Evaluation of the International Student Program

Evaluation Division

July 2010
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Executive summary

Policy and program context

International students are attractive to Canada. They bring economic, social and cultural benefits to the institutions at which they study, to the organizations in which they work and to the communities in which they live. Their Canadian education and work experience also make them sought after as potential immigrants.

CIC’s International Student Program has been evolving since the introduction of the Immigration and Refugee Protection Act (IRPA) in 2002. One of IRPA’s objectives is to facilitate the entry of temporary residents into Canada, and subsequent program and policy changes to the ISP have been designed with a view to facilitating study and work opportunities for international students, as well as their potential transition to permanent residence.

IRPA’s regulatory framework includes specifications on who can study in Canada with or without a permit, work privileges and application requirements, and sets out a legal description of what constitutes studies. However, responsibility for education in Canada lies with the provinces and territories, and thus, the federal government has no jurisdiction to regulate the quality of education, or its providers.

Evaluation objectives and methodology

Guided by an Evaluation Framework, CIC conducted an evaluation of the International Student Program (ISP) to examine its relevance and performance. The evaluation used multiple lines of evidence, including both qualitative and quantitative research methods, and presents findings on the results of the ISP (post-IRPA) for the 2003 to 2008 reporting period.

Profile of international students in Canada

The number of international student entries is growing; it increased from 69,712 in 2003 to 79,509 in 2008, with consistently more males than females arriving. The largest percentage of international students arriving during this period was studying at the university level (39% of entries in 2008); and the second largest percentage was studying at the elementary/secondary level (25% of entries in 2008).

South Korea (ROK) and China (PRC) were consistently the leading two source countries during the reporting period (accounting for 35% of all entries in 2008), and Ontario and BC have been the two most popular provinces of destination (with 66% of all entries destined to these provinces in 2008).

International students are increasingly using the work permit programs. The number of off-campus work permits issued increased from 731 in 2004 to 16,525 in 2008, and the number of post-graduation work permits issued increased from 2,808 in 2003 to 17,810 in 2008.
Summary of findings

Relevance

- In general, partners and stakeholders indicate a strong need for the ISP, identifying the many economic, cultural and social benefits that international students bring to Canada.

- The ISP is aligned with GoC and CIC objectives and priorities, and consistent with provincial activities. However, there are some inconsistent program and policy objectives among the lead departments – CIC, DFAIT and CBSA.

- The federal government plays an appropriate role with respect to international education in relation to its mandate to support national security, international trade and Canada’s economy.

Performance

Social, cultural and economic benefits

- International students bring with them many benefits to Canada, including increased revenues to educational institutions and communities and enhanced diversity to learning environments and smaller communities.

- The economic benefits to Canada of international students are extensive. A recent study commissioned by DFAIT estimated international student expenditures in 2008 at over $6.5 billion, and suggested that international education is one of Canada’s more lucrative exports.

- The longer-term economic benefits are also being recognized. Increasingly, international students are staying to work post graduation or reside in Canada. However, the number retained is still relatively small compared to the total number of those studying in Canada.

Global competitiveness

- Although globally competitive in terms of its study/work offerings, Canada’s leading competitors have attracted a larger share of the global international student population. Issues with study permit processing and promotion were identified as hindering global competitiveness.

- The quality of education was viewed as most important by international students in their decision-making. Though not as important, opportunities for post graduation work and permanent residence also factored into the decision-making of many students.

- International students are taking advantage of work opportunities in Canada with an increasing number of off-campus and post-graduation work permits being issued annually. However, the extent and quality of the work experience gained by these students is less clear.

Program integrity

- CIC’s policy framework currently leaves the International Student Program vulnerable to potential misuse. Non-genuine students and questionable educational institutions are primary concerns in the student application caseload.

- CIC does not have a complete inventory of legitimate educational institutions in Canada, nor the authority to ensure their quality.
• In general, there is reported fraud and misuse in the International Student Program. Its extent is unclear due to a lack of data and consistent reporting, and efforts to mitigate the risk of fraud and misuse are quite varied.

• Apart from CIC, many partners and stakeholders do not believe that there is consistent decision-making on student applications. Quality assurance activities are inconsistent across the department, making it difficult to objectively assess the overall quality of decision-making.

**Program management and delivery**

• There is a consistent understanding of the objectives of the International Student Program among program partners and stakeholders. However, there is less clarity surrounding roles and responsibilities.

• CIC NHQ and regions are satisfied with communications and information-sharing within CIC. However, survey results suggest that communications and information-sharing among visa offices abroad and between visa offices and other areas of CIC are infrequent.

• Although the information and support provided within CIC and to educational institutions are generally useful, there are issues with their adequacy and timeliness. Of note, visa offices identified a need for information and support related to genuine/non-genuine educational institutions and programs.

• Stakeholders are positive about the changes to Canada’s study/work package. However, some stakeholders have experienced issues with the study and work permit application processes.

**Application processing**

• In 2008, 65% of study permit applications were finalized within 28 days in visa offices abroad. Findings showed that there is a perception that processing times are slow for Canada.

• Processing times and refusal rates for study permits finalized abroad vary considerably by visa office. The perception of fraud, type of educational institution and visa and medical requirements are important factors in this variability.

• Relative to the other temporary streams, overall costs of the study permit program are consistent with the level of effort and time required to process student applications.

**Conclusions**

A number of partners, all with distinct objectives, are responsible for different aspects of the ISP. Three key issues emerged in this evaluation: the global competitiveness of the ISP; program integrity; and CIC’s processing capacity. Findings showed various linkages between these issues and the roles of the different partners in achieving program results: the global competitiveness of the ISP is related to the processing capacity of CIC; the promotional efforts of DFAIT; and the quality of education regulated by provincial/territorial governments. Findings also highlighted how CIC processing capacity may be affected by program integrity issues, such as fraud.
## International Student Program (ISP) Evaluation - Management response

<table>
<thead>
<tr>
<th>Key Finding</th>
<th>Response</th>
<th>Action</th>
<th>Accountability</th>
<th>Implementation Date</th>
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<tbody>
<tr>
<td><strong>I. Program Relevance</strong></td>
<td></td>
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<tr>
<td>Partners and stakeholders indicate a strong need for the ISP, identifying the many economic, cultural and social benefits that international students bring to Canada.</td>
<td>CIC agrees with this finding.</td>
<td>No action required.</td>
<td>Immigration</td>
<td>N/A</td>
</tr>
<tr>
<td>The ISP is aligned with broader GOC and OGD objectives, but is challenged by the differing mandates of the lead departments - CIC, DFAIT and CBSA - which at times may be at cross-purposes.</td>
<td>CIC will continue to work with other departments engaged on the international student file, in order to manage differing priorities as they arise, through fora such as the Advisory Committee on International Students and Immigration (ACISI), and the Federal-Provincial/Territorial Consultative Committee on Education Related International Activities (FPCCERIA).</td>
<td>In June 2010, CIC obtained approval to enter into negotiations with PTs to jointly manage the ISP, with a particular focus on improving program integrity. In line with this, CIC will be establishing a multilateral ad hoc Working Group, comprising of representatives from PT ministries of education and immigration, DFAIT and CBSA.</td>
<td>Immigration</td>
<td>Fall 2010</td>
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<tr>
<td><strong>II. Benefits</strong></td>
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<tr>
<td>The economic benefits for educational institutions and communities through the revenue generated by international students are extensive, and distributed across much of Canada.</td>
<td>CIC agrees with this finding.</td>
<td>No action required.</td>
<td>Immigration /OMC/IR</td>
<td>N/A</td>
</tr>
<tr>
<td>There has been a greater recognition of the longer-term economic benefits that international students can bring to Canada through their eventual immigration and integration. Increasingly, international students are staying to work post-graduation or reside in Canada. However, the number</td>
<td>With the introduction of the Canadian Experience Class (CEC) in September 2008, the number of international students transitioning to permanent residents has increased. In 2009, approximately 3,000 applications were received under the student stream for CEC. Admissions are projected to rise in 2010 and beyond. Moreover, the provinces continue to</td>
<td>CIC will continue to monitor the progress of existing programs, and assess trends in terms of international students working after graduation and transitioning to permanent residence (Ongoing).</td>
<td>Immigration /Communications /OMC/IR</td>
<td>N/A</td>
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<td>Key Finding</td>
<td>Response</td>
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| retained is still relatively small compared to the total number of those studying in Canada. | experience increased intake of international students through their respective Provincial Nominee Programs (PNPs). Those that currently have student streams in their PNPs include British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Nova Scotia and Newfoundland.  

It is worth noting that PNP student streams are meant to retain students living and working in a particular province, whereas CEC permits applicants to select the province/territory of their choice.  

It is also important to note that in cases where international students choose to return to their countries of origin, this also creates benefits to Canada by strengthening the economic, social and cultural ties between Canada and the home countries of international students. |        |                 |                    |

### III. Global Competitiveness

While Canada’s study/work offerings for international students are comparable to those of other countries, it is still being outperformed by comparable countries.  
- Issues with respect to promotion and application processing were identified as possible obstacles to Canada’s global competitiveness.

| Promotion: |
| Promotion of international education falls under the responsibility of DFAIT and PTs.  

| Processing: |
| The Government of Canada is working with provinces and territories to increase its standing as a destination of choice for international students. Through the recent launch of the “Imagine” brand, and increased cooperation and coordination between DFAIT and PT ministries of education, it is expected that Canada will become a stronger competitor in the international education sector.  

With regards to application processing, CIC processing times are competitive, with close to 70% of study permit applications being processed within 28 days. Factors such as medical examinations, criminal checks, and verification of bona fides must also be taken into consideration. In competitor countries | Promotion: |
| Promotion: DFAIT  

| Processing: |
| SIO/IR/CPR |
| Promotion: |
| N/A |
| Processing: |
| SIO/IR/CPR |
| Promotion: |
| Fall 2010 |
### Key Finding

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<tr>
<td>such as Australia, UK and the USA, average processing times vary between 4-6 weeks. CIC has introduced pilot projects in specific missions aimed at further reducing processing times and streamlining overall application procedures (e.g. Student Partners Program in India, and up-front medicals in China). CIC will continue to review potential options for streamlining application procedures, and further reducing processing times, where feasible.</td>
<td>In Fall 2010, CIC will begin negotiations with PTs, with the objective to enter into bilateral arrangements/MOUs for the joint management of the ISP. As part of the negotiations, CIC will: 1. propose to introduce regulatory changes that would require international students to study; and 2. ask PTs to provide CIC with a list of legitimate educational institutions.</td>
<td>Immigration</td>
<td>Fall 2011</td>
</tr>
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### IV. Program Integrity

- CIC’s policy framework and gaps in program design leave the ISP vulnerable to potential misuse.
  - There is no legislative requirement for international students to study once they are in Canada.
  - CIC does not have a complete list of legitimate educational institutions in Canada.

  **CIC agrees with this finding.**

  - In Fall 2010, CIC will begin negotiations with PTs, with the objective to enter into bilateral arrangements/MOUs for the joint management of the ISP.
  - As part of the negotiations, CIC will: 1. propose to introduce regulatory changes that would require international students to study; and 2. ask PTs to provide CIC with a list of legitimate educational institutions.

### There is reported fraud and misuse in the ISP. The absence of data and consistent reporting on fraud has made it difficult to determine the extent of the problem and related implications for program integrity.

  **CIC agrees with this finding.**

  - As part of the work to be conducted with PTs, CIC plans to improve on the identification of genuine educational institutions upfront, and the monitoring of student compliance after arrival. These initiatives are expected to reduce incidences of fraud, as well as improve data capture and consistent reporting on program compliance.

### Quality assurance activities are variable across the department, making it difficult to assess the

  **CIC recognizes the importance of consistency in all our program delivery. As we move to modernize our service delivery model we will**

  **The Draft Quality Assurance Framework (QAF) is currently in consultation with other branches within CIC and will be**

  **OMC/IR/CPR**

  **2010/2011**
<table>
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<th>Key Finding</th>
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<tr>
<td>overall quality and consistency of decision-making on student applications.</td>
<td>ensure that quality assurance is a key objective of our program delivery and that it is applied in a consistent and risk-based fashion to ensure more robust program integrity.</td>
<td>presented in September to senior management. The QAF includes: • mandatory reporting requirements, and • central analysis function to leverage lessons learned and best practices within the network.</td>
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</table>

V. Program Management and Delivery

Visa offices identified a need for greater information and support related to genuine/non-genuine educational institutions and programs.  

CIC agrees with this finding.  

As part of the negotiations with PTs, CIC will request that PTs provide CIC with a list of genuine educational institutions, and eligible programs.  

CIC will also refer to CIC local offices and RHQs for support in identifying genuine and non-genuine institutions based on information local offices have gathered.  

CIC agrees with this finding.  

As part of the negotiations with PTs, CIC will request that PTs provide CIC with a list of genuine educational institutions, and eligible programs.  

CIC will also refer to CIC local offices and RHQs for support in identifying genuine and non-genuine institutions based on information local offices have gathered.  

V. Application Processing

In 2008, 65% of study permit applications were completed within 28 days, although this percentage varied considerably by visa office and region (from 80% in Europe, to 54% in Africa & Middle East). The perception of fraud, type of educational institution and visa and medical requirements affect this variability. The Australians have developed an interesting service standard model that recognizes variations in the risks associated with different applications by having different time standards for different categories of applications.  

In 2009, close to 70% of study permit applications were processed within 28 days.  

CIC will continue to review potential options for streamlining application procedures, and further reducing processing times, where feasible.  

CIC has recently introduced a range of online application services for study permits and work permits for international students in Canada, and will be piloting online application services for study permits overseas for select visa-exempt countries in 2010-11.  

CIC will continue to review potential options for streamlining application procedures, and further reducing processing times, where feasible.  

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CIC will continue to review potential options for streamlining application procedures, and further reducing processing times, where feasible.  

CIC has recently introduced a range of online application services for study permits and work permits for international students in Canada, and will be piloting online application services for study permits overseas for select visa-exempt countries in 2010-11.
1. **Background**

1.1. **Introduction**

Citizenship and Immigration Canada (CIC) conducted an evaluation of the International Student Program (ISP) to examine its performance and relevance. Guided by an Evaluation Framework, the study evaluated the program design, delivery, relevance and effectiveness, and sought to provide results-based information which can facilitate ongoing program improvement and future policy decisions. It also considered the efficiency and economy of the program relative to the other temporary resident streams, and explored various factors affecting program delivery.

The study focused on international students studying at the post-secondary levels. However, the administrative data analysis revealed a substantial number of students arriving to study at the elementary and secondary levels, comprising approximately 25% of all international student entries. This was explored through further research (discussed in section 1.3.1). Data collection for the evaluation was carried out between November 2008 and January 2010.

1.2. **Structure of the report**

The report is organized into four sections:

- Section 1 contains background information about the ISP and the evaluation;
- Section 2 provides information on the evaluation methodology and limitations;
- Section 3 presents the evaluation findings by the themes of relevance and performance; and
- Section 4 presents overall conclusions.

1.3. **Program profile**

1.3.1. **Policy and program context**

International students are attractive to Canada, as they bring economic, social and cultural benefits to the institutions at which they study, to the organizations in which they work and to the communities in which they live. Their education and work experience in Canada also make them sought after as potential immigrants. There is strong competition internationally in attracting and retaining international students. Many countries are investing in promotion, recruitment and streamlining their “student entry” and “student-to-immigrant” processes.

**Legislative and regulatory framework**

The *Immigration and Refugee Protection Act* (IRPA) established a separate category of temporary residents for international students, as well as regulations regarding study permits. IRPA’s regulatory framework includes specifications on who can study in Canada with or without a permit, work privileges and application requirements, and sets out a legal description of what constitutes studies. However, the regulations do not specify a requirement for international students to study while in Canada, nor do they define an educational institution, its eligibility to host international students, or any minimum requirements to ensure the quality of education provided.

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According to IRPA Regulations, “student means a person who is authorized by a study permit or [the] Regulations to engage in studies in Canada and who is studying or intends to study in Canada” and “studies means studies undertaken at a university or college, or any course of academic, professional or vocational training.”

In Canada, education is the constitutional responsibility of the provinces and territories. As such, the federal government has no jurisdiction (or legislative authority) to regulate the quality of education or its providers.

**Policy and program framework**

The program and policy framework for CIC’s International Student Program has been evolving since the introduction of IRPA in 2002, when the study permit requirements were changed for short-term students (see Table 1-1). One of IRPA’s objectives is to facilitate the entry of temporary residents into Canada, and subsequent program and policy changes to the ISP have been designed with a view to facilitating study and work opportunities for international students.

Since IRPA, CIC has undertaken a number of strategies to improve ISP policies and program delivery and to attract international students to Canada.

- In 2005, CIC introduced policy changes to help streamline the application process for changing the conditions of a study permit. The objective of these changes was to reduce the number of transactions with CIC, undertaken by international students after their arrival in Canada.

- CIC also expanded its employment initiatives for international students studying at the post-secondary level. The Off-Campus Work Permit (OCWP) Program was introduced in 2006 and enhancements were made to the Post Graduation Work Permit (PGWP) Program in 2005 and 2008. The objective of these initiatives was to promote Canada as a destination of choice, both for study and potential immigration, as well as to help address labour market needs.

- Online applications were introduced, beginning with the OCWP Program in 2008 and later expanded to the study permit renewal process and PGWP Program in 2009, with a view to improving service delivery.

Changes to the ISP policy and program framework continued in 2008 with the creation of the Canadian Experience Class (CEC) immigration stream. The intent of the CEC is to facilitate the transition from temporary to permanent resident in Canada, and ultimately to help Canada be more competitive in attracting and retaining skilled individuals. In particular, the CEC is creating the opportunity for certain international students with Canadian credentials and Canadian work experience to apply for permanent residency without having to leave Canada.

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3 The OCWP Program and 2005 enhancement to the PGWP Program began as pilot projects in selected provinces in 2003.
4 Online applications were first introduced in the OCWP Program in June 2008 as a pilot project in selected provinces and educational institutions. National implementation began in September of that year.
Table 1-1: Evolution of CIC’s policy and program changes

<table>
<thead>
<tr>
<th>Policy/Program</th>
<th>Date</th>
<th>Description of Changes</th>
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<tr>
<td>Immigration and Refugee Protection Act (IRPA)</td>
<td>2002</td>
<td>International students registered in a short-term course or program of six months or less no longer require a study permit. International students can obtain a study permit valid for the full length of their intended period of study, and those in post-secondary studies can transfer between programs of study and institutions (public and private) without first making an application to CIC.</td>
</tr>
<tr>
<td>Streamlining the SP application process</td>
<td>2005</td>
<td>Full-time international students at participating educational institutions can work off campus during their studies for up to 20 hours per week. International student graduates from a recognized Canadian educational institution outside Montreal, Toronto and Vancouver can work after graduation in Canada for an additional year (up to a total of two years).</td>
</tr>
<tr>
<td>PGWP Program</td>
<td>May 2005</td>
<td>International student graduates from a recognized Canadian educational institution outside Montreal, Toronto and Vancouver can work after graduation in Canada for an additional year (up to a total of two years).</td>
</tr>
<tr>
<td>OCWP Program</td>
<td>April 2006</td>
<td>Full-time international students at participating educational institutions can work off campus during their studies for up to 20 hours per week. International student graduates can obtain an open work permit (for up to three years), with no restrictions on the type of employment and no requirement for a job offer.</td>
</tr>
<tr>
<td>PGWP Program</td>
<td>April 2008</td>
<td>International student graduates with professional, managerial and skilled work experience have access to a new immigration stream that allows their education and work experience in Canada to be considered as key selection criteria for permanent residence.</td>
</tr>
<tr>
<td>Online Applications</td>
<td>September 2008</td>
<td>International students in Canada can apply online for an off-campus work permit.</td>
</tr>
<tr>
<td>Canadian Experience Class (CEC)</td>
<td>September 2008</td>
<td>International student graduates with professional, managerial and skilled work experience have access to a new immigration stream that allows their education and work experience in Canada to be considered as key selection criteria for permanent residence.</td>
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</table>

Many of the opportunities included in Canada’s study/work package, though designed to attract international students to Canada, are not immediately available to younger students. The evaluation revealed a significant K-12 sector in international education, with school boards/districts encouraging and recruiting young students in other countries to come and study in Canada at the elementary and secondary levels.5

1.3.2. Objectives

Since its inception, Canada’s International Student Program has been a demand-driven program. The number of student applications received in Canada has been increasing over the years and is expected to continue to grow with increasing global demand.6 CIC’s objective has been to process student applications in response to this demand and facilitate the entry of international students to meet partner and stakeholder needs. However, more recently, there has been a greater recognition within CIC of the longer-term benefits that international students can bring to Canada through their eventual immigration and integration.

The long-term outcomes of the International Student Program are:

- Canada attracts and retains a pool of highly qualified international students consistent with its immigration objectives; and

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5 Planning and Possibilities: The Report of The Declining Enrolment Working Group (ON Gov’t, March 2009); Lessons in Learning: School enrolment trends in Canada (Canadian Council on Learning, 2006); School boards turning to foreign students to fill classrooms as enrolments decline – Big bucks brought in with tuition fees, but practice criticized by some educators as being unfair to rural areas – By Jill Mahoney – Published in the Globe and Mail June 9, 2008; Canadian Association of Public Schools - International (CAPS-I) website: www.caps-i.ca.
6 Profile of the Eda-Canada Initiative (DFAIT 2009); IDP Education Australia.
Canada benefits from international students. The ultimate outcome is that the program contributes to Canada’s economic, social and cultural development.

1.3.3. Program description

Study permits

In most cases, international students require a study permit to study in Canada. Some may also require a temporary resident visa or medical exam if they are from a country designated by Canada for these requirements. International students applying to study in Quebec also require a certificate of acceptance (CAQ: Certificat d’acceptation du Québec). An international student must also:

- have been accepted by a school, college, university or other educational institution in Canada;
- prove that they have sufficient funds to pay for their tuition fees, living expenses and return transportation (for themselves and any accompanying family members);
- be a law-abiding citizen with no criminal record and not be a risk to the security of Canada;
- be in good health and willing to complete a medical examination, if necessary; and
- satisfy an immigration officer that they will leave Canada upon completion of their studies.

The acceptance letter and proof of financial support (without working in Canada) are of particular importance for international students, and the burden of proof is on the applicant to demonstrate that they are a “bona fide” temporary resident. Of note, a student application cannot be refused solely based on the cultural context or historical migration patterns of a client group, or on the applicant’s “dual intent”; nor can it be refused based on concerns about the academic or administrative practices of a particular educational institution.

Work opportunities

International students that meet program requirements are eligible to work in Canada during their studies, and/or after graduation. They do not require a labour market opinion (Service Canada confirmation), but generally do require a work permit.

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7 A study permit is a written authorization to study in Canada issued by CIC to a person who is not a permanent resident or citizen of Canada. Some international students do not require a study permit to study in Canada. They include: those registered in a short-term course or program (six months or less); family or staff members of a foreign representative to Canada accredited by DFAIT; members of a foreign armed force under the Visiting Forces Act; and in some cases, minor children.

8 IRPA Regulations: Restrictions on Studying in Canada: Acceptance letter 219 (1); IRPA Regulations: Financial resources 220; OP12 Section 7.7 Reviewing applicants for financial sufficiency.

