not receive their co-op work permit with their study permit and have to apply from within Canada and risk missing or delaying their work semester, as the processing time is significant that they may not receive their work permit in time to start working. This can lead to students missing this valuable work experience and institutions needing to find alternative opportunities to meet the learning outcomes, such as completing a capstone project instead.

- 2. Potential impacts on PGWP eligibility and the completion of students' programs**

The long processing times can also delay the completion of the students' program or force a student to have a gap in their studies, as the work experience is an integral part of their program and a requirement for graduation, and this may impact PGWP eligibility. There are times when students have to wait until the next semester in order to begin their work semester because of these processing delays.

- 3. Reputational damage to institutions and international student's reliability to work**

For institutions that offer cohort-based programs, the work experience is embedded in the program curriculum and there may not be alternatives to re-arrange this component at a later time. As a result, this negatively impacts partner relationships with businesses that place international students in their co-op which can ultimately affect the institution's reputation.

- 4. Undo administrative burden for institutions**

These processing issues and delays create a significant amount of additional work for institutions. When students apply for their co-op work permit from within Canada, the institution has to produce a subsequent support letter, in addition to the letters they already provided the student upon acceptance to their program that outline the work component, as well as coordinating with students to determine who possesses their co-op work permit and who still needs to apply to ensure students are compliant with this legal requirement.

Recommendations

The Committee requests that IRCC consider the following recommendations:

- 1. Eliminate the separate work permit for practical components of a student's program**

Considering that international students who meet the requirements as per section R186(f) and (V) are already authorized to work without a separate work permit and that the work authorization remarks are included on their study permit, a similar system could be envisioned for practical components of a student's program of studies.

Under such a system, the need for a separate "co-op" work permit could be eliminated. Instead, students who have to complete a mandatory practical component would include a letter from the Canadian institution confirming that they have to complete a mandatory practical component with their study permit application. Their study permit would then include a remark authorizing them to complete this practical component either part-time or full-time. This remark would be in addition to the authorization to work off-campus as per section 186 (F) of IRPR. Employers would ask for a study permit with remarks and letter from educational institution in order to confirm that the student is authorized to complete this practical component.

Furthermore, this system would eliminate the need to distinguish between experiential learning and work. Understandably, the implementation of such a system would require a change in legislation. A new work permit exemption would have to be added at section 186 of IRPR and the section 205 (c) (i.1) and (c) (i.2) of IRPR would be annulled.

If the elimination of a separate work permit is not feasible or while this legislative change is being implemented, the committee recommends the following:

2. Expedite and clarify processes by:

- a) Providing visa processing offices with comprehensive instructions on co-op work permit processing requirements to increase the number of co-op work permits that are issued with initial study permits.
- b) Collaborating with CBSA on clarifying the policy of issuing co-op work permits at the time of entry to Canada and standardize the remarks that are on the co-op work permit.
- c) Creating an exception at POEs that allow co-op work permits to be issued at all times, and be exempt from the peak period blackout times, since these work permits are required for students to complete integral parts of their academic programs.
- d) For in-Canada processing of co-op work permits, processing these in priority or process them along study permit extensions, which tends to have a shorter processing time.
- e) Indicating "Co-op Work Permit" on the document instead of "Work Permit" to provide clarity on the type of work authorized for the student.

Issue #2: Clarity on practical component types requiring co-op work permits

Specifically:

The committee, in an effort to ensure all international students are compliant, would welcome clarification of what constitutes a mandatory work experience and when is a "co-op work permit" required.

With programs that include work integrated learning or that are research based, questions arise as to whether or not students actually require a work permit issued under LMIA exemption code C32 and commonly referred to as a "co-op work permit" in order to complete the work/practical component of their studies. In some cases, it is clear that the purpose of the practical component is

to gain work experience, and therefore students must obtain a co-op work permit. This is the case for example for mining engineering students that have to complete a mandatory work experience in order to graduate. However, in other cases the purpose of the practical component is not to gain work experience but to learn or to pursue research related to their thesis studies in an off-campus setting, for example in an industry. In these cases, it is unclear as to whether or not a student needs a co-op work permit to complete the practical component when the purpose is clearly not to gain work experience.

From the definitions provided by IRCC, one can infer that a person who requires a work permit obtains authorization to work and therefore the activity for which they require the work permit meets the definition of work as per the regulations.