9 OP12 Section 5.15 Bona fides. Bona fides are assessed on an individual basis, and take into account: “the length of time that the applicant will be spending in Canada; the means of support; obligations and ties in home country; the likelihood of leaving Canada should an application for permanent residence be refused; and compliance with requirements of the Act and Regulations.”

10 OP12 Section 5.15 Bona fides. Note: Section A22(2) (Dual intent) states that an intention by a foreign national to become a permanent resident does not preclude them from becoming a temporary resident if the officer is satisfied that they will leave Canada by the end of the period authorized for their stay.

11 OP12 Section 5.8 Concerns about institutions.

12 A work permit is a written authorization to work in Canada issued by CIC to a person who is not a permanent resident or citizen of Canada. It is required whether or not the employer is in Canada. CIC may impose, vary or cancel conditions when issuing a work permit. These conditions may include one or more of the following: the type of employment in which a student may work; the employer for whom they may work; where they may work; and how long they may work.
There are four types of employment in which international students can engage (see [www.cic.gc.ca/english/study/work.asp](http://www.cic.gc.ca/english/study/work.asp) for specific eligibility requirements).

**On Campus**: International students may work on campus at the institution where they study without a work permit if they have a valid study permit and are a full-time student at an eligible institution.

**Off Campus**: To work off campus, international students must apply for a work permit. This allows the student to work up to 20 hours per week during regular academic sessions, and full-time during scheduled breaks (e.g. winter and summer holidays, and spring break). A work permit is not a job guarantee; it is the student’s responsibility to look for work. Studies must still be the primary reason for their stay in Canada.

**Co-op and Internship Programs**: 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 and hold a valid student permit.

**Post Graduation**: The Post-Graduation Work Permit Program allows students who have graduated from a recognized Canadian post-secondary institution to gain valuable work experience in Canada. A work permit under the Post-Graduation Work Permit Program is limited to the duration of the student’s study program (minimum of eight months, and up to a maximum of 3 years).

### 1.3.4. Roles and responsibilities

Education in Canada is a provincial-territorial jurisdiction, and as such, cannot be legislated at the federal level. A number of partners, all with different perspectives and priorities, are responsible for different aspects of the program.

CIC has overall policy responsibility for temporary resident processing, status, and documents. CIC and CBSA share responsibility for service delivery in this regard, as well as responsibility for program integrity.

DFAIT is responsible for the promotion of international education, including hosting and/or participating in international activities related to international education. While CIC is not directly involved in the promotional aspect of international education, CIC is often present at international education events to answer any immigration-related questions.

Provinces and territories have constitutional responsibility for education in Canada. They, along with educational institutions and related non-government organizations, all play a role in ensuring the quality of this education and promoting Canada and its institutions internationally.

Other key stakeholders include international students, as clients, and, more recently, employers with the emergence of the work permit programs and the potential to retain international students in Canada to help address labour market needs.

### CIC Program management and delivery

The implementation of the ISP involves a number of different areas within CIC that work together to manage and deliver the program, including:

**Immigration Branch**: Policy and program direction (including planning, analysis and strategic advice) and liaison with interdepartmental, provincial/territorial and NGO partners is led by the Temporary Resident Policy and Program Development Division within Immigration Branch.
Operational Management and Coordination (OMC) Branch: Operational and functional support is provided by the OMC Branch. It coordinates all operational activities of the Department (domestically and internationally), and gathers, analyzes, and reports operational statistics. OMC also deals with operational issues relating to fraud, verification and quality assurance.

International Region: The International Region is responsible for the delivery of Canada's immigration program abroad, including recruitment and selection, facilitating the entry of genuine temporary residents and assessing admissibility. This Region also liaises with foreign governments, international agencies and non-governmental organizations, and participates in overseas immigration control and enforcement activities.

Visa offices overseas: Visa officers process study permit applications, and are responsible for making the final decision on eligibility for a study permit. If an applicant is from a visa-designated country, visa officers also process an application for a temporary resident visa at the same time. If accepted, a letter of introduction is sent to the applicant confirming the approval. This letter is not the study permit, but is required at the POE to show to immigration officials upon arrival in Canada.

Ports of Entry (POE) in Canada: The study permit is issued by CBSA officers at the POE. Students from the United States, Saint-Pierre et Miquelon and Greenland can also apply for a study permit at the POE when they arrive in Canada.

Case Processing Centre (CPC) at Vegreville: The Case Processing Centre processes applications to change the conditions of a study permit and to obtain a work permit under the Off-Campus and Post-Graduation Work Permit Programs.

CIC local offices: Study and work permit applications may be referred to CIC local offices for further assessment and verification. These applications are not processed at local offices; however, final decisions can be made here.

Advisory committees

The Advisory Committee on International Studies and Immigration (ACISI), founded in 1995, is CIC’s primary consultative mechanism with stakeholders. ACISI membership includes representatives from provincial and territorial governments, OGDs, NGOs and other stakeholders. The Federal-Provincial Consultative Committee on Education-Related International Activities (FPCCERIA) is another consultative mechanism in which CIC participates. It is co-chaired by DFAIT and the Council of Ministers of Education Canada (CMEC), which represents all the provinces and territories.

1.3.5. Resources

The budget for the International Student Program is a portion of the total budget for the Temporary Resident Program (TRP), which was $73.4M in 2007-08. Although the ISP allocation cannot be isolated from the overall TRP budget, the Cost Management Model (2006/07) estimates the cost of selection and processing of international students at $16.8M. This amount, however, does not include the costs associated with policy and program development.

1.3.6. Profile of international students in Canada

CIC administrative data was used to examine the profile of international students in Canada, along with trends in student arrivals, and usage of the work permit programs.

---

In 2008, there were a total of 178,227 international students present in Canada, of whom 55% were male and 54% were studying at the university level.

With respect to entries, there was a broad trend of steady increases between 2003 and 2008 in the number of international student arrivals to Canada (from 69,712 to 79,509), with consistently more males than females arriving.

When grouped by level of study (see Table 1-2), the largest percentage of international students arriving during the reporting period was studying at the university level (39% of entries in 2008), and the second largest percentage was studying at the secondary or less level (25% of entries in 2008).

Table 1-2: International student entries by level of study and year (number and percentage*)

<table>
<thead>
<tr>
<th>Level of study</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>University</td>
<td>28,165 (40%)</td>
<td>28,046 (42%)</td>
<td>28,457 (41%)</td>
<td>29,397 (41%)</td>
<td>29,933 (40%)</td>
<td>31,368 (39%)</td>
</tr>
<tr>
<td>Trade</td>
<td>11,595 (17%)</td>
<td>10,403 (16%)</td>
<td>10,126 (15%)</td>
<td>10,436 (15%)</td>
<td>10,210 (14%)</td>
<td>8,985 (11%)</td>
</tr>
<tr>
<td>Secondary or less</td>
<td>15,947 (23%)</td>
<td>15,927 (24%)</td>
<td>16,811 (25%)</td>
<td>18,891 (26%)</td>
<td>19,513 (26%)</td>
<td>19,832 (25%)</td>
</tr>
<tr>
<td>Other post-secondary</td>
<td>8,486 (12%)</td>
<td>6,380 (10%)</td>
<td>7,217 (11%)</td>
<td>7,816 (11%)</td>
<td>9,361 (13%)</td>
<td>13,644 (17%)</td>
</tr>
<tr>
<td>Other</td>
<td>5,504 (8%)</td>
<td>5,352 (8%)</td>
<td>5,260 (8%)</td>
<td>5,230 (7%)</td>
<td>5,010 (7%)</td>
<td>5,663 (7%)</td>
</tr>
<tr>
<td>Not stated</td>
<td>15 (0%)</td>
<td>13 (0%)</td>
<td>6 (0%)</td>
<td>16 (0%)</td>
<td>11 (0%)</td>
<td>17 (0%)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>69,712</strong></td>
<td><strong>66,121</strong></td>
<td><strong>67,877</strong></td>
<td><strong>71,786</strong></td>
<td><strong>74,038</strong></td>
<td><strong>79,509</strong></td>
</tr>
</tbody>
</table>

*Percentages may not add up to 100% due to rounding.

The number arriving to study at the trade level decreased between 2007 and 2008, whereas the number arriving to study at the other post-secondary level increased. Trade-level institutions include technical and vocational institutions, CEGEPs and colleges; other post-secondary institutions include language institutions, private institutions and university qualifying programs (not at the university or trade level).14

Corresponding to level of study, the largest percentage of international students was aged 18 to 25 years (60% of entries in 2008) during the reporting period (see Table 1-3). The second largest percentage was aged 17 years and under (27% of entries in 2008).

Table 1-3: International student entries by age and year (number and percentage*)

<table>
<thead>
<tr>
<th>Age</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>17 and under</td>
<td>16,289 (23%)</td>
<td>16,655 (25%)</td>
<td>17,693 (26%)</td>
<td>19,991 (28%)</td>
<td>20,743 (28%)</td>
<td>21,295 (27%)</td>
</tr>
<tr>
<td>18-25</td>
<td>42,614 (61%)</td>
<td>39,354 (60%)</td>
<td>39,845 (59%)</td>
<td>41,701 (58%)</td>
<td>43,229 (58%)</td>
<td>47,315 (60%)</td>
</tr>
<tr>
<td>26-35</td>
<td>9,058 (13%)</td>
<td>8,519 (13%)</td>
<td>8,742 (13%)</td>
<td>8,513 (12%)</td>
<td>8,426 (11%)</td>
<td>9,273 (12%)</td>
</tr>
<tr>
<td>36-45</td>
<td>1,374 (2%)</td>
<td>1,245 (2%)</td>
<td>1,245 (2%)</td>
<td>1,204 (2%)</td>
<td>1,292 (2%)</td>
<td>1,287 (2%)</td>
</tr>
<tr>
<td>46+</td>
<td>374 (1%)</td>
<td>346 (1%)</td>
<td>352 (1%)</td>
<td>376 (1%)</td>
<td>348 (0%)</td>
<td>339 (0%)</td>
</tr>
<tr>
<td>Missing or invalid</td>
<td>3 (0%)</td>
<td>2 (0%)</td>
<td>0 (0%)</td>
<td>1 (0%)</td>
<td>0 (0%)</td>
<td>0 (0%)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>69,712</strong></td>
<td><strong>66,121</strong></td>
<td><strong>67,877</strong></td>
<td><strong>71,786</strong></td>
<td><strong>74,038</strong></td>
<td><strong>79,509</strong></td>
</tr>
</tbody>
</table>

*Percentages may not add up to 100% due to rounding.

The top ten source countries for international students in Canada accounted for 68% of all entries in 2008 (see Table 1-4). Of these, South Korea (ROK) and China (PRC) were consistently the leading two source countries during the reporting period, accounting for just over one-third (35%) of all international student entries in 2008.

14 Facts and Figures, 2008. Note: An examination of the 2008 administrative data on institutions by level of study revealed some overlap in the institutions categorized as trade and other post-secondary.
Table 1-4: International student entries by country of residence* and year (number and percentage**)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Korea, Republic of</td>
<td>13,972 (20%)</td>
<td>13,456 (20%)</td>
<td>13,819 (20%)</td>
<td>15,597 (22%)</td>
<td>15,169 (20%)</td>
<td>13,941 (18%)</td>
</tr>
<tr>
<td>China, People’s Republic of</td>
<td>10,140 (15%)</td>
<td>7,462 (11%)</td>
<td>7,434 (11%)</td>
<td>8,988 (13%)</td>
<td>10,032 (14%)</td>
<td>13,668 (17%)</td>
</tr>
<tr>
<td>France</td>
<td>3,955 (6%)</td>
<td>4,237 (6%)</td>
<td>4,411 (6%)</td>
<td>5,125 (7%)</td>
<td>4,816 (7%)</td>
<td>4,675 (6%)</td>
</tr>
<tr>
<td>United States</td>
<td>5,609 (8%)</td>
<td>5,648 (9%)</td>
<td>5,582 (8%)</td>
<td>5,300 (7%)</td>
<td>5,185 (7%)</td>
<td>4,553 (6%)</td>
</tr>
<tr>
<td>Japan</td>
<td>6,021 (9%)</td>
<td>5,712 (9%)</td>
<td>5,518 (8%)</td>
<td>4,814 (7%)</td>
<td>4,308 (6%)</td>
<td>3,630 (5%)</td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td>565 (1%)</td>
<td>643 (1%)</td>
<td>839 (1%)</td>
<td>2,256 (4%)</td>
<td>2,675 (3%)</td>
<td>2,511 (3%)</td>
</tr>
<tr>
<td>Germany</td>
<td>1,766 (3%)</td>
<td>1,903 (3%)</td>
<td>2,035 (3%)</td>
<td>2,096 (3%)</td>
<td>2,343 (3%)</td>
<td>2,511 (3%)</td>
</tr>
<tr>
<td>Brazil</td>
<td>687 (1%)</td>
<td>835 (1%)</td>
<td>975 (1%)</td>
<td>1,203 (2%)</td>
<td>1,428 (2%)</td>
<td>1,746 (2%)</td>
</tr>
<tr>
<td>Other</td>
<td>22,123 (32%)</td>
<td>22,014 (33%)</td>
<td>22,391 (33%)</td>
<td>22,379 (31%)</td>
<td>23,993 (32%)</td>
<td>25,435 (32%)</td>
</tr>
<tr>
<td>Total</td>
<td>69,712</td>
<td>66,121</td>
<td>67,877</td>
<td>71,786</td>
<td>74,038</td>
<td>79,509</td>
</tr>
</tbody>
</table>

* Ten most common source countries for international students by 2008 levels.
** Percentages may not add up to 100% due to rounding.

Over the years, Ontario and BC have been the two most popular provinces of destination for international students, followed by Quebec at a distant third (see Table 1-5). In 2008, 66% of international student entries were destined for Ontario and BC, with slightly more students going to Ontario (34%).

Table 1-5: International student entries by province of destination and year (number and percentage*)

<table>
<thead>
<tr>
<th>Province</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Newfoundland and Labrador</td>
<td>347 (0%)</td>
<td>299 (0%)</td>
<td>414 (1%)</td>
<td>432 (1%)</td>
<td>569 (1%)</td>
<td>656 (1%)</td>
</tr>
<tr>
<td>Prince Edward Island</td>
<td>131 (0%)</td>
<td>125 (0%)</td>
<td>135 (0%)</td>
<td>167 (0%)</td>
<td>215 (0%)</td>
<td>260 (0%)</td>
</tr>
<tr>
<td>Nova Scotia</td>
<td>2,178 (3%)</td>
<td>2,014 (3%)</td>
<td>2,004 (3%)</td>
<td>2,028 (3%)</td>
<td>2,169 (3%)</td>
<td>2,527 (3%)</td>
</tr>
<tr>
<td>New Brunswick</td>
<td>988 (1%)</td>
<td>958 (1%)</td>
<td>936 (1%)</td>
<td>1,044 (1%)</td>
<td>1,184 (2%)</td>
<td>1,328 (2%)</td>
</tr>
<tr>
<td>Quebec</td>
<td>11,563 (17%)</td>
<td>11,614 (18%)</td>
<td>11,302 (17%)</td>
<td>12,575 (18%)</td>
<td>13,024 (18%)</td>
<td>12,934 (16%)</td>
</tr>
<tr>
<td>Ontario</td>
<td>23,810 (34%)</td>
<td>22,809 (34%)</td>
<td>23,314 (34%)</td>
<td>24,562 (34%)</td>
<td>24,476 (33%)</td>
<td>26,782 (34%)</td>
</tr>
<tr>
<td>Manitoba</td>
<td>1,853 (3%)</td>
<td>1,641 (2%)</td>
<td>1,542 (2%)</td>
<td>1,640 (2%)</td>
<td>1,566 (2%)</td>
<td>1,730 (2%)</td>
</tr>
<tr>
<td>Saskatchewan</td>
<td>1,388 (2%)</td>
<td>1,165 (2%)</td>
<td>1,323 (2%)</td>
<td>1,267 (2%)</td>
<td>1,269 (2%)</td>
<td>1,433 (2%)</td>
</tr>
<tr>
<td>Alberta</td>
<td>5,201 (7%)</td>
<td>4,773 (7%)</td>
<td>5,042 (7%)</td>
<td>5,369 (7%)</td>
<td>5,292 (7%)</td>
<td>6,122 (8%)</td>
</tr>
<tr>
<td>British Columbia</td>
<td>22,183 (32%)</td>
<td>20,682 (31%)</td>
<td>21,820 (32%)</td>
<td>22,667 (32%)</td>
<td>24,234 (33%)</td>
<td>25,688 (32%)</td>
</tr>
<tr>
<td>Territories</td>
<td>70 (0%)</td>
<td>41 (0%)</td>
<td>45 (0%)</td>
<td>35 (0%)</td>
<td>37 (0%)</td>
<td>42 (0%)</td>
</tr>
<tr>
<td>Province or territory not listed</td>
<td>0 (0%)</td>
<td>0 (0%)</td>
<td>0 (0%)</td>
<td>0 (0%)</td>
<td>3 (0%)</td>
<td>7 (0%)</td>
</tr>
<tr>
<td>Total</td>
<td>69,712</td>
<td>66,121</td>
<td>67,877</td>
<td>71,786</td>
<td>74,038</td>
<td>79,509</td>
</tr>
</tbody>
</table>

*Percentages may not add up to 100% due to rounding.

CIC administrative data also show that international students are using the off-campus and post-graduation work programs (see Table 1-6). The number of off-campus work permits issued increased markedly after 2005, corresponding to the transition of this program from a pilot project to a national program in 2006. The number of post-graduation work permits issued rose steadily.

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15 The Off-Campus Work Permit Program did not begin until October 2003, and then only as a pilot project in Manitoba. As a result, there are no data for 2003. The pilot project was later expanded to New Brunswick and Quebec in 2004 and then became national in 2006. There are select private institutions currently eligible for the OCWP, though this is still in a pilot phase, and is currently limited to those provinces that have signed an MOU with CIC – BC, Alberta, Manitoba and PEI.
between 2003 and 2007, and then increased sharply by 64% in 2008, corresponding to the change in requirements to this program in April of that year.\textsuperscript{16}

Table 1-6: Work permits issued in Canada\textsuperscript{17}

<table>
<thead>
<tr>
<th>Year</th>
<th>Off-Campus Work Permits (C25)</th>
<th>Post-Graduation Work Permits (C43)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2003</td>
<td>0</td>
<td>2,808</td>
</tr>
<tr>
<td>2004</td>
<td>731</td>
<td>4,412</td>
</tr>
<tr>
<td>2005</td>
<td>1,119</td>
<td>6,730</td>
</tr>
<tr>
<td>2006</td>
<td>11,231</td>
<td>8,578</td>
</tr>
<tr>
<td>2007</td>
<td>17,254</td>
<td>10,872</td>
</tr>
<tr>
<td>2008</td>
<td>16,525</td>
<td>17,810</td>
</tr>
</tbody>
</table>

\textsuperscript{16} In April 2008, changes were made to the Post-Graduation Work Permit Program, allowing recent graduates to obtain an open work permit for up to 3 three years (depending on length of their program of study) with no restrictions on location of study or requirement of a job offer.

\textsuperscript{17} These numbers include new and extension work permits issued at all ports of entries, inland offices and CPC-Vegreville.
2. Evaluation framework and methodology

2.1. Evaluation framework

This study was guided by an Evaluation Framework developed in consultation with program representatives, and completed in October 2008 (see Appendix A). The evaluation methodologies were later confirmed and the availability of data was assessed in an initial planning phase. The evaluation questions are outlined thematically below.

<table>
<thead>
<tr>
<th>Evaluation Theme</th>
<th>Evaluation Question</th>
</tr>
</thead>
</table>
| Relevance                             | • Is the ISP aligned with CIC objectives and priorities with respect to temporary residents and immigration?  
|                                       | • Does the program support GOC objectives and priorities, and is it consistent with related activities in other government departments? |
| Profile of the ISP                    | • How many international students have come to Canada to study over time?             
|                                       | • Has their profile changed?                                                         |
| Meeting Canada’s Immigration Objectives | • Are Canada’s study and work opportunities for international students globally competitive?  
|                                       | • How successful has Canada been in attracting and retaining international students?     
|                                       | • Are international students taking advantage of work opportunities and gaining Canadian work experience?  
|                                       | • What factors contribute to international students taking advantage of work opportunities and gaining Canadian work experience? |
|                                       | • Is the profile of international students choosing to stay in Canada consistent with Canada’s immigration objectives?  
|                                       | • What are the social, economic and cultural benefits of having international students studying and working in Canada? |
| Program Integrity                     | • Do program information and tools support quality decision-making?                   
|                                       | • Is there misuse and fraud in the ISP? What is being done to verify and deter program misuse and Fraud? Are there alternatives to the current design and delivery of the ISP that would improve program integrity? |
| Program Management                    | • Is the program delivery coordinated, timely and efficient?                          |
| Policy & Program Development          | • Is there a shared understanding of roles, responsibilities and ISP policy and program objectives across program partners and stakeholders?  
|                                       | • Are program partners and stakeholders engaged and working together to advance the objectives of the ISP? |
|                                       | • Do ISP policies and programs address partner and stakeholder needs and facilitate study and work opportunities for international students?  
|                                       | • Is the ISP based on a consistent, coherent and complementary policy and program framework? |
| Cost-effectiveness                    | • Are the costs in line with what would be expected in other similar programs?         
|                                       | • Are there alternatives to the current design and delivery of the ISP that would improve efficiency/effectiveness? |
| Other                                 | • Have there been any unexpected outcomes?                                            |
2.2. Methodology

The evaluation used multiple lines of evidence, as well as both qualitative and quantitative research methods. It examines results of the ISP post-IRPA, providing findings for the 2003 to 2008 reporting period.

2.2.1. Document review

Documents reviewed for this evaluation were of four general types:

- Government of Canada and legislative documents, such as the Speech from the Throne, Budget, Advantage Canada, the Immigration and Refugee Protection Act (IRPA) and IRP Regulations;
- Departmental website and documents, such as Reports on Plans and Priorities (RPP), Departmental Performance Reports (DPR) and Annual Reports;
- Documents and websites of other government departments (CBSA, DFAIT, IC, etc.) and stakeholders, such as CBIE, AUCC, ACCC\(^\text{18}\); and
- Program and policy documents and operational documents.

2.2.2. Interviews

Forty-three interviews were conducted with ISP program stakeholders by telephone and in-person. Interview guides were provided to all interviewees in advance of the interviews. The breakdown of interviews is shown below. See Appendix B: for the interview guides.

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Number of Interviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>Internal CIC (Immigration, OMC, IR, Regional Offices, CPC-Vegreville, SIO(^\text{19}))</td>
<td>13</td>
</tr>
<tr>
<td>Other Government Departments (DFAIT, CBSA, IC, CIDA, HRSDC)</td>
<td>5</td>
</tr>
<tr>
<td>Provincial Governments</td>
<td>10</td>
</tr>
<tr>
<td>Non-Governmental Organizations</td>
<td>15</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>43</strong></td>
</tr>
</tbody>
</table>

2.2.3. Surveys

Four surveys were conducted during the evaluation: three conducted internally by the CIC Evaluation Division and one conducted by the Canadian Bureau of International Education (CBIE).

**International Students:** The *Canada First Survey of International Students*, conducted by the CBIE, examined the study and work experiences of international students in Canada.\(^20\) The CIC Evaluation Division used data from this survey for the evaluation. Fifty universities and colleges were contacted to participate; and 22 universities and 4 colleges agreed to participate. Institutions were asked to

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\(^{18}\) Note: Canadian Bureau for International Education (CBIE), Association of Universities and Colleges of Canada (AUCC), Association of Canadian Community Colleges (ACCC).

\(^{19}\) The Service Innovation Office (SIO) is responsible for the development of electronic services for clients, which includes the development of online tools for the submission of off-campus and post-graduation work permits and extension of study permits from within Canada.

\(^{20}\) CIC’s Division of Evaluation and Temporary Resident Program Division provided financial support for the CBIE *Canada First survey*, as well as input into the design of the survey questionnaire.
randomly sample 1,000 of their international students, and student respondents completed the survey online. The overall student response rate was 24% (n = 5,925). See Appendix C: for the survey questionnaire.

**Visa Offices:** An online survey was administered to CIC visa offices abroad to gather information on student application processing, its issues and challenges and the activities in place to support and monitor program delivery. Fifty visa offices responded to the survey out of a possible 61 visa offices that process student applications, for a response rate of 82%. See Appendix D: for the survey questionnaire.

**Educational Institutions:** A survey of educational institutions was administered online. Invitation emails were sent by CBIE and Languages Canada to 103 international student advisors from various universities and colleges and 144 representatives from language schools. Representatives were asked to complete only one questionnaire per educational institution – preferably by an individual with a function directly linked to international students or internationalization strategies. Sixty respondents completed the questionnaire, for a response rate of 24%. See Appendix E: for the survey questionnaire.

**Employers:** Employers were surveyed on their awareness and use of the ISP and the program’s strengths and limitations. It was requested that the survey be completed by a person at the company who is primarily responsible for staffing or human resources. CIC worked with the Canadian Association of Career Educators and Employers (CACEE) to distribute the survey to 125 of their members. Twenty-two surveys were completed, for a response rate of 18%. See Appendix F: for the survey questionnaire.

### 2.2.4. Analysis of administrative data

Key program data is gathered on an ongoing basis through CIC’s Field Operations Support System (FOSS) and Computer-Assisted Immigration Processing System (CAIPS). Both research statistics (stocks and flows) and operational statistics, related to the number of study and work permit applications were used in this study. Whenever possible, data already compiled in CIC’s Facts & Figures were also used.

### 2.2.5. Literature review

A literature review and comparative study of the design and delivery mechanisms for international student programs was commissioned by CIC for this evaluation and conducted by independent researchers. The study analyzed multiple sources to report on Canada’s market share of international students in relation to its chief competitors, and looked at policy, design and implementation differences between Canada’s international student program and similar programs in other countries (the United States, UK, Australia, France and New Zealand).

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21 Note: If an institution did not have 1,000 international students, all students who met the criteria were asked to be included in their sample.

22 The methodology for the CBIE study is described in more detail in the CBIE report: Canada First: The 2009 Survey of International Students.

23 Note: More than one representative from a particular educational institution may have responded to the survey.

24 The Canadian Association of Career Educators and Employers (CACEE) is a national non-profit partnership of employer recruiters and career services professionals.
2.3. Limitations

- Data from CBIE’s Canada First Survey of International Students does not include information on international students in British Columbia. The Province of BC conducted a similar survey of international students in the Fall 2008, and institutions in BC declined to participate in the CBIE survey. Where appropriate, findings from the BC survey were used to represent the views of international students studying in this province. The representation of respondents for both surveys was heavily weighted towards the university level (CBIE: 93%; BC: 76%). However, international students at the university level are Canada’s largest cohort group.

- Data from the survey of employers could not be used, as its low response rate made it unrepresentative. This limitation was addressed by using information related to employment from other lines of evidence, such as the student survey and document review.

- There were some gaps in CIC’s administrative data. Departmental data on field of study were not available, and information on the institutions at which international students are studying could not be used, as the coding information is out of date. Steps were taken to minimize the impact of these gaps by using other administrative data, the document review and extrapolating from the student survey data.

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25 The Ministry of Advanced Education and Labour Market Development in British Columbia (BC) conducted its own web-based survey between October 10, and December 10, 2008 with international students studying in BC. A total of 5,179 international students completed the survey out of a possible 18,052, translating into a response rate of 29%.
3. Findings

3.1. Relevance

Summary of findings:

In general, partners and stakeholders indicate a strong need for the ISP, identifying the many economic, cultural and social benefits that international students bring to Canada.

The ISP is aligned with GoC and CIC objectives and priorities, and consistent with provincial activities. However, there are some inconsistent program and policy objectives among the lead departments - CIC, DFAIT and CBSA.

The federal government plays an appropriate role with respect to international education in relation to its mandate to support national security, international trade and Canada’s economy.

3.1.1. Need for the International Student Program

Ninety-five percent of those interviewed (41 of 43) indicated a continued need for the program, and described this need in terms of the many benefits (social, cultural, and economic) it brings to international students, educational institutions and communities.

The document review found that educational institutions need international students to compete in the “global race for research talent” and address student shortages. The need to address student shortages was further highlighted in the interviews and confirmed by 48% of the educational institutions surveyed. Specifically, survey respondents indicated that international students bring benefits to their educational institution by addressing these shortages; of these, representatives from universities, colleges, and language schools were evenly distributed.

In addition, 49% of those interviewed (21 of 43) saw a role for the ISP in contributing to Canada’s economic needs through the potential future immigration and integration of international students in Canada. International students are recognized for their potential to integrate easily given their language skills and Canadian experience, and are thus desirable candidates for immigration.

3.1.2. Alignment with GoC, CIC, OGD and provincial priorities and objectives

Alignment with Government of Canada and CIC

The need for international students, as well as their labour force and immigration potential, was articulated in various Government of Canada (GoC) policy documents, including Advantage Canada 2006 and the 2008 Speech from the Throne. The 2008 Speech from the Throne indicated that the Government of Canada would “work with the provinces to attract top international students to Canada.”

Similarly, there was a strong consensus among key informants interviewed (13 of the 14 respondents who commented) that the ISP is consistent with GoC objectives, priorities and activities.

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27 Lessons in Learning: School enrolment trends in Canada (Canadian Council on Learning, 2006); School boards turning to foreign students to fill classrooms as enrolments decline – Big bucks brought in with tuition fees, but practice criticized by some educators as being unfair to rural areas – By Jill Mahoney – Published in the Globe and Mail June 9, 2008; Planning and Possibilities: The Report of The Declining Enrolment Working Group (March 2009) (Ontario Ministry of Education website: www.edu.gov.on.ca/eng/policyfunding/DEWG.pdf).
28 Speech from the Throne 2008: Protecting Canada's Future, 19 November 2008
The ISP’s objective to attract and retain international students is articulated in CIC’s departmental documents, and supported by CIC’s strategic objective for the temporary resident program to “design, develop and implement policies and programs to facilitate the entry of temporary workers, students and visitors in a way which maximizes their contribution to Canada’s economic, social and cultural development while protecting the health, safety and security of Canadians.” CIC and OGD key informants interviewed (8 of the 11 who commented) indicated that the ISP was aligned with other CIC programs, most often mentioning the Canadian Experience Class (CEC), the Provincial Nominee Program (PNP) and the Temporary Foreign Worker (TFW) program.

Alignment with other government departments

Although their mandates vary, other government departments have an interest in international students and international education. In particular, CIC works closely with DFAIT and CBSA in the implementation of the ISP.

Interviews with representatives from CIC and other government departments revealed some incongruence between the objectives of the lead departments – CIC, CBSA and DFAIT. A little over half of the 13 CIC respondents indicated that CIC objectives were not aligned with the objectives, priorities and activities of other federal departments. Four CIC respondents indicated that it was aligned, however, two of these respondents qualified their responses. Specifically, it was noted that CBSA’s priority related to enforcement can be at odds with CIC’s facilitation objective, and DFAIT’s focus on promotion does not take into account CIC service-delivery capacity. Many respondents highlighted a need for improved coordination among government departments.

Alignment with provinces

The majority of provincial government representatives interviewed (80%) reported that the ISP was consistent with their provincial program priorities and activities. However, processing times and communication and outreach were mentioned as areas requiring improvement.

3.1.3. Federal role

While education in Canada is a provincial/territorial jurisdiction, there is an appropriate role for the federal government with respect to international education. The federal government is responsible for Canada’s national security, international trade, and national economy, which together provide the backdrop for the provision of education to international students and their potential transition to permanent residence in Canada.

- The federal government supports Canada’s national security interests by ensuring the integrity of the study permit program and preventing the entry of non-genuine students. It is responsible for the implementation of IRPA. Section 3(1) of IRPA states that the objectives with respect to immigration are to “protect the health and safety of Canadians and to maintain the security of Canadian society”… and to deny “access to Canadian territory to persons who are criminals or security risks”. CIC and CBSA share the responsibility for program integrity – CIC with a focus on the processing of applications, including admissibility, and CBSA primarily through enforcement.

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29 Citizenship and Immigration Canada’s DPR 2007/08 (p. 27).
30 Section 3 (1) of IRPA (2002).
• **The federal government promotes Canada’s national trade interests in international fora.**
  The main role of DFAIT is to promote education in Canada abroad. Through the Canada brand, DFAIT brings together provinces and territories to market Canada as a destination for international students. The objective is to “enhance Canada’s international profile for education excellence and encourage linkages between Canadian and foreign institutions, thereby creating opportunities for Canadian students to study abroad and to attract more international students to Canada.”

• **The federal government is responsible for Canada’s national economy.** An important focus of the federal government is Canada’s continued economic growth. The Government of Canada views international students as a potential pool of candidates for labour force participation and permanent residence, contributing to a stronger economy in the long term. Bringing international students to Canada has significant implications for these national interests that can only be addressed at the federal level. As jurisdiction over education lies with the provinces and territories, the federal government must work with provincial and territorial governments to set the standards for quality assurance in education, and therefore, must work with them to protect Canada’s reputation and ensure that the ISP continues to benefit Canada.

### 3.2. Performance

#### 3.2.1. Social, cultural and economic benefits

**Summary of findings:**

International students bring with them many benefits to Canada, including increased revenues to educational institutions and communities and enhanced diversity to learning environments and smaller communities.

The economic benefits to Canada of international students are extensive. A recent study commissioned by DFAIT estimated international student expenditures in 2008 at over $6.5 billion, and suggested that international education is one of Canada’s more lucrative exports.

The longer-term economic benefits are also being recognized. Increasingly, international students are staying to work post graduation or reside in Canada. However, the number retained is still relatively small compared to the total number of those studying in Canada.

**Benefits to educational institutions, communities and international students**

Findings showed that partners and stakeholders recognize the many benefits (social, economic and cultural) that international students bring to Canada, and that these benefits are distributed regionally – in each province and in large and smaller communities.

**Benefits to educational institutions:** Respondents interviewed identified benefits to educational institutions, including economic benefits through student tuition, as well as benefits from enhanced diversity within learning environments. Findings from the survey of educational institutions were consistent with these results. Most respondents indicated that international students enhance the
diversity of the learning environment (internationalization) (95%), promote the reputation of the educational institution internationally (93%), and increase revenues (87%).

**Benefits to communities:** Those interviewed also identified many benefits, including economic benefits through the money spent while studying, the social/cultural diversity gained (primarily in smaller communities), the potential transition to permanent residence and resultant population growth, as well as labour market benefits.34

Administrative data for the reporting period showed the distribution of international students in each province (see Table 1-5), as well as in Canada's major metropolitan areas of Montreal, Toronto and Vancouver (MTV) and the rest of Canada (ROC) (see Table 3-1). Of note, about 44-45% of international students were destined to communities in the ROC each year.

**Table 3-1: Number of international students by Canadian Metropolitan Area (CMA) and year**

<table>
<thead>
<tr>
<th>CMA</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Montréal</td>
<td>9,019</td>
<td>8,952</td>
<td>8,471</td>
<td>9,481</td>
<td>10,196</td>
<td>10,090</td>
</tr>
<tr>
<td>Toronto</td>
<td>13,808</td>
<td>13,021</td>
<td>13,169</td>
<td>13,772</td>
<td>13,663</td>
<td>15,164</td>
</tr>
<tr>
<td>Vancouver</td>
<td>16,356</td>
<td>15,320</td>
<td>15,716</td>
<td>16,248</td>
<td>17,556</td>
<td>18,581</td>
</tr>
<tr>
<td>Total MTV</td>
<td>39,183</td>
<td>37,293</td>
<td>37,356</td>
<td>39,501</td>
<td>41,415</td>
<td>43,835</td>
</tr>
<tr>
<td>ROC</td>
<td>30,529</td>
<td>28,828</td>
<td>30,521</td>
<td>32,285</td>
<td>32,623</td>
<td>35,674</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>69,712</td>
<td>66,121</td>
<td>67,877</td>
<td>71,786</td>
<td>74,038</td>
<td>79,509</td>
</tr>
</tbody>
</table>

**Benefits to international students:** Though less of a focus, a number of benefits to international students were noted by respondents interviewed. Benefits included exposure to Canadian values/society and opportunities for personal/professional growth, quality education, work experience, and increased employability in one’s home country.35 In addition, many respondents to the CBIE survey of international students indicated that their Canadian program of study had been valuable/beneficial in helping to make them a more educated person (good: 44%; excellent: 40%) and in preparing them for further study (good: 42%; excellent: 32%).

**Economic benefits to Canada**

Numerous studies have demonstrated the economic benefits of international education at the national and provincial levels.36 A recent study commissioned by DFAIT estimated that “in 2008, international students in Canada spent in excess of $6.5 billion on tuition, accommodation and discretionary spending; created over 83,000 jobs; and generated more than $291 million in government revenue.”37 This study also compared international education to lumber and coal, and suggested that it was one of Canada’s more lucrative exports.

At the provincial level, studies in British Columbia, Manitoba and Saskatchewan have shown similar economic benefits of international students in their jurisdictions.

34 Ibid.
- The BC study found that international students spend close to $511M for direct purchases of goods and services each year.
- The MB study estimated that their total economic impact (including tuition, academic fees and non-academic spending) surpassed $74M during the 2006-2007 academic year.
- The SK study estimated the annual expenditures of international students at the University of Regina, the University of Saskatchewan and in the K to 12 sector to be over $71M in 2007.

There is also growing recognition in Canada of the longer-term benefits of international students as labour market contributors and potential immigrants with Canadian education and work experience (discussed in section 3.1 on Relevance). The CEC immigration stream was created in order to retain international students and realize the benefits. Between September 17, 2008 and July 3, 2009, CIC received 1,780 applications and issued a total of 606 permanent residence visas to international student applicants by way of the CEC.

CIC administrative data on transitions to work and permanent residence showed that Canada’s retention of international students increased over the reporting period, but was relatively small compared to the total stock of international students in Canada.

- In 2008, 11,760 international students transitioned to foreign worker status (compared to 3,454 in 2003); of which, 66% did so with a post-graduation work permit. The number of those transitioning to foreign worker status was about 8% of the total stock of international students in post-secondary or other studies.
- In 2008, 10,357 international students transitioned to permanent resident status (compared to 5,486 in 2003). A little over half of those transitioning (55%) did so as a skilled worker (3,717) or as the spouse or dependant (1,939) of a skilled worker; 55% studied previously at the university level; and 11% studied previously at the trade level. The number of those transitioning to permanent resident status was about 7% of the total stock of international students in post-secondary or other studies.

3.2.2. Global competitiveness

Summary of findings:

Although globally competitive in terms of its study/work offerings, Canada’s leading competitors have attracted a larger share of the global international student population. Issues with study permit processing and promotion were identified as hindering global competitiveness.

The quality of education was viewed as most important by international students in their decision-making. Though not as important, opportunities for post graduation work and permanent residence also factored into the decision-making of many students.

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39 News Release: Canadian Experience Class now open for business (Ottawa, September 5, 2008). Note: Eligible temporary foreign workers and international students were able to start applying for permanent residence under the Canadian Experience Class on September 17, 2008.
40 Data source: dwsweb\International Region\imm_caips_e at July 3, 2009 download.
41 Note: An international student could have transitioned to a foreign worker and a permanent resident in the same year.
42 Retention rates are not tracked systematically by CIC, so administrative data on transitions to work and permanent residence were used to estimate retention.
43 Note: Post-secondary studies include university, trade and other post-secondary levels of study.
44 Ibid.
International students are taking advantage of work opportunities in Canada with an increasing number of off-campus and post-graduation work permits being issued annually. However, the extent and quality of the work experience gained by these students is less clear.

**Canada’s performance**

**Market share of international students:** As noted earlier, the number of international students coming to Canada is increasing. However, Canada’s market share of international students relative to other countries is declining. There are numerous measures to assess market share of the international education industry. Looking at market share as a simple proportion of the tertiary international student population world-wide, Canada had around 4.4% of the total market share of international students in 2007, ranking 6th in the world after the US (19.7%), UK (11.6%), Germany (8.6%), France (8.2%) and Australia (7.0%). This was a decrease from the previous year in which Canada had 5.1% of this market.

Larger countries tend to have larger market shares, which can distort a country’s relative performance. Therefore, country size was considered in the measure of market share, and showed that Canada’s performance was consistent with its size. Nevertheless, it was still outperformed by its main competitors – the UK, Australia and New Zealand (see Figure 3-1).

**Figure 3-1: Ratio of OECD student to OECD population shares (2007)**

![Chart showing the ratio of OECD student to OECD population shares (2007)](chart)

Source: OECD Factbook 2010 and Education at a Glance 2009: OECD Indicators

**Stakeholder perception of global competitiveness:** Findings were mixed in terms of partner and stakeholder perceptions of Canada’s global competitiveness. A little over half of the partners and stakeholders interviewed (56%) generally viewed the ISP as globally competitive; however, more than half of these qualified their response, indicating that we could be doing better. Conversely, a little over a quarter of those interviewed (27%) indicated that the program is not globally competitive.

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Similarly, findings were mixed among educational institutions surveyed. Forty-one percent of universities and colleges agreed that Canada’s study and work opportunities for international students are globally competitive, while 32% disagreed. Seventy-four percent of language schools disagreed; however, their students are typically not eligible for all the work opportunities.\textsuperscript{46}

**Canada’s ranking as a study destination**: Findings from the CBIE survey showed that Canada was not the first choice for a number of respondents choosing Canada as a study destination. A little over half (52%) of respondents had Canada as their first choice, while 25% had the US, 7% had the UK and 2% had Australia. Due to study limitations, only international students in Canada could be surveyed, so the analysis considered the context of those applying for admission to institutions in more than one country. Of the 2,550 respondents who had applied to more than one country, 44% indicated that Canada was their first choice.

**Competitiveness of Canada’s study/work package**

Canada’s study/work package has evolved over the reporting period to incorporate opportunities believed to be attractive to international students. The comparative study, commissioned as part of the evaluation to examine Canada’s program relative to that of its competitor countries, found that Canada is generally on par or better in terms of its offerings for international students.

The study compared Canada’s program to those of the United States (US), the United Kingdom (UK), Australia, New Zealand and France. Canada’s policies regarding working on and off campus for international students were consistent with those of its competitors. Its provisions for the work of partners/spouses were as good as or better, particularly in comparison to the US and France, where partners/spouses are not permitted to work. The review also noted that Canada offers the most generous post-graduation work opportunity, allowing recently graduated international students to apply for up to a three-year work permit.\textsuperscript{47}

**Factors contributing to the appeal of Canada**

Factors contributing to international student decision-making to study in Canada were examined by the CBIE survey. Quality of education was most commonly reported (74%) as very important by respondents (see Table 3-2). The BC survey found similar results, with 90% of students indicating that the quality of education was important or very important to their decision to study in B.C.

<table>
<thead>
<tr>
<th>Reason</th>
<th>Not important</th>
<th>Somewhat important</th>
<th>Very important</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada’s reputation in general</td>
<td>7%</td>
<td>41%</td>
<td>52%</td>
</tr>
<tr>
<td>Canada’s reputation as a safe country</td>
<td>8%</td>
<td>27%</td>
<td>65%</td>
</tr>
<tr>
<td>The quality of education in Canada</td>
<td>3%</td>
<td>23%</td>
<td>74%</td>
</tr>
<tr>
<td>The prestige of a Canadian degree or diploma</td>
<td>8%</td>
<td>34%</td>
<td>58%</td>
</tr>
<tr>
<td>The cost of studying in Canada in comparison to other countries</td>
<td>18%</td>
<td>36%</td>
<td>45%</td>
</tr>
<tr>
<td>Ease of getting a Canadian study permit</td>
<td>24%</td>
<td>39%</td>
<td>37%</td>
</tr>
<tr>
<td>Off-campus work opportunities in Canada</td>
<td>35%</td>
<td>32%</td>
<td>32%</td>
</tr>
<tr>
<td>Post-graduation work opportunities in Canada</td>
<td>21%</td>
<td>27%</td>
<td>51%</td>
</tr>
<tr>
<td>Opportunities for permanent residence in Canada</td>
<td>23%</td>
<td>29%</td>
<td>48%</td>
</tr>
</tbody>
</table>

\textit{Note: Percentages may not add up to 100%, as non-responses were not included in the table.}

\textsuperscript{46} These students may be eligible for a co-op/internship work permit.

\textsuperscript{47} Devoretz and Coulombe, 2009.
Opportunities for post-graduation work and permanent residence were also seen as important to a number of respondents, similar to the costs of studying in Canada. Approximately half of respondents identified these opportunities as very important. However, off-campus work was less of a driver. A little over a third of respondents indicated that it was not important.

**Taking advantage of work opportunities**

Employment opportunities are considered to be an important driver in the decision-making of international students,\(^{48}\) and the off-campus and post-graduation work permit programs were cited in the interviews as contributing factors to Canada’s competitiveness. In particular, the OCWP program allows international students “to acquire work experience in the labour market, strengthen their ties to local communities and enhance their overall experience in Canada”, while the PGWP program “enhance[s] employment opportunities for recently graduated foreign students, helping them to experience Canada and build relationships, with a view to encouraging immigration in a diversity of regions in Canada”.\(^{49}\)

**Off-campus employment:** The number of students with off-campus work permits in Canada as of December 1st increased over the reporting period, from 652 in 2004 to 24,437 in 2008.\(^{50}\) Seventy-nine percent of those with off-campus work permits in 2008 were studying at the university level.

Since the OCWP program became national in 2006, most international students with off-campus work permits have been distributed across Ontario, British Columbia, Quebec and Alberta, where most of Canada’s eligible educational institutions are located (187 out of 223 participating educational institutions).\(^{51}\) In 2008, 86% of all international students with off-campus work permits were located in these four provinces, with the largest percentage concentrated in Ontario (36%).

**Post-graduation employment:** The number of students with post-graduation work permits in Canada as of December 1st also increased over the reporting period, from 3,004 in 2003 to 12,671 in 2008.\(^{52}\)

The regional distribution inside and outside of the urban centres of MTV – is of note (see Table 3-3). Between 2003 and 2006, there were more international students with post-graduation work permits in MTV than in the ROC. However, this difference decreased in 2006, and the trend was reversed by 2007, consistent with the timing of the enhancement to the PGWP program that allowed international students outside of MTV to work up to two years post graduation.

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\(^{49}\) Ibid.

\(^{50}\) Ibid. An international student may have had both an off-campus and a post-graduation work permit in the same year.

\(^{51}\) Note: The province or territory indicated is that reported at entry on the study permit, and may not be consistent with where the international student actually worked.