As the “co-op” work permit grants authorization to students to complete a mandatory work component which is an integral part of their studies, it follows that the activity that they are engaging in is an “activity for which wages are paid or commission is earned, or that is in direct competition with the activities of Canadian citizens or permanent residents in the Canadian labour market.” According to an Immigration Representative Mailbox response dated December 5, 2016, students are required to obtain a “co-op” work permit in order to complete the practical components of their studies. This would mean that all practical components of a student’s studies are considered work and should thus meet the definition of work as per section 2 of IRPR.

The problem with this conclusion is that not all practical components are the same nor are they activities “for which wages are paid or commission is earned, or that is in direct competition with the activities of Canadian citizens or permanent residents in the Canadian labour market.” For example, nursing students have to complete clinical courses at a teaching hospital in order to acquire knowledge and skills that cannot be learned or taught through theoretical courses. These are courses that are supervised and for which students earn a grade like in a theoretical course. International students completing these clinical courses are not remunerated or paid for the training they receive. Nor is this an activity that is considered part of the Canadian labour market. Therefore, one could conclude that these students do not need a co-op work permit to complete these clinical courses, which are practical components to their studies. Yet the response from the Immigration Representative mailbox dated December 5, 2016, clearly states that health care students must apply for a co-op work permit to complete the practical component of their studies. It is not clear why this is the case.

Interestingly, IRCC allows health care students that are registered at a foreign institution to complete a practicum or short clerkship without a work permit under section 186(p) of IRPR. The activity that IRCC recognizes as being work permit exempt under 186(p) IRPR is the same activity that Immigration Representatives states needs a work permit. Healthcare students are not the only ones that have to complete practical components that are activities that meet the definition of work. Another example are students completing a bachelor in education who have to complete a field experience at a school or social work students who have to complete a field placement. Both of these practical components are considered experiential learning classes that provide students an opportunity to learn through hands on outside of the classroom learning. Moreover, in the case of research programs (masters and PhD) in some study fields (such as engineering) the research must

sometimes be done in an industry setting or on site, as the necessary technology is not accessible in the students' institutions. In these cases, students are registered in their program as full time students, but complete their scientific experiments – which they need to complete to write their thesis - outside of campus. We do not think of these research activities as an entry into the labour market.

Impacts

The major impacts of this issue include:

- 1. International students and institutions unwittingly provide missing or wrong information**

International students need to be aware of when they are required to apply for a separate co-op work permit. The current instructions are not clear on this issue, since most students who, for example, complete a clinical course or any other experiential learning course or off-campus thesis research do not view the activity as work or as a form of employment. Therefore, when they are asked if work is an essential part of their studies, they are inclined to answer “no” to this question.

Furthermore, educational institutions also need to understand when a “co-op” work permit is needed, so that they may properly inform their students and prepare the necessary documentation in order for the student to apply for their “co-op” work permit.

- 2. Ambiguity around permits for work during scheduled breaks**

The need for clarification on this issue is also stressed by the fact there is ambiguity about whether or not a “co-op” work permit is required when the mandatory work is completed during a student's schedule academic break such as the summer or if the work is less than 20 hours a week. As noted from the Immigration Representatives Mailbox's response in the background section dated October 6, 2015, it seems that a “co-op” work permit is required regardless of the number of hours worked per week or if the work is completed during a scheduled break. However, this requirement is not clearly stated anywhere on IRCC's website nor in the regulations.

- 3. Inconsistencies in information provided**

The Immigration Representatives Mailbox's responses are inconsistent with the responses received from the IRCC call center agents and the information given to students by CBSA agents upon entry to Canada.

Recommendations

The Committee requests that IRCC consider the following recommendations:

- 1. Only practical components that are completed for the purposes of gaining work experience should require a separate work permit, such as co-ops or internships**

IRCC should allow educational institutions the discretion to distinguish between practical components that are done for the purposes of learning or of completing thesis research regardless of whether the research is completed on or off-campus from those that meet the

definition of work as per section 2 of IRPR and which are completed for the purposes of gaining work experience.

2. **All mandatory practical components of an international student's program of studies, including those that allow for directly gaining work experience (co-ops or internships), should require a separate work permit regardless of the purpose**

If the requirement to obtain a "co-op" work permit applies to all practical components of a student's program of studies, regardless of the purpose of that practical component, then it is recommended that this requirement apply only if the practical component exceeds the hours authorized by the off-campus work regulations as per section R186(v). Additionally, educational institutions could have the option to indicate in the DLI compliance report that a student has a co-op work permit and is completing a mandatory practical component to their studies.