\(^{52}\) Note: An international student may have had both an off-campus and a post-graduation work permit in the same year.
Table 3-3: Number of international students with a post-graduation work permit by Canadian Metropolitan Area (CMA) and year

<table>
<thead>
<tr>
<th>CMA</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Montréal</td>
<td>337</td>
<td>394</td>
<td>451</td>
<td>460</td>
<td>377</td>
<td>872</td>
</tr>
<tr>
<td>Toronto</td>
<td>1,028</td>
<td>1,722</td>
<td>2,554</td>
<td>3,061</td>
<td>2,892</td>
<td>3,936</td>
</tr>
<tr>
<td>Vancouver</td>
<td>261</td>
<td>385</td>
<td>590</td>
<td>801</td>
<td>881</td>
<td>1,423</td>
</tr>
<tr>
<td>Total MTV</td>
<td>1,626</td>
<td>2,501</td>
<td>3,595</td>
<td>4,322</td>
<td>4,150</td>
<td>6,231</td>
</tr>
<tr>
<td>Total ROC</td>
<td>1,378</td>
<td>1,877</td>
<td>2,927</td>
<td>4,195</td>
<td>4,606</td>
<td>6,440</td>
</tr>
<tr>
<td>Grand Total</td>
<td>3,004</td>
<td>4,378</td>
<td>6,522</td>
<td>8,517</td>
<td>8,756</td>
<td>12,671</td>
</tr>
</tbody>
</table>

The largest increase experienced both inside and outside MTV, was between 2007 and 2008, corresponding to the lessening in the requirements for the program. The number of international students working post graduation increased by 50% in MTV, and by 40% in the ROC, representing an overall increase of 45%.

Throughout the reporting period, approximately half of the international students with post-graduation work permits were in Ontario, many located in Toronto. In 2008, 31% of all international students with post-graduation work permits were located in Toronto.

**On-campus employment:** CIC does not track the number of international students working on-campus, as there is no requirement for a permit to work on-campus. However, findings from the CBIE Survey of International Students suggest that a number of students are taking advantage of this opportunity, with a little over a third of student respondents (35% or 2,080 respondents) indicating that they had worked on campus for pay during their studies.

Of note, more student respondents indicated that they had worked on campus than off-campus (18% or 1,092 respondents) or in a co-op/internship (11% or 631 respondents). These findings are consistent with results from the BC Survey of International Students, showing that of the 2,056 respondents who reported working for pay or wages in B.C., 46% worked on-campus, 36% worked off-campus and 14% participated in a co-op or internship program.

**Extent and quality of work experience:** With respect to the OCWP program, findings from the CBIE survey showed that 37% of the international student respondents reporting off-campus work indicated that this experience was related to their program of study or future career plans. However, a greater percentage of respondents reporting on-campus work (59%) indicated that their work was related.

With respect to the PGWP program, it can be inferred that international students applying before April 2008 did in fact work and gain experience related to their future career path, as a job offer in a field related to their program of study was a requirement. However, changes to the program subsequently eliminated these requirements, along with the ability to make these conclusions.

**Limitations to Canada’s global competitiveness**

Issues with promotion and processing were highlighted as limitations to Canada’s global competitiveness in the interviews. Most of the respondents who indicated that the program was not globally competitive (10 of 11 respondents) highlighted issues with processing, primarily in terms of

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53 After April 2008, international student graduates, irrespective of location, could work up to 3 years without a job offer in field related to their program of study.

54 Note: The province or territory indicated is that reported at entry on the study permit, and may not be consistent with where the international student actually worked.
the time it takes. Moreover, many (7 of 11 respondents) raised issues related to promotion/recruitment, with a number indicating that Canada is not marketing itself sufficiently.

According to a DFAIT report, Canada’s underperformance is related to a lack of branding of Canadian education and a coordinated approach to marketing, as well as limited support for promotion and a lack of policy direction in Canadian missions abroad.\(^{55}\) Unlike its competitor countries, education is not governed at the national level in Canada, posing unique challenges for promoting international education in a coordinated way, and the Canada Education Brand, “Imagine”, which unifies Canada’s promotional efforts, was not developed until 2008.\(^{56}\)

Languages Canada notes that international students are choosing other countries (e.g. Australia) over Canada because their visa processes are easier and quicker.\(^{57}\) Findings from the survey of educational institutions showed that a little over a quarter (29\%) of the 34 respondents who provided suggestions or recommendations for program improvements wanted to see improvements to processing times (faster). Also, about three-quarters of the international students surveyed indicated that the ease of getting a Canadian study permit factored into their decision-making (see Table 3-2).

### 3.2.3. Program Integrity

**Summary of findings:**

CIC’s policy framework currently leaves the International Student Program vulnerable to potential misuse. Non-genuine students and questionable educational institutions are primary concerns in the student application caseload.

CIC does not have a complete inventory of legitimate educational institutions in Canada, nor the authority to ensure their quality.

In general, there is reported fraud and misuse in the International Student Program. Its extent is unclear due to a lack of data and consistent reporting, and efforts to mitigate the risk of fraud and misuse are quite varied.

Apart from CIC, many partners and stakeholders do not believe that there is consistent decision-making on student applications. Quality assurance activities are inconsistent across the department, making it difficult to objectively assess the overall quality of decision-making.

Program integrity was examined in relation to fraud and monitoring of international students and educational institutions in Canada and quality of decision-making.

**Fraud in the student application caseload**

Fraud in the student application caseload is a significant concern for CIC – not only does it pose a risk to the integrity of the International Student Program, but it also compromises Canada’s reputation for quality education and raises serious issues related to national safety and security.\(^{58}\) Not surprisingly, misuse and fraud (or the extent to which it is occurring) was the focus for many interview respondents reporting unexpected or unintended outcomes of the ISP. Specific areas mentioned included the creation of illegitimate schools (“visa mills”), fraudulent consultants and issues with individuals using the study permit to get into Canada with no intention of studying.

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55 Profile of the Edu-Canada Initiative (DFAIT 2009).
56 The Canada Education Brand was developed in partnership by the Department of Foreign Affairs and International Trade (DFAIT) and the Council of Ministers of Education Canada (CMEC), and is managed jointly.
57 Immigration Issues – Affecting the Language Training Sector: Languages Canada’s Position Paper (January 2009).
58 International Student Review policy paper (CIC, 2008).
Vulnerability of the ISP design: The legislative and policy framework supporting the ISP leaves the program open to potential misuse.\textsuperscript{59} In particular, there is no legislative requirement for international students to study once they are in Canada. Students must demonstrate only an intention to study in order to remain in Canada for the duration of their study permit. Moreover, recent changes to ISP policies intended to be responsive to stakeholder needs have weakened some of the controls in place to prevent misuse. For example, study permits are now typically issued for the full length of the student’s program of study, and international students, and the educational institutions at which they study, are not required to notify CIC of any changes to a program of study or institution.\textsuperscript{60}

CIC does not have a complete list of educational institutions in Canada. Educational institutions are loosely defined by CIC and are not required to meet any minimum standards to host international students. Public and private educational institutions offering academic, professional or vocational training are eligible, but within the existing jurisdictional framework the federal government has no legislative authority to regulate them. Provinces and territories are responsible for education in Canada. All have mechanisms in place to ensure the quality for publicly funded institutions, but such is not the case for most privately funded institutions.

Nature of fraud: CIC defines fraud as “an intentional misrepresentation or false representation of truth or concealment of material fact” and suspected fraud as “physical evidence, conflicting information or behaviour of applicant that would suggest misrepresentation.”\textsuperscript{61} A40 is the inadmissibility provision for misrepresentation. “Persons who misrepresent or withhold material facts, either directly or indirectly, relating to a relevant matter that induces or could induce an error in the administration of the Act [IRPA] are inadmissible to Canada pursuant to A40(1)(a).” A44 is a report on inadmissibility. An A44 report may be written in situations where an application is refused by virtue of the A40 clause.\textsuperscript{62}

Visa offices abroad were surveyed for the evaluation regarding different issues typically encountered with respect to fraud (see Figure 3-2). The majority (88\%) identified non-genuine students as an issue. Sixty-six percent indicated that this was the most frequently encountered type of fraud.

\textsuperscript{59} Anti-Fraud Survey Report (CIC International Region, 2006); Student Fraud in the Pacific Region (CBSA BC Region, 2006); International Student Review (CIC, 2008).
\textsuperscript{60} Exception: International students and educational institutions participating in the OCWP program must report such changes.
\textsuperscript{61} Source: OP23/IP11 2006/01/19 (p. 9).
\textsuperscript{62} Source: OP23/IP11 2006/01/19 (p. 3 and p.13).
Strategic analysis reports, produced monthly by CPC-Vegreville, were also reviewed to examine cases involving fraud and possible misrepresentation discovered during inland processing in 2008. This review found a total of 1,028 referrals for questions related to educational institutions for the year, accounting for 25% of the referrals related to anti-fraud or quality assurance. It also found between one and four descriptions of “interesting cases” involving student-related fraudulent activity each month. Issues highlighted in these cases included: not paying tuition fees while in Canada; fraudulent letters of acceptance; not submitting transcripts; questions concerning education path given past experience; and possible misrepresentation in transcripts.63

**Previous work to examine fraud:** One of the first efforts to take a closer look at student-related integrity issues was the work conducted by CBSA BC Region in 2006. In this review, CBSA BC Region identified and investigated several hundred cases of suspected student-related fraud. Some of the investigations also found links to organized criminal activities, such as prostitution and drug trafficking. From this work, “it became apparent that the scope of student-related fraud was much larger than anyone had previously anticipated.”64

That same year, CIC’s International Region conducted an anti-fraud survey of visa offices and case processing centres, and found that “fraud is prevalent in every region and every program, but is especially concentrated in the Africa-Middle East and Asia-Pacific regions, which have the highest percentage of TRV applications and are major sources of legal and illegal migrants.” In this study, temporary resident programs were highlighted by visa offices as being the most susceptible to fraud due to short processing times and low cost recovery fees; and the student application caseload was identified as having a slightly higher incidence of fraud than the other temporary resident streams. In addition, CPC-Vegreville noted the issue of questionable educational institutions, and indicated that CIC’s policy to issue long-term generic permits to students contributed to the program’s vulnerability.65

63 Source: Strategic Analysis Month End Reports (CPC-Vegreville, January-December 2008).
64 Student Fraud in the Pacific Region (CBSA BC Region, 2006).
Stakeholder perception of fraud: In 2007, consultations were conducted during the ACISI and FPCCERIA meetings, at which there was a general consensus that some level of fraud exists and recognition that more data was needed. The potential of this issue to affect Canada’s ability to attract international students was also noted.  

There was also wide agreement that misuse and fraud exist within the ISP among partners and stakeholders interviewed for the evaluation. However, reports on the extent to which it exists differed between respondent groups. Though still relatively low (approximately one third), a higher percentage of CIC respondents indicated that fraud and misuse is a significant concern. Many respondents were either unsure whether fraud actually exists or did not know the extent to which it exists due to a lack of available data and fraud tracking mechanisms. Questionable educational institutions (mainly privately funded), misuse of study permits and fraudulent documents were all mentioned during the interviews as issues related to fraud.

Findings from the survey of visa offices showed that the frequency of fraud (suspected or confirmed) encountered in the student application caseload tended to vary across missions. Thirty percent of visa offices surveyed reported that they often encounter fraud in the student application caseload, while 36% reported that they rarely or never encounter it. Consistent with the 2006 anti-fraud survey, two-thirds of those reporting that they often encounter fraud were located in the Asia and Pacific region or in Africa and the Middle East.

Detection and verification of fraud

Much of the fraud attributed to the ISP is “suspected”, with only a small number of cases actually confirmed. CIC processes do not support the identification of fraud and the department lacks the means to track suspected fraud.

The 2006 anti-fraud survey report observed that “there is little consistency amongst visa offices in how fraud challenges are understood, documented, investigated and resourced,” and that “the means to track fraud…are mission-specific, but more often non-existent.” The 2008 ISP Review noted that CIC’s “case management systems do not have the capability to measure fraud within the immigration program.” It also reported that a data mining exercise, conducted in October 2007, found only 470 instances of A44 reports in FOSS linked to international students since the introduction of IRPA.

Consistent with these findings, the 2006 CBSA report on student fraud in the Pacific Region noted that of the 639 investigations initiated, only 80 were closed, resulting in 48 A44 reports (including both reports of inadmissibility due to misrepresentation and non-compliance).

Following the anti-fraud survey, OMC Branch’s Fraud Deterrence and Verification Division began a tri-annual anti-fraud reporting process with CIC visa offices abroad. As part of this process, A40 refusals (for both temporary and permanent resident applications) were compared against the total number of cases processed for three reporting periods: October 2007 to January 2008; February to May 2008; and June to September 2008. It was concluded that the A40 refusal was used so infrequently that it was “impotent as a fraud deterrent” and that the “use of A40 [could] no longer...

66 Consultations with PTs and stakeholders in October 2007 (CIC Immigration Branch, November 2007).
68 Anti-Fraud Survey Report (CIC International Region, 2006, p. 4).
69 International Student Review policy paper (CIC, 2008). It is important to note that the A44 reports documented misrepresentation for clients “who had a study permit at any time”.

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be considered as an indicator of anti-fraud activity”. Furthermore, the quality and consistency of reporting by visa offices was identified as an issue.70

Similarly, the reasons for refusals and frequency of referrals to CBSA, reported in the survey of visa offices, did not reflect an abundance of fraud. Visa offices surveyed estimated an average of 58% of refusals based on bona fides, 29% for lack of adequate finances and only 6% for misrepresentation (A40). Moreover, 31 visa offices surveyed indicated that they rarely or never refer cases to CBSA for further investigation (i.e. second-level anti-fraud verification), even though more than half of these indicated that they sometimes (35%) or often (23%) encounter fraud (suspected or confirmed).

As a possible explanation, results from the tri-annual anti-fraud reporting suggest that some visa offices find the A40 procedures to be cumbersome and impractical.71 Moreover, it has been noted that instead of verifying suspected fraud, many visa offices refuse suspicious temporary resident applications for non bona-fides, thereby limiting CIC’s ability to systematically track and report on fraud.72 Instructions to the field seem to support this practice: operational guidelines (OP23) advise CIC officers to carefully consider whether they should request a CBSA fraud investigation if they have sufficient information to warrant a refusal.73

**Strategies to mitigate fraud in the student application caseload**

Anti-fraud is the term used to describe the “processes implemented to deter abuse of the immigration program (or measures taken to mitigate fraudulent activity).”74 There are two levels of anti-fraud. The first level includes activities to verify client information and documentation that are carried out by CIC and CBSA officers as part of their regular work. These activities provide “the first point for detecting fraud and initiating investigations”. The second level includes intelligence and investigative activities to detect and take action to counter fraud. Second-level anti-fraud is the responsibility of CBSA, both in Canada and abroad.75

CIC’s anti-fraud efforts are varied, and have been described as “uneven” across the department.76 More recently, however, additional resources have been put in place to mitigate fraud in the immigration program. The results of these efforts for the student application caseload are as yet unknown.

**CIC:** The most commonly reported strategies used by visa offices surveyed were telephone verification (92%), document verification (90%) and personal interviews with a fraud focus (88%) – all activities that are in line with their first-level anti-fraud responsibilities. CPC-Vegreville also plays a role with respect to anti-fraud and the student application caseload. Most notably, it monitors educational institutions and immigration consultants about which there are questions. Also, when case processing officers suspect fraud or misrepresentation in a case, they can refer it for further verification.77

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70 Tri-annual anti-fraud reports (CIC Operational Management and Coordination Branch, Fraud Deterrence and Verification Division, 2008). Reporting periods: October 2007 to January 2008; February to May 2008 (DRAFT); June to September 2008 (DRAFT).

71 Ibid.

72 Anti-Fraud Survey Report (CIC International Region, 2006).

73 Source: OP23/IP11 2006/01/19.

74 Source: OP23/IP11 2006/01/19 (p. 8).

75 OP23/IP11 2006/01/19 (p. 7).

76 Anti-Fraud Survey Report (CIC International Region, 2006, pp. 1-2).

77 Source: OP23/IP11 2006/01/19 (p. 7).
The document review noted other developments within CIC to increase capacity to mitigate fraud in the immigration program: the expansion of anti-fraud field support; the creation of an anti-fraud coordinator network; the distribution of an anti-fraud bulletin; the development of an anti-fraud training course; and the provision of various data collection tools (to assist with the tri-annual anti-fraud reporting). The introduction of the Electronic Notification System (ENS) in the OCWP program is also believed to improve monitoring and reporting related to international students.

**CBSA:** Findings suggest that CBSA’s involvement in anti-fraud activities related to the student application caseload has been somewhat limited, but may be growing. A little over half of responding visa offices reported that CBSA officers (e.g. MIOs) are rarely (34%) or never (20%) involved. However, this level of involvement may be appropriate for many visa offices, as almost half (48%) of the 27 visa offices that indicated this lack of involvement also reported that they rarely or never encountered fraud in this caseload. The most commonly reported types of CBSA involvement were providing consultation on anti-fraud activities (54%), conducting some second-level anti-fraud activities/investigations (46%) and handling complex cases of fraud (40%) – all activities that are in line with their second-level anti-fraud responsibilities.

However, more recently, increases in CBSA anti-fraud support have been observed. Twelve new anti-fraud officer positions were created in various visa offices abroad, and CBSA regional offices increased inland investigative support to CPC Vegreville and CPC Mississauga (including support to address student-related fraud). In addition, CBSA recently received funding in the amount of $103.3 million over 5 years ($26.2M ongoing) through the CEC for the expansion of enforcement activities to address fraud in the Temporary Foreign Worker and International Student Programs.

The funds allocated through the CEC were to support incremental increases in workload as a result of expected growth in the two temporary resident programs due to the new immigration stream. However, funds were not allocated to CIC for corresponding increases to their processing workload, which is understood to include first level anti-fraud activities.

**Country comparisons:** The comparative study examined different approaches that have been adopted by other countries to deter fraud and ensure program integrity. It found that warnings about fraud were posted on nearly all websites, and that all countries in the review had comparable immigration and security requirements for international students.

The comparative study highlighted the utility of interviews (though costly and time-consuming) to minimize the various types of fraud. Of the countries reviewed, only the US and France conduct interviews with first-time applicants. The US and the UK were recognized for their use of biometrics. Canada conducts interviews only in certain circumstances, when there are questions concerning an application, or a need for clarification or more information. Canada is also currently developing a biometric system to be introduced in the Temporary Resident Program.

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78 CIC DPR 2007-08, p.23; Email description of actions taken as a result of 2006 Anti-Fraud Survey (received January 5 2009).
79 International Student Review policy paper (CIC, 2008).
80 Email description of actions taken as a result of 2006 Anti-Fraud Survey since the creation of the Fraud Deterrence and Verification Division within OMC Branch in 2008 (received January 5, 2009).
81 CBSA RPP 2008-09 (p. 41-42); International Student Review policy paper (CIC, 2008).
82 International Student Review policy paper (CIC, 2008).
83 Ibid.
84 OP12 Manual, section 7.11 Need for an interview.
Monitoring educational institutions and international students in Canada

As discussed earlier, the ISP legislative and policy framework leaves Canada vulnerable to non-genuine students and educational institutions. One of the key ways to mitigate this risk is through monitoring. Thus, the federal government must work in partnership with provincial/territorial governments. There are several initiatives currently underway (federal, provincial/territorial, education sector and international) that can serve as models for the ISP.

**Federal initiatives:** The OCWP program and the “Imagine” Brand are two key federal initiatives that are grounded in a quality assurance framework. Both represent partnerships between the federal and provincial/territorial governments and incorporate a quality assurance component that limits the participation of education institutions to those recognized by provincial/territorial governments. In addition, the OCWP program requires that international students, using the program, continue to study and remain in good academic standing at their educational institution.

The Canada in India Student Partners Program (SPP) is another quality assurance initiative at the federal level. Established in April 2009, this pilot project brings together Canadian visa offices in India (New Delhi and Chandigarh) and the Association of Canadian Community Colleges (ACCC) to address program integrity issues in this locale. The SPP combines a strategy to streamline and improve the quality of documents supporting student applications (more reliable and verifiable) with monitoring of international students in Canada and better communications. Preliminary results have shown an increased approval rate for cases meeting all SPP document requirements and streamlined processing times. 85

**Provinces and education sector:** There is a gap in the ISP quality assurance framework with respect to educational institutions that are privately funded. This segment of the education sector is not as closely monitored by provincial/territorial governments for the quality of education provided and the federal government does not currently have the legislative and/or regulatory authorities to enforce quality control.

There are a few initiatives underway to address this gap. The Government of BC is developing an Education Quality Assurance (EQA) designation that will be voluntary and available to all public and private post-secondary institutions in BC. Languages Canada (LC) serves both public and private language schools, and has an accreditation requirement for all member schools. The National Association of Career Colleges (NACC) has a Quality Assurance Initiative to institute a new accreditation process for private career colleges.

**Country comparisons:** The comparative study noted that non-genuine educational institutions have been, and continue to be, issues for each country reviewed, and that Canada was the only country reviewed “without a government-maintained, centralized, exhaustive list of approved educational institutions.” 86

The study recognized Australia and the US for their monitoring of educational institutions and international students. Australia has quality assurance built into its legislation. 87 Its educational

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85 Canada-in-India + ACCC Student Partners Program – Summary Report: September 2009 Cohort (Canadian High Commission, New Delhi, September 2009).
86 Devoretz and Coulombe, 2009.
87 “The Education Services for Overseas Students (ESOS) Act of 2000 regulates the provision of education and training to overseas students,” and “is designed to protect overseas students and provide a basis for consistency in registration of providers.” The Australian student visa program was reformed in 2001. The objectives of these reforms were: “transparency in requirements, consistency in decision-making and integrity in the student visa program.” (Source: Australia's Student Visa Program: Education Provider Responsibilities (Presentation by the Australian Government, c. 2004-05).
institutions are controlled through a combination of government and industry regulations, and must be registered and meet certain quality standards in order to host international students. International students in Australia are monitored by the Provider Registration and International Student Management System (PRISMS), in which educational institutions notify the government about course enrolments and visa breaches.88

However, Australia has recently made changes to its program to address issues of fraud, which make it more difficult to obtain a student visa (namely imposing stricter assessments for applying to lower-level courses), which has resulted in a recent and notable decline in international student applications corresponding to these changes.89

Like Canada, the US has experienced all types of fraud. However, having an approved list of educational institutions was of particular concern in the mid-1990s. The US introduced the Student Exchange and Visitor Program (SEVP) to certify educational institutions, by a recognized accreditation agency. In addition, it created the Student and Exchange Visitors Information System (SEVIS) to monitor international students already in the country.90

**Quality of decision-making**

Quality assurance is complementary to anti-fraud, and involves both the quality of decision-making and the reliability of client information. CIC defines quality assurance (QA) as the “planned and systematic processes, usually involving random sampling (either one-time or ongoing), used to monitor and assess established procedures;” and sets as its goal “to ensure efficiency, accuracy and consistency in decision-making, and to ensure fairness and integrity in programs.”91

In the student application caseload, QA activities vary between domestic and international operations and between individual visa offices abroad. Given this uneven approach to QA, it is difficult to assess the overall quality of decision-making on study permits, and thus verify stakeholder perceptions of its consistency.

**Stakeholder perception of decision-making:** When asked if decision-making is consistent on student applications, a little over a third of respondents (primarily provincial and NGO representatives) indicated that it is not consistent. About another third of respondents (primarily CIC) indicated that it is, although more than half of these qualified their response, identifying various issues. Regional differences, lack of clarity on IRPA guidelines, and dual intent were all mentioned during the interviews as issues affecting the consistency of decision-making.