3. **Set an hours or time threshold on experiential learning placements**

If IRCC is not at ease with granting discretion to educational institution and if it is IRCC's intent to prevent the direct entry of international students (while they study) into the labour market, setting an experiential learning time threshold could help delineate which experiences directly compete, and which do not. As the example above indicates, a nursing student who participates in a few sporadic experiential learning opportunities at a hospital (for example for a few hours per day or only a few times throughout the term) would certainly not be competing in the labour market. Rather, the student would be accessing equipment required to develop a specific competency required to complete the course or program. On the other hand, if an international student is on a co-op placement at this hospital full-time (8:00 to 4:30) for an entire term, we could infer that there is a direct entry into the labour market, validating the requirement for a co-op work permit.

Setting an hours or time threshold on the experiential learning placement would enable students in programs with condensed experiential learning outcomes (that are sporadic and irregular in nature) to participate in such programs without having to apply for a new work permit. This would not only alleviate IRCC's processing resources, but also enhances international students' experience in programs where experiential learning and corresponding competencies and outcomes are required.

Please note that the committee's preferred option would be option 1. If IRCC considers option 3, there are concerns with imposing a time threshold since each educational institution has different program needs and therefore having a blanket time threshold may disadvantage certain institutions.

Background on this Issue

IRPA	N/A
IRPR	<p>Relevant current regulations:</p> <p>1. Work and work permit are defined in the <i>Immigration and Refugee Protection Regulations (IRPR)</i> at section 2.</p> <p><i>work means an activity for which wages are paid or commission is earned, or that is in direct competition with the activities of Canadian citizens or permanent residents in the Canadian labour market.</i></p> <p><i>work permit means a written authorization to work in Canada issued by an officer to a foreign national.</i></p> <p>From the above definitions one can infer that a person that requires a work permit obtains authorization to work and therefore the activity for which they require the work permit meets the definition of work as per the regulations.</p> <p>2. IRPR states that in order to work a foreign national must be authorized to do so either through a work permit exemption or through the granting of a work permit:</p> <p>No permit required</p> <p><i>186 A foreign national may work in Canada without a work permit</i></p> <p>Work permit required</p> <p><i>196 A foreign national must not work in Canada unless authorized to do so by a work permit or these Regulations.</i></p> <p>3. Work permits for international students completing a mandatory work experience as per their program of studies in Canada are issued under section 205 IRPR.</p> <p>Canadian interests</p> <p>205. A work permit may be issued under section 200 to a foreign national who intends to perform work that</p> <p>(c) is designated by the Minister as being work that can be performed by a foreign national on the basis of the following criteria, namely,</p>

	<ul style="list-style-type: none"> ○ (i.1) the work is an essential part of a post-secondary academic, vocational or professional training program offered by a designated learning institution as defined in section 211.1 ○ (i.2) the work is an essential part of a program at the secondary level <ul style="list-style-type: none"> • (A) that is a vocational training program offered by a designated learning institution in Quebec, or • (B) that is a program offered by a designated learning institution that requires students to work in order to obtain their secondary or high school diploma or certificate of graduation <p>4. IRPR allows foreign health care students to acquire training in Canada without a work permit http://www.cic.gc.ca/english/resources/tools/temp/work/permit/health.asp).</p> <p>No permit required</p> <p>186 A foreign national may work in Canada without a work permit</p> <p>(p) as a student in a health field, including as a medical elective or clinical clerk at a medical teaching institution in Canada, for the primary purpose of acquiring training, if they have written approval from the body that regulates that field;</p>
IRCC/CBSA Manual and/or others:	<p>1. IRCC's publication and manual "Temporary Foreign Worker Program: What is work?" (http://www.cic.gc.ca/english/resources/tools/temp/work/about.asp):</p> <ul style="list-style-type: none"> • Provides a definition of wages and commissions as well as a definition as to what constitutes an activity that "competes directly": <p>"Wages or commission"</p> <p>This includes salary or wages paid by an employer to an employee, remuneration or commission received for fulfilling a service contract, or any other situation where a foreign national receives payment for performing a service.</p> <p>What is an activity that "competes directly"?</p> <p>Officers should consider whether there is entry into the labour market. Questions to consider:</p> <ul style="list-style-type: none"> • Will they be doing an activity that a Canadian or permanent resident should really have an opportunity to do? • Will they be engaging in a business activity that is competitive in the marketplace? <ul style="list-style-type: none"> • Provides examples of work including:

	<p>unpaid employment undertaken for the purpose of obtaining work experience, such as an internship or practicum normally done by a student.</p> <ul style="list-style-type: none"> As well as an explanation of what activities are not considered work: <p>An activity which does not really 'take away' from opportunities for Canadians or permanent residents to gain employment or experience in the workplace is not "work" for the purposes of the definition.</p> <p>2. IRCC's Program Delivery Instructions "Work as a co-op student or intern" http://www.cic.gc.ca/english/study/work-coop.asp</p> <ul style="list-style-type: none"> States that: <p>For some academic programs, work experience is part of the curriculum. Foreign students who wish to participate in a co-op or internship program must apply for a work permit as well as a study permit.</p> <ul style="list-style-type: none"> The eligibility criteria for applying for this work permit are the following: <p>To be eligible for a work permit, you must meet the following requirements:</p> <ul style="list-style-type: none"> You must have a valid study permit. Your intended employment must be an essential part of your program of study in Canada. Your employment must be part of your academic, vocational or professional training program offered by a designated learning institution, certified by a letter from a responsible academic official of the institution. Your co-op or internship employment cannot form more than 50% (percent) of the total program of study. <p>3. Instruction Guide – IMM 5580 – "Applying for a work permit – student guide"</p> <ul style="list-style-type: none"> Provides additional information on who can apply for a "co-op" work permit: <p>What is the co-op work program?</p> <p>International students may work as part of a co-op or internship program only if work is an essential part of an academic, professional or vocational training program offered by</p>
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	<p>a Designated Learning Institution. To be able to work, students will need a co-op work permit and a study permit.</p> <p>If the students are eligible, an open work permit can be issued with the institution listed as the employer. In situations where several work periods are necessary throughout the program, the work permit can be issued for the same period as the study permit.</p> <p>To be eligible for a work permit under a co-op or internship program, the following conditions must be met:</p> <ul style="list-style-type: none"> • you must have a valid study permit and your intended employment must be an essential part of <ul style="list-style-type: none"> ○ a postsecondary academic, vocational or professional training program; ○ a vocational training program at the secondary level in Quebec; or ○ a secondary level program that requires student to work in order to obtain their secondary or high school diploma or certificate of graduation, ○ offered by a Designated Learning Institution. • your employment must be certified as part of the academic program by a responsible academic official of the institution; and • your co-op or internship employment cannot form more than 50 percent of the total program of study; and • you are not a medical intern or extern, nor a resident physician (except in veterinary medicine). <p>4. Work permit exemption for health care students</p> <ul style="list-style-type: none"> • IRCC allows international students who are registered at a foreign institution to complete a clinical clerkship or short-term practicum in Canada without a work permit (http://www.cic.gc.ca/english/resources/tools/temp/work/permit/health.asp): <p>R186(p) allows foreign students, registered at foreign educational institutions outside Canada, to do their clinical clerkships or short-term practicums in Canada in fields such as:</p> <ul style="list-style-type: none"> • medicine • occupational and physical therapy • nursing • medical technology
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	<p>Written permission from the body that regulates the particular health field is required in order to ensure that Canadian health care students are placed for clinical practice first. The primary purpose of the practicum must be to acquire training in the related field; therefore these positions will often be unpaid and should be of no more than four months' duration</p> <ul style="list-style-type: none"> IRCC states in their publication and manual "Temporary Foreign Worker Program: What is work?" the following: <p>We recognize that there may be overlap in activities that we do not consider to be work and those activities which are defined as work not requiring a work permit in R186. However, the net effect (no work permit required) is the same.</p>
Responses from Immigration Representatives email	<p>1. Email response from Immigration Representatives dated December 5, 2016 concerning the requirement of applying for a "co-op" work permit in order to complete a practical components to an international student's program of study.</p> <p><ImmigrationRepresentatives@cic.gc.ca> Mon 12/5, 10:44 AM ****, ImmigrationRepresentatives <ImmigrationRepresentatives@cic.gc.ca> Good afternoon ***,</p> <p>We apologize for the delay in our response.</p> <p>This is in response to your enquiry of August 19th regarding IRCC instructions on the necessity for a co-op work permit (C32) for international students completing a degree (in a health field or any other field that has a practical component such as the field of education) at a Canadian post-secondary institution.</p> <p>If the practical component of student's studies is an essential part of their program, i.e. the student will not be able to complete their studies and receive their degree without completing the practical component of their studies, then the student is eligible to apply for a coop work permit. Please note that the coop work permit is necessary even if the student is not being paid during their practical part of their program.</p> <p>Health care students, for example nurses, who must complete a practical component of the program must apply for a coop work permit to complete that component of their studies. Please note that if a student must complete a coop term in the medical field, they will have to provide proof of completion of upfront medical examination from the panel physician. For more information about medical exam requirements please follow this link: http://www.cic.gc.ca/english/information/medical/medexams-temp.asp</p>