Findings from the survey of educational institutions also highlighted a lack of consistency. A little over half (55%) of respondents disagreed that decision-making on study permit applications is consistent and appropriate. In contrast, only 20% agreed. Of the 33 respondents who disagreed, 14 were from universities, 8 from colleges and 10 from language schools. Eleven respondents highlighted various inconsistencies, such as differences between regions, offices, or students. Also, seven respondents noted that consistency in the study and work permit decision-making process could be improved.

**Visa offices abroad:** In 2003, CIC’s International Region introduced a QA framework in response to a recommendation from a 2001 Auditor General Report. However, “given the lack of additional resources to implement a quality assurance strategy and the diversity represented by the visa office

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88 Devoretz and Coulombe, 2009; International Student Review policy paper (CIC, 2008).
90 International Student Review policy paper (CIC, 2008); Devoretz and Coulombe, 2009.
network, International Region adopted a decentralized and phased approach to the quality assurance strategy\(^92\). The short-term goal of this strategy was to have quantifiable quality assurance activities undertaken at all visa offices, focussing on consistency and quality of decision-making and/or the fairness and integrity of the program. A reporting exercise was conducted in 2004 following the launch of the QA framework to develop a picture of the various QA and anti-fraud activities underway in visa offices abroad and identify operational needs and best practices that could be shared. During this exercise, 113 diverse activities were identified by 63 visa offices.\(^92\)

Consistent with this decentralized approach, a number of visa offices surveyed for the evaluation reported conducting activities on an as needed basis, to assess:

- Quality and consistency of decision-making (40%);
- Reliability of client information (54%); and
- Reliability/consistency of process (50%).

**Inland:** In addition to the various activities abroad, CIC’s OMC Branch conducts an annual QA exercise on the student application caseload at CPC-Vegreville.\(^93\) Two error rates are calculated as part of these exercises: the overall error rate, which represents the number of errors out of the total number of possible errors that could be made\(^94\); and the file error rate, which represents the percentage of files with one or more errors. A review of the reports resulting from these exercises over four fiscal years (FY 2005-06 to FY 2008-09) showed that while the overall error rate is low, the number of files with errors is high, with close to half of the files reviewed in each QA exercise demonstrating at least one error (see Table 3-4).

**Table 3-4: Quality of Decision Making (QDM) study permit reports: error rates (2005/06 to 2008/09)**

<table>
<thead>
<tr>
<th>Province</th>
<th>2005/06</th>
<th>2006/07</th>
<th>2007/08</th>
<th>2008/09</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of files monitored</td>
<td>441</td>
<td>430</td>
<td>452</td>
<td>453</td>
</tr>
<tr>
<td>Number of questions per file that could generate errors</td>
<td>50</td>
<td>46</td>
<td>38</td>
<td>38</td>
</tr>
<tr>
<td>Overall Error Rate</td>
<td>2% (393/22,050)</td>
<td>1.967% (389/19,780)</td>
<td>1.68% (288/17,176)</td>
<td>3.49% (600/17,214)</td>
</tr>
<tr>
<td>File Error Rate</td>
<td>53% (232/441)</td>
<td>43% (187/430)</td>
<td>44% (198/452)</td>
<td>56% (254/453)</td>
</tr>
</tbody>
</table>

However, the scope of these exercises was limited, and focused on the decision-making process rather than on the accuracy of final decisions; and the types of errors tracked in these exercises were largely administrative (such as errors related to proof of sufficient and available financial resources, conditions imposed, valid until date, level of study and field of study, and name of educational institution).\(^95\)

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\(^92\) Quality Assurance and Anti-Fraud Activities (CIC International Region, 2003).

\(^93\) Quality of Decision Making (QDM) exercises on Study Permits are conducted on an annual basis by monitors from National Headquarters, CIC local offices and CPC Vegreville. A statistically representative random sample of finalized Study Permit applications, based on the number of cases processed within the last calendar year, is selected by CPC Vegreville for the exercise. The monitors review the files and complete a QDM checklist for each file on the Quality Assurance System (QAS), an electronic system from which data is extracted by IMTB and provided to the OMC Branch for analysis and reporting.

\(^94\) Note: The total number of possible errors that could be made equals the number of questions per file that could generate errors multiplied by the number of files monitored.

### 3.2.4. Program management and delivery

**Summary of findings:**

There is a consistent understanding of the objectives of the International Student Program among program partners and stakeholders. However, there is less clarity surrounding roles and responsibilities.

CIC NHQ and regions are satisfied with communications and information-sharing within CIC. However, survey results suggest that communications and information-sharing among visa offices abroad and between visa offices and other areas of CIC are infrequent.

Although the information and support provided within CIC and to educational institutions are generally useful, there are issues with their adequacy and timeliness. Of note, visa offices identified a need for information and support related to genuine/non-genuine educational institutions and programs.

Stakeholders are positive about the changes to Canada’s study/work package. However, some stakeholders have experienced issues with the study and work permit application processes.

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**Understanding objectives, roles and responsibilities**

Interview findings showed that partners and stakeholders had a similar understanding of ISP objectives. However, 29% of those interviewed reported a lack of consistent understanding of roles and responsibilities; representatives from provincial governments and other government departments accounted for more than half (58%) of this group.

A number of issues were mentioned regarding roles and responsibilities during the interviews. Of note, more than a third (37%) of those interviewed commented on a lack of understanding of either their role or the role of CIC, and approximately 17% noted a lack of communication and outreach by CIC.

**Communications, information-sharing and coordination**

**Within CIC:** Overall, the majority of CIC respondents interviewed expressed general satisfaction with communication and information-sharing within CIC. Those interviewed were primarily located at NHQ or in regional offices in Canada.

However, more than half of the visa offices surveyed reported that they rarely or never shared information related to student application processing with other CIC groups:

- With other visa offices: Rarely (54%) and Never (8%);
- With CIC-NHQ: Rarely (48%) and Never (8%); and
- With CPC-Vegreville: Rarely (42%) and Never (38%).

**External partners and stakeholders:** ACISI is CIC’s main conduit to consult and share information, and was identified by nearly 80% of those interviewed (32 respondents). Of those who mentioned ACISI in the interviews, 56% indicated that it was effective (though two-thirds qualified their response), 13% said that it was not effective, and the rest did not comment.

A number of other engagement mechanisms were also mentioned in the interviews. DIFIT's working group/marketing strategy (NEMR/Canada Brand) (27%), outreach to educational institutions (24%) and provinces (17%) and FPCCERIA (15%) were the most frequently mentioned. Of note, half of the provincial representatives referred to DIFIT’s working group/marketing strategy and FPCCERIA; whereas CIC representatives primarily referred to outreach to educational institutions and provinces.


**Educational institutions:** Most educational institutions surveyed (92%) indicated that they had at least one means to participate in discussions and/or communicate with CIC regarding international student issues; 7% (4 respondents) indicated that they did not have or use a mechanism. Mechanisms included:

- National associations representing their interests (85%);
- Regional/local CIC representatives (one-third); and
- A provincial government representative (28%).

Most of those who identified regional/local CIC representatives (17 out of 20 respondents) or a provincial government representative (14 out of 17 respondents) were representatives from a university or college.

However, a number of institutional respondents (42%) indicated that they were dissatisfied with the mechanisms in place, while one-third indicated that they were satisfied. Of the 25 respondents who were dissatisfied, 11 were representatives from language schools, 8 from universities and 5 from colleges. Comments from the survey highlighted difficulties communicating directly with CIC and dissatisfaction with Call Centre service delivery (such as difficulty getting consistent answers to questions or difficulty getting through to a real person).

**Employers:** CIC has identified employers as a stakeholder group of the ISP in relation to the work permit programs. It has been noted that the involvement and support of employers are critical to the success of these programs, and that outreach will be needed to raise their awareness of the opportunity to hire international graduates. However, in spite of an identified need to connect with them, the lack of representation on ACISI, as well as the low response rate to the survey for this evaluation, suggests that employers have not been very engaged in the ISP.

**Functional guidance, information and support**

**Within CIC:** Functional guidance and support related to student application processing is largely provided by way of the Overseas Processing Manual – Students (OP12). It explains the policies and procedures for processing study permit applications outside Canada, at ports of entry and inland. Operational Bulletins are issued periodically to disseminate current information on procedural changes related to student application processing.

Many CIC respondents interviewed, primarily from NHQ or regional offices, indicated that the tools and support provided by NHQ to ensure appropriate decision-making on client applications are insufficient and/or inadequate. However, findings were mixed with respect to timeliness, with equal numbers reporting that the tools and support were or were not distributed in a timely manner.

Visa offices surveyed were asked to report on the types of functional guidance and support used or received from CIC-NHQ (past 12 months). The most commonly reported types were program manuals (96%) and operational directives/guidelines/updates (90%). To a lesser extent, anti-fraud resources and tools (52%) and operational statistics and trends (44%) were also reported by some visa offices.

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97 Ibid.

98 Employment Programs for International Students (CIC program document, c. 2008).

99 Note: Only CIC interview respondents were asked to respond to this question.
Visa offices were also asked to reflect on the quality of the functional guidance and support used or received from CIC-NHQ (see Table 3-5).

**Table 3-5: Quality of OP12 and the timeliness of functional guidance and support from CIC-NHQ (Survey of Visa Offices)**

<table>
<thead>
<tr>
<th>Quality of functional guidance and support</th>
<th>Agreed</th>
<th>Neither agreed nor disagreed</th>
<th>Disagreed</th>
</tr>
</thead>
<tbody>
<tr>
<td>The information on delivery of the International Student Program presented in OP12 is clear and easy to understand</td>
<td>84%</td>
<td>10%</td>
<td>6%</td>
</tr>
<tr>
<td>OP12 provides useful information for the delivery of the International Student Program at my mission</td>
<td>90%</td>
<td>6%</td>
<td>4%</td>
</tr>
<tr>
<td>In general, the functional guidance and support provided by CIC-NHQ is timely to support efficient student application processing</td>
<td>44%</td>
<td>40%</td>
<td>6%</td>
</tr>
</tbody>
</table>

Many of the responding visa offices agreed that the information on the delivery of the ISP presented in OP12 is clear and easy to understand and that OP12 provides useful information for the delivery of the ISP at their mission. However, results were more mixed in terms of the timeliness of functional guidance and support, with almost equal numbers indicating that they agreed or neither agreed nor disagreed that it is timely to support efficient student application processing.

Seventeen of the visa offices surveyed reported a requirement for additional guidance and support. Of these, eight indicated that they would like more information/support related to genuine/non-genuine education institutions/program of study.

**International students and educational institutions**: The information and support provided to educational institutions and international students contributes to the quality of the applications submitted and the efficiency of the decision-making process.

Survey findings showed that most international students and educational institutions found the information and/or support provided by CIC to be somewhat or very useful, and that most educational institutions understand the study permit application process and can provide assistance when needed to international students.

However, 53% of educational institutions surveyed indicated that they required additional information and/or support from CIC related to study permits, and more than a third (38%) disagreed that CIC responds in a timely manner to requests for information/support related to the study permit application process. Of the 23 respondents who disagreed, 9 were from universities, 7 from language schools and 5 from colleges.

**Policy and program development**

As discussed earlier, CIC has made a number of changes to the ISP and policy framework over the reporting period to facilitate study and work opportunities, and the transition to permanent residence, for international students.¹⁰⁰ Partners and stakeholders interviewed were asked to reflect

¹⁰⁰ News Release – Off-campus work permit program launched (Ottawa, April 27, 2006); News Release – Government of Canada introduces changes to work permits for international students, making Canada more attractive for skilled individuals (Vancouver, April 21, 2008); News Release – Canada’s government to help temporary foreign workers and foreign student graduates become permanent residents (Waterloo, August 12, 2008); News Release – Government of Canada makes it easier for international students to apply to work off-campus (Ottawa, September 3, 2008; 2008 Annual Report (p. 5).
on the changes (other than the OCWP and PGWP programs) that have been made in this regard, and noted many changes. The most frequently cited changes were the introduction of e-applications and the CEC.

The document review also revealed that stakeholders have been supportive of many of the changes to the ISP – in particular recent enhancements to the PGWP program, and survey findings showed that 81% of universities and colleges surveyed agreed that recent changes (for example, the introduction of off-campus work permits, changes to post-graduation work permit requirements, introduction of the CEC) have been responsive to their needs.

**Program delivery**

Stakeholders have been positive about the changes to Canada’s study/work package. However, there is evidence that there are some issues with the study and work permit application processes.

**Study permits**: A number of educational institutions do not believe that CIC policies and programs facilitate the entry of international students. Survey findings showed that 38% of universities and colleges disagreed and 27% agreed that CIC policies and programs are facilitative. Fifty-eight percent of language schools disagreed and 11% agreed.

Although many international students surveyed did not experience a problem or difficulty with the CIC study permit process, findings highlighted challenges for some. Some respondents reported experiencing somewhat of a problem or a big problem with obtaining a study permit (31%), and some with providing proof of finances to the Canadian government (35%). In addition, 30% reported some or much difficulty with Canadian visa officers in their home country. A number of those reporting “much” difficulty described frequent delays (application process/port of entry), unfriendly/not very helpful immigration officials or the inaccessibility of immigration officials.

**Work permits**: Results for the work opportunities were more positive. Of the universities and colleges surveyed, 68% agreed that CIC policies and programs facilitate work opportunities for international students; very few disagreed (4 respondents).

Findings from the CBIE survey of international students showed that of the 2,308 respondents indicating an experience with the services of CPC-Vegreville, the CIC Call Centre and/or local offices when applying for a work permit, 35% reported some or much difficulty. Similarly, findings from the CBIE study of international students and the workforce showed that 13% of respondents, reporting labour market experience, indicated getting a work permit but having to wait a long time for it.

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3.2.5. Application processing

Summary of findings:

In 2008, 65% of study permit applications were finalized within 28 days in visa offices abroad. Findings showed that there is a perception that processing times are slow for Canada.

Processing times and refusal rates for study permits finalized abroad vary considerably by visa office. The perception of fraud, type of educational institution and visa and medical requirements are important factors in this variability.

Relative to the other temporary streams, overall costs of the study permit program are consistent with the level of effort and time required to process student applications.

Most new applications for study permits are processed in CIC visa offices abroad. However, study permit extensions, off-campus and post-graduation work permits are largely processed in Canada at CPC-Vegreville. In 2008, 92% of the study permits issued in Canada were for extensions; and 97% of the applications processed in Canada were finalized at CPC Vegreville. The numbers for off-campus and post-graduation work permits issued are reported in Table 1-6. The rest of this section focuses on application processing conducted in CIC visa offices abroad.

Table 3-6 presents information on the number of study permits received and processed in visa offices abroad by year, as well as overall refusal rates and processing times (passed + failed) within 28 days. Visa office intake of study permit applications increased by 21% over the reporting period.

Table 3-6: Operational statistics for study permits (cases) processed abroad by year

<table>
<thead>
<tr>
<th>Status</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Intake</td>
<td>87,346</td>
<td>83,123</td>
<td>85,363</td>
<td>90,577</td>
<td>95,293</td>
<td>105,780</td>
</tr>
<tr>
<td>Passed</td>
<td>64,064</td>
<td>60,794</td>
<td>63,068</td>
<td>67,959</td>
<td>71,185</td>
<td>78,970</td>
</tr>
<tr>
<td>Failed</td>
<td>22,163</td>
<td>18,467</td>
<td>20,043</td>
<td>20,224</td>
<td>20,856</td>
<td>22,482</td>
</tr>
<tr>
<td>Withdrawn</td>
<td>2,926</td>
<td>2,239</td>
<td>2,154</td>
<td>2,854</td>
<td>5,306</td>
<td>2,257</td>
</tr>
<tr>
<td>Refusal rate</td>
<td>26%</td>
<td>23%</td>
<td>24%</td>
<td>23%</td>
<td>23%</td>
<td>22%</td>
</tr>
<tr>
<td>% Processed in or under 28 days</td>
<td>69%</td>
<td>72%</td>
<td>75%</td>
<td>76%</td>
<td>71%</td>
<td>65%</td>
</tr>
<tr>
<td>Total processed (passed + failed)</td>
<td>86,227</td>
<td>79,261</td>
<td>83,111</td>
<td>88,183</td>
<td>92,041</td>
<td>101,452</td>
</tr>
</tbody>
</table>

Although refusal rates have remained fairly stable over the reporting period (ranging from 22 to 26%), there was a notable decrease between 2006 and 2008 in the percentage of applications finalized within 28 days. A review of departmental documents indicates that the same resources are used for processing both permanent and temporary resident streams. As a result, increased demand in one stream can put pressure on the other. The rising backlog in the permanent resident stream during this period, coupled with the increasing intake of study permit applications (by 17%), may in part have been responsible for this decline.

CIC administrative data show that there is considerable variability in intake, processing times and refusal rates across visa offices (see Table 3-7). In 2008, the percentage of applications finalized

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103 Processing times for study permits processed abroad are available to the public and published on the CIC website at [www.cic.gc.ca/english/information/times/international/14-temp-students.asp](http://www.cic.gc.ca/english/information/times/international/14-temp-students.asp). Processing time statistics show the percentage of applications finalized within 2, 7, 14 and 28 days. The 28-day timeframe is used as a benchmark in this study.

Within 28 days was considerably lower and the refusal rate considerably higher for Africa and the Middle East relative to these rates for other regions and across all visa offices.

Table 3-7: 2008 Operational statistics for study permits (cases) processed abroad by region of visa office

<table>
<thead>
<tr>
<th>Region</th>
<th>Intake</th>
<th>Passed</th>
<th>Failed</th>
<th>Withdrawn</th>
<th>Refusal Rate in or under 28 days</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asia &amp; Pacific</td>
<td>54,442</td>
<td>41,610</td>
<td>12,033</td>
<td>774</td>
<td>22%</td>
<td>53,643</td>
</tr>
<tr>
<td>Africa &amp; Middle East</td>
<td>20,364</td>
<td>11,704</td>
<td>6,435</td>
<td>541</td>
<td>35%</td>
<td>18,139</td>
</tr>
<tr>
<td>Europe</td>
<td>16,293</td>
<td>14,020</td>
<td>1,731</td>
<td>424</td>
<td>11%</td>
<td>15,751</td>
</tr>
<tr>
<td>Americas</td>
<td>14,681</td>
<td>11,636</td>
<td>2,283</td>
<td>518</td>
<td>16%</td>
<td>13,919</td>
</tr>
<tr>
<td>All Visa Offices</td>
<td>105,780</td>
<td>78,970</td>
<td>22,482</td>
<td>2,257</td>
<td>22%</td>
<td>101,452</td>
</tr>
</tbody>
</table>

Processing times

Temporary resident applications are demand-driven, requiring rapid processing to facilitate the timely entry of visitors, students and temporary foreign workers. Although there is a perception that processing times in Canadian visa offices abroad are slow relative to other countries, there is little comparative evidence to verify this view.

Findings from the survey of educational institutions showed that 60% of respondents disagreed that processing times for study permit applications are reasonable. Of these, 17 were from universities, 9 from colleges and 9 from language schools. These results are consistent with interview findings (discussed earlier) that highlighted processing times as an issue limiting Canada’s global competitiveness.

Study permit processing times in Canada were compared to those of its competitors. The US, the UK, Australia and New Zealand all have processing service standards posted on their websites. New Zealand is the most ambitious, setting a target of 100% of applications finalized within 30 days; and the US sets the longest processing time of 90 days.

Statistical information on processing times was only found for the UK. Actual processing times were compared across visa offices for the UK and Canada in three countries with similar intake (Riyadh, New Delhi and Sao Paulo-Rio De Janeiro) from October 2008 to September 2009. This analysis showed that the UK was able to assess a greater percentage of applications than Canada in a similar timeframe in all three cases.

For Riyadh and New Delhi, the difference was substantial (26% and 28% respectively); for Sao Paulo-Rio De Janeiro the difference was 15%.

Note: Average processing times were calculated across four quarters for the UK and compared to Canada’s annual information for the same reporting period. Processing times for the UK indicate the percentage of applications assessed within 30 days; while those for Canada indicate the percentage assessed within 28 days.

Statistical information on processing times was only found for the UK. Actual processing times were compared across visa offices for the UK and Canada in three countries with similar intake (Riyadh, New Delhi and Sao Paulo-Rio De Janeiro) from October 2008 to September 2009. This analysis showed that the UK was able to assess a greater percentage of applications than Canada in a similar timeframe in all three cases. For Riyadh and New Delhi, the difference was substantial (26% and 28% respectively); for Sao Paulo-Rio De Janeiro the difference was 15%.


106 Note: Average processing times were calculated across four quarters for the UK and compared to Canada’s annual information for the same reporting period. Processing times for the UK indicate the percentage of applications assessed within 30 days; while those for Canada indicate the percentage assessed within 28 days.

Factors affecting application processing

Further analysis explored factors that potentially affect the efficiency of application processing in visa offices abroad.

Intake: Mean refusal rates were fairly stable across intake levels. However, small visa offices, on average, finalized a greater percentage of applications within 28 days than average-size and large visa offices (see Table 3-8). The processing times for average and large visa offices were more consistent with the processing time for all visa offices (65% within 28 days).

Table 3-8: Mean refusal rates and processing times by level of intake (2008 operational data)

<table>
<thead>
<tr>
<th>Intake (number of applications received)</th>
<th>Mean refusal rate</th>
<th>Mean processing time (within 28 days)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small visa office (under 500)</td>
<td>25%</td>
<td>75%</td>
</tr>
<tr>
<td>Average visa office (between 500 and 2,000)</td>
<td>28%</td>
<td>63%</td>
</tr>
<tr>
<td>Large visa office (2,000 or more)</td>
<td>23%</td>
<td>66%</td>
</tr>
</tbody>
</table>

Perception of fraud: According to the 2006 anti-fraud survey report, “detection of fraud in applications is resource-intensive.” Visa offices surveyed for this study estimated that cases with suspected fraud can take 3 to 10 times the amount of work to process than cases without. \(^{108}\)

Subsequent analysis of 2008 operational data and survey data from the evaluation found that mean refusal rates were higher and the percentage of cases finalized were lower for visa offices reporting that they often encountered fraud (suspected or confirmed) in the student application caseload (see Table 3-9).

Table 3-9: Mean refusal rates and processing times by level of perceived fraud (2008 operational data)

<table>
<thead>
<tr>
<th>Level of perceived fraud</th>
<th>Mean refusal rate</th>
<th>Mean processing time (within 28 days)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Often</td>
<td>38%</td>
<td>56%</td>
</tr>
<tr>
<td>Sometimes</td>
<td>29%</td>
<td>71%</td>
</tr>
<tr>
<td>Rarely or never</td>
<td>14%</td>
<td>74%</td>
</tr>
</tbody>
</table>

Educational institutions: Type of institution may also play a role in the resources required to process study permit applications. Over a third (38%) of visa offices surveyed reported that applications for study at private language schools required the most effort to process, while 20% indicated that applications for study at community colleges and 16% indicated that applications for study at private career colleges required the most effort. Applications for study at universities were reported by almost two-thirds (66%) of responding visa offices as requiring the least effort to process.

Similarly, a review of operational statistics for 2008 showed that refusal rates were the highest among applicants in the “post secondary” (45%) and “other studies” (26%) levels of study, corresponding to levels of study typically used to classify language schools and career colleges. Conversely, refusal rates were lower for those in the university degree levels of study (doctorate: 7%; master’s: 15%; and bachelor’s: 15%). However, information on processing times (in or under 28 days) was not available for these levels.

\(^{108}\) Anti-Fraud Survey Report (CIC International Region, 2006, pp.7-8).
Medical and visa requirements: Designated countries with medical and visa requirements involve extra steps in the student application process that can add time to processing. It was estimated that 41 of the visa offices surveyed had visa requirements and 39 had medical requirements, with 38 having both, and 8 having neither. Moreover, all 15 visa offices reporting that they often encountered fraud (suspected or confirmed) had both visa and medical requirements, possibly compounding the resources required for application processing.

Subsequent analysis showed that the mean refusal rate was higher for visa offices with visa or medical requirements than those without (see Table 3-10). For mean processing times, visa offices with visa or medical requirements finalized a lower percentage of applications within 28 days than those without. However, the percentage finalized was still consistent with the processing time for all visa offices (65% within 28 days).

Table 3-10: Refusal rates and processing times by visa and medical requirements (2008 operational data)

<table>
<thead>
<tr>
<th>Requirements</th>
<th>Mean refusal rate</th>
<th>Mean processing time (within 28 days)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Visas</td>
<td>30%</td>
<td>66%</td>
</tr>
<tr>
<td>No visas</td>
<td>10%</td>
<td>76%</td>
</tr>
<tr>
<td>Medicals</td>
<td>28%</td>
<td>65%</td>
</tr>
<tr>
<td>No medicals</td>
<td>18%</td>
<td>77%</td>
</tr>
</tbody>
</table>

Addressing factors affecting application processing

Findings revealed three different approaches that could be further developed to address the variability in application processing related to the various factors discussed above.

Assessment levels in Australia: Australia has developed an interesting model of service standards related to processing times that takes into consideration the different factors described above.

Australia has two processing standards based on Assessment Level: one targeting 100% of level 1 & 2 applicants in no more than 28 days; and the second targeting 100% of level 3 & 4 applicants in no more than 84 days. Assessment levels “align student visa requirements to the immigration risk posed by applicants from a particular country studying in a particular education sector.” There are five levels, with the first level corresponding to the lowest risk and the fifth level to the highest risk. The higher the level, the greater the evidence required to support the application. Assessment Levels are believed to “enable consistency in decisions across this diverse range of clients” and “streamline this process, allowing the department to deliver fast and efficient service…while maintaining the integrity of Australia’s immigration program.”

Canada in India Student Partners Program (SPP): Described in more detail in section 3.2.3 on Program integrity, the SPP approach shows how working with educational institutions, developing
standardized documentation/tools and monitoring international students in Canada can mitigate risks to program integrity, as well as contribute to processing efficiencies.111

**Online applications:** Online applications, though only used in in-Canada processing of study permit extensions and work permits, present an interesting opportunity to improve application processing, in particular where the immigration risk is minimal.

Findings indicated that the use of online applications is believed to improve application processing and service delivery in the study permit program. Almost three-quarters of respondents to the survey of educational institutions (73%) agreed that the use of online applications facilitates the application process for the study and work permit programs. This is consistent with earlier interview findings in which e-applications was one of the most frequently cited program changes to facilitate study and work opportunities for international students.

Online applications were first introduced in the OCWP program as a pilot and then later incorporated into the study permit renewal process and the PGWP program. A study was conducted on the OCWP program pilot and a report produced.112 It noted that educational institutions were pleased with the ENS, indicating that it was user-friendly and that they had more control over their time. In addition, CIC staff appreciated the reduced data entry and related data entry errors, as well as the paperless process.113

**Relative costs and use of resources for application processing**

A comparative analysis was conducted looking at relative costs and resource utilization across the three temporary resident streams (see Table 3-11). Measures from several data sources were used, including cost per permit114, processing times and refusal rates for 2008, data from the survey of visa offices and findings from the 2006 anti-fraud survey. A review of the requirements for each application process was also conducted to better understand the different elements considered in the assessment of applications for each temporary resident stream. Subsequently, each program was ranked from highest to lowest according to its score for each measure.

Based on these measures, study permit applications fell between the TFW and Visitor programs in terms of costs to process and percentage of applications processed within 28 days. Visa office survey respondents also indicated that the overall effort required to process study permit applications was greater than that required to process visitor permits but less than work permits. The estimated level of fraud in the student caseload is higher than the other streams. This may contribute to the highest refusal rate of the three, which in turn affects the ability to process applications in a timely manner due to the effort required to process suspected or confirmed fraudulent cases.

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111 Canada-in-India + ACCC Student Partners Program – Summary Report: September 2009 Cohort (Canadian High Commission, New Delhi, September 2009).
114 Cost per permit was derived for each temporary resident stream using estimates from the 2007-08 CIC Cost Management Model divided by the number of applications (passed and failed) processed abroad in 2008.
### Table 3-11: Comparative analysis of resource utilization across temporary resident streams

<table>
<thead>
<tr>
<th>MEASURE</th>
<th>Study permits</th>
<th>Worker permits</th>
<th>Visitor permits*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cost per permit processed (CMM 2007-08 and 2008 processing data)**</td>
<td>$167.41</td>
<td>$180.96</td>
<td>$76.00</td>
</tr>
<tr>
<td>Percentage of applications processed within 28 days (2008)</td>
<td>65.0%</td>
<td>59.0%</td>
<td>95.0%</td>
</tr>
<tr>
<td>Refusal rates (2008)</td>
<td>22.2%</td>
<td>19.0%</td>
<td>20.5%</td>
</tr>
<tr>
<td>Visa office survey ranking re: level of effort to process a typical application(2009)</td>
<td>Largest percentage of visa office respondents indicated middle relative effort required</td>
<td>Largest percentage of visa office respondents indicated most relative effort required</td>
<td>Largest percentage of visa office respondents indicated least relative effort required</td>
</tr>
<tr>
<td>Estimated percentage of fraudulent cases from IR anti-fraud survey (2006)</td>
<td>Average for all missions - 13% CPC-Vegreville - 50%</td>
<td>Average for all missions - 11% CPC-Vegreville - 50%</td>
<td>Average for all missions - 11% CPC-Vegreville - n/a</td>
</tr>
<tr>
<td>Application process</td>
<td>1. Assessment of acceptance at educational institution: a) verification of letter of acceptance from the prospective institution; and b) CAQ if applicable.</td>
<td>1. Assessment of employment in Canada: a) verification of job offer letter or contract from the prospective employer with LMO confirmation; b) evidence that applicant meets the requirements of the job, such as resume; and c) CAQ if applicable.</td>
<td>1. Assessment of identity (same).</td>
</tr>
<tr>
<td></td>
<td>3. Proof of financial support (same).</td>
<td>3. Proof of financial support (same).</td>
<td>3. Additional requirements, such as security and medical (same).</td>
</tr>
<tr>
<td></td>
<td>4. Additional requirements, such as security and medical (same).</td>
<td>4. Additional requirements, such as security and medical (same).</td>
<td>4. Administrative assessment of forms (same).</td>
</tr>
</tbody>
</table>

*Note: Certain countries are exempt; their inhabitants do not require a visa to visit Canada.

**Note: Additional application processing may be conducted in-land to extend the study and work permits, or process work permits for students, and is understood to be part of the CMM costing for the study and work permit programs. This additional work is for existing students or workers that have been processed abroad, and is thus included in the level of effort associated with these temporary streams.

Subsequent analysis supported this conclusion. The mean refusal rate was higher and the mean percentage of applications finalized within 28 days was lower for visa offices reporting that the student application caseload required the most effort to process. Also, eight of the 11 visa offices reporting the most effort indicated that they often or sometimes encountered fraud in the student application caseload.
4. Conclusions

International students are attractive to Canada, as they bring economic, social and cultural benefits to the institutions at which they study, to the organizations in which they work and to the communities in which they live. Their education and work experience in Canada also make them sought after as potential immigrants and there is strong competition internationally in attracting and retaining international students.

CIC’s objective has been to process student applications in response to the demand to study in Canada and facilitate the entry of international students. However, more recently, there has been a greater recognition within CIC of the longer-term benefits that international students, with their Canadian education and work experience, can bring to Canada through their eventual immigration and integration.

A number of partners, all with distinct objectives, are responsible for different aspects of the ISP. CIC has overall policy responsibility for temporary resident processing, status, and documents, while service delivery and program integrity related to temporary residents are the shared mandate of CIC and CBSA. DFAIT is responsible for international activities, including the marketing abroad of education in Canada, and provinces and territories have constitutional responsibility for education in Canada.

Three key issues emerged in this evaluation: the global competitiveness of the ISP; program integrity; and CIC’s processing capacity. Findings showed various linkages between these issues and the roles of the different partners in achieving program results: the global competitiveness of the ISP is related to the processing capacity of CIC; the promotional efforts of DFAIT; and the quality of education regulated by provincial/territorial governments. Findings also highlighted how CIC processing capacity may be affected by program integrity issues, such as fraud, and how CIC and CBSA efforts to ensure program integrity are bound by the mechanisms established by provinces and territories to ensure the quality of education and its institutions.

4.1. Key findings

Relevance

- Partners and stakeholders indicate a strong need for the ISP, identifying the many economic, cultural and social benefits that international students bring to Canada.

- The program is aligned with the broader Government of Canada and OGD objectives to attract and retain international students, but is challenged by the differing mandates of the lead departments – CIC, DFAIT and CBSA – which at times may be at cross-purposes.

- The federal government plays an appropriate role with respect to international education in relation to its mandate to support national security, international trade and Canada’s economy.

Benefits

- The economic benefits for educational institutions and communities through revenue generated by international students are extensive, and distributed across much of Canada.

- The main social and cultural benefits identified by the evaluation were the diversification of Canadian communities and internationalization of Canadian campuses.
• The number of international students staying to work after graduation and/or reside in Canada is increasing, consistent with the growing recognition of the economic benefits to Canada of their retention.

**Global competitiveness**

• While its study/work offerings for international students are comparable to those of other countries, Canada's leading competitors have attracted a larger share of the global international student population, and many stakeholders believe that Canada could be doing better.

• Issues with respect to promotion and application processing were identified as possible obstacles to Canada’s global competitiveness, the latter being within the purview of CIC to address.

**Program integrity**

CIC’s policy framework and gaps in the program design leave the ISP vulnerable to potential misuse. In particular, there is no legislative requirement for international students to study once they are in Canada; and students must only demonstrate an intention to study. Furthermore, educational institutions are loosely defined by CIC, and CIC does not have the legislative authority to regulate them. Subsequently, CIC does not have a complete list of legitimate educational institutions in Canada.

• In general, there is reported fraud and misuse in the International Student Program. The absence of consistent data, tracking and reporting on fraud has made it difficult to ascertain the extent of the problem, and implications for program integrity.

• Much of the fraud that has been identified is “suspected.” Non-genuine students and questionable educational institutions are primary concerns in the student application caseload.

• Quality assurance activities are inconsistent across the department, making it difficult to assess the overall quality of decision-making on student applications and verify stakeholder perceptions of its inconsistency.

**Program management and delivery**

• There is a consistent understanding of the objectives of the International Student Program among program partners and stakeholders. However, there is less clarity surrounding roles and responsibilities, particularly among provincial and OGD partners.

• Although the information and support provided within CIC and to educational institutions are generally reported as useful, there are issues with their adequacy and timeliness. Of note, visa offices identified a need for greater information and support related to genuine/non-genuine educational institutions and programs.
Application processing

- In 2008, 65% of study permit applications were finalized within 28 days in visa offices abroad. Findings showed that there is a perception that processing times are slow for Canada.

- Processing times and refusal rates for study permits finalized abroad vary considerably by visa office and region. The perception of fraud, type of educational institution and visa and medical requirements (and associated level of effort required to assess them) are important factors in this variability.
Appendix A: Evaluation framework - Logic model and evaluation matrix

INTERNATIONAL STUDENT PROGRAM LOGIC MODEL

Activities
- Policy and Program Development
  - Stakeholder Engagement, Partnership Development and Coordination
- Research
  - Policy Analysis, Program Design
- Application Processing
  - Study Permit
  - Work Permit
- Operational Coordination, Monitoring and Support
  - Functional Guidance
  - Quality Assurance

Outputs
- Meetings, Consultations, Presentations, Working Groups, MOUs, Partnerships
- Policies, Programs, Revisions and Improvements, Policy Advice
- Decisions on Applications (overseas, inland, PoE)
- Decisions on applications for OCMP and PGWIP (inland only)
- Manuals, Application Kits and Tools, Operational Bulletins, Websites, Coordination and Information-sharing
- Monitoring, Reports (quality decision-making, reasons for refusals, fraud) and Referrals

Immediate Outcomes
- Shared understanding of roles, responsibilities and policy and program objectives and effective relationships
- Responsive programs and policies that facilitate study and work opportunities for international students
- International student arrivals
- International students use the work programs
- Program delivery is coordinated, timely and efficient
- Information and tools support application processing

Intermediate Outcomes
- Consistent, coherent and complementary policy and program framework
- Canada’s study and work opportunities for international students are globally competitive
- Social, economic and cultural benefits to educational institutions, international students and communities
- International students gain Canadian work experience
- Quality decision-making in application processing
- Program integrity is maintained

Final Outcomes
- Canada attracts and retains a pool of highly qualified international students consistent with its immigration objectives
- Canada benefits from international students

Ultimate Outcome
- International Student Program contributes to Canada’s economic, social and cultural development through immigration
## Evaluation matrix

<table>
<thead>
<tr>
<th>Evaluation Issue</th>
<th>Indicators</th>
<th>Methodology</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Relevance</strong></td>
<td></td>
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</tr>
<tr>
<td>Q1. Is the International Student Program aligned with CIC objectives and priorities with respect to migration?</td>
<td>• Alignment with CIC’s legislative obligations&lt;br&gt;• Alignment of ISP to CIC objectives with respect to migration</td>
<td>• Document review (IRPA, ISP and other documentation related to immigration mandate, RPP, DPR)&lt;br&gt;• Internal interviews[^115] (Immigration, OMC, Strategic Policy and Priorities Branches)</td>
</tr>
<tr>
<td>Q2. Does the program support Government of Canada objectives and priorities, and is it consistent with related activities in other government departments?</td>
<td>• Alignment of ISP to GoC objectives and priorities&lt;br&gt;• Alignment with related activities in other government departments&lt;br&gt;• Evidence of Canada’s economic need for migration strategies&lt;br&gt;• Perceptions of program partners (OGDs and P/Ts)</td>
<td>• Document review (Throne Speech, Budget, Advantage Canada, documentation from OGDs)&lt;br&gt;• Internal interviews (Immigration, OMC, Strategic Policy and Priorities Branches)&lt;br&gt;• Partner interviews (DFAIT, CBSA, HRSDC, PCH, CIDA, IC, P/Ts)</td>
</tr>
<tr>
<td><strong>Program results</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Profile of the International Student Program</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q3. How many international students have come to Canada to study over time?</td>
<td>• Number of international students arriving&lt;br&gt;• Trends over time</td>
<td>• Existing databases (FOSS/CAIPS)&lt;br&gt;• Facts and Figures</td>
</tr>
<tr>
<td>Q4. Has their profile changed?</td>
<td>• Profile of international students arriving (gender, level of study, length of study, country of origin, field of study, regional distribution by province and relation to MTV, urban and other)&lt;br&gt;• Profile of educational institutions receiving international students[^116]&lt;br&gt;• Trends over time</td>
<td>• Document review (ISP documentation and stakeholder/partner reports, including CBIE research, P/T websites and reports, DFAIT and OECD reports)&lt;br&gt;• Existing databases (FOSS/CAIPS)&lt;br&gt;• Facts and Figures&lt;br&gt;• Survey of international students (via CBIE)</td>
</tr>
<tr>
<td><strong>Meeting Canada’s immigration objectives</strong></td>
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<tr>
<td>Q5. Are Canada’s study and work opportunities for international students globally competitive?</td>
<td>• Changes over time to Canada’s market share of international students&lt;br&gt;• Comparisons of Canada’s market share of international students to other comparable countries (taking into consideration such things as size of country and education sector)&lt;br&gt;• Changes over time in the number of international student arrivals</td>
<td>• Document review (CIC analysis and stakeholder/partner reports, including CBIE research, DFAIT branding work, IC report, NZ report)&lt;br&gt;• OECD statistics&lt;br&gt;• Administrative databases (FOSS/CAIPS)&lt;br&gt;• Survey of international students (via CBIE)</td>
</tr>
</tbody>
</table>

[^115]: Internal interviews refer to interviews with CIC officials. Partner interviews refer to interviews with delivery partners including other government departments (CBSA and DFAIT principally, but also IC, HRSDC, PCH, CIDA) and provincial and territorial departments. Stakeholders refer to educational institutions, employers and international students and their representative associations.

[^116]: To the extent possible, a profile of educational institutions receiving international students will be explored through document review and developed in the evaluation.
### Evaluation Issue

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Methodology</th>
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<tbody>
<tr>
<td>Perceptions of international students and educational institutions</td>
<td>Survey of educational institutions</td>
</tr>
<tr>
<td>International comparisons of policies, programs and operations (e.g.</td>
<td>Literature review (documentation/websites on programs from comparable</td>
</tr>
<tr>
<td>processing times, ease of application process, marketing and branding)</td>
<td>countries such as UK, NZ, USA, Australia, France).</td>
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<tr>
<td>related to international students</td>
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</table>

Q6. How successful has Canada been in attracting and retaining international
students?

- Changes over time to Canada’s market share of international students
- Changes over time in the number of international student arrivals
- Changes over time in the number of international students staying to
work post graduation
- Number of international students applying for permanent residence (through
various streams, including CEC, if feasible)
- Number of international students who become permanent residents
- Comparison of federal program with Quebec program (transitions
from international student to PR by program and comparison of
policies and programs)

Q7. Are international students taking advantage of work opportunities and
gaining Canadian work experience?

- Number of international students using work programs (OCWP, PGWP)
- Percentage of international students with a work permit who
obtained employment
- Duration/frequency of work experience
- Quality of work experience (e.g. related to field of study, part-time
during studies versus full-time post graduation)

Q8. What factors contribute to international students taking advantage of work
opportunities and gaining Canadian work experience?

- Differences in the profile of international students using the work
programs and those not using them (e.g. gender, family wealth)
- Differences in the profile of international students obtaining
employment and those not obtaining employment
- Perceptions and experiences of employers (including factors affecting
their use of employment programs to hire international students)
- Perceptions and experiences of educational institutions (DIRs)

Q9. Is the profile of international students choosing to stay in Canada
consistent with Canada’s immigration objectives?

- Profile of international students in PGWP and applying for
permanent residence (gender, level of study, regional distribution
by province and relation to MTV, urban and other)
- Field of study of international students in PGWP and applying for
permanent residence
- Number of international students in PGWP and applying for
permanent residence
- Comparison of federal program with Quebec program (transitions
from international student to PR by program and comparison of
policies and programs)

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<tr>
<th>Methodology</th>
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</thead>
<tbody>
<tr>
<td>Document review (ISP documentation, QC website and reports)</td>
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<tr>
<td>Existing databases (FOSS/CAIPS)</td>
</tr>
<tr>
<td>Facts and Figures</td>
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<tr>
<td>OECD statistics</td>
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<tr>
<td>Stakeholder reports (e.g. CBIE research)</td>
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<tr>
<td>Survey of international students (via CBIE)</td>
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<tr>
<td>OECD statistics</td>
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<tr>
<td>Stakeholder reports (e.g. CBIE research)</td>
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<tr>
<td>Survey of international students (via CBIE)</td>
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1\textsuperscript{17} It is important to note that each of these countries has a national department of education, so they do not face the same jurisdictional issues as Canada.
## Evaluation Issue

### Q10. What are the social, economic and cultural benefits of having international students studying and working in Canada?

- Evidence of economic benefits to international students, educational institutions, communities and Canada (e.g. revenues to educational institutions, average amount of money spent by international students each year, number of international students who obtained employment, number of international students that become permanent residents, including regional distribution, trends over time, and their employment/economic earnings)
- Evidence of social and cultural benefits to international students, educational institutions, communities and Canada (e.g. diversity of international students, regional distribution of international students studying across Canada, participation of international students in cultural/social clubs/groups, perceptions of international students and educational institutions, distribution of international students across educational institutions, diversity and regional distribution of international students who become permanent residents)

### Methodology

- Document review (reports/research from stakeholders/partners, including CBIE, AUCC, ACCC, educational institutions, P/Ts/QC, DFAIT/EduCanada) [Comment: Contact Pari Johnson at AUCC.]
- OECD statistics
- Administrative databases (FOSS)
- IMDB and other Statistics Canada data
- Survey of international students (via CBIE)
- Survey of educational institutions

## Program integrity

### Q11. Do program information and tools support quality decision-making?

- Extent, timeliness and quality of functional guidance documentation, communications and field support
- Evidence of monitoring and data capture related to quality decision-making (including acceptance and refusal rates, reasons for refusals overseas, inland and PoE)
- Effectiveness of existing mechanisms/procedures for quality decision-making (monitoring practices, data capture, strategic analysis, reports, bulletins/guidance to the field, information-sharing and coordination, etc.)
- Perceptions of CIC visa officers, CPC Vegreville officers and CBSA border services officers
- Evidence of inconsistent/inappropriate decision-making

### Methodology

- Document review (OMC, IR, CPC Vegreville documentation, CIC website)
- Existing databases (FOSS/CAIPS)
- IR, OMC and Vegreville statistics/analyses
- Internal interviews (OMC Branch, IR, CPC Vegreville)
- Partner interview with CBSA
- Survey of CIC visa officers, CPC Vegreville officers and CBSA border services officers
- Survey of international students and CBSA border services officers
- Survey of employers

### Q12.

I. Is there misuse and fraud in the International Student Program?

- Evidence of misuse and fraud by source (international students, educational institutions, third parties)
- Evidence of misuse and fraud by type of educational institution and level of study
- Number of cases referred to CBSA for investigation
- Evidence of monitoring and data capture related to misuse and fraud
- Effectiveness of existing mechanisms/procedures for fraud verification (monitoring practices, data capture, strategic analysis, reports, anti-fraud bulletins/guidance to the field, coordination and information-sharing within CIC and with CBSA, etc.)
- Success factors, gaps and barriers to effective verification of fraud
- Potential impacts of gaps and ambiguities in the legislation and