The only medical practitioner groups that are exempt from the requirement of applying for a coop work temp are medical residency or medical fellowship positions. Students enrolled in these programs must apply for work permits in order to work in Canada.

I hope that this information is helpful to you. If you have any further enquiries, you may contact us at ImmigrationRepresentatives@cic.gc.ca

Regards,

The Immigration Representatives Mailbox

From: ****

Sent: December 1, 2016 10:53 AM

To: ImmigrationRepresentatives <ImmigrationRepresentatives@cic.gc.ca>

Subject: FW: co-op work permit for health care students-REP-2016-1293-due by Sep. 16

Dear Madam/Sir,

I have yet to receive a reply to my inquiry below concerning the necessity for a co-op work permit (C32) for international students completing a degree (in a health field or **any other field that has a practical component** such as the field of education) at a Canadian post-secondary institution.

Please note that my question concerns international students registered and completing their degree at a Canadian post-secondary institution and **not** international students registered at a foreign institution.

I would appreciate a response to this important matter.

Thank you,

From: ****

Sent: August-19-16 3:54 PM

To: 'ImmigrationRepresentatives' <ImmigrationRepresentatives@cic.gc.ca>

Subject: co-op work permit for health care students

Dear Madam/Sir,

	<p>I am seeking clarification as to when a co-op work permit issued under LMIA exemption C32 is required.</p> <p>According to IRCC's website, a co-op work permit may be issued to foreign nationals who “intend to perform work that is an essential part of a postsecondary academic, vocational or professional training offered by a designated learning institution in Canada”.</p> <p>Furthermore, IRCC specifies that in order to be eligible for the co-op work permit, the foreign national must meet the following requirements:</p> <ul style="list-style-type: none"> • You must have a valid study permit. • Your intended employment must be an essential part of your program of study in Canada. • Your employment must be part of your academic, vocational or professional training program offered by a designated learning institution, certified by a letter from a responsible academic official of the institution. • Your co-op or internship employment cannot form more than 50% (percent) of the total program of study. <p>From the instructions on IRCC website, it is clear that a co-op work permit is required when a student is completing an employment or work position.</p> <p>However, what is unclear is whether international students that have to complete a practical component to their studies are also required to obtain a co-op work permit in order to complete that practical component.</p> <p>Some program by nature require outside of the class room learning. For example, nursing students, as well as other health care students, have to complete a clinical component to their program of studies at a university teaching hospital or clinic. This clinical component consists of clinical study courses and completion of an unpaid clinical internship course for which the student receives academic credits.</p> <p>From the language in IRCC's instructions, it is unclear as to whether these health care students require a co-op work permit or not to complete the practical component of their studies.</p> <p>Primarily because the principal reason for these clinical courses and internship are not to gain work experience but to be trained as health care workers. Secondly, these clinical courses and internship are not a form of employment. Finally, the activity that they will be doing does not meet the definition of work as per section 2 of IRPR since it is not an activity “for which wages are paid or commission is earned, or that competes directly with activities of Canadian citizens or permanent residents in the Canadian labour market.”</p>
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I had written to the International Mobility Workers Unit in order to receive a response to my inquiry. Unfortunately, their response was not at all substantial as they simply referred me to the IRCC website (see attached). I sincerely hope to receive an informative response from Immigration Canada that will clarify this ambiguous situation.

I therefore would appreciate any clarification that your office can provide on this important matter.

With kind regards,

2. Email response from ImmigrationRepresentatives dated October 6, 2015 concerning when a co-op work permit is required.

From: ImmigrationRepresentatives
[<mailto:ImmigrationRepresentatives@cic.gc.ca>]

Sent: October-06-15 1:46 PM

To: ****

Cc: ImmigrationRepresentatives <ImmigrationRepresentatives@cic.gc.ca>

Subject: RE: co-op work permit REP-2015-2765

Good Afternoon

Thank you for your inquiry.