### Methodology

- Document review (documentation on systems and procedures, reports by CIC and enforcement agencies, QC website and reports)
- Existing databases (CAIPS/FOSS)
- IR/OMC/Vegreville/CBSA statistics
- Internal interviews (Immigration and OMC Branches, IR, Regional Offices/RPAs and CPC Vegreville)
- Partner interviews (DFAIT, CBSA, RCMP and P/Ts/QC)
- Stakeholder interviews (ACISI, NEMR, F/P/T Groups)
- Survey of CIC visa officers, CPC Vegreville officers and CBSA border services and program integrity officers
- Literature review (documentation/websites on programs from comparable countries, such as UK, NZ, USA, Australia, France)
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<tr>
<th>Evaluation Issue</th>
<th>Indicators</th>
<th>Methodology</th>
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<tr>
<td></td>
<td>regulations</td>
<td>Document review (OMC, IR, CPC Vegreville documentation, MOUs and other formal agreements)</td>
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<tr>
<td></td>
<td>• International comparisons of policies, programs and operations related to international students for the verification and prevention of misuse and fraud 3</td>
<td>• Existing databases (CAIPS/FOSS)</td>
</tr>
<tr>
<td></td>
<td>• Comparison of federal program with Quebec program (policies, programs and operations for the verification and prevention of misuse and fraud)</td>
<td>• IR/OMC/Vegreville/CBSA statistics</td>
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<tr>
<td></td>
<td>• Evidence of coordination and information-sharing within CIC and with CBSA (and/or other enforcement authorities) and P/Ts (OCWP)</td>
<td>• Internal interviews (Immigration and OMC Branches, IR, CPC Vegreville, SIO)</td>
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<td></td>
<td>• Extent, timeliness and quality of functional guidance documentation, communications and field support</td>
<td>• Partner interviews (DFAIT, CBSA and P/Ts)</td>
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<td></td>
<td>• Changes in processing times / inventory (inland and overseas)</td>
<td>• Survey of CIC visa officers, CPC Vegreville officers and CBSA border services officers</td>
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<tr>
<td>Program management</td>
<td>• Acceptance and refusal rates</td>
<td>• Literature review (documentation/websites on programs from comparable countries, such as UK, NZ, USA, Australia, France)</td>
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<td>• Level of stakeholder satisfaction with service</td>
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<td></td>
<td>• Perceptions of CIC visa officers, CPC Vegreville officers and CBSA border services officers</td>
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<tr>
<td></td>
<td>• Success factors, gaps and barriers to coordinated, timely and efficient program delivery</td>
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<td></td>
<td>• International comparisons of program delivery related to international students</td>
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<tr>
<td>Policy and program development</td>
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<tr>
<td>Q14. Is there a shared understanding of roles, responsibilities and ISP policy and program objectives across program partners and stakeholders?</td>
<td>Document review (meeting documentation from ACISI, NEMR, F/P/T Groups, MOUs and other formal agreements, other documentation from partners and stakeholders, including P/T and stakeholder reports and documents related to attracting and recruiting international students, as available)</td>
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<tr>
<td></td>
<td>• Level of partner understanding and consensus with respect to roles, responsibilities and objectives</td>
<td>• Internal interviews (Immigration Branch, OMC, IR, CPC Vegreville, Strategic Policy and Priorities, SIO)</td>
</tr>
<tr>
<td></td>
<td>• Level of stakeholder (educational institutions, employers) understanding and consensus with respect to roles, responsibilities and objectives</td>
<td>• Partner interviews (DFAIT, CBSA, HRSDC, PCH, CIDA, IC and P/Ts)</td>
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<td></td>
<td>• Stakeholder interviews (ACISI, NEMR, F/P/T Groups)</td>
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<td>• Survey of educational institutions</td>
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<td>• Survey of employers</td>
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<tr>
<td>Q15. Are program partners and stakeholders engaged and working together to advance the objectives of the International Student Program?</td>
<td>Document review (ISP and other documentation related to immigration mandate, RPP, DPR, meeting documentation from ACISI, NEMR, F/P/T Groups, reports from stakeholders, MOUs and other formal agreements, reports from P/Ts)</td>
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<tr>
<td></td>
<td>• Evidence of meetings, consultations, presentations, working groups, MOUs and other formal agreements with partners and stakeholders</td>
<td>• Internal interviews (Immigration Branch, OMC, IR, CPC Vegreville, Strategic Policy and Priorities)</td>
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<tr>
<td></td>
<td>• Number/percentage of P/T jurisdictions partnering with CIC and of eligible educational institutions partnering with P/T jurisdictions (e.g. for the OCWP)</td>
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</table>
### Evaluation Issue

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Methodology</th>
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</table>
| - Quality of mechanisms to engage program partners and stakeholders (e.g. ACISI, NEMR, F/P/T Groups), and formalize relationships (MoUs and other formal agreements with partners)  
- Quality of relationships with partners and stakeholders  
- Evidence of coordinated planning (commitment of necessary resources)  
- Evidence of joint/collaborative frameworks and initiatives |
| - Partner interviews (DFAIT, CBSA, HRSDC, PCH, CIDA, IC and P/Ts)  
- Stakeholder interviews (ACISI, NEMR, F/P/T Groups)  
- Survey of educational institutions  
- Survey of employers |

**Q16. Do ISP policies and programs address partner and stakeholder needs and facilitate study and work opportunities for international students?**

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Methodology</th>
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| - Evidence of policy and program shifts/changes and their timeliness  
- Evidence of measures planned/underway to improve policies and programs  
- Evidence of policy issues not yet addressed or resolved  
- Perceptions of international students, educational institutions and employers (including satisfaction/dissatisfaction with policies and programs)  
- Number of international students arriving  
- Number of international students using work programs |
| - Document review (ISP and other documentation related to immigration mandate, meeting documentation from ACISI, NEMR, F/P/T Groups, reports from stakeholders, MOUs and other formal agreements, reports from P/Ts, new release database and daily rap)  
- Existing databases (FOSS)  
- Internal interviews (Immigration Branch, OMC, IR, CPC Vegreville, Strategic Policy and Priorities)  
- Partner interviews (DFAIT, CBSA, HRSDC, PCH, CIDA, IC and P/Ts)  
- Stakeholder interviews (ACISI, NEMR, F/P/T Groups)  
- Survey of international students (via CBIE)  
- Survey of educational institutions  
- Survey of employers |

**Q17. Is the International Student Program based on a consistent, coherent and complementary policy and program framework?**

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Methodology</th>
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</table>
| - Level of integration/coherence of ISP with other CIC objectives for migration  
- Evidence of complementary policy objectives across other government departments and provinces/territories  
- Evidence of competing priorities and inconsistent policies and programs within CIC and across other government departments and provinces/territories |
| - Document review (ISP and other documentation related to immigration mandate, RPP, DPR , meeting documentation from ACISI, NEMR, F/P/T Groups, reports from stakeholders, MOUs and other formal agreements and reports from P/Ts)  
- Internal interviews (Immigration Branch, OMC, IR, CPC Vegreville, Strategic Policy and Priorities)  
- Partner interviews (DFAIT, CBSA, HRSDC, PCH, CIDA, IC and P/Ts and PCO)  
- Stakeholder interviews (ACISI, NEMR, F/P/T Groups) |

### Cost-Effectiveness

**Q18. Are costs in line with what would be expected in other similar programs?**

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Methodology</th>
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</thead>
</table>
| - Cost per undertaking ISP versus cost per undertaking Temporary Foreign Worker (TFW) Program  
- Review/comparison of costs of international approaches (e.g. Australia, UK, NZ, USA) | - Existing databases (CAIPS/FOSS)  
- Cost Management Model  
- Literature Review (documentation/websites on ISP and programs from comparable countries, such as UK, NZ, USA, Australia, France) |

**Q19. Are there alternatives to the current design and delivery of the International Student Program?**

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Methodology</th>
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</thead>
</table>
| - Review/comparison of alternative design/delivery approaches (e.g. Australia, UK, NZ, USA)  
- Changes/improvements to ISP design and delivery |
| - Literature review (documentation/websites on ISP and programs from comparable countries, such as UK, NZ, USA, Australia, France) |

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118 Feasibility will depend on our ability to isolate the costs of the program using the Cost Management Model.
119 Costing information may not be available in sufficient detail to make comparisons.
<table>
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<tr>
<th>Evaluation Issue</th>
<th>Indicators</th>
<th>Methodology</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student Program that would improve efficiency?</td>
<td>• Trends in processing times/inventory for international students</td>
<td>• Internal Interviews (Immigration and OMC Branches, IR, CPC Vegreville, SIO)</td>
</tr>
<tr>
<td></td>
<td>• Trends in the number of transactions with CIC (applications for study and work permits and for changes/renewal)</td>
<td>• Survey of CIC visa officers, CPC Vegreville officers and CBSA border services and program integrity officers</td>
</tr>
<tr>
<td></td>
<td>• Time allocated to ISP application processing by CIC visa officers relative to TFW application processing</td>
<td>• Existing databases (CAIPS/FOSS)</td>
</tr>
<tr>
<td></td>
<td>• Relative time allocated to processing ISP applications for different types of educational institutions (university, college, private school)</td>
<td>• OMC/IR/Vegreville statistics</td>
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<td></td>
<td></td>
<td>• SIO reports (if available)</td>
</tr>
<tr>
<td>Q20. Have there been any unexpected outcomes?</td>
<td>• Changes in policy and program direction</td>
<td>• Document review (audits, evaluations/reviews, reports)</td>
</tr>
<tr>
<td></td>
<td>• Unintended results of programs and policies</td>
<td>• Internal interviews (Immigration and OMC Branches, IR and CPC Vegreville)</td>
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<td>• Partner interviews (DFAIT, CBSA, HRSDC, PCH, CIDA, IC and P/Ts)</td>
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<td></td>
<td>• Stakeholder interviews (ACISI, NEMR, F/P/T Groups)</td>
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Appendix B: Interview guides

CIC Stakeholders

The Evaluation Division of Citizenship and Immigration Canada (CIC) is conducting an evaluation of CIC’s International Student Program (ISP). The purpose of this evaluation is to examine program relevance, integrity, program management and performance, cost-effectiveness and potential alternatives.

As part of the evaluation, CIC’s Evaluation Division is conducting interviews with key stakeholders involved in the program. The goal of the interviews is to gain a better understanding of the program, examine how it is designed, coordinated, managed and implemented, and collect information to assess the performance of the program.

The following questions will serve as a guide for our interview. In some cases, questions will not be relevant to your particular situation and the interviewers will focus on those most relevant to you. Please note that the responses you provide are confidential and will not be attributed to you in the evaluation report (only aggregate information will be released).

Background

1) Can you briefly describe your role and involvement with the ISP?

Relevance

2) Does Canada still need to keep bringing in international students?
3) What are the objectives of the ISP as you understand them?
   a) What role does the ISP play in meeting Canada’s economic need for immigration?
4) Is the ISP aligned with the objectives, priorities and activities of:
   a) the Government of Canada?
   b) other federal departments (e.g. DFAIT, CBSA, etc.)?
   c) other CIC programs?

Program Integrity

5) Do you feel there is consistent decision-making on ISP applications?
6) What types of tools and support are provided by NHQ to ensure appropriate decision-making on client applications?
   a) Are they sufficient/adequate?
   b) Is the information distributed in a timely manner?
7) Is there misuse and fraud in the International Student Program?
   a) What is being done to verify and deter program misuse and fraud?
   b) What’s working? What’s not? What’s needed?
   c) What data capture and monitoring mechanisms exist for quality assurance and fraud detection?
Program Management

8) Do you think there is a consistent understanding of roles and responsibilities between program partners and stakeholders?

9) What mechanisms are being used to engage partners and stakeholders (e.g. educational institutions, other departments, Provinces and Territories, etc.)?
   a) How frequent are these mechanisms being employed? Is that sufficient?
   b) Are these mechanisms effective? Is the level/quality of information exchange appropriate?

10) Are you satisfied with communication/information-sharing and coordination within CIC with respect to the ISP?

Policy and Program Development

11) In addition to the Off-Campus and Post-Graduation Work Permit programs, what other policy and program changes have been made that facilitate study and work opportunities for students?

Performance

12) What do you feel are the benefits of the ISP to educational institutions, international students and communities?

13) Do you think that Canada’s study and work opportunities for international students are globally competitive?

General

14) Has the ISP had any unintended or unexpected outcomes, either positive or negative?

15) If you could change something about the ISP, what would it be?

Do you have anything else to add?
Other government department representatives

The Evaluation Division of Citizenship and Immigration Canada (CIC) is conducting an evaluation of CIC’s International Student Program (ISP). The purpose of this evaluation is to examine program relevance, integrity, program management and performance, cost-effectiveness and potential alternatives.

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The following questions will serve as a guide for our interview. In some cases, questions will not be relevant to your particular situation and the interviewers will focus on those most relevant to you. Please note that the responses you provide are confidential and will not be attributed to you in the evaluation report (only aggregate information will be released).

**Background**

1) Can you briefly describe your role and involvement with the ISP?

**Relevance**

2) Does Canada still need to keep bringing in international students?

3) What are the objectives of the ISP as you understand them?
   a) What role does the ISP play in meeting Canada’s economic need for immigration?

4) Is the ISP aligned with the objectives, priorities and activities of:
   a) the Government of Canada?
   b) other federal departments (e.g. DFAIT, CBSA, etc.)?
   c) other CIC programs?

**Program integrity**

5) Do you feel there is consistent decision-making on ISP applications?

6) Is there misuse and fraud in the International Student Program?

**Program management**

7) Do you think there is a consistent understanding of roles and responsibilities between program partners and stakeholders?

8) What mechanisms are being used to engage partners and stakeholders (e.g. educational institutions, other departments, Provinces and Territories, etc.)?
   a) How frequent are these mechanisms being employed? Is that sufficient?
   b) Are these mechanisms effective? Is the level/quality of information exchange appropriate?
Policy and program development

9) In addition to the Off-Campus and Post-Graduation Work Permit programs, what other policy and program changes have been made that facilitate study and work opportunities for students?

Performance

10) What do you feel are the benefits of the ISP to educational institutions, international students and communities?

11) Do you think that Canada’s study and work opportunities for international students are globally competitive?

General

12) Has the ISP had any unintended or unexpected outcomes, either positive or negative?

13) If you could change something about the ISP, what would it be?

Do you have anything else to add?
The Evaluation Division of Citizenship and Immigration Canada (CIC) is conducting an evaluation of CIC’s International Student Program (ISP). The purpose of this evaluation is to examine program relevance, integrity, program management and performance, cost-effectiveness and potential alternatives.

As part of the evaluation, CIC’s Evaluation Division is conducting interviews with key stakeholders involved in the program. The goal of the interviews is to gain a better understanding of the program, examine how it is designed, coordinated, managed and implemented, and collect information to assess the performance of the program.

The following questions will serve as a guide for our interview. In some cases, questions will not be relevant to your particular situation and the interviewers will focus on those most relevant to you. Please note that the responses you provide are confidential and will not be attributed to you in the evaluation report (only aggregate information will be released).

**Background**
1) Can you briefly describe your role and involvement with the ISP?

**Relevance**
2) Does Canada still need to keep bringing in international students?
3) What are the objectives of the ISP as you understand them?
   a) What role does the ISP play in meeting Canada’s economic need for immigration?
4) Do you feel the ISP is aligned with priorities and activities of provincial/territorial programs?

**Program integrity**
5) Do you feel there is consistent decision-making on ISP applications?
6) Is there misuse and fraud in the International Student Program?

**Program management**
7) Do you think there is a consistent understanding of roles and responsibilities between program partners and stakeholders?
8) What mechanisms are being used to engage partners and stakeholders (e.g. educational institutions, other departments, Provinces and Territories, etc.)?
   a) How frequent are these mechanisms being employed? Is that sufficient?
   b) Are these mechanisms effective? Is the level/quality of information exchange appropriate?
Policy and program development

9) In addition to the Off-Campus and Post-Graduation Work Permit programs, what other policy and program changes have been made that facilitate study and work opportunities for students?

Performance

10) What do you feel are the benefits of the ISP to educational institutions, international students and communities?

11) Do you think that Canada’s study and work opportunities for international students are globally competitive?

General

12) Has the ISP had any unintended or unexpected outcomes, either positive or negative?

13) If you could change something about the ISP, what would it be?

Do you have anything else to add?
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The following questions will serve as a guide for our interview. In some cases, questions will not be relevant to your particular situation and the interviewers will focus on those most relevant to you. Please note that the responses you provide are confidential and will not be attributed to you in the evaluation report (only aggregate information will be released).

### Background
1) Can you briefly describe your role and involvement with the ISP?

### Relevance
2) Does Canada still need to keep bringing in international students?
3) What are the objectives of the ISP as you understand them?
   a) What role does the ISP play in meeting Canada’s economic need for immigration?

### Program integrity
4) Do you feel there is consistent decision-making on ISP applications?
5) Is there misuse and fraud in the International Student Program?

### Program management
6) Do you think there is a consistent understanding of roles and responsibilities between program partners and stakeholders?
7) What mechanisms are being used to engage partners and stakeholders (e.g. educational institutions, other departments, Provinces and Territories, etc.)?
   a) How frequent are these mechanisms being employed? Is that sufficient?
   b) Are these mechanisms effective? Is the level/quality of information exchange appropriate?

### Policy and program development
8) In addition to the Off-Campus and Post-Graduation Work Permit programs, what other policy and program changes have been made that facilitate study and work opportunities for students?
**Performance**

9) What do you feel are the benefits of the ISP to educational institutions, international students and communities?

10) Do you think that Canada’s study and work opportunities for international students are globally competitive?

**General**

11) Has the ISP had any unintended or unexpected outcomes, either positive or negative?

12) If you could change something about the ISP, what would it be?

*Do you have anything else to add?*
Appendix C: CBIE Canada First Survey of International Students

http://www.cbie.ca/data/media/resources/20091110_SurveyInternationalStudents_e.pdf
Appendix D: Survey of CIC visa offices

CIC’s Evaluation Division is currently conducting an evaluation of the International Student Program. The evaluation will assess the program’s relevance, design and delivery and performance, and will use multiple lines of evidence, including a document review, analysis of administrative data, interviews and surveys of internal CIC staff, key partners and stakeholders, and a literature review.

The purpose of this survey is to obtain important information from CIC missions on student application processing in order to better understand how it is carried out, the issues and challenges, and the activities in place to support and monitor the delivery of the International Student Program.

The survey is intended for the Immigration Program Manager (IPM) in each CIC mission, and can take up to 30 minutes to complete (depending on the level of consultation with staff). If appropriate, the survey may be delegated to an officer responsible for student application processing at your mission. Comment boxes have been provided for many of the questions throughout the survey in order to allow you to qualify responses or clarify non-responses (i.e.: don't know/not applicable) as desired. Only one completed survey is requested permission. To the extent possible, survey results will be reported in aggregate form.

If you have any questions regarding this survey or the evaluation project in general, please feel free to contact David Kurfurst, Evaluation Manager or Marion Clark, Director Evaluation. We would greatly appreciate if this survey could be completed by no later than May 15th.

Thank you in advance for your participation.

Section 1: Program delivery

2. Please rank each temporary resident stream below according to the level of effort required to process a typical application at your mission (1 = most effort and 3 = least effort).

(LEVEL OF EFFORT is the actual number of hours required to conduct the application processing work. It is different from processing time, which is the period of time over which this work occurs. Your mission may have noticed differences in the level of effort required to process a typical application based on different application types.)

<table>
<thead>
<tr>
<th>Temporary Resident</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
</tr>
<tr>
<td>2</td>
</tr>
<tr>
<td>3</td>
</tr>
</tbody>
</table>
### 3.
What types of educational institution does your mission typically encounter on student applications? Please check **all** that apply.

- [ ] University
- [ ] Community College
- [ ] Private Career College
- [ ] Vocational school
- [ ] Language school associated with university / community college
- [ ] Private language school
- [ ] Public primary or secondary school
- [ ] Other - please specify below:

**Comments:**

________________________
________________________
________________________
________________________
4. For which educational institution types does it require the *most* effort to process a typical student application at your mission? Please rank the types requiring the first, second and third *most* effort.

<table>
<thead>
<tr>
<th>First most effort</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ University</td>
</tr>
<tr>
<td>☐ Community College</td>
</tr>
<tr>
<td>☐ Private Career College</td>
</tr>
<tr>
<td>☐ Vocational school</td>
</tr>
<tr>
<td>☐ Language school associated with university / community college</td>
</tr>
<tr>
<td>☐ Private language school</td>
</tr>
<tr>
<td>☐ Public primary or secondary school</td>
</tr>
<tr>
<td>☐ Other - please specify below:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Second most effort</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ University</td>
</tr>
<tr>
<td>☐ Community College</td>
</tr>
<tr>
<td>☐ Private Career College</td>
</tr>
<tr>
<td>☐ Vocational school</td>
</tr>
<tr>
<td>☐ Language school associated with university / community college</td>
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<tr>
<td>☐ Private language school</td>
</tr>
<tr>
<td>☐ Public primary or secondary school</td>
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<tr>
<td>☐ Other - please specify below:</td>
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</tbody>
</table>

<table>
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<tr>
<th>Third most effort</th>
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<tbody>
<tr>
<td>☐ University</td>
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<tr>
<td>☐ Community College</td>
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<tr>
<td>☐ Private Career College</td>
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<tr>
<td>☐ Vocational school</td>
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<tr>
<td>☐ Language school associated with university / community college</td>
</tr>
<tr>
<td>☐ Private language school</td>
</tr>
<tr>
<td>☐ Public primary or secondary school</td>
</tr>
<tr>
<td>☐ Other - please specify below:</td>
</tr>
</tbody>
</table>

**Please specify if ‘Other’ was selected:**

__________________________________________________________________________

__________________________________________________________________________

__________________________________________________________________________
5. For which educational institution type does it require the least effort to process a typical student application at your mission?

- University
- Community College
- Private Career College
- Vocational school
- Language school associated with university / community college
- Private language school
- Public primary or secondary school
- Other - please specify below:

Please specify if ‘Other’ was selected:

6. Please estimate the percentage of student applications that were refused in the past 12 months for each of the reasons indicated below (i.e. as a percentage of the total number of applications refused). Percentages should total to 100%.

- Lack of adequate funding for studies (R220)
- Bona fides (R216)
- Misrepresentation (A40) (i.e. confirmed fraud)
- Other - please specify below:

Comments:

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### Section 2: Information-sharing and coordination

#### 7. How often does your mission share information related to your work on student application processing with each of the following groups?

<table>
<thead>
<tr>
<th></th>
<th>Often</th>
<th>Sometimes</th>
<th>Rarely</th>
<th>Never</th>
<th>Don’t know</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other CIC missions</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CIC NHQ</td>
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<td></td>
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<tr>
<td>CPC Vegreville</td>
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<tr>
<td>CBSA (MIOs at the mission, CBSA NHQ, and/or other CBSA officers)</td>
<td></td>
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</tbody>
</table>

#### 8. What kinds of information related to your work on student application processing does your mission typically share with these other groups? Please check **all** that apply.

- [ ] Processing issues and challenges
- [ ] Operational statistics and trends
- [ ] Best practices and lessons learned
- [ ] Anti-fraud practices, resources and tools
- [ ] Quality assurance practices, resources and tools
- [ ] Training resources and tools
- [ ] Reference documents
- [ ] Databases
- [ ] Other - please specify below: 

**Comments:**

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9. In general, how would you rate the level of communication and information-sharing to support the delivery of the International Student Program among the following groups? (Delivery of the International Student Program could include activities related to your work on student application processing, as well as promotional activities, such as participation at recruitment fairs, agent seminars or meeting with visiting school delegations.)

<table>
<thead>
<tr>
<th></th>
<th>Excellent</th>
<th>Very good</th>
<th>Good</th>
<th>Fair</th>
<th>Poor</th>
<th>Don’t know</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Between your mission and other CIC missions</td>
<td></td>
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<td></td>
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<tr>
<td>Between your mission and CIC-NHQ</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Between your mission and CPC Vegreville</td>
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<tr>
<td>Between CIC and CBSA officers at your mission</td>
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<td></td>
</tr>
<tr>
<td>Between CIC officers and DFAIT trade commissioners at your mission</td>
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</tbody>
</table>

10. In general, how would you rate the level of coordination to support the delivery of the International Student Program among the following groups? (Delivery of the International Student Program could include activities related to your work on student application processing, as well as promotional activities, such as participation at recruitment fairs, agent seminars or meeting with visiting school delegations.)