*Both a co-op work permit as well as a study permit are required when International Students are enrolled in an academic, professional or vocational training program at a [designated learning institution](#) that requires **mandatory work experience**, such as a co-op or internship placement as part of their program requirements.*

*If completing the internship requires them to **work less than 20 hours per week during the academic schedule or full time during the summer break they are still required to secure a co-op work permit.***

*To get a co-op work permit, the student must prove that the **work experience/internship** is essential to successful completion of their program. Acceptable proof of this requirement may include a letter from the school they are attending or a copy of the school curriculum.*

Please note however that the co-op or internship/work experience requirement cannot be more than 50% of the total program of study. Also note that Foreign nationals studying English or French as a second

language (ESL/FSL), or participating in general interest or preparatory courses, **are not eligible for a co-op work permit.**

There is no fee for the co-op work permit. For more information, see [Work permits for students - Co-op and internship programs](#).

Immigration Representatives Mailbox

From: ****

Sent: September 16, 2015 4:41 PM

To: ImmigrationRepresentatives

Subject: co-op work permit REP-2015-2765

Dear Madame/Sir,

I am seeking clarification as to when a co-op work permit is required.

More specifically, if a student is completing a mandatory internship that is an essential part of their program, however the internship requires them to work less than 20 hours per week during their academic schedule or full-time during their summer break is the student required to have a **co-op work permit** or is the student's work authorization covered under the **off-campus** regulation regardless of the fact that their internship is an essential part of their program.

If the student is allowed to complete the mandatory internship of less than 20 hours under the off-campus regulations, is the co-op work permit only mandatory when the internship requires the student to work more than 20 hours per week?

Thank you for taking the time to answer my questions.

With kind regards,

3. Email response from ImmigrationRepresentatives dated December 6, 2016 concerning whether a post-graduate work permit can be used to complete a mandatory internship.

From: ImmigrationRepresentatives

[mailto:ImmigrationRepresentatives@cic.gc.ca]

Sent: December-06-16 9:52 AM

To: ****

	<p>Cc: ImmigrationRepresentatives <ImmigrationRepresentatives@cic.gc.ca> Subject: FW: Est-ce qu'un PTPD peut être utilisé pour effectuer un stage obligatoire dans un programme d'études? - #235297-REP-2016-1705</p> <p>Bonjour, Requête:</p> <p>Nous avons une étudiante admise dans un programme de maîtrise professionnelle qui est détentrice d'un permis de travail post-diplôme valide. Le programme contient un stage obligatoire (moins de 50% du programme) et les étudiants demandent un permis de travail pour stage obligatoire.</p> <p>Dans son cas, elle fera sa demande de CAQ pour études et de permis d'études pour pouvoir suivre son programme, mais nous voudrions savoir si elle a besoin de faire aussi une demande de permis de travail pour stage obligatoire ou si elle peut utiliser son PTPD pour effectuer le stage prévu dans son programme.</p> <p>Réponse :</p> <p>Le permis de travail ouvert permet à une personne de chercher et d'accepter un emploi, et de travailler pour n'importe quel employeur pendant une période déterminée. Dans le scénario décrit, l'étudiante pourrait ne pas avoir besoin de permis de travail pour stage et utiliser son PTPD pour effectuer ce stage.</p> <p><i>Cependant, IRCC encourage les étudiants à posséder le permis de travail adéquat en l'occurrence dans ce cas-ci le permis de travail pour stage obligatoire.</i></p> <p>Cordialement, La boîte aux lettres des représentants en immigration</p> <p>-----</p> <p>From: **** Sent: Thursday, November 17, 2016 11:50:33 AM To: ImmigrationRepresentatives Subject: Est-ce qu'un PTPD peut être utilisé pour effectuer un stage obligatoire dans un programme d'études? Auto forwarded by a Rule</p> <p>Bonjour, Nous avons une étudiante admise dans un programme de maîtrise professionnelle qui est détentrice d'un permis de travail post-diplôme valide. Le programme contient un stage obligatoire (moins de 50% du programme) et les étudiants demandent un permis de travail pour stage obligatoire.</p> <p>Dans son cas, elle fera sa demande de CAQ pour études et de permis d'études pour pouvoir suivre son programme, mais nous voudrions savoir si elle a besoin de faire aussi une demande de permis de travail pour stage obligatoire ou si elle peut utiliser son PTPD pour effectuer le stage prévu dans son programme.</p> <p>Merci à l'avance de votre réponse. Cordialement, ****</p>
Case Law	None found