<table>
<thead>
<tr>
<th></th>
<th>Excellent</th>
<th>Very good</th>
<th>Good</th>
<th>Fair</th>
<th>Poor</th>
<th>Don’t know</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Between your mission and other CIC missions</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Between your mission and CIC-NHQ</td>
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<tr>
<td>Between your mission and CPC Vegreville</td>
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<tr>
<td>Between CIC and CBSA officers at your mission</td>
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<td>Between CIC officers and DFAIT trade commissioners at your mission</td>
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</tbody>
</table>
Section 3: Functional guidance and support

11. What kinds of functional guidance and support related to student application processing has your mission used or received from CIC-NHQ in the past 12 months? Please check all that apply.

- Program manuals (OP12, etc.)
- Operational directives/guidelines/updates
- Operational statistics and trends
- Training, workshops or presentations
- Assistance with processing issues and challenges
- Sharing of best practices and lessons learned
- Anti-fraud resources and tools
- Quality assurance resources and tools
- Support/mechanisms to network and share information
- Other - please specify below:

Comments:

12. Please rate your level of agreement with the following statements about your mission’s experience with the functional guidance and support provided by CIC-NHQ?

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly Disagree</th>
<th>Disagree</th>
<th>Neither agree nor disagree</th>
<th>Agree</th>
<th>Strongly Agree</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information on the delivery of the International Student Program presented in OP12 is clear and easy to understand.</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>OP12 provides useful information for the delivery of the International Student Program at my mission.</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>In general, the functional guidance and support provided by CIC-NHQ is responsive to the issues and challenges of student application processing at my mission.</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>
In general, the functional guidance and support provided by CIC-NHQ is **timely** to support efficient student application processing.

|   |   |   |   |   |   |   |

In general, the functional guidance and support provided by CIC-NHQ is **sufficient** to support quality and consistent decision making on student applications.

|   |   |   |   |   |   |   |

Comments:

|   |   |   |   |   |   |   |

13. **Does your mission require any additional guidance and support from CIC-NHQ for the successful delivery of the International Student Program?**

- [ ] No
- [x] Yes - please specify below:

|   |   |   |   |   |   |   |
|   |   |   |   |   |   |   |
Section 4: Quality assurance and anti-fraud

14. What frequency would best describe how often your mission conducts quality assurance activities on the student application caseload for each of the following quality assurance areas? Please select one frequency for each area.

Quality and consistency of decision-making (e.g. are decisions being made according to IRPA and Regulations, are departmental policies and procedures being followed, are case notes appropriate and sufficiently detailed, do interview/waiver and approval/refusal rates coincide and are they consistent in the same office, etc.)

- Daily
- Weekly
- Monthly
- Quarterly
- Semi-annually
- Annually
- Less than once per year
- Don't know

Reliability of client information (e.g. are the documents provided by applicants fraudulent, are the statements made by applicants on the application forms truthful, etc.)

- Daily
- Weekly
- Monthly
- Quarterly
- Semi-annually
- Annually
- Less than once per year
- Don't know

Reliability/consistency of process (e.g. are office procedures being followed in all cases, are processing steps being skipped/missed, are there any efficiencies in the process that can be identified, etc.)

- Daily
- Weekly
- Monthly
- Quarterly
- Semi-annually
- Annually
- Less than once per year
- Don't know

Comments:

____________________________________________________________________

____________________________________________________________________

____________________________________________________________________

____________________________________________________________________
15. What kinds of quality assurance methods/tools does your mission typically use to assess quality and consistency of decision-making? Please select all that apply.

☐ Senior officer conducts paper review
☐ Case study discussions led by supervisor, unit manager, or IPM
☐ Data Warehouse/ CAIPS Command Mode reports analysed by a senior officer (e.g. refusal rate by officer; decisions per officer, etc.)
☐ Review the percentage of cases that are interviewed
☐ Other - please specify below:

16. What kinds of quality assurance methods/tools does your mission typically use to assess reliability of client information? Please select all that apply.

☐ Document verification
☐ Telephone checks
☐ Site visit
☐ Interviews
☐ Other - please specify below:

17. What kinds of quality assurance methods/tools does your mission typically use to assess reliability/consistency of process? Please select all that apply.

☐ Senior officer conducts paper review and follows paper trail of case through particular process
☐ A checklist is developed for each stage of processing and attached to the file jacket
☐ Other - please specify below:
18. Please estimate how often your mission encounters fraud (suspected or confirmed) in the student application caseload?

☐ Often
☐ Sometimes
☐ Rarely
☐ Never
☐ Don’t know

Comments


19. Typically, what issues are encountered with respect to fraud (suspected or confirmed) in the student application caseload at your mission? Please check all that apply.

☐ Non-genuine students
☐ Non-genuine institutions
☐ Fraudulent letters of acceptance
☐ Fraudulent bank statements
☐ Third-party consultants/recruiters of concern
☐ Fraudulent school certificates
☐ Fraudulent transcripts
☐ Other - please specify below:

Comments


20. Which issues does your mission encounter most frequently with respect to fraud (suspected or confirmed) in the student application caseload? Please rank your first, second and third most frequent issues.

<table>
<thead>
<tr>
<th>First most frequent issue</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-genuine students</td>
<td></td>
</tr>
<tr>
<td>Non-genuine institutions</td>
<td></td>
</tr>
<tr>
<td>Fraudulent letters of acceptance</td>
<td></td>
</tr>
<tr>
<td>Fraudulent bank statements</td>
<td></td>
</tr>
<tr>
<td>Third-party consultants/recruiters of concern</td>
<td></td>
</tr>
<tr>
<td>Fraudulent school certificates</td>
<td></td>
</tr>
<tr>
<td>Fraudulent transcripts</td>
<td></td>
</tr>
<tr>
<td>Other - please specify below:</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Second most frequent issue</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-genuine students</td>
<td></td>
</tr>
<tr>
<td>Non-genuine institutions</td>
<td></td>
</tr>
<tr>
<td>Fraudulent letters of acceptance</td>
<td></td>
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<tr>
<td>Fraudulent bank statements</td>
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<tr>
<td>Third-party consultants/recruiters of concern</td>
<td></td>
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<tr>
<td>Fraudulent school certificates</td>
<td></td>
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<tr>
<td>Fraudulent transcripts</td>
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<tr>
<td>Other - please specify below:</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Third most frequent issue</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-genuine students</td>
<td></td>
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<tr>
<td>Non-genuine institutions</td>
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<td>Fraudulent letters of acceptance</td>
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<td>Fraudulent school certificates</td>
<td></td>
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<tr>
<td>Fraudulent transcripts</td>
<td></td>
</tr>
<tr>
<td>Other - please specify below:</td>
<td></td>
</tr>
</tbody>
</table>

Please specify if ‘Other’ was selected:

_________________________________________________________________________
_________________________________________________________________________
_________________________________________________________________________
21. What mitigation strategies does your mission use to counter fraud in the student application caseload? Please check **all** that apply.

- [ ] Field investigations/site visits
- [ ] Document verification
- [ ] Telephone verification
- [ ] Personal interviews with a fraud focus
- [ ] Information-sharing with other embassies
- [ ] Collaboration with local authorities
- [ ] Open source searches (e.g. Directory assistance)
- [ ] Database searches in CAIPS to detect fraud trends
- [ ] Concentration of anti-fraud duties or establishment of anti-fraud unit/group
- [ ] Reference documents kept on file or library of original and fraudulent documents for comparison purposes
- [ ] Other - please specify below:

**Comments**

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

22. How often are CBSA officers (e.g. MIOs) involved in anti-fraud activities related to the student application caseload at your mission?

- [ ] Always
- [ ] Often
- [ ] Sometimes
- [ ] Rarely
- [ ] Never
- [ ] Don’t know
23. In what ways are CBSA officers (e.g. MIOs) involved in anti-fraud activities that support the student application caseload at your mission? Please check all that apply.

- Interdiction
- Conduct some first-level anti-fraud activities (e.g. telephone checks, site visits)
- Provide consultation on anti-fraud activities
- Handle complex cases of fraud
- Provide anti-fraud training to CIC officers
- Conduct some second-level anti-fraud activities and/or investigations (background checks, detailed document analysis, analysis of fraud trends)
- Manage an anti-fraud unit
- Coordinate an anti-fraud network
- Other - please specify below:
- Not applicable - CBSA officers are not involved in anti-fraud activities related to the student application caseload

24. When fraud is suspected in student applications, how often do CIC officers at your mission refer the applications to CBSA for further investigation (i.e. second-level anti-fraud verification)?

- Always
- Often
- Sometimes
- Rarely
- Never
- Don’t know
Section 5: Recommendations for changes or improvements

25. What suggestions or recommendations would your mission make to improve the design and delivery of the International Student Program?
Appendix E: Survey of educational institutions

Citizenship and Immigration Canada (CIC) is conducting an evaluation of its International Student Program. The evaluation will assess the program’s relevance, design and delivery and performance, using multiple lines of evidence. As part of this evaluation, CIC is surveying Canadian educational institutions to better understand some of their experiences with international students as well as their issues and challenges with respect to CIC’s International Student Program.

The survey is intended for a representative at your educational institution with a function directly linked to international students or internationalization strategies, and can take about 15 minutes to complete. Only one completed survey is requested per educational institution. The survey is anonymous. The responses that you provide are confidential and will not be attributed to you or your educational institution in the evaluation report or in any documentation provided to CIC (only aggregate information will be used).

We hope that your educational institution will be able to participate in this survey, as we want to ensure that the various perspectives of educational institutions are accurately reflected in the evaluation. If you have any questions regarding this survey or the evaluation project in general, please feel free to contact David Kurfurst, Evaluation Manager, or Marion Clark, Evaluation Director.

We would greatly appreciate if this survey could be completed by no later than August 14th. Thank you in advance for your assistance.

1. In which province/territory is your educational institution located?
   - Newfoundland and Labrador
   - Prince Edward Island
   - Nova Scotia
   - New Brunswick
   - Quebec
   - Ontario
   - Manitoba
   - Saskatchewan
   - Alberta
   - British Columbia
   - Yukon
   - Northwest Territories
   - Nunavut
2. What type of educational institution do you represent?
   - University
   - College
   - School board / district
   - Language school
   - Other (please specify)?

3. What type of office or department do you represent? Please check all that apply.
   - Registrar
   - Recruitment/Admissions
   - Office for International Students
   - Dean’s/President’s Office
   - Career Development Office
   - Work Placement Office
   - Department/Faculty Office
   - Other (please specify)?

4. Can you briefly describe your role with respect to international students?
5. What information and/or support has your educational institution used or received related to international students in the past 12 months? Please check all that apply.

- Designated Institutional Representative (DIR) Guide for the Off-Campus Work Permit Program
- CIC Manuals - Overseas Processing Manual for Study Permits (OP12) and/or Foreign Worker Manual (FW1)
- CIC Guides for Study and/or Work Permit Applications for International Students
- Site visits/presentations/meetings with CIC representatives
- Study section of the CIC website
- CIC Newsletters and/or other program/policy information related to international students
- CIC information on international student application processing times and/or acceptance rates
- Assistance from the CIC Call Centre
- Other (please specify)?

6. In general, to what extent would you say that this information and/or support was useful to your work related to international students?

- Not useful at all
- Not very useful
- Somewhat useful
- Very useful
- Don’t know
- Not applicable

Comments
7. Does your educational institution require any additional information and/or support from CIC in your work with international students related to:

<table>
<thead>
<tr>
<th></th>
<th>Yes (please specify below):</th>
<th>No</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Study permits?</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Work permits for international students (off campus, post graduation)?</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Opportunities for permanent residence (e.g. Canadian Experience Class)?</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>

Comments

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8. Does your educational institution have a mechanism to participate in discussions and/or communicate with CIC regarding international student issues? Please select **all** that apply.

- [ ] A national association representing your interests (e.g. Canadian Bureau for International Education, Association of Universities and Colleges of Canada, Association of Canadian Community Colleges)
- [ ] A provincial government representative
- [ ] Regional/local CIC representatives
- [ ] Network of Designated Institutional Representatives for the Off-Campus Work Permit Program
- [ ] Other (please specify below):
- [ ] Do not have or use a mechanism

---
9. In general, to what extent would you say that you are satisfied with the mechanisms in place to participate in discussions and/or communicate with CIC regarding international student issues?

- Very satisfied
- Satisfied
- Neither satisfied nor dissatisfied
- Dissatisfied
- Very dissatisfied

Comments


10. What economic, social and/or cultural benefits do international students bring to your educational institution? Please check all that apply.

- Enhance diversity of the learning environment (internationalization)
- Promote the reputation of the educational institution internationally
- Increase revenues
- Address student shortages
- Other (please specify below):
- No added benefits
11. In the past 12 months, has your educational institution experienced any of the following situations?

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) An international student who is registered at your educational institution never shows up</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) An international student leaves your educational institution (or stops attending classes) part way through their program of study without providing proper notification</td>
<td></td>
<td></td>
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<tr>
<td>c) A prospective international student provides a fraudulent letter of acceptance naming your educational institution in their study permit application</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) A prospective international student provides fraudulent school certificates/transcripts from their own country in their application to your educational institution</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) A third-party consultant or recruiter (either assisting our educational institution or an international student interested in or registered at your educational institution) demonstrates inappropriate/unethical behaviour</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>f) An international student attending your educational institution does not have sufficient finances to live comfortably in Canada</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Comments

12. Does your educational institution have a mechanism to confirm the status (e.g. academic standing, attendance, etc.) of international students registered in your programs?

- Yes
- No
- Don’t know
13. If yes, how does your educational institution check on the status of international students? Please check all that apply.

- Reporting through the Electronic Notification System (ENS) for international students with off-campus work permits
- Other (please specify below):

14. Please indicate your level of agreement with each of the following statements regarding the study permit application process.

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly Disagree</th>
<th>Disagree</th>
<th>Neither agree nor disagree</th>
<th>Agree</th>
<th>Strongly Agree</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) My educational institution understands the study permit application</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
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<tr>
<td>process and can provide assistance to international students when</td>
<td></td>
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<td></td>
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<tr>
<td>needed.</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) When my educational institution requests information and/or support</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>from CIC related to the study permit application process, CIC</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>responds in a timely manner.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Processing times for study permit applications are reasonable.</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>d) Decision-making on study permit applications is consistent and</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>appropriate.</td>
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<td></td>
</tr>
</tbody>
</table>

Comments:
15. Please indicate your level of agreement with each of the following statements regarding the work permit application process for international students.

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly Disagree</th>
<th>Disagree</th>
<th>Neither agree nor disagree</th>
<th>Agree</th>
<th>Strongly Agree</th>
<th>Don’t know</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) My educational institution understands the work permit application process and can provide assistance to international students when needed.</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>b) When my educational institution requests information and/or support from CIC related to the work permit application process for international students, CIC responds in a timely manner.</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>c) Processing times for work permit applications for international students are reasonable.</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>d) Decision-making on work permit applications for international students is consistent and appropriate.</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>

Comments:

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16. Please indicate your level of agreement with each of the following statements regarding CIC’s policies and programs related to international students.

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly Disagree</th>
<th>Disagree</th>
<th>Neither agree nor disagree</th>
<th>Agree</th>
<th>Strongly Agree</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Recent changes to CIC’s policies and programs related to international students have been responsive to the needs of my educational institution (e.g. introduction of off-campus work permits, changes to post graduation work permit requirements, introduction of the Canadian Experience Class immigration stream).</td>
<td>○</td>
<td>○</td>
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<td>○</td>
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</tr>
<tr>
<td>b) The use of online applications in the study and work permit programs facilitates the application process.</td>
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<td></td>
</tr>
<tr>
<td>c) The level of consultation/engagement of educational institutions by CIC in the development of policies and programs related to international students is appropriate.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>d) CIC’s policies and programs facilitate the entry of international students.</td>
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<tr>
<td>e) CIC’s policies and programs facilitate work opportunities for international students.</td>
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</tr>
<tr>
<td>f) Canada’s study and work opportunities for international students are globally competitive.</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

Comments:


17. What suggestions or recommendations would your educational institution make to improve the design and delivery of CIC’s study and/or work permit programs for international students?
Appendix F:  Survey of employers

The Evaluation Division of Citizenship and Immigration Canada (CIC) is conducting an evaluation of CIC’s International Student Program (ISP). The purpose of this evaluation is to examine program relevance, integrity, program management and performance, cost-effectiveness and potential alternatives.

As part of the evaluation, CIC’s Evaluation Division is conducting a survey of employers. The objective of this survey is to assess the level of awareness and use of the program by employers and its strengths and limitations.

Ideally, this survey should be completed by the person in a company primarily responsible for staffing/HR. Please note that the responses you provide are confidential and will not be attributed to you in the evaluation report (only aggregate information will be released).

1. Where is your company located? Please check all that apply.

☐ Vancouver
☐ British Columbia (outside of Vancouver)
☐ Alberta
☐ Yukon
☐ Northwest Territories
☐ Nunavut
☐ Saskatchewan
☐ Manitoba
☐ Greater Toronto Area (GTA)
☐ National Capital Region (NCR)
☐ Other Ontario (outside of GTA & NCR)
☐ Quebec (outside Montreal)
☐ Montreal
☐ Nova Scotia
☐ New Brunswick
☐ Prince Edward Island
☐ Newfoundland and Labrador
☐ All of Canada

2. Which region(s) do you represent on behalf of your company? Please check all that apply.

☐ Vancouver
☐ British Columbia (outside of Vancouver)
☐ Alberta
Yukon
Northwest Territories
Nunavut
Saskatchewan
Manitoba
Greater Toronto Area (GTA)
National Capital Region (NCR)
Other Ontario (outside of GTA & NCR)
Quebec (outside Montreal)
Montreal
Nova Scotia
New Brunswick
Prince Edward Island
Newfoundland and Labrador
All of Canada

3. Which of the following categories best describes your company?

- Accommodation and Food Services
- Administrative and Support, Waste Management and Remediation Services
- Agriculture, Forestry, Fishing and Hunting
- Arts, Entertainment and Recreation
- Construction
- Educational Services
- Finance and Insurance
- Health Care and Social Assistance
- Information and Cultural Industries
- Management of Companies and Enterprises
- Manufacturing
- Mining, Quarrying, and Oil and Gas Extraction
- Other Services (except Public Administration)
- Professional, Scientific and Technical Services
- Public Administration
- Real Estate and Rental and Leasing
- Retail Trade
4. Approximately how many people are employed by your company in the region(s) you represent?
   - Less than 20
   - 20-99
   - 100-500
   - Over 500
   - Don’t know

5. Approximately how many people are employed by your company overall (including the region(s) you represent)?
   - Less than 20
   - 20-99
   - 100-500
   - Over 500
   - Don’t know
   - Does not apply (if you represent all regions covered by company)

6. Has your company hired international students or international graduates?
   
   *Note: International students refer to students from other countries who are currently studying at a Canadian educational institution. International graduates refer to international students who have recently graduated from a Canadian educational institution.*
   
   - Yes
   - No
   - Don’t know
7. In the region(s) you represent, how many international students or international graduates has your company hired in the last year? (Best estimate)

8. In the region(s) you represent, of the international students/graduates that your company has hired in the last year, how many:

had a work permit for a co-op/internship? (Best estimate, Not Applicable or Don't Know)

had an “Off-Campus Work Permit” (permit for international students allowing them to work in Canada while they’re studying or between semesters)? (Best estimate, Not Applicable or Don't Know)

had a “Post-Graduate Work Permit” (permit to work in Canada for recent post-secondary graduates of a Canadian institution)? (Best estimate, Not Applicable or Don't Know)

9. What factors influenced your company’s decision to hire international students and international graduates: Please check all that apply.

<table>
<thead>
<tr>
<th>Factor</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>With a work permit for a coop/internship?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>With an “Off-Campus Work Permit”?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>With a “Post-Graduate Work Permit”?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
10. Is your company aware that it may be able to hire international students or international graduates with either an Off-Campus Work Permit or Post-Graduate Work Permit?

☐ Yes
☐ No
☐ Don’t know

11. What influences your company’s decision not to hire international students or international graduates? Please check all that apply.

☐ We typically don’t hire students (either Canadian or international)
☐ We have had no need for temporary work placements
☐ Option has not been explored
☐ Students have not applied for positions with our company
☐ We have filled our need for temporary work through other means
☐ Students may not have the capacity/skills to do the work we would require
☐ Lack of resources to hire or recruit students
☐ Not aware this was an option
☐ Process is too difficult
☐ Aware that we can hire international students, but unaware of how to do it
☐ Don’t Know
☐ Other - please specify below

12. Would you consider hiring international students or international graduates:

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>Not sure</th>
</tr>
</thead>
<tbody>
<tr>
<td>With a work permit for a coop/internship?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>With Off-campus work permits?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>With Postgraduate work permits?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
13. Has your company hired Temporary Foreign Workers?

Note: Temporary Foreign Workers refer to foreign workers with temporary work permits (not students) coming to Canada specifically to address short-term labour needs.

☐ Yes
☐ No
☐ Don’t know

14. How many Temporary Foreign Workers have you hired in the last year? (Best estimate or Don’t know)

15. What influenced your company’s decision to hire Temporary Foreign Workers? Please check all that apply.

☐ Speed with which these workers can be hired
☐ Process is easy/uncomplicated
☐ These workers offer valuable skills
☐ To enrich cultural diversity
☐ Insufficient availability of Canadian labour
☐ Required low-skilled labour
☐ Other - please specify below

16. What prompted you to fill these positions with Temporary Foreign Workers, and not international graduates with a Post-Graduate Work Permit? Please check all that apply.

☐ Post-secondary educated workers are not required for these positions
☐ Unaware that hiring international graduates with a Post-Graduate Work Permit was an option
☐ Unaware of the difference between the two types of work permits (Temporary Foreign Worker and Post-Graduate)
☐ Position required more experience then students could offer
☐ Other - please specify below
17. Would you consider hiring international graduates with post-graduate work permits instead of Temporary Foreign Workers? (when applicable)

☐ Yes
☐ No
☐ Don’t know

18. What influences your company’s decision not to hire Temporary Foreign Workers? Please check all that apply.

☐ Much easier to acquire students with Post-Graduate Work Permits
☐ Not appropriate for the type of temporary work we require
☐ We have no need for temporary work placements
☐ We fill our need for temporary work through other means
☐ Not aware this was an option
☐ Process is too complicated
☐ We have no need for temporary foreign workers as there are sufficient numbers of Canadian persons to meet our temporary work needs
☐ Other - please specify below

19. Please rank your agreement/disagreement with the following?

My company sees a **clear benefit** in hiring international students and/or international graduates.

☐ Strongly disagree
☐ Disagree
☐ Neither Agree nor Disagree
☐ Agree
☐ Strongly agree
☐ Not applicable to me
☐ Don’t know
20. Please rank your agreement/disagreement with the following?

For HR purposes, my company has a clear understanding of the rules and regulations regarding hiring international students and/or international students) graduates with work permits.

- [ ] Strongly DISAGREE
- [ ] Disagree
- [ ] Neither Agree nor Disagree
- [ ] Agree
- [ ] Strongly AGREE
- [ ] Not applicable to me
- [ ] Don’t know

21. Can you describe any issues or challenges that you have encountered with respect to hiring international students/ international graduates?

22. Do you have any further comments?